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Sunderland Draft Core Strategy and Development Plan

Sustainability Appraisal Addendum - SA of Main Modifications

On behalf of **Sunderland City Council**



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1 Introduction

1.1 Background

1.1.1 Peter Brett Associates, now part of Stantec (PBA) has been commissioned by Sunderland City Council (SSC) to undertake the Sustainability Appraisal (SA) of the emerging Sunderland Core Strategy & Development Plan ('the CSDP'). This report provides an Addendum to the Publication Draft Sunderland CSDP SA Report (June 2018) to consider whether post examination Main Modifications now proposed to the CSDP would affect previous SA conclusions and in particular would result in any new or different likely significant environmental or sustainability effects.

1.2 Purpose

- 1.2.1 In line with relevant statutory requirements, SA incorporating Strategic Environmental Assessment (SEA) has been undertaken at all stages in the preparation of the CSDP in order to assess the likely significant environmental and wider sustainability effects of the document. Building upon previous SA reporting, the purpose of this SA Report Addendum is to confirm the environmental acceptability and identify any likely significant effects of incorporating Main Modifications recommended by an Examination Inspector into the CSDP prior to the adoption of the document. A schedule of the recommended Main Modifications has been published for consultation alongside this SA Addendum Report.
- 1.2.2 This report therefore considers whether the recommended Main Modifications would result in any new or different likely significant effects from those already reported within the Publication Draft Sunderland CSDP SA Report (June 2018).

1.3 Statutory Requirements

- 1.3.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') and the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'), SCC is required to carry out a SA incorporating SEA of the emerging Sunderland CSDP throughout its preparation. Regulation 8 of the SEA Regulations requires all likely significant effects on the environment to have been identified and consulted on before the (finalised) CSDP is adopted, whilst Regulation 16 requires a report setting out all such effects to then be published alongside the adopted CSDP. This reporting will need to take account of all likely significant effects from the final CSDP as adopted, including as a result of any Main Modifications at this stage.
- 1.3.2 The Publication Draft Sunderland CSDP (2018) was submitted to the Secretary of State in December 2018 to undergo an independent Examination in Public (EiP) in accordance with Section 20 of the 2004 Act and Regulations 22 and 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Development Planning Regulations'). Both the 2004 Act and the Development Planning Regulations make clear that any Main Modifications identified by an Examination Inspector in their final Examination Report as being required to ensure the soundness of an emerging Local Plan are binding on the local planning authority. Owing to the need to identify and consult on all likely significant effects from the finalised CSDP (i.e. the document as modified post Examination) before adoption can take place, in practice it is necessary to consult on a schedule of proposed Main Modifications, and any associated likely significant effects, prior to these modifications being confirmed within the final Sunderland CSDP Examination Report.
- 1.3.3 Taken together, these statutory requirements mean it is necessary to screen the proposed Main Modifications recommended to the Publication Draft Sunderland CSDP to consider their sustainability implications and confirm whether the modifications are likely to result in any new or different significant effects from those previously reported in the Publication Draft Sunderland CSDP SA Report (June 2018).



1.4 SA Process for the Sunderland CSDP

SA Project Team

1.4.1 The SA (incorporating SEA) of the emerging CSDP is being undertaken by PBA on behalf of Sunderland City Council (SCC). The consultant team involved in carrying out the SA is therefore independent of both the CSDP preparation team within SCC and the Examination Inspector appointed by the Secretary of State, which helps to ensure the objectivity and robustness of the SA process. The SA team within PBA has however held regular discussions with SCC officers to facilitate feedback of recommendations and ideas for improvement throughout the preparation of the CSDP.

Previous SA and SEA Reporting

- 1.4.2 The preparation of the (then) Sunderland Core Strategy (now the CSDP) commenced in March 2016 with the publication of a SA Scoping Report ('the SA Scoping Report') in accordance with the SEA Regulations. Iterative assessments of likely significant environmental and wider sustainability effects have since been carried out and consulted on in tandem with each substantive component of the emerging CSDP, namely:
 - SA of Growth Options (May 2016);
 - SA of Draft Sunderland CSDP (Regulation 18) (August October 2017); and,
 - SA of Publication Draft Sunderland CSDP (Regulation 19) (June July 2019).

Sunderland CSDP SA Framework

1.4.3 The SA process undertaken to date has generally followed the approach to SA set out in the SA Scoping Report (March 2016), including the adoption of an SA Framework to assess the likely significant environmental and wider sustainability effects from all substantive components of the emerging CSDP (policies, site allocations, etc.). This SA Framework was expanded throughout the SA process to accommodate the augmented scope of the CSDP itself (i.e. additional types of strategic site allocations), with the final SA Framework presented in full in **Appendix A**. In short, the SA Framework comprises the following 15 thematic objectives:

Table 1.1 Sustainability Appraisal Objectives within the Sunderland CSDP SA Framework

- Biodiversity and Geodiversity: To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.
- 2. Housing: To meet the housing needs of the Sunderland City area.
- **3. Economy and Employment:** To achieve a strong and stable economy which offers rewarding and well located employment opportunities for everyone.
- **4. Learning and Skills:** To improve the educational attainment and skills of Sunderland City's residents.
- **5. Sustainable Communities:** To promote sustainable communities within the Sunderland City area.
- **6. Health and Wellbeing:** To improve the health and wellbeing of those living and working in the Sunderland City area.
- 7. **Transport and Communication:** To reduce the need to travel, promote sustainable modes of travel, improve telecommunications infrastructure and align investment in infrastructure with growth.



- **8.** Land Use and Soils: To encourage the efficient use of land and conserve and enhance soils.
- **9. Water:** To conserve and enhance water quality and resources.
- **10. Flood Risk and Coastal Erosion:** To reduce the risk of flooding and coastal erosion to people and property, taking into account the effects of climate change.
- 11. Air: To improve air quality.
- **12.** Climate Change: To minimise greenhouse gas emissions and adapt to the effects of climate change.
- **13. Waste and Natural Resources:** To promote the movement up the waste hierarchy (reduce, reuse, recycle, recover) and ensure the sustainable use of natural resources.
- **14. Cultural Heritage:** To conserve and enhance the historic environment, cultural heritage, character and setting.
- **15.** Landscape and Townscape: To conserve and enhance landscape character and townscape.
- 1.4.4 As with the Publication Draft Sunderland CSDP (June 2019), this SA Framework (**Appendix A**) has been used to assess the suite of proposed Main Modifications and to determine whether these would result in any new or different likely significant effects from those identified in previous stages of the SA process.

1.5 Publication Draft Sunderland CSDP (2018) – Likely Significant Effects

- 1.5.1 The Publication Draft Sunderland CSDP included the following substantive components:
 - Strategic Framework
 - Vision
 - Strategic Priorities
 - Strategic Site Allocations
 - Urban Sites
 - o Housing Growth Areas (Greenbelt Release sites)
 - o Employment Sites
 - Travelling Showpeople, Gypsies and Travellers (TSGT) Sites
 - Policies
- 1.5.2 Each component was subject to a proportionate level of SA, as reported within the Publication Draft Sunderland CSDP SA Report (PBA, June 2018). Appendix B provides a reference point for the assessment of proposed main modifications by summarising all previously identified likely significant effects of the Publication Draft Sunderland CSDP (i.e. pre-examination), as reported within the Publication Draft Sunderland CSDP SA Report (PBA, 2018). This allows any new or different likely significant effects arising from the proposed modifications to be identified in Section 2.

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2 SA Screening of Examination Modifications

2.1 Introduction

2.1.1 This section presents a proportionate screening of all recommended Main Modifications¹ to the Publication Draft CSDP, as set out in a consolidated schedule which has been published for consultation alongside this SA Addendum Report. For the avoidance of doubt, this includes the Main Modifications recommended within the Examination Inspector's Post Hearing Advice Note - Main Modifications and Related Matters (August 2019), the published Action Logs from the Examination Hearing Sessions and any modifications proposed by the Council at the time of Submission. The purpose of this exercise is to determine whether each proposed modification would result in any new or different likely significant environmental effects from those previously assessed within the Publication Draft Sunderland CSDP SA Report, as summarised in Appendix B.

SA Screening of Main Modifications

- 2.1.2 Table 2.1 below provides a proportionate SA screening of the Main Modifications, each of which is substantive in nature (e.g. changes to policy wording or site allocations) and therefore has at least some potential to result in new or different environmental effects. In accordance with statutory requirements, the screening exercise assesses whether the incorporation of the modifications into the emerging CSDP would be likely to result in any new or different significant effects from those identified in previous SA reporting. Table 3.1 identifies each modification using the same Main Modification number/code as provided in the Schedule of Main Modifications and then provides a commentary covering (in numbered bullet points):
 - i. A description of the modification;
 - ii. Summary of previous SA Report conclusions relating to the affected policy or site allocation; and,
 - iii. Identification of likely effects resulting from the incorporation of the modification into the emerging CSDP (i.e. not assessing the modification on a standalone basis, as it would intrinsically change an existing substantive component of Publication Draft Sunderland CSDP).
- 2.1.3 A separate column in **Table 2.1** then confirms whether any identified effects as a result of the modifications constitute new or different likely *significant* effects from those previously reported in the Publication Draft Sunderland CSDP SA Report (hereafter 'the SA Report').

¹ SCC have also published a schedule of proposed "additional", non-substantive modifications to the Publication Draft Sunderland CSDP. These only contain minor changes such as typographical alterations and have been assessed as having no prospect of generating new or different likely significant effects.



Table 2.1: SA Screening of Main Modifications

Modification by Issue Number	Plan Section	Commentary	New or Different Likely Significant Effects? (Y/N)
MM1	2. Sunderland Today	1. Modification comprises an update to the background in which the CSDP (the Plan) has been prepared. This largely focuses on accounting for SHLAA evidence base updates but does not result in changes to the Plan itself.	N
		2. The SA Report did not assess this element of the CSDP as it is a non-substantive component.	
		3. The modification informs the baseline and provided important background for the function of the Plan, but it will not generate any likely significant effects which can be assessed.	
MM2	Figure 12 Key Diagram	1. Modification is a change to Key Diagram to account for all modifications to the Plan. This is a graphic representation of the spatial strategy.	N
		2. The SA Report did not assess this element of the CSDP as it is a non-substantive component.	
		3. The individual and cumulative effects of the Proposed Main Modifications are assessed elsewhere within this section of the report. This modification would not produce any new or different Likely Significant Effects.	
ММ3	Policy SP1	1. Modification reflects alterations to both the evidence base predominantly informing the housing and employment use elements of the spatial strategy, including the outcomes of recent assessment of the Local Housing Need calculation, as well as associated changes to the spatial distribution of housing as a result of the Inspector's proposed removal of three HGAs, and clarifications on NPPF treatment of Safeguarded Land.	N
		2. The SA Report assessed the policy as generating a range of likely significant beneficial effects and no likely significant adverse effects.	
		3. This modification simply reflects the removal of three housing sites and some inconsequential changes to supporting text. A separate discussion on the likely significant effects of removing the three housing sites is provided in Section 3 of this report.	
MM4	Policy SP3 Washington	1. Modification accounts for the removal of HGA2 – East Springwell and Safeguarded Land south of East Springwell (Policy SS3) and HGA6 – Rickleton. As a result of this change the list of HGAs in Washington has been altered and the overall Strategic Policy for Washington altered.	N
		2. The SA Report assessed HGA2 as site B (in Table 5.2 of the SA Report). No significant negative effects were identified. It was assessed as Amber for Additional Criteria Acceptability 'Greenbelt Purpose'. HGA6 (identified as site F in Table 5.2). Significant negative effects were identified against two of the assessment criteria for SAO 6 Health and Wellbeing (Designated Open Space Playing Field) and against SAO Objective 15 Landscape and Townscape Designated (Open Space Playing Field). It was Amber for Additional Criteria Acceptability 'Greenbelt Purpose'.	
		3. The modification removes the allocations of each site for housing (and Safeguarded Land) and retains all three sites as Greenbelt. This will improve the overall performance of Policy SS3 in sustainability terms, particularly in relation to SA Objective 15 - Landscape and Townscape.	
MM5	Policy SS2 Washington Housing Growth Areas	1. The modification again accounts for the removal of HGA2 and HGA6 (assessed above) and makes consequential amendments to the site-based policy for the HGA sites which remain in the Plan. The effects of removing HGA2 and HGA6 have been assessed above. The remaining changes:	N
		- Provide clarity on house types and the appropriateness of developer contributions.	
		- SS2 HGA1 simplifies and alters criterion to retain rather than protect views and vi) removes this criterion.	
		- SS2 HGA3 iii) removes criterion requiring a specific wildlife and green infrastructure corridor, iv) increases requirements for screening; v) clarifies tree retention only where possible; removes a requirement (previously at criterion vi) to retain a specific part of the site as undeveloped vii) removes criterion requiring 'high architectural quality'. In addition, introduces a new criterion (to seek improvement to the permissive footpath between Stone Cellar Road and the A195 at Follingsby) and replaces Figure 19 North of Usworth Hall.	
		- SS2 HGA4 iii) revises text regarding the inclusion of greenspace provision, v) provides minor wording changes vi) removes criteria regarding the provision of greenspace, vii) alters criterion to retain views through good design, viii) provides minor word changes ix) simplifies wording to be less specific on junction improvements and x) adds specific need for avoiding development in flood zones 2 and 3.	
		- SS2 HGA5 (v) removes criterion requiring 'high architectural quality' vii) and viii) makes minor wording edit.	
		2. The removal of HGA2 and HGA6 have been assessed above under modification MM4.	
		The previous SA conducted for sites HGA1 produced no significant adverse effects and some significant beneficial effects which were based on its sustainable location.	
		HGA3 (site D) contributed significant negative effects under SA Objective 5, and 7 based on its lack of access to convenience store and SA Objective 6 and 15 due to impact on designated open space. It produced various significant positive effects due to its otherwise sustainable location.	
		HGA4 (site E) contributed significant negative effects under SA Objective 5, and 7 based on its lack of access to convenience store.	
		HGA5 (site G) contributed significant negative effects under SA Objective 6 due to its impact on open space/playing field and Objective 15 due to landscape character and open space/playing field. It produced various significant positive effects due to its otherwise sustainable location.	
		3. This main modification provides additional clarity and improvements to previously proposed site allocation policies. It does not however alter the performance of the HGA allocations or change the need for appropriate mitigation through the application of relevant subject policies in the determination of planning applications on specific allocated sites. No new or different likely significant effects are therefore predicted.	



Modification by Issue Number	Plan Section	Commentary	New or Different Likely Significant Effects? (Y/N)
MM6	Policy SS3 Safeguarded Land	1. Modification accounts for the removal of Safeguarded Land south of East Springwell (assessed above) and removes commentary in background text on the permanence of green belt boundaries. In addition, background text has been added to set out that the Council will give consideration as to whether an early release of safeguarded land is justified through the A and D Plan.	N
		2. The policy was assessed in Table 2.3 of the SA Report with no significant effects identified. The continued protection under safeguarding was noted.	
		3. The modification removes one safeguarded site (East Springwell reverts to Greenbelt) and retained one as Safeguarded. In itself, this would not generate any new or different likely significant effects.	
MM7	SP4 North Sunderland	1. Modification removes site HGA7 North Hylton. As a result of this change the list of HGAs in North Sunderland has been altered and the overall Strategic Policy for North Sunderland altered. In addition, new background text is added regarding the exceptional circumstances for green belt deletion in North Sunderland.	N
		2. 2. HGA7 (site I) as assessed in Table 5.2 of the SA Report. The site contributed significant negative effects under SA Objective 5 Sustainable Communities and SA Objective 7 for proximity to convenience store, and SA Objective 15 for impact on Landscape character. It was amber for Additional Criteria Acceptability 'Greenbelt Purpose'. Mitigation had been recommended and was set out in the Sunderland CSDP Publication Draft (p44).	
		3. The modification removes the allocations for housing and retains all the site as Greenbelt. This will improve the overall performance of the Policy in sustainability terms, particularly in terms of SAO 15 Landscape and Townscape.	
MM8	SS4 North Sunderland Housing Growth Areas	1. Modification again accounts for the removal of HGA7 (already assessed above) and provides clarification and alterations to the site-based policy for the HGA sites which remain in the Plan. The effects of removing HGA7 has been assessed above. The remaining changes:	N
		A range of modifications to Policy SS4 are made regarding clarification on house types, the justification of developer contributions and the appropriateness of access enhancement measures to local facilities and services: HGA8 vii) Alters the design element of the criterion removing reference to 'highest architectural quality'. Adds specific listed buildings and scheduled monuments which require consideration in the design of the development.	
		Adds a passage to confirm that the site can only be developed subject to a Playing Pitch assessment in consultation with Sport England adhering to Sport England exception policies.	
		2. HGA8 (Site J) was assessed in Table 5.2 of the SA Report. Significant Negative Effects were identified SAO6 and SAO15 due to the potential loss of designated open space/playing field. Significant Positive Effects were identified largely due to the sustainability of the location in terms of transport and access and social infrastructure.	
		3. Design policy is contained elsewhere in the Plan and will be applied at the Development Management stage. In addition, the specification of achieving the 'highest architectural quality' is a criterion that is subjective in nature and it is unlikely that it would have achieved its purpose. The identification of listed buildings and ancient monuments improves the policy but only clarifies mitigation measures which would have been applied through Development Management processes. The addition of the Sport England requirements (used in addition to NPPF) will enhance the mitigation of significant negative effects. Overall, this does not alter the scoring of the SS4 and site HGA7 and would not generate any new or different likely significant effects.	
MM9	Policy SP5	Figure 26 is a graphical representation of modifications to the South Sunderland sub-area. As a non-substantive component, its inclusion in the CSDP would not generate any new or different likely significant effects.	N
MM10	Policy SS6	1. Modification makes minor changes to what the South Sunderland Growth Area (SSGA) should deliver. The changes provide greater detail on the requirements for various infrastructure across the SSGA. It is difficult to assess the additional detail as constituting additional requirements as the previous form of the policy also covered such facilities and infrastructure elements at a broader level. The modification would not lead to a reduction in infrastructure requirements, although:	N
		The modification clarifies that the required SANG may be able to provide use as public open space; and,	
		The modification maintains the provision of 3000 homes but increases the expected delivery within the Plan period from 2,285 to 2,305.	
		The modification sets out the need for a new neighbourhood centre within Land North of Burdon Lane to provide a focal point within the SSGA and setting out various requirements for the neighbourhood centre.	
		2. In accordance with the SEA Regulations, the SSGA was not subject to detailed assessment in the Publication Draft Sunderland SA Report as it was instead assessed within a separate SA report which accompanied the Draft SSGA Supplementary Planning Document.	
		3. These modifications are mainly clarifications and the provision of additional information. SANG is already required to mitigate likely significant effects. A clarification that SANG might be used, if appropriate, as public openspace does not alter the impact of such mitigation.	
MM11	Policy SP6	1. Modification requires a replacement of Figure 29 Key Diagram for The Coalfield sub-area. This will incorporate proposed changes to the identification of settlement breaks. The Examination Inspector has recommended the removal of The Russell Foster Football Centre from the settlement break. In consequence, the modification would amend the Policies Map to exclude the site from the settlement break so that Policy NE7 remains effective. The playing fields would continue to be protected by the National Planning Policy Framework and Policy NE4. Additionally, the term 'inappropriate development' has been removed from criterion 1 within Policy SP6.	N
		In addition, new background text is added regarding the exceptional circumstances for green belt release in the Coalfield.	
		2. SP6 was assessed in 2.3 of the SA report of Area Strategy Policies and each component site was assessed individually and summarised in Table 5.2.	
		HGA9 (Site L) was assessed as having a range of likely significant beneficial effects largely due to its location relative to key amenities. It produced no significant negative effects.	



Modification by Issue Number	Plan Section	Commentary	New or Different Likely Significant Effects? (Y/N)
		HGA10 (Site M) was assessed as having a range of likely significant beneficial effects largely due to its location relative to key amenities. It produced no significant negative effects.	
		HGA11 (Site O) was assessed as having a range of likely significant beneficial effects due to its location relative to environmental assets and key amenities It produced one significant negative effect due to its use of 'best and most versatile agricultural land'.	
		3. The modification will produce no new or different likely significant effects (see MM12 for further site-specific modifications).	
MM12	Policy SS7	1. A range of detailed modifications to Policy SS7 are made to provide clarification on house types, the justification of developer contributions and the appropriateness of access enhancement measures to local facilities and services:	N
		HGA9 Penshaw, modifications:	
		iii) adds 'appropriate' to buffer requirements vi) provides additional detail on habitat protection vii) specifies the need to avoid Flood Zones 2 and 3 x) updates detail on access and adds need for justification for further junction improvements.	
		HGA10 New Herrington:	
		i) increases the site delivery from 20 to 30 homes; iii) clarifies that a new club building and car park should be provided (changed from 'incorporated') and this is to be provided with the locality (removes implications that this was to be provided on-site) iv) removes text on the location of the new community building and car part should be appropriately located to serve all users vi) alters trees and hedgerows protection removing superfluous text on TPOs while also changing retention of 'all healthy trees and hedgerows' with the addition of 'where possible'.	
		HGA11 Philadelphia	
		iii) adds need to protect views and listed building which contribute to Conservation Area and in doing this removes need for additional criterion on architectural quality at criterion iv.	
		x) removes the need to provide junction improvements where necessary at Coaley Lane/Houghton Road, A182/Front Street and A182/B1286 and changes made to ix) which is less specific on junction improvements and inserts the need for these to be justified and necessary.	
		2. The site assessment details are provided under MM11 above.	
		3. The modifications would:	
		HGA9: The modifications would not produce any new or different likely significant effects. The changes that have been made are due to the availability of updated information or clarifications that apply national policy which would have been applied in any case.	
		HGA10: The modifications would not produce any new or different likely significant effects. The main change is to increase the capacity from 20 to 30 units. The increase in capacity is a response to flexibility on the location of club facilities including parking. Other changes that have been made are due to the availability of updated information or clarifications that apply national policy which would have been applied in any case.	
		HGA11: The modifications would not produce any new or different likely significant effects. The changes that have been made are due to the availability of updated information or clarifications that apply national policy which must be applied in any case.	
MM13	Policy HS1 Quality of Life and	1. The modifications:	N
	Amenity	Update the policy to ensure cumulative impacts do not result in 'unacceptable' impacts on communities (rather than 'significant').	
		Revision to background text to refer to policy on mineral legacy issues (Policy M3).	
		Inclusion of the 'agent of change' principle as per NPPF within background text.	
		2. The policy was assessed in the SA report as having a range of significant beneficial effects, with no significant negative effects.	
		3. These modifications would not generate any new or different likely significant effects. The modifications ensure compliance with national policy which improves the likely policy performance and introduces changes which must be applied in any case.	
MM14	Policy SP8 Housing Supply and Delivery	1. The modification to the clarifies that the housing target is a net target. In addition, changes to background text provide updates to the evidence base on potential housing supply and updates the policy to account for changes to NPPF. In addition, there are changes to the background text which discusses five-year land supply, the NPPF buffer, small sites allowance and the role of the Housing Implementation Strategy.	N
		2. The policy was assessed in the SA report as having one significant beneficial effect and no significant adverse effects.	
		3. There is no change to the housing minimum target but the clarity on NPPF changes will improve performance in relation to SA Objective 2 Housing. The addition of Figure 34 Housing Land Supply Breakdown will improve the performance of the Plan. These modifications would not produce any new or different likely significant effects. The modifications ensure compliance with national policy which improves likely policy performance and introduces changes which must be applied in any case.	
MM15	Policy H1 Housing Mix	1. The modifications provide updates on housing mix including additional allowance for viability, transition towards the application of new requirements for accessible and adaptable dwellings, and the requirement for developers to take on board appropriate evidence to ensure suitable accommodation for older people and those with special housing needs;	N



Modification by Issue Number	Plan Section	Commentary	New or Different Likely Significant Effects? (Y/N)
		2. The policy was assessed in the SA report as having a range of significant beneficial effects, with no significant negative effects.	
		3. The policy change adds additional explanation of how the building regulations will be enforced. Potentially, this could reduce the performance of the Plan in terms of SA Objective 2. However, the modifications ensure compliance with national policy which improves likely policy performance and introduces changes which would have had to have been applied in any case.	
MM16	Policy H2 Affordable Homes	1. The modifications clarify that off-site contributions are 'exceptional'; remove the need for clusters of affordable housing to be 'small'; introduce the need to reflect the latest available evidence on tenure split and size; introduce the need to comply with viability assessment in line with PPG; introduce a policy position on rural exception sites; provide a policy reference to the SSGA; clarifies the role of SHMA alongside other evidence; removes detail on clusters of affordable housing development.	
		2. The policy was assessed in the SA report as having significant beneficial effects on SAO2 and SAO3.	
		3. The modifications adds detail which will improve the working of the policy. The addition of 'exceptionality' could improve the performance of the policy in terms of SA Objective 2 which already scored (++). The other changes bring the policy into line with national policy and guidance. This improves likely policy performance and introduces changes which would have had to have been applied in any case.	
MM17	Policy H4 Travelling Showpeople,	The modifications introduce further detail regarding proposed site allocations.	N
	Gypsies and Travellers	2. The policy was assessed in the SA report as having significant beneficial effects with no significant negative effects predicted.	
		3. The modifications add detail to improve the working of the policy but would not generate any new or different likely significant effects.	
MM18	Policy H6 Homes in Multiple	1. The modification clarifies the terms of Policy H6 and emphasises the need for HMOs to be of suitable quality.	N
	Occupation Orders	2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 2 and 3 with no significant negative effects predicted.	
		3. The modifications introduce an additional criterion 'to provide a good standard of living space and amenity for occupiers of the HMO'. This would improve the contribution of the policy towards SA Objective 2, already assessed as being likely to experience a significant beneficial effect. However, no new or different likely significant effects are predicted.	
MM19	7. Economic Growth	1. The modifications introduce further detail on the purpose of the policy and site allocations which had already been made in the Plan. It provides reference to the evidence base for the policy and updates this.	N
		2. This is preamble and an introduction to the CSDP Employment policies. As a non-substantive component, it has not been subject to SA.	
		3. This non-substantive modification provides additional clarity on the evidence base for the employment policies but would not result in any new or different likely significant effects.	
MM20	Policy VC3 Primary Shopping Areas	1. The changes involved include rearranging parts of the policy and introducing the term 'will normally be resisted'.	N
	and Frontages	2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 3 and 7 with no significant negative effects predicted.	
		3. Whilst this modification would improve the clarity and effectiveness of Policy VC3, it would not alter the substantive requirements of the policy and no new or different likely significant effects are therefore predicted.	
MM21	Policy BH1 Design Quality	1. The changes broadly introduce greater flexibility and proportionality in the application of policy BH1. It also introduces a transitional period to the introduction of the new Nationally Described Space Standards and a definition for large-scale development within the context of the preparation of masterplans.	N
		2. The policy was assessed in the SA report as having a range of likely significant beneficial effects with no significant negative effects predicted.	
		3. These modifications would not produce any new or different likely significant effects. The modifications ensure compliance with national policy which improves likely policy performance and introduces changes which would have had to have been applied in any case.	
MM22		The changes broadly introduce direction in terms of applying the policy appropriately.	N
	Construction	2. The policy was assessed in the SA report as having a range of likely significant beneficial effects with no significant negative effects predicted.	
		3. These modifications would not produce any new or different likely significant effects. The modifications ensure compliance with national policy which improves likely policy performance and introduces changes which would have had to have been applied in any case.	
MM23	Policy BH8 Heritage Assets	The modification changes terminology regarding development which adversely affects non-designated heritage assets.	N
		2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 8 and 14 with no significant negative effects predicted.	
		3. The modifications could potentially reduce the contribution of the policy to SA Objectives 14 and 15 but would provide a more workable policy. These modifications would not produce any new or different likely significant effects.	
MM24	Policy BH9 Archaeology and Recording of Heritage	1. The modifications introduce clarity that the policy applies to non-designated heritage assets where appropriate and removes unnecessary wording.	N



Modification by Issue Number	Plan Section	Commentary	New or Different Likely Significant Effects? (Y/N)
	assets	2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 8 and 14 with no significant negative effects predicted.	
		3. The modifications have the potential to improve the performance of the policy in terms of SA Objective 14, which was already predicted to experience likely significant beneficial effects. No new or different likely significant effects are therefore predicted.	
MM25	Policy NE1 Green infrastructure	1. The modification introduces Blue infrastructure as a part of Policy NE1. This now includes the protection and enhancement and restoration of blue infrastructure. It clarifies that Fig 40 is indicative.	N
		2. The policy was assessed in the SA report as having a range of likely significant beneficial effects with no significant negative effects predicted.	
		3. The addition of blue infrastructure and addition of blue infrastructure features will improve the performance of the policy in terms of SA Objective 1 and SA Objective 9. The policy already performed strongly in terms of SA Objective 1 and SA Objective 9. However, this would produce no new or likely significant effects.	
MM26	Policy NE2 Biodiversity and	1. The modifications reflect a review of the policy to ensure that national and international standards are applied appropriately.	N
	Geodiversity	2. The policy was assessed in the SA report as having a range of likely significant beneficial effects with no significant negative effects predicted.	
		3. These modifications would not produce any new or different likely significant effects. The modifications ensure compliance with international and national law and policy. This improves likely policy performance and introduces changes which would have had to have been applied in any case.	
MM27	NE3 Woodlands/hedgerows and	1. The modifications provide explanation to ensure the policy works more effectively through the removal of criterion and rearranging of the policy.	N
	Trees	2. The policy was assessed in the SA report as having a range of likely significant beneficial effects with no significant negative effects predicted.	
		3. The removal of criterion 1 will not affect the performance of the policy as the purpose of criterion 1 is more adequately addressed through criterion 1.ii The modification will help the policy work more effectively but would not result in any new or different likely significant effects.	
MM28	NE4 Greenspace	1. The modification changes the terminology within policy. The word 'amenity' replaces 'useable'.	
		2. The policy was assessed in the SA report as having a range of likely significant beneficial effects with no significant negative effects predicted.	
		3. The modification could improve the function of the policy, by removing ambiguity around the functional purpose of greenspace, but would not produce any new or different likely significant effects.	
MM29	NE6: Green Belt	1. The modification removes ambiguity around the application of green belt policy.	N
		2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 8 and 15 with no significant negative effects predicted.	
		3. The modification could improve the function of the policy but would not produce any new or different likely significant effects.	
MM30	Policy NE7 Settlement Breaks	1. The modification provides clarity on the purpose of Settlement Breaks, specifically regarding what constitutes "essential development" within these.	N
		2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 8 and 15 with no significant negative effects predicted.	
		3. The modification could improve the function of the policy but would not produce any new or different likely significant effects.	
MM31	NE8 Development in the Open Countryside	1. The modifications provide clarity, improving the explanation of the policy criteria. Most importantly, this adds the extension of residential curtilage to the criteria. Figure 42 on Open Countryside is also removed as a result of changes to the land allocations in the plan which are assessed above.	N
		2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives, 3, 5 and 15 with no significant negative effects predicted.	
		3. The modifications could improve the function of the policy and the introduction of extensions to residential curtilage strengthen the policy. However, this would not create any new or different likely significant effects.	
MM32	NE9 Landscape Character	1. The modification adds explanatory material clarifying that valued landscapes are highlighted in the Landscape Character Assessment. It adds these to a new map in Appendix 3.	N
		2. The policy was assessed in the SA report as having significant beneficial effects on SA Objectives 14 and 15 with no significant negative effects predicted.	
		3. The modification could improve the function of the policy, making the technical evidence base clearer and more accessible. However, this would not generate any new or different likely significant effects.	
MM33	Policy WWE5	1.The modification adds a criterion on the disposal of trade effluent including the requirement for Foul Water Management Plans and clarification on the definition of trade effluent including car washes.	N
		2. No likely significant effects previously identified.	
		3. The modification could improve the function of the policy, strengthening the policy through additional requirements for foul Water Management Plans and clarifying that these will be required for car washes. However, while this will strengthen the positive effects (for example those already identified under SAO1, SAO8 and SAO9) it would not result in any new or different likely significant positive effects.	



Modification by Issue Number	Plan Section	Commentary	New or Different Likely Significant Effects? (Y/N)
MM34	Policy WWE8	1. The modifications add the requirement to protect existing and proposed waste facilities form unsuitable neighbouring development. It also adds updated information on the Waste Arisings and Capacity Requirements Report (2018) and provides further clarity to guide the list of sites in that report.	N
		2. The policy was assessed in the SA report as having significant beneficial effects on SA Objective 13 with no significant negative effects predicted.	
		3. The modification would strengthen the performance of the policy in terms of SAO13, already identified as being likely to experience a significant beneficial effect. It could also improve the performance of Policy WWE8 in relation to SA Objective 5 by ensuring the provision of essential community facilities, although this would not generate a likely significant beneficial effect. No new or different likely significant effects are therefore predicted.	
MM35	SP10 Connectivity and Transport Network	1. The modification includes detailed explanation of the rational for SSTC4 and identifies specific junction improvements on the SRN which are likely to be required. It adds that the Council will consider new links on the local road network that could improve the SRN and details how these should be progressed with the Council. It highlights the importance of road safety in terms of the SRN. It adds that decreasing car use and particularly addressing single car occupancy are essential issues to tackle congestion.	N
		2. The policy was assessed in the SA report as having likely significant beneficial effects on SA Objectives 3, 5, 6, 7, 11 and 12, with no likely significant adverse effects predicted.	
		3. The modification improves the performance of the policy and reinforces the assessment of the policy for all SA Objectives by removing potential ambiguity and adding detail on future proposals and local road interventions. The modification is likely to improve the functioning of the policy. This does not alter the overall SA of the policy and produces no new or likely significant effects.	
MM36	SP11 Mineral Extraction	1. The modification removes criterion 2 from the policy which had allowed the overriding of all elements of criterion 1 where the benefits outweighed the likely harm identified.	N
		2. The policy was assessed in the SA report as having likely significant beneficial effects on SA Objectives 9, 10, 11, 14 and 15, with no likely significant adverse effects predicted.	
		3. The modification improves the performance of the policy. It removes a potential ambiguity and overall this strengthens the policy in terms of environmental protection. The modification is likely to improve the functioning of the policy. It reinforces the effectiveness of the policy in relation all SA Objectives, but would not generate any new or different likely significant effects.	
MM37	Policy ID2 Planning Obligation	1. The modification removes criterion 2 which previously discussed financial contributions to assist in the delivery of mitigation. It clarifies that Planning Obligations will need to be 'evidenced' and it alters criterion 3 to ensure compliance with PPG.	N
		2. No likely significant effects previously identified.	
		3. The modification will improve the performance of the policy, through a clearer alignment with the PPG. The removal of criterion 2 could be considered as the removal of superfluous information. It reinforces the effectiveness of the policy in relation all SA Objectives, but would not generate any new or different likely significant effects.	
MM38	Monitoring Section following paragraph 14.16	1. The modification adds supporting information to explain the importance of development plan monitoring and brings the Monitoring Framework table into the Plan instead of a standalone Monitoring and Implementation document.	N
		2. This is not a substantive policy or proposal in itself and does not require to be subject to SA.	
		3. The modification adds a clearer reference to the purpose of development plan monitoring but would itself produce no likely significant effects. In accordance with the SEA Regulations, any possible relevance of the inclusion of the Monitoring Framework within the Plan, for the monitoring of likely significant environmental effects, will be considered in due course in the preparation of a SA Post Adoption Statement for the Sunderland CSDP.	
MM39	New Appendix following Appendix 2	1. The modification adds Appendix 3 Areas for Landscape Protection.	N
		2. This modification has already been assessed under Policy NE9 (MM32).	
		3. The addition of Appendix 3 will improve the function of Policy NE9 but this has already been accounted for in relation to Policy NE9 (MM32).	
MM40	New Appendix 8 Monitoring	1. The modification brings the Monitoring Framework Table into the Plan (see Appendix 1).	N
	Framework	2. As per MM38, the Monitoring Framework Table is not a substantive policy or proposal in itself and does not require to be subject to SA.	
		3. The modification is required as part of MM38 and will be subject to assessment as per MM38 (see above).	
MM41	Policies Map	This consequential modification replaces the Policies Map, reflecting all proposed modifications which have spatial implications.	N
		2. The map simply provides a visual reference to relevant policies and is not a substantive policy or proposal in itself such that it was not subject to SA as an individual component.	
		3. This consequential modification only reflects the proposed modifications which have already been assessed above. It would not result in any new or different likely significant effects.	



3 SA of Modified Housing, Employment and Green Belt Strategies

- 3.1.1 **Table 2.1** above provides a proportionate assessment of each individual proposed main modification. This confirms that whilst the suite of recommended substantive modifications to the CSDP would result in some new or different environmental effects, none would be considered significant in the context of the SEA Regulations or core SA requirements outlined in the 2004 Act. As the Examination Inspector has recommended the deletion of three HGAs and a change in the land use of one PEA, there is also a need to consider more widely whether the incorporation of the main modifications would alter the sustainability of the overall housing, employment and Green Belt strategies which underpin individual policies and proposals within the emerging CSDP:
 - Housing Land Strategy: SCC's response to the Examination Inspector's Post Hearing Advice Note Main Modifications and Related Matters (August 2019) confirms that the deletion of three previously proposed HGAs would result in a reduction of approximately 370 residential units but would not affect either the published five-year housing land supply or the ability to meet the minimum housing requirement over the CSDP period. This indicates that the modifications requiring the removal of three HGAs would neither hinder the ability to meet identified housing needs under SA Objective 2 Housing nor be likely to increase residential development pressure elsewhere to meet identified needs (which, if it were to occur, could give rise to a range of adverse environmental effects). On this basis, the deletion of three HGAs would not materially alter the housing land strategy within the CSDP and thus would not result in any new or different likely significant effects;
 - Employment Land Strategy: The Economic Growth chapter of the Publication Draft Sunderland CSDP including site allocation policies EG1 - Primary Employment Areas (PEA) and EG2 - Key Employment Areas (KEA) was informed by the Sunderland Employment Land Review (NLP, 2016). This recommended that SCC should plan for demand of between 95ha and 115ha (gross) of employment land in order to accommodate demand over the period 2015 to 2033. The Examination Inspector concluded that part of KEA1 - Hendon would be more appropriately allocated as urban 'white land' rather than forming part of the protected employment land supply, as the CSDP already makes provision for more than the minimum 95ha employment land required and this site has a history of residential development proposals and limited demand for employment use. As the site may not be available for employment use in any case and given that the CSDP would continue to allocate in excess of the minimum required employment land supply, the removal of KEA1 from the plan would not result in an overall effect on the ability to meet identified employment and economic growth needs under SA Objective 3 – Economy and Employment. No new or different likely significant effects would therefore occur:
 - Green Belt Strategy: A comprehensive Green Belt Review has been undertaken by SCC to identify suitable land for release from the Green Belt to address identified housing needs which cannot be met on viable sites within settlement boundaries. This Green Belt Review is documented within the following reports which form part of the Sunderland CSDP evidence base:
 - Stage 1 Green Belt Site Selection Report Growth Options (SCC, 2016);
 - Stage 2 Green Belt Site Selection Report Call for Sites Review and Constraints Assessment (SCC, 2016);
 - Stage 3 Green Belt Site Selection Report Site Assessment and Deliverability (SCC, June 2017);



- Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt (PBA, June 2018); and,
- Review of the Sunderland Green Belt Part 2: Boundary Assessment and Recommendations (PBA, June 2018).

The Green Belt work undertaken by SCC was subject to independent review by PBA through the 'Review of the Sunderland Green Belt' papers (PBA, June 2018) noted above. The first of these sets out in full the exceptional circumstances which have resulted in the need for SCC to release land from the Green Belt. This evidence has broadly been accepted by the Examination Inspector, particularly in relation to the principle of releasing land from the Green Belt for housing. The recommended deletion of individual HGAs relates instead to the environmental impacts of releasing these sites from the Green Belt, rather than affecting the wider strategy of protecting important areas of the Green Belt whilst facilitating housing development to meet identified needs. Nevertheless, the reduction in allocated development sites within the Green Belt would improve the overall level of protection afforded to the Green Belt and thus would enhance the overall performance of the emerging CSDP in relation to SA Objective 15 - Landscape and Townscape.



4 Conclusion

4.1 Implications of SEA Screening

- 4.1.1 This report has provided a proportionate SA screening of the suite of recommended main modifications to the Publication Draft Sunderland CSDP in order to confirm that these would not result in any new or different likely significant effects in the context of the SEA Regulations or core SA requirements outlined in the 2004 Act. In the absence of any new or different likely significant effects being identified:
 - The incorporation of all recommended modifications into the CSDP would be acceptable
 in environmental and wider sustainability terms, including in relation to consequential
 effects on the housing, employment and Green Belt strategies which underpin the plan;
 - The conclusions of the Publication Draft Sunderland CSDP SA Report (PBA, June 2018) are considered to remain valid; and therefore,
 - No development of additional mitigation measures or further SA consultation is necessary prior to the consideration by SCC of the finalised CSDP (i.e. as a modified) for adoption.

4.2 Next Steps

4.2.1 Following the formal completion of the Examination and the subsequent adoption of the Sunderland CSDP by SCC, a SA Post Adoption Statement will be produced. In accordance with statutory requirements this will set out, amongst other matters, how environmental considerations and the SA (incorporating SEA) process have been taken into account in the CSDP, and how the likely significant effects of implementing the CSDP will be monitored.



Appendix A SA Framework

A.1.1 **Table A.1** below sets out the full Sustainability Appraisal (SA) Framework which underpins the SA of the emerging Sunderland CSDP.



Table A.1: Sunderland CSDP SA Framework

SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
geodiversity and promote improvements to the green infrastructure network.	Will it conserve and enhance international and national designated nature conservation sites (Special Areas of Conservation, Special Protection Areas, Ramsars and Sites of Special Scientific Interest)? Will it ensure no net loss of designated habitats? Will it conserve and enhance Local Nature Reserves, Local Wildlife Sites and Ancient Woodland? Will it avoid damage to, and protect, geologically important sites? Will it protect and enhance existing priority habitats and species and provide for appropriate long term management of wildlife habitats? Will it enhance ecological connectivity and maintain and improve the green infrastructure network? Will it make use of opportunities wherever possible to enhance the environment as part of other initiatives? Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment and biodiversity and promote access to nature on appropriate sites?	Greenspaces lost to development. Reported levels of damage to designated sites. Reported condition of nationally and locally important wildlife sites. Number/Area of nature conservation sites. Number of designated Local Nature Reserves. Number of parks awarded Green Flag status. Area of city which meets the Woodland Trust's Access Standard. Area of city which meets the ANGST criteria. Population of wild birds. Achievement of Biodiversity Action Plan targets.	Biodiversity, Fauna and Flora Human Health
	Will it make housing available to people in need? Will it stop out-migration? Will it improve the quality of housing stock? Will it improve energy efficiency/insulation in housing? Will it increase the use of sustainable building practices? Will it reduce homelessness?	% of housing stock judged unfit to live in. Average energy efficiency of housing. House price/earnings affordability ratio. Housing completions (including size and type).	Population



	SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
		Will it deliver pitches and plots required for Gypsies, Travellers and Travelling Showpeople?	Affordable housing completions. Starter home completions. Households accepted in priority need. Population figures. Homelessness figures. No. of pitches/plots available.	
3.	Economy and Employment: To achieve a strong and stable economy which offers rewarding and well located employment opportunities for everyone.	Will it provide employment opportunities for local people? Will it contribute to improving the diversity of employment opportunities? Will it support existing businesses? Will it support economic growth and inward investment? Will it help create higher value permanent jobs? Will it help to create a low carbon economy? Will it provide for the needs of business (such as a range of premises, land and infrastructure)?	% of individuals of working age in employment. GDP per head. % of businesses surviving three years. % increase or decrease in the number of VAT registered businesses. % of resident population in higher grade occupations Average unemployment rate in the city. Amount of employment floorspace permitted/developed. Shop vacancy rates within designated centres.	Population
4.	Learning and Skills: To improve the educational attainment and skills of Sunderland City's residents and its workforce.	Will it improve lifelong learning and widen participation in lifelong learning activities? Will it improve levels of basic skills and/or information/communication technology (ICT)? Will it ascertain skills/skills training gaps and/or promote specialised training for areas in transition? Will it contribute to meeting identified skills shortage?	% of 16 year olds attaining 5 GCSEs at Grade A*-C. % of adults with NVQ level 4 qualifications or above. % of employees undertaking work related training in last 13 weeks. % of employers with hard to fill vacancies. Amount of higher education development taking place.	Population



SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
	Will it support the development of high education institutions within the city?		
5. Sustainable Communities: To promote sustainable communities within the Sunderland City area.	Will it improve and increase access to community facilities? Will it ensure that everyone has access to essential services (e.g. employment, education, health services and shops) and resources to serve communities are within reasonable non-car based travelling distance? Will it reduce the potential for social isolation with particular regard to potentially disadvantaged groups? Will it reduce crime and disorder through design measures? Will it address the causes of crime disorder and/or reduce crime through intervention? Will it reduce fear of crime?	% of people satisfied with their local area as a place to live. Geographical access to services. Areas of the city with low earnings and high dependency. Indices of Multiple Deprivation rankings. % of residents surveyed who feel safe outside. Crime rate. Domestic burglaries per 100 households. Vehicle crimes per 1000 population. Violent crimes per 1000 population.	Population Human Health
6. Health and Wellbeing: To improve the health and wellbeing of those living and working in the Sunderland City area. Output Description:	Will it improve equitable access to health services? Will it improve positive health and prevent ill health? Will it address health inequalities? Will it encourage healthy lifestyles? Will it support and protect greenspaces for leisure activities? Will it meet the needs of an ageing population? Will it support those with disabilities? Will it maintain and enhance healthcare facilities and services? Will it align investment in healthcare facilities and services with growth?	Proportion of the city's LSOAs within the 20% most deprived in the country. Geographical access to services. Death rate from: heart disease and stroke; all cancers; hospital admission rate for accidents; suicide and undetermined injury. Number of years of expected healthy life. % of people who regularly participate in walking, swimming, cycling and keep fit/aerobics. Number of people accessing greenspace for leisure activity.	Population Human Health



	SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
		Will it avoid locating development where environmental circumstances could negatively impact on people's health?	Quantity and quality of greenspaces.	
7.	Transport and Communication: To reduce the need to travel, promote sustainable modes of travel, improve telecommunications infrastructure and align investment in infrastructure with growth.	Will it improve road safety? Will it reduce causes of accidents? Will it increase access to key resources and services by means other than the car (e.g. health, education, work and food shopping)? Will it ease congestion on the road/rail network? Will it improve access to opportunities and facilities for all groups, particularly those without access to a car? Will it make the transport/environment attractive to non-car users (e.g. pedestrians and cyclists)? Will it encourage freight transfer from road to rail and water? Will it provide integrated transport services? Will it increase provision of public transport where needed? Will it improve rail services and facilities? Will it reduce environmental impacts of traffic? Will it ensure that necessary improvements are made to the telecommunications infrastructure to allow access for all, including access to superfast broadband?	Number of people killed or seriously injured on the city's roads. Levels of car ownership. Usage of non-car transport. Freight transport by mode. Availability of cycle networks (km) Increase in passenger numbers (bus, rail and metro). Improvements for pedestrians. Completion of transport improvement schemes (e.g. Sunderland Strategic Transport Corridor). Air quality monitoring.	Population Human Health Air Climatic Factors
8.	Land Use and Soils: To encourage the efficient use of land and conserve and enhance soils.	Will it clean up contaminated land? Will it make efficient use of land (appropriate density, protect good agricultural land, use brownfield land in preference to greenfield sites)? Will it avoid the loss of the best and most versatile agricultural land?	Area of contaminated land. Amount of development on 'best and most versatile agricultural land'. Amount of development completed on previously developed land.	Material Assets Soil



SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
Water: To conserve and enhance water quality and resources.	Will it protect and enhance the region's rivers, estuary and coastal waters to achieve good ecological status? Will it maintain and where possible improve surface water and groundwater quality? Will it increase efficiency in water use?	Water usage. Bathing water quality. Groundwater quality.	Water
Flood Risk and Coastal Erosion: To reduce the risk of flooding and coastal erosion to people and property, taking into account the effects of climate change.	Will it help to minimise the risk of flooding to existing and new developments? Will it manage effectively, and reduce the likelihood of, flash flooding, taking into account the capacity of sewerage systems? Will it discourage inappropriate development in areas at risk from flooding? Will it ensure that new development does not give rise to flood risk elsewhere? Will it deliver sustainable drainage systems (SuDs) and promote investment in flood defences that reduce vulnerability to flooding? Will it help to discourage inappropriate development in areas at risk from coastal erosion? Will it help to manage and reduce the risks associated with coastal erosion?	Number of properties at risk from flooding. Number of permissions granted against Environment Agency's advice on flooding.	Climatic Factors Water
11. Air: To improve air quality.	Will it maintain and where possible improve air quality? Will it avoid locating development in areas of existing poor air quality? Will it minimise emissions to air from new development? Will it raise awareness about pollution and its effects?	Air quality monitoring. Number of AQMAs.	Air Human Health
12. Climate Change: To minimise greenhouse gas emissions and adapt to the effects of climate change.	Will it minimise energy use and reduce or mitigate greenhouse gas emissions?	Greenhouse gas emissions. Installed capacity of renewable energy schemes.	Climatic Factors



SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
	Will it plan or implement adaptation measures for the likely effects of climate change? Will it support the delivery of renewable and low carbon energy and reduce dependency on non-renewable sources? Will it promote sustainable design that minimises greenhouse emissions and is adaptable to the effects of climate change?	Capacity of renewable energy schemes permitted.	
13. Waste and Natural Resources: To promote the movement up the waste hierarchy (reduce, reuse, recycle, recover) and ensure the sustainable use of natural resources.	Will it minimise the demand for raw materials? Will it promote the use of local resources? Will it reduce minerals extracted and imported? Will it reduce waste arisings? Will it increase prevention, re-use, recovery and recycling of waste? Will it increase awareness and provide information on resource efficiency and waste?	Amount of waste arisings and their management type. % of household waste recycled. Local Aggregates Assessment.	Material Assets
Cultural Heritage: To conserve and enhance the historic environment, cultural heritage, character and setting.	Will it increase availability and accessibility of culture, leisure and recreation (CLR) activities/venues? Will it provide support for CLR providers and/or creative industries? Will it protect and enhance features and areas of historical and cultural value? Will it promote sensitive re-use of historic or culturally important buildings where appropriate? Will it conserve the character of heritage assets and conservation areas? Will it preserve, and where appropriate enhance, features of archaeological importance?	Total tourist visitors to the city. % of people who regularly participate in walking, swimming, cycling and keep fit/aerobics. Number of people accessing greenspace for leisure activity. Location and condition of features of cultural heritage. Number of listed buildings, ancient monuments and conservation areas. Number of entries on the Heritage at Risk Register. Loss or damage to listed buildings and their settings. Loss or damage to scheduled ancient monuments and their settings.	Cultural Heritage Landscape



SA Objective	Guide Questions	Indicators	SEA Directive Topic(s)
		Loss or damage to historic parks and gardens and their settings. % of conservation area demolished or otherwise lost.	
15. Landscape and Townscape: To conserve and enhance landscape character and townscape.	Will it contribute to local distinctiveness and countryside character? Will it conserve and enhance landscape character and townscapes? Will it promote high quality design in context with its urban and rural landscape? Will it avoid inappropriate development in the Green Belt and ensure the Green Belt endures? Will it avoid inappropriate erosion to the Settlement Breaks?	Development in Greenbelt. Development in Settlement Breaks. Development in most sensitive landscape areas. Buildings for Life 12 Assessments.	Landscape Cultural Heritage





Appendix B Publication Draft Sunderland CSDP (2018) – Review of Likely Significant Effects

B.1 Introduction

B.1.1 This appendix provides a reference point for the assessment of proposed main modifications by summarising all previously identified likely significant effects of the Publication Draft Sunderland CSDP (i.e. pre-examination), as reported within the Publication Draft Sunderland CSDP SA Report (PBA, 2018). This allows any new or different likely significant effects arising from the proposed modifications to be identified in **Section 3**.

B.2 Publication Draft Sunderland CSDP Strategic Framework

- B.2.1 In relation to high-level strategic framework elements of the Publication Draft Sunderland CSDP, previous SA reporting (June 2018) identified:
 - The CSDP Vision aligns well with all SA Objectives, indicating the potential for significant beneficial effects across all SA Objectives depending on the implementation of other CSDP components;
 - The CSDP Vision is supported by a set of Strategic Priorities which indicate how the vision will be achieved. The Strategic Priorities have good coverage of all SA Objectives, with many potential significant beneficial effects identified and no Significant Adverse effects predicted. However, the SA did identify that the Strategic Priorities could be enhanced or clarified, including in relation to Water Resources and the need to avoid pollution effects.

B.3 Proposed CSDP Strategic Sites

B.3.1 A proportionate SA of all proposed strategic site allocations, together with identified reasonable alternative sites, was provided in Section 5.3 and Appendix E of the Publication Draft Sunderland CSDP SA Report (PBA, 2018).

Urban Sites

B.3.2 For the reasons detailed in the Publication Draft Sunderland CSDP SA Report (June 2018), both proposed strategic urban sites (The Vaux and South Sunderland Growth Area) were excluded from detailed consideration in this SA. As such, no likely significant effects from the allocation of these sites were reported.

Housing Growth Areas

- B.3.3 Policies SP3 SP6, SS2 SS7 and HGA1 HGA11 within the Publication Draft Sunderland CSDP (2018) set out area-based strategies and spatial policies, within which 11 Housing Growth Areas (HGAs) were identified for release from the Green Belt and allocation to deliver approximately 1,355 dwellings.
- B.3.4 The rationale for these HGAs is to:
 - Eliminate a predicted housing land supply shortfall against Sunderland's objectively assessed need (OAN);
 - Contribute to meeting SCC's minimum housing target of 745 new dwelling per year over the period to 2033;



- Provide sufficient flexibility within Sunderland's identified deliverable housing land supply to guard against potential non-delivery on individual sites; and,
- Support the delivery of the spatial strategy set out within the Publication Draft Sunderland CSDP (2018).
- B.3.5 Whereas the Draft Sunderland CSDP (2017) originally proposed to allocate 15 Green Belt Housing Release Sites, this was reduced to 11 proposed HGAs owing to the identified reduction in Sunderland's Objectively Assessed (Housing) Need (OAN) combined with the identification of additional non-strategic sites within the Sunderland Strategic Housing Land Availability Assessment (SHLAA) (2018).
- B.3.6 The Publication Draft Sunderland CSDP SA Report provided a proportionate SA of 30 identified reasonable alternative candidate Green Belt release housing sites, including the 11 proposed HGAs. This assessment was summarised in Table 5.2 and provided in full within Appendix E of the Publication Draft Sunderland CSDP SA Report. A range of likely significant beneficial and adverse effects were predicted from the 11 proposed HGAs and reasonable alternative sites, with appropriate policy level mitigation to address likely significant adverse effects identified in Appendix E. With reference to the Sunderland CSDP SA Framework:

SA Objective 1 - Biodiversity and Geodiversity

B.3.7 No likely significant effects are predicted.

SA Objective 2 - Housing

B.3.8 14 sites with capacity of 100+ dwellings were predicted to have likely significant beneficial effects.

SA Objective 4 - Learning and Skills

B.3.9 10 sites were predicted to significant beneficial effects on this SA Objective owing to their immediate proximity to existing education infrastructure.

SA Objective 5 - Sustainable Communities

B.3.10 All assessed sites except Granaries, Offerton CO31 (464B) were predicted to have likely significant beneficial effects on aspects of this SA Objective owing to their close proximity to amenities and community facilities. Five of these same sites are also predicted to have significant adverse effects through their lack of proximity to other specific amenities, with an additional two sites predicted to have a likely significant effect on aspects of this SA Objective owing to their lack of proximity to convenience stores and allotments.

SA Objective 6 - Health and Wellbeing

B.3.11 All assessed sites except Granaries, Offerton CO31 (464B) were predicted to have likely significant beneficial effects on aspects of this SA Objective owing to their proximity to open space, which could facilitate and encourage physical activities as well as enhancing mental health. However, 8 sites were also predicted to have likely significant adverse effects on aspects of this SA Objective due to the potential loss of designated open spaces, playing fields or well used allotments.

SA Objective 7 - Transport and Communication

B.3.12 13 of the assessed sites were predicted to have likely significant beneficial effects due to their close proximity to amenities, with 18 assessed sites were predicted to have likely significant beneficial effects as they were located within 400m of a bus stop on regular/frequent route or 800m of a train station. 6 assessed sites were however predicted to have likely significant



adverse effects on this SA Objective owing to being located more than 1200m away from a convenience store.

SA Objective 8 - Land Use

B.3.13 2 of the assessed sites were predicted to have likely significant beneficial effects on this SA Objective owing to be located on brownfield land. 5 assessed sites were predicted to have likely significant adverse effects on this SA Objective as they exceed 2 hectares and comprise agricultural land identified as 'best and most versatile quality'. 1 additional site (East of Seaham Road WA33 (645) was predicted to have a likely significant adverse effect on this SA Objective due to the site encompassing existing, well used allotments.

SA Objective 9 - Water

B.3.14 1 assessed site (West of Cherry Knowle BU4 (674) was predicted to have a likely significant adverse effect on this objective owing to being located within an inner Groundwater Source Protection Zone (Zone 1).

SA Objective 10 - Flood Risk and Coastal Erosion

B.3.15 1 assessed site (Middle Herrington (SW) MD4-5-6 (648B) was predicted to have a likely significant adverse effect on this objective owing >5% of the site area being within in area affected by 1:30 incidence surface water flooding.

SA Objective 11 – Air Quality

B.3.16 18 of the assessed sites were predicted to have a likely significant beneficial effect on this SA Objective owing to being located within either 400m from a bus stop on regular/frequent route or 800m from a train station.

SA Objective 14 - Cultural Heritage

B.3.17 1 assessed site (Peareth Hall/Trust SP11 (299-300) was predicted to have a likely significant adverse effect on this SA Objective as it encompasses the Grade II listed Peareth Hall. All other sites are predicted to have Minor Negative or Neutral effects owing to either being located within a conservation area, adjacent to a listed building or Scheduled Monument, covered by a local archaeological area designation, or (for Neutral effects) not being situated within any of these constrained areas.

SA Objective 15 - Landscape and Townscape

B.3.18 9 of the assessed sites were predicted to have likely significant adverse effects on this SA Objective owing to being located within an area identified by SCC as being of higher landscape value and thus for landscape protection. In addition, 9 assessed sites were predicted to have a likely significant adverse effect as they encompass designated open space or playing fields which could be lost to development.

Proposed Key and Primary Employment Areas

- B.3.19 The findings from the SA of all candidate Primary and Key Employment Areas (PEAs and KEAs) including proposed allocations and reasonable alternatives were summarised in Table 5.4 and detailed in Appendix E of the Publication Draft Sunderland CSDP SA Report. All 73 candidate KEAs and PEAs as well as reasonable alternatives were identified from the Sunderland Employment Land Review 2016, which includes a map of all candidate sites.
- B.3.20 With reference to the Sunderland CSDP SA Framework:



- 69 of the assessed sites were predicted to have likely significant adverse effects on SA Objective 1 owing to their proximity to designated sites;
- 17 of the assessed sites were predicted to have likely significant beneficial effects on SA Objective 3 owing to their site size (thus potential employment generating development);
- All 73 assessed sites were predicted to have a likely significant beneficial effect on SA Objective 5 owing to being located within 500m of an identified residential area;
- 25 of the assessed sites were predicted to have a likely significant beneficial effect on SA Objective 7 owing to being located within 500m of the strategic transport network. However, 52 assessed sites were predicted to have a likely significant adverse effect owing to being located within 2km of areas of traffic congestion or capacity constraints, as identified within the adopted 3rd Local Transport Plan (LTP) for Tyne and Wear (2011 2021);
- 65 of the assessed sites were predicted to have a likely significant beneficial effect on SA Objective 8 owing to being located on existing industrial land, a brownfield site or previously developed land;
- 65 of the assessed sites were predicted to have a likely significant adverse effect on SA Objective 9 owing to being located within 500m of an identified waterbody;
- 14 of the assessed sites were predicted to have a likely significant adverse effect on SA Objective 10 owing to being located within or immediately adjoining Flood Zone 3;
- 68 of the assessed sites were predicted to have a likely significant beneficial effect on SA Objective 11 owing to be located at least 2km from an Air Quality Management Area (AQMA), with 5 candidate sites having a significant adverse effect due to being located within 500m of an AQMA (outwith the SCC administrative boundary);
- 48 of the assessed sites were predicted to have a likely significant adverse effect on SA
 Objective 14 owing to these sites either encompassing or being located within 500m of a
 designated cultural heritage site (listed building or Scheduled Monument); and,
- One assessed site (not proposed for allocation) was predicted to have a likely significant adverse effect on SA Objective 15 owing to being located within the existing Green Belt or a Settlement Break as per the existing statutory Development Plan for the SCC area.

TSGT Sites

- B.3.21 The findings from the SA of all candidate Travelling Showpeople, Gypsies and Travellers (TSGT) sites including proposed allocations and reasonable alternatives were summarised in Table 5.5 and detailed in Appendix E of the Publication Draft Sunderland CSDP SA Report. As with other sites and policies, where the SA identified a likely significant adverse effect from the allocation of a candidate TSGT site, Appendix E identified that suitable mitigation to ensure the avoidance of likely significant adverse effects from any development proposals subsequently brought forward on allocated sites.
- B.3.22 With reference to the Sunderland CSDP SA Framework:
 - **SA Objective 1 Biodiversity and Geodiversity**
- B.3.23 No likely significant effects predicted.

SA Objective 2 - Housing



B.3.24 All of the assessed sites except one (Land at Lorne St/Elemore Lane) were predicted to have likely significant beneficial effects on this SA Objective as their site areas are considered sufficient to accommodate 15+ plots for showpeople or 5+ pitches for gypsy and travellers, both of which would significantly contribute to meeting identified TSGT accommodation needs within the SCC area.

SA Objective 4 - Learning and Skills

B.3.25 31 of the assessed sites were predicted to have likely significant beneficial effects on this SA Objective owing to their immediate proximity to existing school infrastructure.

SA Objective 5- Sustainable Communities

B.3.26 35 of the assessed sites were predicted to have some likely significant beneficial effects on aspects of this SA Objective owing to their close proximity to amenities and community facilities. However, 2 of these same sites are also predicted to have likely significant adverse effects owing to their lack of proximity to other specific amenities. 1 additional site is predicted instead to have a likely significant adverse effect owing to its lack of proximity to specific amenities.

SA Objective 6 - Health and Wellbeing

B.3.27 30 of the assessed sites were predicted to have likely significant beneficial effects on this SA Objective owing to their proximity to open space, which could facilitate and encourage physical activities as well as enhancing mental health. No likely significant adverse effects were predicted.

SA Objective 7 - Transport and Communication

B.3.28 40 of the assessed sites were predicted to have likely significant beneficial effects on this SA Objective owing to their proximity to being located within 500m of the strategic road network (A1M, A194M, A1231, A19, A690, A1018) or being located within 400m of a bus stop on a regular/frequent route or within 800m of a train station. However, 8 sites were predicted to have likely significant adverse effects owing to being located greater than 1500m from the strategic road network, although these sites remain within 400m of the public transport network. 2 other assessed sites were predicted to have likely significant adverse effects owing to being located greater than 1500m away from the strategic road network.

SA Objective 8 - Land Use

B.3.29 All of the assessed sites are predicted to have likely significant beneficial effects on this SA Objective owing to being located within 800m walking distance of a designated open space.

SA Objective 9 - Water

B.3.30 No likely significant effects predicted.

SA Objective 10 - Flood Risk and Coastal Erosion

B.3.31 1 assessed site (Land at Lyons Ave, Easington Lane) was predicted to have likely significant beneficial effects on this objective as this site is known to be at a high level of risk of groundwater flooding.

SA Objective 11 - Air Quality

B.3.32 No likely significant effects predicted.

SA Objective 14 - Cultural Heritage



B.3.33 No likely significant effects predicted.

SA Objective 15 - Landscape and Townscape

B.3.34 6 of the assessed sites were predicted to have likely significant adverse effects on this SA Objective owing to being located within an area identified by SCC as being of higher landscape value and thus for landscape protection.

B.4 CSDP Subject Policies

- B.4.1 The findings of a SA of all proposed CSDP policies were summarised in Section 5.4 of the Publication Draft Sunderland CSDP SA Report and detailed in Appendix F. The assessment was undertaken by policy grouping, corresponding with each chapter of policies contained within the Publication Draft Sunderland CSDP. This enabled a proportionate assessment to be undertaken of each policy and of the cumulative effects of each policy grouping, focusing on the sustainability issues most relevant to the policy or policies being assessed.
- B.4.2 With reference to the Sunderland CSDP SA Framework, **Table C.1** below summarises the likely significant effects of all proposed CSDP policies. Taking account of mitigation and enhancement measures which were developed through the SA process and incorporated into the Publication Draft Sunderland CSDP prior to its publication, **Table C.1** confirms that the proposed subject policies perform well in sustainability terms, with many likely significant beneficial effects identified and no likely significant adverse effects predicted.



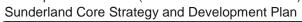
Table C.1: Likely Significant Effects of Publication Draft Sunderland CSDP Policies

Sunderland CSDP SA Objectives	Identified Likely Significant (Beneficial) Effects from Sunderland CSDP Subject Policies
SA Objective 1: Biodiversity and Geodiversity	BH1: Design Quality; BH2: Sustainable design and construction; VC2: Retail Impact Assessments; VC3: Primary shopping areas and frontages; NE1: Green infrastructure; NE2: Biodiversity and geodiversity; NE3: Woodlands/hedgerows and trees; NE4: Greenspace; WWE1: Decentralised, renewable and low carbon energy; WWE2: Flood risk and coastal management; WWE3: Water management;: Water quality; WWE6: Waste management; WWE9: Open waste facilities; and, WWE10: Energy from waste.
SA Objective 2: Housing	SP1 Spatial Strategy; SP2 Urban Core; H1: Housing mix; H2: Affordable housing; H3: Student accommodation; H4: Travelling Showpeople, Gypsies and Travellers; H5: Loss of residential stock; H6: Housing in Multiple Occupation; and, H7: Backland and tandem development.
SA Objective 3: Economy & Employment	SS5 The Port of Sunderland; SP2 Urban Core; SP7 Healthy and Safe Communities; SP8 Housing Supply and Delivery; SP9 Comparison Retail; H1: Housing mix; H2: Affordable homes; H3: Student accommodation; H4: Travelling Showpeople, Gypsies and Travellers; H5: Existing Homes and Loss of Homes; H: Homes in Multiple Occupation (HMOs); H7: Backland and tandem development; EG1: Primary employment areas; EG2: Key Employment Areas; EG3: Other employment sites; EG4: New employment areas; EG5: Offices; EG6: Trade counters; VC1: Main Town Centre Uses and Retail Hierarchy; VC2: Retail impact assessments; VC3: Primary shopping areas and frontages; VC5: Protection and delivery of community facilities and local services; VC6: Culture, leisure and tourism; BH1: Design Quality; NE8: Development in the open countryside; WWE1: Decentralised, renewable and low carbon energy; WWE10 Energy from Waste; SP10: Connectivity and Transport Network; ST1: Urban Core Accessibility and Movement; and, ST2: Local Road Network.
SA Objective 4: Learning & Skills	SP2 Urban Core; VC5: Protection and delivery of community facilities and local services; and Culture, leisure and tourism.
SA Objective 5: Sustainable Communities	SP1 Spatial Strategy; SP2 Urban Core; SP7 Healthy and Safe Communities; H3: Student accommodation; H4: Travelling Showpeople, Gypsies and Travellers; VC5: Protection and delivery of community facilities and local services; VC6: Culture, leisure and tourism; BH1: Design Quality; BH3: Public realm; NE1: Green infrastructure; NE4: Greenspace; NE8: Development in the open countryside; SP10: Connectivity and Transport Network; ST1: Urban core accessibility and movement; and, ST2: Local road network.
SA Objective 6: Health & Wellbeing	HS1: Quality of Life and Amenity; HS2: Noise-sensitive Development; HS3: Contaminated Land; HS4: Health and safety executive areas and hazardous substances; H2: Housing mix; H4: Student accommodation; H5: Travelling Showpeople, Gypsies and Travellers; VC5: Protection and Delivery of Community Facilities and Local Services; VC6 - Culture, Leisure and Tourism; BH1: Design Quality; BH3: Public realm; NE4: Greenspace; SP7: Healthy and Safe Communities; and, ST1: Urban core accessibility and movement.



Sunderland CSDP SA Objectives	Identified Likely Significant (Beneficial) Effects from Sunderland CSDP Subject Policies
SA Objective 7: Transport & Communications	SP1: Spatial Strategy; SS5 The Port of Sunderland; SP2 Urban Core; H1: Housing mix; H3: Student accommodation; H4: Travelling Showpeople, Gypsies and Travellers; EG1: Primary employment areas; EG2: Key Employment Areas; EG3: Other employment sites; EG4: New employment areas; EG5: Offices; EG6: Trade counters;: Main Town Centre Uses and Retail Hierarchy; VC2: Retail impact assessments; VC3: Primary shopping areas and frontages; VC6: Culture, leisure and tourism; BH6: High quality communications; NE1: Green infrastructure; NE5: Burial space; SP10 Connectivity and transport network; ST1: Urban core accessibility and movement; ST2: Local road network; and, ST3: Development and transport.
SA Objective 8: Land Use & Soils	SP1: Spatial Strategy; SP2: Urban Core; HS3: Contaminated Land; BH7: Historic environment; BH8: Heritage assets; BH9: Archaeology and Recording of Heritage Assets; NE2: Biodiversity and geodiversity; NE6: Green Belt; NE7: Settlement Breaks; M1: Mineral safeguarding areas and infrastructure; M3: Land instability and minerals legacy; and, M4: Restoration and Aftercare.
SA Objective 9: Water	HS1: Quality of Life and Amenity; HS4: Health and safety executive areas and hazardous substances; BH2: Sustainable design and construction; NE1: Green infrastructure; NE2: Biodiversity and geodiversity; WWE1: Decentralised, renewable and low carbon energy; WWE2: Flood risk and coastal management; WWE3: Water management; WWE4: Water quality; WWE6: Waste management; WWE7: Waste facilities; WWE9: Open waste facilities; WWE10: Energy from waste; SP11 Mineral Extraction; and, M2: Surface Coal Extraction.
SA Objective 10: Flood Risk & Coastal Erosion	BH1: Design Quality; BH3: Public realm; WWE1: Decentralised, renewable and low carbon energy; WWE2: Flood risk and coastal management; WWE3: Water management; WWE4: Water quality; WWE6: Waste management; WWE7: Waste facilities; WWE9: Open waste facilities; WWE10: Energy from waste; SP11 Mineral Extraction; and, M2: Surface Coal Extraction.
SA Objective 11: Air	HS1: Quality of Life and Amenity; HS4: Health and safety executive areas and hazardous substances; BH1: Design Quality; WWE1: Decentralised, renewable and low carbon energy; WWE6: Waste management; WWE7: Waste facilities; WWE9: Open waste facilities; WWE10: Energy from waste; SP7: Healthy and Safe Communities; SP10 Connectivity and transport network; ST1: Urban core accessibility and movement; ST2: Local road network; ST3: Development and transport; SP11 Mineral Extraction; and, M2: Surface Coal Extraction.
SA Objective 12: Climate Change	SP2 Urban Core; NE1: Green infrastructure; NE4: Greenspace; WWE1: Decentralised, renewable and low carbon energy; WWE10: Energy from waste; SP10 Connectivity and transport network; ST1: Urban core accessibility and movement; Local road network; and, ST3: Development and transport.
SA Objective 13: Waste & Natural Resources	BH2: Sustainable design and construction; WWE6: Waste management; and, WWE8: Safeguarding Waste Facilities.

SA Report Addendum (Examination Modifications)





Sunderland CSDP SA Objectives	Identified Likely Significant (Beneficial) Effects from Sunderland CSDP Subject Policies
SA Objective 14: Cultural Heritage	SP2 Urban Core; VC1: Main Town Centre Uses and Retail Hierarchy; VC5: Protection and delivery of community facilities and local services; VC6: Culture, leisure and tourism; BH5: Shop Fronts; BH6: High quality communications; BH7: Historic environment; BH8: Heritage assets; BH9: Archaeology and Recording of Heritage Assets; NE9: Landscape character; NE11: Creating and protecting views; WWE1: Decentralised, renewable and low carbon energy; WWE6: Waste management; WWE7: Waste facilities;: Open waste facilities; WWE10: Energy from waste; SP11 Mineral Extraction; and, M2: Surface Coal Extraction.
SA Objective 15: Landscape & Townscape	SP2 Urban Core; H1: Housing mix; H7: Backland and tandem development; BH1: Design Quality; BH3: Public realm; BH4: Advertisements; BH5: Shop Fronts; NE6: Green Belt; NE7: Settlement Breaks; NE8: Development in the open countryside; NE9: Landscape character; NE11: Creating and protecting views; WWE1: Decentralised, renewable and low carbon energy; WWE6: Waste management; WWE9: Open waste facilities; WWE10: Energy from waste; SP11 Mineral Extraction; and, M2: Surface Coal Extraction.

