

PLANNING OBLIGATIONS
SUPPLEMENTARY PLANNING
DOCUMENT

Consultation Statement

Table of Contents

Introduction	2
What is the Planning Obligations Supplementary Planning Document	2
Consultation on the SSGA SPD	3
Persons the local planning authority consulted when preparing the supplementary planning document	3
Consultation at each stage.....	3
Stage 1 Initial pre-consultation	3
Stage 2 Draft SPD	3
Stage 3 Final Draft SPD.....	4
A summary of the main issues raised by those persons; and how those issues have been addressed in the supplementary planning document.....	5
Stage 1 Scoping Report	5
Stage 2 Draft SPD	6
Stage 3 Final Draft SPD.....	27
Appendix 1 – Letters	34
Stage 1 Scoping	34
Stage 2 Draft SPD	35
Stage 3 Final Draft.....	37
Appendix 2 – Events.....	39
Stage 1 Scoping Report	39
Stage 2 Draft SPD	39

Introduction

The Town and Country Planning (Local Planning) (England) Regulations 2012, requires that “Before a local planning authority adopt a supplementary planning document it must a) prepare a statement setting out—

- I. the persons the local planning authority consulted when preparing the supplementary planning document;
- II. a summary of the main issues raised by those persons; and
- III. how those issues have been addressed in the supplementary planning document;

This Consultation statement sets out detail of the consultation Sunderland City Council has undertaken in the preparation of Planning Obligations Supplementary Planning Document (SPD).

What is the Planning Obligations Supplementary Planning Document

SPDs add further detail to the policies in development plans. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.

Sunderland’s Local Plan consists of three development plans, the Core Strategy and Development Plan (CSDP) (adopted 2020), the Allocations and Designations Plan (emerging) and the International Advanced Manufacturing Park (IAMP) Area Action Plan.

The Planning Obligations SPD provides further guidance how CSDP policy ID2 will be delivered.

ID2 Planning obligations

Section 106 planning obligations will be sought to facilitate the delivery of:

- i. affordable housing (see Policy H2); and
- ii. local improvements to mitigate the direct or cumulative impact of development, where evidenced, and/or additional facilities and requirements made necessary by the development, in accordance with the Planning Obligations SPD.

Where it is not possible to deliver the policy requirements in full, a viability assessment should be submitted in line with the requirements of the PPG.

Consultation on the SSGA SPD

The Council, in accordance with the Statement of Community Involvement has undertaken several rounds of consultations.

Stage 1 – Scoping Report	August - October 2017
Stage 2 – Draft SPD	June – July 2018
Stage 3 – Final Draft Consultation	February 2020

Persons the local planning authority consulted when preparing the supplementary planning document

At every stage, the Council wrote to all persons on the Local Plan Database, this includes statutory consultees, general consultation bodies and those who had previously expressed an interest in the Local Plan. Copies of the correspondence inviting persons to make representations on the SPD is included in Appendix 1.

Consultation at each stage

Stage 1 Initial pre-consultation

The Scoping Report was consulted upon alongside CSDP and as such it was made publicly available for comment for 8 weeks between 7 August – 2 October 2017. The SPD was made available on the Council's website¹ on the Council's online consultation portal² at Sunderland Civic Centre, libraries (in Sunderland's City Library @ Museum & Winter Gardens, Washington Galleries and Houghton-le-Spring), as well as at the 30 public consultation drop-in exhibition events held around the city during August and September (Appendix 2).

Stakeholders were invited to make representations electronically via the Council's online consultation portal (<http://sunderland-consult.limehouse.co.uk/portal>), and in writing by email (planningpolicy@sunderland.gov.uk) or letter.

Stage 2 Draft SPD

A total of 4 representations were received in response to the scoping report consultation. In summary these related to the timescales for the delivery of the document, support for the inclusion of planning obligations for education, health facilities and the maintenance and enhancement of the historic environment and advice on the pooling restriction to ensure delivery of the appropriate mitigation measures.

These representation were taken into consideration when preparing the Draft SPD. Public consultation on the Draft Planning Obligations Supplementary Planning Document took place over a six week period, commencing on Friday 15 June 2018 and finishing at 5pm on Friday 27 July 2018.

Once again, the consultation on the draft SPD was run alongside the Publication Draft CSDP consultation. A copy of the SPD was made available to view on line on the council's website³, on the Council's online consultation portal⁴ and at the Sunderland Civic Centre between the hours of 8.30am and 5.00pm, Monday to Friday. Copies were also made available at all the Council's libraries. A statement of representation procedure was made available on the Council's website, detailing when representations could be made, the deadline for making representations, how consultees could make representations, where and at what times consultation documents were available for the public and interested parties to view.

A series of ten consultation drop in events were held across Sunderland across a two week period. The first week of consultation commenced on Monday 18 June 2018 and finished on Friday 22 June 2018, with the second week

¹ <https://www.sunderland.gov.uk/article/14749/Draft>

² <https://sunderland-consult.objective.co.uk/portal/>

³ <https://www.sunderland.gov.uk/article/14749/Draft>

⁴ <http://sunderland-consult.limehouse.co.uk/portal/>

commencing on Monday 16 July 2018 and finishing on 20 July 2018. A range of morning, afternoon and evening sessions were arranged to help to reach as wide an audience as possible.

Submission of representations were encouraged through the Council's online consultation portal. However, email and written representations were also accepted. Drop boxes were provided at all consultation events and Sunderland Civic Centre for consultees to submit their completed response forms.

Stage 3 Final Draft SPD

A total of 27 representations were received in response to the draft SPD consultation. The summary of responses covered the topic areas of affordable housing, education, open space, equipped playspace, viability, health infrastructure, implementation and monitoring fees. These representations were taken into consideration where possible in the preparation of the final draft SPD.

A public consultation on the final Draft Planning Obligations SPD took place between Monday 24 February to Monday 30 March 2020.

Stakeholders were invited to make representations electronically via the Council's online consultation portal (<http://sunderland-consult.limehouse.co.uk/portal>), and in writing by email (planningpolicy@sunderland.gov.uk) or letter. A total of 4 representations were received in response to the consultation.

A summary of the main issues raised by those persons; and how those issues have been addressed in the supplementary planning document

Stage 1 Scoping Report

Consultee	Summary of Representations	Council Response
Member of the public	In all sections priority must be given to improving Schools and if necessary the building of new schools, also consideration is a must for medical services ie. Doctors surgeries	The draft SPD includes detailed methodology for seeking developer contributions for education and includes the opportunity to seek contributions for health facilities
Barratt David Wilson Homes North East	Timetable - Given the current status of the Viability Assessment we consider the timetable proposed unrealistic if proper consultation with the development industry is to be had.	The draft SPD has been finalised later than initially planned and now aligns with the consultation on the Core Strategy and Development Plan and supporting evidence base
Historic England	Recommends that consideration is given to ways planning obligations can be used to implement the strategy and policies within the Local Plan which aim to conserve and enhance the historic environment. CIL can be used to fund a wide range of infrastructure and facilities. This flexibility means that many projects may be associated with the repair and maintenance of heritage assets, and it is now well established that heritage is not an adjunct to a healthy economy, but an important component of growth and a source of employment. Historic buildings can accommodate many social and community services and activities, and the historic environment can make a valuable contribution to green infrastructure networks, and offer a range of leisure and recreational opportunities. Physical and transport infrastructure may include historic bridges or coastal/ flood protection structures, while open space can encompass historic areas and townscapes. 'In kind' payments may include land transfers which enable the transfer of an 'at risk' building as part of a comprehensive regeneration scheme. Welcome the recognition that site specific contributions could include heritage protection. Suggest greater consideration is also given to the conservation and enhancement of heritage assets and their settings. Specific planning obligations and S106 offer opportunities for funding improvements to, and mitigating adverse impacts upon, the historic environment including: archaeological investigations; access and interpretation; public realm improvements; maintenance of heritage	Comments and support noted. The draft SPD has been prepared to include the provision to seek contributions for heritage protection and enhancement. CIL has not been adopted in Sunderland.

	assets (including transport, green and social infrastructure, parks and gardens, churchyards and civic spaces); and the repair and reuse of buildings or other heritage assets. Inclusion of these within the Infrastructure List (Regulation 123) would also ensure that it would be possible to fund appropriate initiatives which deliver necessary infrastructure and also help to conserve and enhance the historic environment. Recommend the Charging Schedule is fully informed by an up to date and relevant evidence base which could provide a useful insight into project opportunities for the Regulation 123 list.	
Natural England	Natural England notes that it is proposed to include 'Biodiversity and Geodiversity including Suitable Alternative Natural Greenspace' into the Planning Obligations SPD. We advise to be mindful of the pooling restrictions with regards to Section 106 agreements, so that it can be certain that SANGS/AANGs and other projects to deliver benefits to biodiversity can be delivered.	Comments noted.

Stage 2 Draft SPD

Respondent	Summary of Representations	Council Response
Keith Cameron	I think it is a disgrace that the green belt is being devastated locally. Springwell Village will no longer be a Village. The area round Penshaw Monument & Herrington Park is a fantastic green space for enjoying family time. To build so many houses on the land without increasing roads will turn it into a constant roadblock.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Karen Jones	Building houses at Herrington is wrong. It's greenbelt land where birds nest and is a place of natural beauty next to Herrington Park	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Kirsty Oliver	I OBJECT TO HRS12	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Stephanie Pickering	Building on Green Field/Playing Fields ant Southern Playing Fields in Rickleton. Council Booklet page 23 states: The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; The Proposed building on the Southern Playing Fields will remove 7 football pitches - whilst proposals to move to 3G pitches on the Northern Area Playing	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

	<p>fields have been suggested this will result in 7 grass pitches at Rickleton being lost PLUS at least 2 at the Northern Area to accommodate the proposed 3G pitches - therefore a minimum of 9 full size football pitches will be lost forever - thus the statement above is broken as whilst the Council may deem these proposed pitches better provision they are certainly NOT equal or better quantity.</p> <p>The council need to exhaust ALL Brownfield sites for housebuilding before allowing builders to buy sports fields, especially those that are used by hundreds of people per week, if the council has been led to believe these sports fields are not being used fully, they need to ensure they visit them at weekends and evenings not through the day when everyone is at work and school. Huge areas of Sunderland have potential brown field sites that builders would build on if they were their only options, if you potentially offer greenfield sites to builders, they would ALWAYS choose these over brownfield sites.</p>	
<p>Andrew Bean</p>	<p>I strongly object to the proposal of a highway being built through Elba Park. The area is one of the only areas remaining which are dedicated to leisure and nature in the area</p> <p>The area is always filled with families with young children and a highway through this area would no doubt pose such a risk that the area would become unused and no doubt the death of all wildlife in the area</p> <p>I also live in Elba Park and the proposed site of the new highway is approximately 20 feet from my property. It is totally unacceptable that a highway is built so close to major residential housing, the disruption, noise and traffic pollution caused by this is something which is unacceptable. I do not feel that this has been taken into consideration by the council and how close the road will be to properties. The existing road which passes alongside the Biddick estate is at a much greater distance to housing and is not comparable</p> <p>Finally I would question the cost of such a project and the benefits it would bring, the proposal talks of bringing economy to Houghton town centre however the majority of persons attending the town centre do so on foot or via public transport. The layout and infrastructure of the town centre is not equipped to deal with additional vehicular volume which will result in this highway being an expensive and unnecessary mistake</p> <p>I hope that the considerations raised are taken into account</p>	<p>This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.</p>

	Thank You	
David Tatters	<p>The impact of your plans will have a significant impact on the wellbeing of people living in Barmston, Sulgrave and concord. The disproportionate amount of industrial and retail expansion is having an effect now. In the future it will be intolerable because you have not taken into account traffic density, traffic noise and the sheer over whelming effect of surrounding our villages with additional industrial and retail activity. We are surrounded by eight industrial areas and a retail park now, there are at least 360 major units in the industrial areas alone. The traffic noise level from the A1231 is at an extremely high level now, further traffic from the additional approved planned development is going to make it more difficult for residents. The traffic noise starts at 0445 and last until 0300 the next morning, we also worry about the levels of pollution from all the traffic. I am advised that planners do not take traffic noise into consideration, I would invite the planning department to come and have a listen. Residents are starting to e mail their councillors regarding this problem. I would also advise that the traffic on Spire Road at the Peel Centre in Washington is going to get worse due to the approval of more popular retail units, couple that with the HGV units going to the various industrial sites means that noise and pollution levels from vehicles will increase. The safety of residents in the area will also be at risk.</p>	This representation was considered as part of the CSDP. Not relevant to SPD. No change required.
Kelly Stockton	<p>I would like to object to the development of the road through Elba Park. I believe that it is important to ensure a wide area of green recreational space where family's can enjoy the outdoors together.</p> <p>Can we not think of more sustainable solutions which protects the natural environment and animal habitats. Re open the old train lines or use this and develop a road next to it.</p>	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
David Hicks	<p>I object to the development of the road near Elba Park.</p> <p>perhaps the road could be built closer to the old railway line and not destroy animal habitats.</p>	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Julie Shaw	<p>I oppose SP10 • the Central Route in the Coalfield will link the A182 at Biddick Woods via Sedgeleth and Dubmire South to Rainton Bridge Industrial Estate. The road will support housing and employment regeneration and improve connectivity in the Coalfield.</p> <p>The road is going to run straight through a park which is used by myself and many people everyday. We walk our dogs, cycle, observe nature which will be detrimentally impacted on if this road goes ahead. The park is currently a safe</p>	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

	<p>place for children and dogs away from moving traffic. If this road goes ahead we will all be in danger and at risk of a car collision. It will bring pollution, noise and disturbance. There is nothing positive about this plan as if you ask the residents who live by the park and/or use it you will be advised that no one wants this. We have had no correspondence sent to us about this proposal? Why is this? Your proposals state you want to maintain semi rural character. Placing a road through an award winning park full of rural character and wildlife can only be described as absolutely ludicrous. New houses need to be built to meet demand but where do you expect these families to take their children if you are destroying a safe environment full of nature and education opportunities?? Therefore I strongly object to SP10</p>	
Julie Weedy	<p>I object to the sp10 proposal to put a road through Elba Park. The park is used daily by dog walkers, cyclists, horse riders and family's with their children. Not to mention the wildlife that live in the park! A road would totally destroy the tranquility of the park and force out the wildlife that have lived here for years. Surly there is an alternative route that can be used instead of destroying an award winning park such as Elba, there is an old railway line sitting there unused! Use that. Elba Park is a part of our community the residents who live near by are always out helping to keep it clean and tidy for everyone to enjoy and it should be left as it is , it has already had 500 homes built on it encroaching onto the wildlife and now you want to put a road through it! It's ridiculous. I strongly object.</p>	<p>This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.</p>
Kara Bell	<p>Do not build houses on this area this is a nice patch of countryside for the people of penshaw and Herrington. Many people come to Herrington country park for the experience and part of this is seeing the beautiful fields and cattle surrounding. Houses will destroy the experience for many.</p>	<p>This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.</p>
Julie Hedley	<p>I was dismayed to see ther are proposals to build a road through Elba Country Park, this amazing local resource was one of the best things created for this area and now you plan to bulldoze a road through it. I object in the strongest possible terms, this area is rich in wildlife which has built up over the years of the parks maturity, the housing which isn't yet complete was sold on the strength of being adjacent to such a lovely green area. Running alongside the park is a disused railway line In desperation I suggest this as a possible alternative location. Sunderland Council would appear to be hell bent on the destruction and minimising of our green spaces which have taken years to</p>	<p>This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.</p>

	mature and cannot be replaced with a token nod to a green belt or corridor. I am furious at this stupidity and ignorance.	
Adele Carter	There are other areas other than Green Belt that can be considered for building why not use that? there is “brown land” to buy and build on but because of greed and corruption within the council it’s cheaper to use green belt. In the area there is only 35% green belt and is the lowest in the region so why reduce it further?	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Catherine Carr	As a National Trust member I strongly object to the use and development of land that is green in order to provide housing for a population that is already housed in other areas, some in desperate need of development. The finances should be utilised to develop Sunderland, Philadelphia and Houghton area. Currently I live in the Penshaw area where applications to schools are competitive, with my child being one of the 70 applicants to a 30 pupil class. Another 400 houses would not assist this issue in the short or medium term. Medical general practice surgeries are not sufficient for the current residents I know the long term view from the developer is that doctors surgeries and schools can be built in the future, this is not a guarantee and only offers potential future issues with building, congestion, disruption, etc The building and development will cause extreme interruption to the local area, even after building the local traffic congestion issues would be massive increases. The area real currently has epic green field views for runners and cyclists, encouraging local revenue by park run and walk activities. A development would hinder this due to a decrease of beauty and access	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Sophie Smith	the planning for a road through Elba Park would spilt the Park in two and destroy wildlife.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Kim Lomax	I might sound a bit selfish but those animals have been there for as long as I can remember. I can’t manage to take my children to a farm. But other than that I worry about schools and doctors surgeries there isn’t any appointments available now without having to be on hold for a long time before being told there isn’t any.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Norman Heron	If Joe Bloggs was unhappy that our council had chosen Penshaws Greenbelt to build houses on when there are 3000 empty homes in Sunderland, he might wish to choose the option that states it has not been positively prepared, as our council have failed to look at this before suggesting our Greenbelt land. Joe Bloggs might say it was not justified because the need for housing can be	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

	found elsewhere and that there is no need to build more when 3000 stand empty. Joe Bloggs may wish to say that our councils plan is not consistent with National Planning Policy Framework - as stated on paragraph 87, building on greenbelt must only be in exceptional or special circumstances, such as the need for a hospital and there is no other land available etc this does not include housing.	
Ann Emery	My views are as follows, we already greatly benefit as a community from penshaws greenbelt. We do not want our VALUABLE open space being transformed into an ugly housing estate. The traffic will increase immensely on an already very busy road Chester Road. School places that are already difficult for resident parents to secure will become almost impossible when hundreds more children move into penshaw. The same prediction can be made in regards to our already struggling gp services.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change necessary.
Michael Collier	This site is part of the greenbelt within the City of Sunderland and wasn't considered suitable for development in Sunderland's own report in 2016. In that report it was mentioned that there is a biodiversity value, it is a wildlife corridor with landscape value. All of these features will be lost if permission is given to build more than 100 high value homes. The answer to relieve the housing crisis must be for affordable homes to be built to help younger people gain access to the housing market, Sunderland has plenty of brownbelt sites which could be utilized, creating homes in pleasant surroundings without ruining the greenbelt, Pennywell is one area which springs to mind as well as areas in Hendon. I notice the three ward councillors are also opposed to the plan.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Paul Thompson	The statement in this paragraph " Greenspace relates to public and private open space and is identified within the city's Greenspace Audit as including amenity greenspace, provision for children and young people, natural and semi-natural greenspace, formal parks and country parks, allotments and community gardens, outdoor sports facilities, school playing fields and grounds, cemeteries and church grounds, civic spaces and coast and estuary" totally contradicts the current application by Miller Homes, UOS, SCC and WYG application ref 18/00609/FU4	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
Christopher Smith	Blank submission	No comment made.

NHS Sunderland CCG	This comment pertains to the para starting 'This document ..'. As a general comment it is noted that the SPD does not form part of the Sunderland Local Plan. Conscious of the recent case R (oao Skipton Properties Limited and Craven District Council 2017) it is important that the SPD does not include proposals which should be in the Local Plan and not in an SPD.	Comment noted. The SPD supports policies, particularly Policy ID2, within the CSDP. The content of Policy ID2 was dealt with at the Plan's examination therefore there is no concern that the SPD contains wording that should be in CSDP Policy ID2
NHS Sunderland CCG	Whilst supporting the reference to health facilities in the last bullet point, health infrastructure should be expressly listed as a bullet point in its own right. This is necessary amongst other things acknowledging that health is a particular issue in the City and that all of its premises are at capacity. Following on from the above, health infrastructure is not referred to in Section 12 of the SPD (Other Site Specific Planning Obligations). The respondent is concerned at this apparent omission, health infrastructure should be a priority in the City. Health infrastructure should have a specific section within the SPD as does education, open space, equipped play space, ecology, sport and recreation, highways and public transport.	Noted. Reference to health infrastructure added to Section 12. The Council will continue to work constructively with Sunderland CCG to establish if there is evidence of health infrastructure need across Sunderland.
NHS Sunderland CCG	Health Infrastructure should be expressly listed as a type of infrastructure. The threshold for when contributions are required towards Health Infrastructure should be at applications for 50 dwellings or more. For student accommodation the threshold should be set at 50 bedspaces or more.	Comments noted. This representation was considered as part of the CSDP.
NHS Sunderland CCG	It is noted that bedspaces are set out in para 10.26 of the Plan and it is further understood that the Council work on the basis of 1 bedspace per person. As a general comment in other authorities where health infrastructure contributions are sought lower occupancy rates are used, namely; 33 occupancy rate in 1 & 2 bed properties 07 occupancy rate in 3 bed properties 73 occupancy rate in 4 bed properties 02 occupancy rate in 5+ bedroom properties There will be a need to work through the approach in progressing both the Plan and the SPD.	Comments noted. This representation was considered as part of the CSDP. The Council will continue to work constructively with Sunderland CCG to establish if there is evidence of health infrastructure need across Sunderland.
NHS Sunderland CCG	Section 3.1 in the other site specific requirements bullet reference health facilities. For whatever reason health facilities do not appear to be considered within Section 12. The CCG are concerned that health infrastructure is not seen as a priority in the City and that contributions will be limited especially acknowledging the para 14.4 of the SPD which states that where it is demonstrated that the full amount of planning obligations cannot be delivered due to viability the City Council will determine where the	A paragraph on health has been identified within "other specific requirements". The Council has worked, and will continue to work, closely with Sunderland CCG to ensure a robust, evidenced calculation, which can be used by the CCG to request contributions for health.

	<p>available contributions should be directed. The CCG are concerned that this is indicative that contributions will be other than to healthcare infrastructure. The CCG's suggested approach is set out in their response to policy ID2 of the Plan.</p> <p>Without prejudice this apparent omission health infrastructure should have a specific section within the SPD as does education, open space, equipped play space, ecology, sport and recreation, highways and public transport. Health is a particular issue in Sunderland and all premises being at capacity. In the circumstances it is not sound to leave health infrastructure to 'other' assuming its omission was an oversight.</p>	
NHS Sunderland CCG	<p>Disagree, when full contributions cannot be made for viability reasons, contributions required by a development should be apportioned amongst the infrastructure required to mitigate the impact of the development by way of an equal percentage discount to each requirement. The methodology should be set out in the Policy and not in an SPD.</p>	<p>The City Council will direct reduced funds on a case-by-case basis in accordance with national legislation. No change necessary.</p>
Mr David Gallagher -NHS Sunderland CCG	<p>Scant mention of the need / intention to use section 106 monies to support health infrastructure.</p> <p>The addition of significant numbers of new home - 13,410 or 745 new dwellings each year, will increase population size and create increased demand for services</p> <p>While funding for health services is allocated nationally based on population and a formula, this funds service provision eventually. It does not account for infrastructure such as buildings and premises from which they are delivered. This capital funding is not available to Clinical Commissioning Groups, who receive funding to commission services.</p> <p>Greater commitment to other use of section 106 funding needs to included otherwise there is a significant risk that where current facilities do not have any further capacity, health care services will not be able to cope with the increased population resulting from the plan</p>	<p>The Council will continue to work constructively with Sunderland CCG to establish if there is evidence of health infrastructure need across Sunderland to warrant a dedicated health chapter within the SPD.</p>
Story Homes Ltd	<p>Story Homes wishes to thank Sunderland City Council for the opportunity to comment on the draft Planning Obligations Supplementary Planning Document (SPD).</p> <p>Page 8 provides the number of bed spaces for different sizes of dwellings, which reiterates those provided in the draft Core Strategy Development Plan 2015 – 2033 (CSDP), and are follows:</p> <p>One bedroom dwelling = 2 bedspaces</p>	

	<p>Two bedroom dwelling = 3 bedspaces Three bedroom dwelling = 5 bedspaces Above three bedrooms = 1 additional bedspace per bedroom. This methodology is not reflective of actual populations per site and occupancy rates. It is unrealistic to assume that 5 people occupy every 3 bedroom property. In calculating open space requirements in County Durham, the Council assumes an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). Story Homes respectfully requests that both the Planning Obligations SPD and the CSDP are amended to assume an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). For consistency, this is to ensure that any contributions / obligations required that relate to the number of bedrooms are fair and reasonably related in scale and kind to the development, to comply with Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations).</p>	<p>This has been updated in line with the CSDP whereby a 3 bedroom dwelling equates to 4 bedspaces.</p>
<p>Story Homes Ltd</p>	<p>The third paragraph refers to Policy H3 of the draft CSDP. However, the relevant policy in the Publication Plan is now 'Policy H2 – Affordable Housing'. Story Homes welcomes the revisions to Policy H2 which now set out that affordable housing can be “...grouped in small clusters” throughout mixed housing schemes and that this is reflected in the draft SPD. Reference was previously made to ‘pepper potting’. Story Homes objects to the 15% affordable housing requirement that is set out in ‘Policy H2 – Affordable Housing’. A lower affordability target should be adopted to ensure that the associated requirements do not negatively impact on future housing delivery across the city. Story Homes also considers that “at least 15%” is open ended and not precise. Any higher levels would not have been viability tested by the Council as part of the Plan preparation process which is contrary to the NPPF (paragraphs 173 and 174). Story Homes considers that requiring affordable housing to be “indistinguishable in terms of appearance from the market housing” is too restrictive. Affordable housing should only be required to be of a ‘similar design and building standard’ as market housing. The second from last paragraph under section 4.5 advises the dwellings should be fully integrated with the market housing and in small clusters of 3 or 4 dwellings across the site. Story Homes welcomes the references to small clusters; however,</p>	<p>Noted and SPD updated to reflect this change.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>

	<p>reference to 3 to 4 dwellings per cluster is overly prescriptive and that the cluster size should depend on the size of the development and the number of affordable homes being provided. In the experience of Story Homes, Registered Provides like affordable homes to be located close to each other for efficiencies in property management and can be deterred if the units are spread around the site too much. Story Homes suggests that the reference to 3 or 4 dwellings is removed from the SPD. Story Homes has made similar comments to paragraph 6.21 of the draft CSDP.</p> <p>Story Homes supports the recognition on page 10 that if there are viability issues, as demonstrated through a viability assessment, that consideration will be given in the first instance to reviewing the tenure split on a sliding scale in the first instance and then reducing the percentage of affordable housing to a percentage that is viable.</p>	
Story Homes Ltd	<p>Story Homes is supportive of the need to pay education contributions towards school place provision. However, they have a few minor comments on the text within this chapter of the draft SDP.</p> <p>Section 5.4 sets out how the contribution will be calculated and what factors will be considered. One of the criteria is that the cumulative impact of planning applications with either full or outline permission which may impact on the availability of places at schools within the vicinity of the development should be taken into account. Story Homes recognises the need to take into account other committed development. However, it is suggested that a mechanism be included in the S106 Agreement which recognises that in the event a committed development does not come forward, that any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places for that school.</p> <p>Section 5.4 sets out the average number of school places per dwelling size. Story Homes suggests that text is included to specify whether there are any exemptions, such as accommodation for the elderly given it is unlikely that such households would include school age children.</p>	<p>In the event that planning permission is superseded, quashed or expires the Council considers any vacant school places which would have otherwise been filled as a result of the development are reincluded in the total availability of spaces at the school. Text added to SPD to clarify.</p> <p>Noted and SPD updated to clarify this.</p>
Story Homes Ltd	<p>The draft SPD seeks a requirement of 15 allotment plots per 1,000 households and where contributions in lieu are proposed then contributions of £85.50 per dwelling is sought. However, Story Homes considers that this requirement is onerous and unsound in terms of the CIL Regulations. The associated evidence base (Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8)) and clearly sets out that Sunderland has 50% more</p>	<p>Noted. Text added to Chapter 6 to clarify when a contribution will be sought.</p>

	<p>allotments than the national average recommendation. It is therefore not considered that this requirement can be justified for all future developments. Story Homes considers that the need and demand for allotments is assessed on a ward-by-ward basis across the City and it is determined on a case-by-case basis whether or not a contribution is required towards future allotment provision. A contribution should only be sought where there is an identified need and/or deficit; otherwise such a request would fail to comply with the tests set out in the CIL Regulations.</p>	
Story Homes Ltd	<p>This section states that a contribution for £704 for equipped play areas will be sought for dwellings of 2 bedrooms or more. However, any requirement for a contribution needs to accord with the CIL Regulations and be justified, necessary and based on an adequate, up-to-date and robust assessment of need which considers the quality, quantity and accessibility of existing provision. A contribution should only be requested if there is an identified need. Story Homes suggests that this section is amended to make this clear, to ensure compliance with national legislation.</p>	<p>Noted. Text added to Chapter 7 to clarify when a contribution will be sought.</p>
Story Homes Ltd	<p>Chapter 12 of the draft SPD advises that there is an extensive range of site-specific matters for which planning obligations will be sought including infrastructure and services, some of which are listed. Story Homes requests that clarify is provided regarding the other site-specific planning obligations to ensure that any requests comply with the CIL Regulations and to ensure a transparent approach.</p> <p>The NPPF is clear that SPDs <i>“should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”</i> (2012 NPPF, para. 153). Story Homes considers that text should be included in Chapter 12 which clarifies that the viability of a development will be taken into account when considering any other site-specific planning obligations. Furthermore, the Planning Practice Guidance states that <i>“planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms”</i> (Planning Practice Guidance, ID ref: 23b-004).</p> <p>Finally, it is also important that the SPD is continually reviewed in collaboration with the development industry following Local Plan adoption to ensure that it remains in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.</p>	<p>Paragraph 1 of Section 12 states site-specific obligations would only be sought ‘where provision is required to make the development acceptable in planning terms.’ No change required.</p> <p>Section 13 and Appendix 2 set out detailed information and guidance in relation to site viability when seeking developer contributions. No change required.</p>

	<p>Story Homes suggest that text is included within the SPD that clarifies the above, to ensure a clear and transparent approach.</p>	
<p>Story Homes Ltd</p>	<p>Section 14.5 The second paragraph in Section 14.5 advises that contributions for the non-residential component of any development will usually be required in full on commencement of development. Story Homes is concerned about this requirement because it will not always be the case that it is necessary for a contribution to be paid before development starts, whilst the viability of a development should also be taken into account when considering the timescales for making payments. Story Homes respectfully requests that the text is amended to state that the timing or phasing of any payments will be discussed on a case-by-case basis, whilst taking in account viability.</p> <p>Section 14.7 This section states that if a contribution is paid late, the owner shall pay the contribution together with interest from the date the payment was due at the rate of 4% per annum above the base rate of the Bank of England. A rate of 4% is excessively high and no justification has been provided as to how this figure has been derived. As such, Story Homes objects to this rate of interest.</p> <p>Appendix 1 and 3 Appendix 3 relates to monitoring fees, whilst Appendix 1 advises that a monitoring fee of £500 will be charged on granting planning permission for each discounted market value dwelling. Appendix 3 and the reference to monitoring fees in Appendix 1 should be removed from the SDP. Such clauses within planning obligations are not justified since they are not necessary to make development acceptable in planning terms, as required by NPPF (para. 204). Furthermore, this matter was considered in the high court (<i>Oxfordshire County Council v Secretary of State for Communities and Local Government & Others [2015] EWHC 186 (Admin)</i>). Relevant extracts from the judgment states: <i>“It seems to me that the Circular and the Guidance envisaged that the cost of essential administration, monitoring and enforcement would be met out of the authority’s own budget, not by charging the developer. An authority is able to incur expenditure incidental to its functions under section 106 by virtue of section 111 of the Local Government Act 1972.” (paragraph 41)</i> “There is nothing in the wording of the TCPA 1990, the Planning Act 2008, the CIL Regulations, the NPPF or the Guidance which suggests that authorities</p>	<p>Accepted and document amended to be consistent with the CSDP.</p> <p>Accepted and document updated.</p> <p>The amended CIL Regulations 2019 permit LPAs to seek monitoring fees, and as such monitoring fees will be sought on this basis.</p>

	<p>could or should claim administration and monitoring fees as part of planning obligations.” (paragraph 45)</p> <p>As such, Story Homes considers there is no justification for the Council to require developers to pay monitoring fee costs and that the monitoring requirements should therefore be removed from the SPD and not be included as a requirement in the new Local Plan.</p>	
Taylor Wimpey	<p>Taylor Wimpey wishes to thank Sunderland City Council for the opportunity to comment on the draft Planning Obligations Supplementary Planning Document (SPD).</p> <p>Page 8 provides the number of bed spaces for different sizes of dwellings, which reiterates those provided in the draft Core Strategy Development Plan 2015 – 2033 (CSDP), and are follows:</p> <p>One bedroom dwelling = 2 bedspaces Two bedroom dwelling = 3 bedspaces Three bedroom dwelling = 5 bedspaces Above three bedrooms = 1 additional bedspace per bedroom.</p> <p>This methodology is not reflective of actual populations per site and occupancy rates. It is unrealistic to assume that 5 people occupy every 3 bedroom property. In calculating open space requirements in County Durham, the Council assumes an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms).</p> <p>Taylor Wimpey respectfully requests that both the Planning Obligations SPD and the CSDP are amended to assume an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). For consistency, this is to ensure that any contributions / obligations required that relate to the number of bedrooms are fair and reasonably related in scale and kind to the development, to comply with Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations).</p>	<p>This has been updated in line with the CSDP whereby a 3 bedroom dwelling equates to 4 bedspaces.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
Taylor Wimpey	<p>The third paragraph refers to Policy H3 of the draft CSDP. However, the relevant policy in the Publication Plan is now ‘Policy H2 – Affordable Housing’.</p> <p>Taylor Wimpey welcomes the revisions to Policy H2 which now set out that affordable housing can be “...grouped in small clusters” throughout mixed housing schemes and that this is reflected in the draft SPD. Reference was previously made to ‘pepper potting’.</p> <p>Taylor Wimpey objects to the 15% affordable housing requirement that is set out in ‘Policy H2 – Affordable Housing’. A lower affordability target should be</p>	<p>Noted and SPD updated to reflect this change.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>

	<p>adopted to ensure that the associated requirements do not negatively impact on future housing delivery across the city. Taylor Wimpey also considers that “at least 15%” is open ended and not precise. Any higher levels would not have been viability tested by the Council as part of the Plan preparation process which is contrary to the NPPF (paragraphs 173 and 174). Taylor Wimpey considers that requiring affordable housing to be “<i>indistinguishable in terms of appearance from the market housing</i>” is too restrictive. Affordable housing should only be required to be of a ‘similar design and building standard’ as market housing.</p> <p>Taylor Wimpey supports the recognition on page 10 that if there are viability issues, as demonstrated through a viability assessment, that consideration will be given in the first instance to reviewing the tenure split on a sliding scale in the first instance and then reducing the percentage of affordable housing to a percentage that is viable.</p> <p>The second from last paragraph under section 4.5 advises the dwellings should be fully integrated with the market housing and in small clusters of 3 or 4 dwellings across the site. Taylor Wimpey welcomes the references to small clusters; however, reference to 3 to 4 dwellings per cluster is overly prescriptive and that the cluster size should depend on the size of the development and the number of affordable homes being provided. In the experience of Taylor Wimpey, Registered Provides like affordable homes to be located close to each other for efficiencies in property management and can be deterred if the units are spread around the site too much. Taylor Wimpey suggests that the reference to 3 or 4 dwellings is removed from the SPD. Taylor Wimpey has made similar comments to paragraph 6.21 of the draft CSDP.</p>	<p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
<p>Taylor Wimpey</p>	<p>Taylor Wimpey is supportive of the need to pay education contributions towards school place provision. However, they have a few minor comments on the text within this chapter of the draft SDP.</p> <p>Section 5.4 sets out how the contribution will be calculated and what factors will be considered. One of the criteria is that the cumulative impact of planning applications with either full or outline permission which may impact on the availability of places at schools within the vicinity of the development should be taken into account. Story Homes recognises the need to take into account other committed development. However, it is suggested that a mechanism be included in the S106 Agreement which recognises that in the</p>	<p>In the event that planning permission is superseded, quashed or expires the Council considers any vacant school places which would have otherwise been filled as a result of the development are reincluded in the total availability of spaces at the school. Text added to SPD to clarify.</p>

	<p>event a committed development does not come forward, that any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places for that school.</p> <p>Section 5.4 sets out the average number of school places per dwelling size. Story Homes suggests that text is included to specify whether there are any exemptions, such as accommodation for the elderly given it is unlikely that such households would include school age children.</p>	
Taylor Wimpey	<p>The draft SPD seeks a requirement of 15 allotment plots per 1,000 households and where contributions in lieu are proposed then contributions of £85.50 per dwelling is sought. However, Taylor Wimpey considers that this requirement is onerous and unsound in terms of the CIL Regulations. The associated evidence base (Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8)) and clearly sets out that Sunderland has 50% more allotments than the national average recommendation. It is therefore not considered that this requirement can be justified for all future developments. Taylor Wimpey considers that the need and demand for allotments is assessed on a ward-by-ward basis across the City and it is determined on a case-by-case basis whether or not a contribution is required towards future allotment provision. A contribution should only be sought where there is an identified need and / or deficit; otherwise such a request would fail to comply with the tests set out in the CIL Regulations.</p>	<p>Noted. Text added to Chapter 6 to clarify when a contribution will be sought.</p>
Taylor Wimpey	<p>This section states that a contribution for £704 for equipped play areas will be sought for dwellings of 2 bedrooms or more. However, any requirement for a contribution needs to accord with the CIL Regulations and be justified, necessary and based on an adequate, up-to-date and robust assessment of need which considers the quality, quantity and accessibility of existing provision. A contribution should only be requested if there is an identified need. Taylor Wimpey suggests that this section is amended to make this clear, to ensure compliance with national legislation.</p>	<p>Noted. Text added to Chapter 7 to clarify when a contribution will be sought.</p>
Taylor Wimpey	<p>Chapter 12 of the draft SPD advises that there is an extensive range of site-specific matters for which planning obligations will be sought including infrastructure and services, some of which are listed. Taylor Wimpey requests that clarify is provided regarding the other site-specific planning obligations to ensure that any requests comply with the CIL Regulations and to ensure a transparent approach.</p>	<p>Paragraph 1 of Section 12 states site-specific obligations would only be sought 'where provision is required to make the development acceptable in planning terms.' No change required.</p>

	<p>The NPPF is clear that SPDs “<i>should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development</i>” (2012 NPPF, para. 153). Taylor Wimpey considers that text should be included in Chapter 12 which clarifies that the viability of a development will be taken into account when considering any other site-specific planning obligations. Furthermore, the Planning Practice Guidance states that “<i>planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms</i>” (Planning Practice Guidance, ID ref: 23b-004).</p> <p>Finally, it is also important that the SPD is continually reviewed in collaboration with the development industry following Local Plan adoption to ensure that it remains in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.</p> <p>Taylor Wimpey suggest that text is included within the SPD that clarifies the above, to ensure a clear and transparent approach.</p>	<p>Section 13 and Appendix 2 set out detailed information and guidance in relation to site viability when seeking developer contributions. No change required.</p> <p>Accepted and text added to Chapter 1.</p>
<p>Taylor Wimpey</p>	<p>Section 14.5</p> <p>The second paragraph in Section 14.5 advises that contributions for the non-residential component of any development will usually be required in full on commencement of development. Taylor Wimpey is concerned about this requirement because it will not always be the case that it is necessary for a contribution to be paid before development starts, whilst the viability of a development should also be taken into account when considering the timescales for making payments. Taylor Wimpey respectfully requests that the text is amended to state that the timing or phasing of any payments will be discussed on a case-by-case basis, whilst taking in account viability.</p> <p>Section 14.7</p> <p>This section states that if a contribution is paid late, the owner shall pay the contribution together with interest from the date the payment was due at the rate of 4% per annum above the base rate of the Bank of England. A rate of 4% is excessively high and no justification has been provided as to how this figure has been derived. As such, Taylor Wimpey objects to this rate of interest.</p> <p>Appendix 1 and 3</p>	<p>Accepted and document amended to be consistent with the CSDP.</p> <p>Accepted and document updated.</p> <p>The amended CIL Regulations 2019 permit LPAs to seek monitoring fees, and as such monitoring fees will be sought on this basis.</p>

	<p>Appendix 3 relates to monitoring fees, whilst Appendix 1 advises that a monitoring fee of £500 will be charged on granting planning permission for each discounted market value dwelling.</p> <p>Appendix 3 and the reference to monitoring fees in Appendix 1 should be removed from the SDP. Such clauses within planning obligations are not justified since they are not necessary to make development acceptable in planning terms, as required by NPPF (para. 204). Furthermore, this matter was considered in the high court (Oxfordshire County Council v Secretary of State for Communities and Local Government & Others [2015] EWHC 186 (Admin)). Relevant extracts from the judgment states:</p> <p>“It seems to me that the Circular and the Guidance envisaged that the cost of essential administration, monitoring and enforcement would be met out of the authority’s own budget, not by charging the developer. An authority is able to incur expenditure incidental to its functions under section 106 by virtue of section 111 of the Local Government Act 1972.” (paragraph 41)</p> <p>“There is nothing in the wording of the TCPA 1990, the Planning Act 2008, the CIL Regulations, the NPPF or the Guidance which suggests that authorities could or should claim administration and monitoring fees as part of planning obligations.” (paragraph 45)</p> <p>As such, Taylor Wimpey considers there is no justification for the Council to require developers to pay monitoring fee costs and that the monitoring requirements should therefore be removed from the SPD and not be included as a requirement in the new Local Plan.</p>	
<p>Burdon Lane Consortium (Taylor Wimpey, Persimmon Homes and Story Homes)</p>	<p>Chapter 3 – Summary of Requirements</p> <p>The Burdon Lane Consortium (consisting of Taylor Wimpey, Persimmon Homes and Story Homes) wishes to thank Sunderland City Council for the opportunity to comment on the draft Planning Obligations Supplementary Planning Document (SPD).</p> <p>The Consortium welcomes the recognition on page 5 that planning applications for sites within the South Sunderland Growth Area will be considered separately to the standards within this document. However, they would still like to make comments on this document.</p> <p>Page 8 provides the number of bed spaces for different sizes of dwellings, which reiterates those provided in the draft Core Strategy Development Plan 2015 – 2033 (CSDP), and are follows:</p> <p>One bedroom dwelling = 2 bedspaces</p>	<p>This has been updated in line with the CSDP whereby a 3 bedroom dwelling equates to 4 bedspaces.</p>

Two bedroom dwelling = 3 bedspaces
Three bedroom dwelling = 5 bedspaces
Above three bedrooms = 1 additional bedspace per bedroom.
This methodology is not reflective of actual populations per site and occupancy rates. For instance, it is unrealistic to assume that 5 people occupy every 3 bedroom property. In calculating open space requirements in County Durham, the Council assumes an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms).
The Consortium respectfully requests that both the Planning Obligations SPD and the CSDP are amended to assume an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). For consistency, this is to ensure that any contributions / obligations required that relate to the number of bedrooms are fair and reasonably related in scale and kind to the development, to comply with Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations).
Chapter 4 – Affordable Housing
The third paragraph refers to Policy H3 of the draft CSDP. However, the relevant policy in the Publication Plan is now ‘Policy H2 – Affordable Housing’.
The third bullet point in section 4.1 and second from last paragraph under section 4.5 advise that when part of a mixed housing scheme affordable housing should be grouped in small clusters throughout the site. The Consortium considers that references to “**small clusters**” and “**small clusters of 3 or 4 dwellings**” is overly prescriptive and that the approach to the location should depend on the size of the development and the number of affordable homes being provided. In the experience of the house builders which make up the Consortium, Registered Providers like affordable homes to be located close to each other for efficiencies in property management and can be deterred from taking on provisions if the units are not appropriately located.
The Consortium considers that requiring affordable housing to be “**indistinguishable in terms of appearance from the market housing**” is too restrictive, as sought in the fourth bullet point in Section 4.1. Affordable housing should only be required to be of a ‘similar design and building standard’ as market housing.
The Consortium supports the recognition on page 10 that if there are viability issues, as demonstrated through a viability assessment, that consideration will

No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.

Noted and SPD updated to reflect this change.

No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.

No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.

be given in the first instance to reviewing the tenure split on a sliding scale in the first instance and then reducing the percentage of affordable housing to a percentage that is viable.

Chapter 5 – Education

The Consortium is supportive of the need to pay education contributions towards school place provision. However, they have a few minor comments on the text within this chapter of the draft SDP.

Section 5.4 sets out how the contribution will be calculated and what factors will be considered. One of the criteria is that the cumulative impact of planning applications with either full or outline permission which may impact on the availability of places at schools within the vicinity of the development should be taken into account. The Consortium recognises the need to take into account other committed development. However, it is suggested that a mechanism be included in the S106 Agreement which recognises that in the event a committed development does not come forward, that any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places for that school.

Section 5.4 sets out the average number of school places per dwelling size. The Consortium suggests that text is included to specify whether there are any exemptions, such as accommodation for the elderly given it is unlikely that such households would include school age children.

Chapter 6 – Open Space (Amenity greenspace and allotments)

The draft SPD seeks a requirement of 15 allotment plots per 1,000 households and where contributions in lieu are proposed then contributions of £85.50 per dwelling is sought. However, the Consortium considers that this requirement is onerous and unsound in terms of the CIL Regulations. The associated evidence base (Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8)) and clearly sets out that Sunderland has 50% more allotments than the national average recommendation. It is therefore not considered that this requirement can be justified for all future developments. The Consortium considers that the need and demand for allotments is assessed on a ward-by-ward basis across the City and it is determined on a case-by-case basis whether or not a contribution is required towards future allotment provision. A contribution should only be sought where there is an identified need and / or deficit; otherwise such a request would fail to comply with the tests set out in the CIL Regulations.

In the event that planning permission is superseded, quashed or expires the Council considers any vacant school places which would have otherwise been filled as a result of the development are reincluded in the total availability of spaces at the school. Text added to SPD to clarify.

Noted and SPD updated to clarify this.

Noted. Text added to Chapter 6 to clarify when a contribution will be sought.

Chapter 7 – Equipped Play Space

Section 7.3

The first paragraph advises that student accommodation will be exempt from the contributions towards equipped play space. The Consortium suggests that accommodation for the elderly should also be exempt given that they are also unlikely to generate a need for such facilities.

Section 7.4

This section states that a contribution for £704 for equipped play areas will be sought for dwellings of 2 bedrooms or more. However, any requirement for a contribution needs to accord with the CIL Regulations and be justified, necessary and based on an adequate, up-to-date and robust assessment of need which considers the quality, quantity and accessibility of existing provision. A contribution should only be requested if there is an identified need. The Consortium suggests that this section is amended to make this clear, to ensure compliance with national legislation.

Chapter 12 - Other site-specific planning obligations

Chapter 12 of the draft SPD advises that there is an extensive range of site-specific matters for which planning obligations will be sought including infrastructure and services, some of which are listed. The Consortium requests that clarity is provided regarding the other site-specific planning obligations to ensure that any requests comply with the CIL Regulations and to ensure a transparent approach.

The NPPF is clear that SPDs **“should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”** (2012 NPPF, para. 153). The Consortium considers that text should be included in Chapter 12 which clarifies that the viability of a development will be taken into account when considering any other site-specific planning obligations.

Furthermore, the Planning Practice Guidance states that **“planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms”** (Planning Practice Guidance, ID ref: 23b-004).

Finally, it is also important that the SPD is continually reviewed in collaboration with the development industry following Local Plan adoption to

Noted. Text added to clarify this point.

Noted. Text added to Chapter 7 to clarify when a contribution will be sought.

Paragraph 1 of Section 12 states site-specific obligations would only be sought ‘where provision is required to make the development acceptable in planning terms.’ No change required.

Section 13 and Appendix 2 set out detailed information and guidance in relation to site viability when seeking developer contributions. No change required.

Accepted and text added to Chapter 1

Accepted and document amended to be consistent with the CSDP.

ensure that it remains in conformity with national guidance and continue to assist with the interpretation of Local Plan policies.

The Consortium suggest that text is included within the SPD that clarifies the above, to ensure a clear and transparent approach.

Chapter 14 – Implementation

Section 14.5

The second paragraph in Section 14.5 advises that contributions for the non-residential component of any development will usually be required in full on commencement of development. The Consortium is concerned about this requirement because it will not always be the case that it is necessary for a contribution to be paid before development starts, whilst the viability of a development should also be taken into account when considering the timescales for making payments. The Consortium respectfully requests that the text is amended to state that the timing or phasing of any payments will be discussed on a case-by-case basis, whilst taking in account viability.

Section 14.7

This section states that if a contribution is paid late, the owner shall pay the contribution together with interest from the date the payment was due at the rate of 4% per annum above the base rate of the Bank of England. A rate of 4% is excessively high and no justification has been provided as to how this figure has been derived. As such, the Consortium objects to this rate of interest.

Appendix 1 and 3

Appendix 3 relates to monitoring fees, whilst Appendix 1 advises that a monitoring fee of £500 will be charged on granting planning permission for each discounted market value dwelling.

Appendix 3 and the reference to monitoring fees in Appendix 1 should be removed from the SDP. Such clauses within planning obligations are not justified since they are not necessary to make development acceptable in planning terms, as required by NPPF (para. 204). Furthermore, this matter was considered in the high court (**Oxfordshire County Council v Secretary of State for Communities and Local Government & Others [2015] EWHC 186 (Admin)**). Relevant extracts from the judgment states:

“It seems to me that the Circular and the Guidance envisaged that the cost of essential administration, monitoring and enforcement would be met out of the authority’s own budget, not by charging the developer. An authority

Accepted and document updated.

The amended CIL Regulations 2019 permit LPAs to seek monitoring fees, and as such monitoring fees will be sought on this basis.

	<p>is able to incur expenditure incidental to its functions under section 106 by virtue of section 111 of the Local Government Act 1972.” (paragraph 41) “There is nothing in the wording of the TCPA 1990, the Planning Act 2008, the CIL Regulations, the NPPF or the Guidance which suggests that authorities could or should claim administration and monitoring fees as part of planning obligations.” (paragraph 45) As such, the Consortium considers there is no justification for the Council to require developers to pay monitoring fee costs and that the monitoring requirements should therefore be removed from the SPD and not be included as a requirement in the new Local Plan.</p>	
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Stage 3 Final Draft SPD

Consultee	Summary of Representations	Council’s Response
Burdon Lane Consortium	<p>The consultee, regarding Chapter 1 (Introduction), sets out that they would like to see a summary / timeline of the next steps and anticipated date for adoption.</p> <p>With regards to Chapter 2 (Planning Obligations and the Purpose of This Document), the consultee sets out they support the recognition on page four regarding that planning applications for sites within the SSGA will be considered separately to the standards within this document.</p> <p>With regards to Chapter 3 (Summary of Requirements) the consultee requests that the list of infrastructure types (in figure 2) is amended to ensure they are consistent with the structure of the document. The consultee supports the inclusion of text related to viability within Chapter 3.</p> <p>With regards to Chapter 4 (Affordable Housing), the consultee considers that requirement (at section 4.1) affordable housing to be ‘indistinguishable in terms of appearance from the market housing’ is too restrictive.</p> <p>In addition, the consultee claims that the SPD with regard to tenure split does not set out how it aligns to national policy set out in NPPF paragraph 64 (which states that planning policies and decisions should “expect at least 10 percent of homes to be available for affordable home ownership” It is the view of the consultee that the SPD should align to this requirement. Consequently, the consultee considers that 10 percent affordable housing requirement in accordance with national policy would mean that 100 percent of the affordable housing is delivered through affordable home ownership routes.</p>	<p>The use of a timetable in the final version of the adopted version of the SPD would not add value as it wouldn’t be relevant once adopted.</p> <p>Comment noted.</p> <p>Comment noted. However, the comment made is non-substantial and does impact on matters of substance of the document. No change required.</p> <p>The requirement is set out within the adopted development plan, Core Strategy and Development Plan Policy H2: Affordable Homes (Criterion 2). It has therefore been tested through the Local Plan process and is consequently considered justified.</p>

The consultee supports the recognition that viability issues, as demonstrated through a viability assessment can reviewing the tenure split, through a sliding scale.

The consultee also supports the recognition that on sites of 50 dwellings, the Council may review the viability of the scheme in respect of phasing to take account of changing market conditions.

With regards to Chapter 5 (Education), the consultee is supportive of the need to pay education contributions towards school place provision.

The consultee suggest that a mechanism is included in a S106 agreement which recognises that in the event of a committed development which does not come forward then any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places.

The consultee requests assurances regarding its contribution to the delivery of education facilities on Land North of Burdon Lane, with the claim that as the consultee will be providing land for the delivery of such facilities, then adjustment to any financial contributions to take account of the land being provided.

The consultee also suggests that criteria is set out which specifies whether there are any exemptions such as accommodation for the elderly given it unlikely that such households would include school age children.

In addition, the consultee sets out that if CIL is adopted, this should not seek to 'double count' contributions in addition to those already sought through S106 requirements.

With regards to Chapter 6, Open Space (page 17), the consultee seek clarity regarding how Policy NE4 will be applied, in the context that the SPD implies that financial contributions will be requested in instances where a development is able to provide open space on site.

The consultee considers that SUDs can add welcomed interest and variety within open space and hence should be appropriate to be included within the area calculations regarding open space provision.

In addition, the consultee requests clarification that where there is a requirement to provide SSAANGS both open space and equipped play can be included within SSAANGs and do not need to be provided in addition.

The consultee view the contributions for allotments as onerous and reference the Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8) which indicate that Sunderland has 50 percent more allotments than the national average.

The purpose of the SPD, in relation to affordable housing, is to set how contributions will be calculated. As acknowledged by the SPD, affordable housing policy is set out within the recently adopted Core Strategy and Development Plan.

Comment noted.

Comment noted.

Comment noted.

This is not considered appropriate; the purpose of the Planning Obligations SPD is to provide general planning guidance on planning obligations and not to provide assurances for individual schemes that are beyond the scope of planning guidance. The CSDP policy sets out planning policies in this regard. Each application will be treated on its merits.

The SPD has been amended to make clear that if the Council does bring forward a CIL, it will be ensured that there is no double counting vis-a-vis infrastructure contributions. Clarity is set out within Policy NE4 on how this will be applied.

This is a policy matter and not a matter for the Planning Obligations SPD. The Core Strategy at Policy NE4 sets out that heavily engineered SUDs are not suitable as Open Space. The Council consider that sufficient clarity is set out within the Core Strategy.

The Council does not consider the requirement as onerous. As noted within Section 6, allotments will only be sought where a shortage in allotment provision is identified or as required as part of a site allocation.

With regards to Chapter 8 (Ecology), the consultees set out that the SPD, should include signposting to the Biodiversity SPD where relevant.

With regards, to Chapter 10 (Highways), the consultee welcome recognition in the SPD that where development coming forward provides land essential to deliver highways infrastructure then this will be considered in lieu of some financial contributions which may be required from the development for other highway improvements.

With regards to Chapter 12 (Other Site-Specific Planning Obligations), the consultee sets out that the SPD provides no details regarding the scale of payments which could be provided or the formula by which they would be calculated. The consultee requests that clarity is provided regarding the other site-specific planning obligations to ensure that any requests comply with CIL regulations.

The consultee considers that that text should be included which clarifies that viability will be taken into account when considering any other site-specific planning obligations.

The consultee also suggest that the SPD should make clear that contributions will only be sought where there is evidence of harm as a result of the development and even then, only when it can be shown that this would not impact the overall scheme viability.

In addition, the consultee sets out that the SPD should be continually reviewed in collaboration with the development industry following Local Plan adoptions.

With regards to Chapter 14 'Implementation', the consultee supports the approach that where necessary the timing of provision of infrastructure will be linked directly to the phasing of development, taking into account viability. In addition, the consultee requests that at page 36, the consortium requests that a paragraph is included to detail how money should be spent within a specific timeframe (5 years is suggested) and also procedures for returning payments should S106 money not be spent.

The Biodiversity SPD will come forward after the adoption of the Planning Obligations SPD. Its content has not yet been confirmed. Consequently, it is not possible to comprehensively signpost to the Biodiversity SPD.

Comment noted.

Given the nature of other site-specific obligations it is not possible to set out a standard calculation for these as each application will be addressed on its individual merits.

Chapter 13 and Appendix 2 set out in detail the Council's approach to viability.

As set out in Chapter 2 any requests for planning obligations will be in accordance with Regulation 122 of the CIL Regulations. In addition, each application will be addressed on its individual merits.

It is considered that the Planning Obligations SPD, like all Local Development Documents would be updated on a regular basis. However, it is not considered necessary for this to be specifically set out.

Comment noted.

Each application and S106 negotiations will be decided on a case-by-case basis to ensure the required mitigation measures are delivered when required. As contributions may be pooled from a number of schemes it is not possible to set out in the SPD a standard approach. In addition, mitigation for HRA is usually

		<p>required in perpetuity and as such a longer spend timescale is required.</p>
<p>Taylor Wimpey</p>	<p>The consultee, regarding Chapter 1 – (Introduction) sets out that they would like to see a summary / timeline of the next steps and anticipated date for adoption.</p> <p>With regards to Chapter 2 (Planning Obligations and the Purpose of This Document), the consultee sets out they support the recognition on page four regarding that planning applications for sites within the SSGA will be considered separately to the standards within this document.</p> <p>With regards to Chapter 3 (Summary of Requirements) the consultee requests that the list of infrastructure types (in figure 2) is amended to ensure they are consistent with the structure of the document. The consultee supports the inclusion of text related to viability within Chapter 3.</p> <p>With regards to Chapter 4 (Affordable Housing), the consultee considers that requirement (at section 4.1) affordable housing to be ‘indistinguishable in terms of appearance from the market housing’ is too restrictive.</p> <p>In addition, the consultee claim the SPD with regard to tenure split, does not set out how it aligns to national policy set out in NPPF paragraph 64 (which states that planning policies and decisions should “expect at least 10 percent of homes to be available for affordable home ownership” It is the view of the consultee that the SPD should align to this requirement. Consequently, the consultee considers that 10 percent affordable housing requirement in accordance with national policy would mean that 100 percent of the affordable housing is delivered through affordable home ownership routes.</p> <p>The consultee also supports the recognition on page 9 that if there are viability issues, as demonstrated through a viability assessment that consideration should be given in the first instance to reviewing the tenure split on a sliding scale and then reducing the percentage of affordable housing to a percentage that is viable.</p>	<p>The use of a timetable in the final version of the adopted version of the SPD would not add value as it wouldn’t be relevant once adopted.</p> <p>Support noted.</p> <p>Comment noted. However, the comment made is non-substantial and does impact on matters of substance of the document. No change required.</p> <p>The requirement is set out within the adopted development plan, Core Strategy and Development Plan Policy H2: Affordable Homes (Criterion 2). It has therefore been tested through the Local Plan process and is consequently considered justified.</p> <p>The purpose of the SPD, in relation to affordable housing is to set how contributions will be calculated. As acknowledged by the SPD, affordable housing policy is set out within the recently adopted Core Strategy and Development Plan.</p> <p>Comment noted.</p>

The consultee also supports the recognition that on sites of 50 dwellings, the Council may review the viability of the scheme in respect of phasing to take account of changing market conditions.

With regards to Chapter 5 (Education), the consultee is supportive of the need to pay education contributions towards school place provision.

The consultee suggest that a mechanism is included in a S106 agreement which recognises that in the event of a committed development which does not come forward then any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places.

The consultee also suggests that criteria is set out which specifies whether there are any exemptions such as accommodation for the elderly given it unlikely that such households would include school age children.

In addition, the consultee sets out that if CIL is adopted, this should not seek to 'double count' contributions in addition to those already sought through S106 requirements.

With regards to Chapter 6, Open Space, (page17) the consultee seeks clarity regarding how Policy NE4 will be applied, in the context that the SPD implies that financial contributions will be requested in instances where a development is able to provide open space on site.

The consultee considers that SUDs can add welcomed interest and variety within open space and hence should be appropriate to be included within the area calculations for open space provision.

In addition, consultee view the contributions for allotments as onerous and reference the Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8) which the consultee state That Sunderland has 50 percent more allotments than the national average.

With regards to Chapter 7 (Equipped Play Space), the consultee suggests that no information has been provided regarding the design specification for on-site provision.

With regards Chapter 8 (Ecology), the consultees set out that the SPD, includes signposting to the Biodiversity SPD where relevant.

With regards to Chapter 9, the consultee requests that more detail and justification is provided for the method of calculating the sport and recreational space generated by a development.

Comment noted

Comment noted.

Comment noted

The CSDP policy sets out planning policies in this regard. Each application will be treated on its merits.

The SPD has been amended to make clear that if the Council does bring forward a CIL, it will be ensured that there is no double counting vis-a-vis infrastructure contributions. Clarity is set out within Policy NE4 on how this will be applied.

This is a policy matter and not a matter for the Planning Obligations SPD. The Core Strategy at Policy NE4 sets out that heavily engineered SUDs are not suitable as Open Space. The Council does not consider the requirement as onerous. As noted within Section 6, allotments will only be sought where a shortage in allotment provision is identified or as required as part of a site allocation.

As set out in Chapter 7 this will be agreed through the planning process on a case-by-case basis to ensure compliance with the most up to date safety and design requirements.

The Biodiversity SPD will come forward after the adoption of the Planning Obligations SPD. Its content has not yet been confirmed. Consequently, it is not possible to comprehensively signpost to the Biodiversity SPD.

Given the nature of other site-specific obligations which by their very nature are determined on the specifics of the site and it's context its not possible to provide a specific scale or formula.

	<p>With regards to Chapter 12 (Other Site-Specific Planning Obligations), the consultee sets out that the SPD provided no indications is provided regarding the scale of payments which could be provided or the formula by which they would be calculated. The consultee requests that clarity is provided regarding the other site-specific planning obligations to ensure that any requests comply with CIL regulations.</p> <p>The consultee also considers that that text should be included which clarifies that the viability of a development will be taken into account when considering any other site-specific planning obligations.</p> <p>The consultee also suggest that the SPD should make clear that contributions will only be sought where there is evidence of harm as a result of the development and even then, only when it can be shown that this would not impact the overall scheme viability. In addition, the consultee sets out that the SPD should be continually reviewed in collaboration with the development industry following Local Plan adoptions.</p> <p>With regards to Chapter 14 'Implementation', the consultee supports the approach that where necessary the timing of provision of infrastructure will be linked directly to the phasing of development, taking into account viability. In addition, the consultee requests that at page 36, a paragraph is included to detail how money should be spent within a specific timeframe (5 years is suggested) and also procedures for returning payments should S106 money not be spent.</p>	<p>Given the nature of other site-specific obligations it is not possible to set out a standard calculation for these as each application will be addressed on its individual merits.</p> <p>Chapter 13 and Appendix 2 set out in detail the Council's approach to viability.</p> <p>As set out in Chapter 2 any requests for planning obligations will be in accordance with Regulation 122 of the CIL Regulations. In addition, each application will be addressed on its individual merits. It is considered that the Planning Obligations SPD, like all Local Development Documents would be updated on a regular basis. However, it is not considered necessary for this to be specifically set out.</p> <p>Comment noted.</p> <p>Each application and S106 negotiations will be decided on a case-by-case basis to ensure the required mitigation measures are delivered when required. As contributions may be pooled from a number of schemes it is not possible to set out in the SPD a standard approach. In addition, mitigation for HRA is usually required in perpetuity and as such a longer spend timescale is required.</p>
<p>Highways England</p>	<p>With regards to Chapter 10 (Highways), the consultee supports the principle of using Transport Assessments to identify the potential adverse transport impacts of development and how it is proposed to mitigate these impacts. The consultee welcomes the clarification that this may include funding to support improvements in the strategic road network and the principle of dialogue and consultation with Highways England.</p> <p>Highways England request that developers consult with them at the earliest opportunity to establish a methodology for assessments on the strategic road network particularly with significant impact is anticipated. Highways England set out the need if the assessments identify that mitigation is required, this should be</p>	<p>Comment noted.</p> <p>Comment noted. It is not considered necessary to make any amendments to the SPD to address this.</p>

	<p>agreed with Highways England and a Stage 1 Road Safety Audit and should be undertaken <u>prior</u> to submission of the planning application. Consequently, consultation at the pre-application stage is essential.</p> <p>In relation to cumulative impact of developments in the area, the Transport Assessment should consider all committed development in the area when considering the impact on the strategic road network and the Council should consider including other allocated sites where appropriate so as to avoid incremental assessments by individual sites and the failure to identify where and when mitigation is required.</p> <p>With regards to Section 13 (Approach to Securing Planning Obligations), the consultee would request that applicants also engage in pre-application discussions with Highways England at the earliest opportunity to understand the need for potential mitigation measures on the strategic road network.</p>	<p>Comment noted. This is addressed through policies within the Core Strategy and Development Plan.</p> <p>Comment noted. It is not considered necessary to make any amendments to the SPD to address this.</p>
<p>The Coal Authority</p>	<p>The consultee provides the LPA with GIS data in respect to Development Risk and Surface Coal Resource Plans and the LPA should use this information to assess any sites being proposed to allocate.</p>	<p>Comment noted.</p>

Appendix 1 – Letters

Stage 1 Scoping



Commercial Development
Planning and Regeneration
Civic Centre
Burdon Road
Sunderland
Tel (0191) 520 5555
Web www.sunderland.gov.uk

Date: 28 July 2017

Our ref:

Your ref:

Dear Resident

HAVE YOUR SAY ON SUNDERLAND'S CORE STRATEGY AND DEVELOPMENT PLAN

I am writing to inform you that from 7 August to 2 October 2017, Sunderland City Council will be consulting on the first draft of the Sunderland Core Strategy and Development Plan. This Plan sets out our long-term strategy on development across the city to 2033. It will ensure that the right type of development is focused in the right places to meet the needs for local people and businesses.

By law, all local councils must prepare a long-term plan which sets out how much development should take place, and where, to meet the needs of local people and businesses. The Plan is a framework which will ensure that Sunderland can:

- deliver an additional 13,800 homes
- create 10,300 number of jobs
- create sustainable communities and deliver a mix of homes of different sizes and types to meet our needs
- support a thriving economy through the development of the Urban Core, Centres and employment sites
- improve sustainable transport
- create healthy communities
- deliver infrastructure such as schools and healthcare to support our future growth

In addition, we are also consulting on the evidence base which justifies the Plan and two additional Planning Documents;

- Draft South Sunderland Growth Area (SSGA) Supplementary Planning Document (SPD), SSGA Infrastructure Delivery Study (IDS) and associated evidence bases. SSGA has the ability to accommodate approximately 3000 homes, the draft SPD will guide the future development of the area
- Planning Obligations Scoping Report which sets out how the council has considered the need for planning obligations and established an approach which is appropriate, fair and justified.

Have your say

This Plan will shape the places where we live, work, and socialize. That is why it is important that you have your say.

The consultation will run for a period of 8 weeks, from **Monday 7 August to Monday 2 October**. All representations should be completed and received by the council no later than 5pm on the final day of consultation.

The council will be hosting a number of drop-in events, where officers will be available to answer any questions that you may have. The schedule for these events are overleaf:

Delivering services for a better future



Date: 28 July 2017
Our ref:
Your ref:

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The council will be hosting a number of drop-in events, where officers will be available to answer any questions that you may have. The schedule for these events are overleaf:

Delivering services for a better future



Wednesday 9 August 2017		Monday 18 September 2017	
10 - 12pm	Springwell Village Hall, NE9 7RP	10 - 12pm	Ralph Carter Sports Centre, SR2 8PD
2 - 4pm	Ryhope Community Centre, SR2 0RX	2 - 4pm	Hetton Centre, DH5 9NE
6 - 8pm	Fulwell Methodist Church, SR6 8LN	6 - 8pm	Barnwell Academy, DH4 7RT
Thursday 10 August 2017		Tuesday 19 September 2017	
10 - 12pm	Philadelphia Cricket Club, DH4 4JE	10 - 12pm	The Secret Garden, SR3 2PD
2 - 4pm	Business & Innovation Centre, SR5 2TA	2 - 4pm	Houghton Welfare Hall, DH4 5AF
6 - 8pm	Harraton Community Centre, NE38 8BQ	6 - 8pm	San Street Youth & Community Centre, SR1 1HG
Friday 11 August 2017		Wednesday 20 September 2017	
10 - 12pm	Hetton Centre, DH5 9NE	10 - 12pm	Fulwell Methodist Church, SR6 8LN
2 - 4pm	Barnwell Academy, DH4 7RT	2 - 4pm	Business & Innovation Centre, SR5 2TA
Monday 14 August 2017		6 - 8pm	Springwell Village Hall, NE9 7RP
10 - 12pm	Holy Trinity Church, NE37 1NR	Thursday 21 September 2017	
2 - 4pm	St Chad's Church, SR3 3ND	10 - 12pm	Philadelphia Cricket Club, DH4 4JE
6 - 8pm	Houghton Welfare Hall, DH4 5AF	2 - 4pm	Ryhope Community Centre, SR2 0RX
Tuesday 15 August 2017		6 - 8pm	Washington Millennium Centre, NE37 2QD
10 - 12pm	Ralph Carter Sports Centre, SR2 8PD	Friday 22 September 2017	
2 - 4pm	Sunderland City Council Customer Service Centre, SR1 1RE	10 - 12pm	Hetton Centre, DH5 9NE
6 - 8pm	Washington Leisure Centre, NE38 7SS	2 - 4pm	David Lloyd Sunderland, SR3 3XN
Wednesday 16 August 2017		6 - 8pm	Lambton Street Youth Centre, SR4 6XA
6 - 8pm	Doxford Park Community Centre, SR3 2ND		

All supporting documentation will be available to view online at www.sunderland.gov.uk/evidence. Reference copies are also available in council libraries at Houghton, Washington Town Centre and City Library @ Museum & Winter Gardens (subject to opening hours) and in the Civic Centre.

The quickest and easiest way for you to respond is online at <http://sunderland-consult.limehouse.co.uk/portal>. You will need to register to comment. If you have already registered during a previous consultation simply enter your username and password.

If you prefer, you can download the comments form from our website www.sunderland.gov.uk/CSDP, pick up a copy from our libraries or from a drop in event and send it to us.

Please email completed comment forms to: Planningpolicy@sunderland.gov.uk or post to: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

After this consultation, the council will take into consideration all views and any additional evidence before consulting on the next version of the Plan.

If you have any queries regarding the consultation, or any other aspect of the Sunderland Local Plan, please do not hesitate to contact us on the contact details listed above.

Yours faithfully

Iain Fairlamb
Head of Planning and Regeneration

Date: 24 February 2020
Our ref: SPD
Your ref:

Dear Sir/Madam

SUPPLEMENTARY PLANNING DOCUMENTS AND CALL FOR SITES

I am writing to inform you that Sunderland City Council is consulting on four Supplementary Planning Documents (SPDs) as set out below:

- Draft South Sunderland Growth Area (SSGA) SPD
- Draft Planning Obligations SPD
- Homes in Multiple Occupation (HMO) SPD Scoping Report
- Biodiversity SPD Scoping Report

Consultation on the Draft SPDs will take place over a four week period, commencing on Monday 24 February and closing on Monday 23 March 2020.

During the consultation period, copies of the above SPDs will be made available for inspection at Sunderland Civic Centre from 8.30am to 5.00pm Monday to Friday, all Council libraries during normal office hours, as well as on the Council's website.

We would welcome any comments you may wish to make on these SPDs. Please complete a "Representation Form" and submit to the council in one of the following ways:

- The quickest and easiest way for you to respond is online at <http://sunderland-consult.limehouse.co.uk/portal>. You will need to register to make a representation. If you have already registered during a previous consultation, simply enter your username and password; or
- If you prefer, you can download the representation form from the Council's website: <https://www.sunderland.gov.uk/article/12733/Supplementary-Planning-Documents-SPDs;>
- or pick up a copy/copies from Civic Centre Reception and send it to us at:
 - Email: planningpolicy@sunderland.gov.uk; or
 - Post: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

- Representation forms can also be requested from the Strategic Plans team by telephoning (0191) 561 1577 or emailing: planningpolicy@sunderland.gov.uk.

If you wish to comment on more than one of the SPDs, please use a separate representation form for each SPD.

All comments should be received no later than 5pm on Monday 23 March 2020. The Council will not accept any representations received after that date

Please note that comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will. If you have received this letter and no longer wish to be contacted about future planning consultations, please contact us in writing at: planningpolicy@sunderland.gov.uk or Strategic Plans, Sunderland Civic Centre, Burdon Road, Sunderland, SR2 7DN and we will remove you from the consultation database.

The Council would also wish to inform you that it has commenced work on its Allocations and Designations Plan, which will identify site specific allocations and designations not covered by the adopted Core Strategy and Development Plan 2015-2033. If you have any sites which you wish to be considered for development, please submit these in writing to the Council including a red line plan identifying the site and an indication of what type of development you are promoting the site for.

If you have any queries regarding the consultation, please do not hesitate to contact us using the details above.

Yours faithfully

Catherine Auld

Assistant Director of Economic Regeneration

Appendix 2 – Events

Stage 1 Scoping Report 2017

Wednesday 9 August	10am - 12noon	Springwell Village Hall, Fell Road, Springwell, Gateshead, NE9 7RP
	2pm - 4pm	Ryhope Community Centre, 2 Black Road, Sunderland, SR2 0RX
	6pm - 8pm	Fulwell Methodist Church, Dovedale Road, Sunderland, SR6 8LN
Thursday 10 August	10am - 12noon	Philadelphia Cricket Club, Bunker Hill, Houghton-Le-Spring, DH4 4JE
	2pm - 4pm	North East Business & Innovation Centre (BIC), Wearfield, Enterprise Park East, Sunderland, SR5 2TA
	6pm - 8pm	Harraton Community Association, Bonemill Lane, Washington, NE38 8BQ
Friday 11 August	10am - 12noon	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	2pm - 4pm	Barnwell Primary School, (Monument Centre), Whitefield Estate, Penshaw, Houghton, DH4 7RT
Monday 14 August	10am - 12noon	Holy Trinity Church, High Usworth, Washington, NE37 1NR
	2pm - 4pm	St Chad's Church Hall, East Herrington, Durham Road, Sunderland, SR3 3ND
	6pm - 8pm	Houghton Welfare Hall, Brinkburn Crescent, Houghton-Le-Spring, DH4 5AF
Tuesday 15 August	10am - 12noon	Raich Carter Centre, Commercial Road, Hendon, Sunderland, SR2 8PD
	2pm - 4pm	Customer Service Contact Centre, Fawcett Street, Sunderland, SR1 1RE
	6pm - 8pm	Washington Leisure Centre, Washington, NE38 7SS
Wednesday 16 August	6pm - 8pm	Doxford Park Community Centre, Mill Hill Road, Sunderland, SR3 2 ND
Monday 18 September	10am - 12noon	Raich Carter Centre, Commercial Road, Hendon, Sunderland, SR2 8PD
	2pm - 4pm	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	6pm - 8pm	Barnwell Primary School (Monument Centre), Whitefield Estate, Penshaw, Houghton, DH4 7RT
Tuesday 19 September	10am - 12noon	The Secret Garden, Doxford Park, Silksworth Road, Sunderland, SR3 2PD
	2pm - 4pm	Houghton Welfare Hall, Brinkburn Crescent, Houghton-Le-Spring, DH4 5AF
	6pm - 8pm	San Street Youth Project, Sans Street South, Sunderland, SR1 1HG
Wednesday 20 September	10am - 12noon	Fulwell Methodist Church, Dovedale Road, Sunderland, SR6 8LN
	2pm - 4pm	North East Business & Innovation Centre (BIC), Wearfield, Enterprise Park East, Sunderland, SR5 2TA
	6pm - 8pm	Springwell Village Hall, Fell Road, Springwell, Gateshead, NE9 7RP
Thursday 21 September	10am - 12noon	Philadelphia Cricket Club, Bunker Hill, Houghton-Le-Spring, DH4 4JE
	2pm - 4pm	Ryhope Community Centre, 2 Black Road, Sunderland, SR2 0RX
	6pm - 8pm	Washington Millennium Centre, The Oval, Washington, NE37 2QD
Friday 22 September	10am - 12noon	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	2pm - 4pm	Health & Racquet Club, 3 Camberwell Way, Sunderland, SR3 3XN
	6pm - 8pm	Lambton Street Youth Centre, 25 Falkland Road, Sunderland, SR4 6XA

Stage 2 Draft SPD 2018

Date	Time	Venue Address
18 June 2018	9.30am – 11.30am	Bunnyhill Community Room, Hylton Lane, Sunderland SR5 4BW

18 June 2018	4.30pm to 7.00pm	Wessington Primary School, Lanercost, Washington NE38 7PY
19 June 2018	11.00am -1.30pm	Houghton Sports Complex Dance Studio, Station Road, Houghton le Spring DH4 5AH
20 June 2018	9.30am – 11.30am	Thorney Close Action & Enterprise Centre, Thorndale Road, Thorney Close, Sunderland SR3 4JQ
22 June 2018	4.30pm – 6.30pm	Ryhope Community Centre, Black Road, Ryhope, Sunderland SR2 0RX
16 July 2018	9.30am – 11.30am	University Sports Hall, Chester Road, Sunderland
17 July 2018	4.30pm – 7.00pm	Barnwell Primary School Sports Hall, Whitefield Estate, Houghton le Spring DH4 7RT
18 July 2018	5.00pm – 6.30pm	Bunnyhill Community Room, Hylton Lane, Sunderland SR5 4BW
19 July 2018	4.30pm – 6.30pm	Silksworth Community Centre, Tunstall Village Road, Sunderland SR3 2BB
20 July 2018	10.00am – 12 noon	Washington Millennium Centre, The Oval, Concord Washington NE37 2QD