

Draft Housing and Employment Land Availability Assessment

July 2025

**Sunderland
City Council**



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Disclaimer

The Sunderland Housing and Economic Land Availability Assessment (HELAA) report is not a policy document. While the HELAA identifies land with the potential to accommodate employment and housing, it does not determine whether a site should be allocated for housing as part of the Local Plan or be granted planning permission. Sites without planning permission in the HELAA require further testing and are subject to the requirements of a planning application or further determination through site allocation processes. The HELAA does not preclude sites from being developed for other suitable uses and does not preclude other sites which have not been submitted or assessed coming forward for employment and housing, subject to the determination of a suitable planning application.

1 Introduction

Introduction

- 1.1 In December 2024, the Council's Cabinet endorsed the Core Strategy and Development Plan review and at the same approved proposals to commence updates to the evidence base for a new Local Plan during 2025.
- 1.2 As a first step in this process, Sunderland City Council are consulting on an updated methodology for the Housing and Economic Land Availability Assessment (HELAA), whilst also commencing a call for sites.
- 1.3 This 2025 publication of the Sunderland HELAA will allow the authority to determine the availability and deliverability of suitable sites for development over the next 15-20 years to meet the city's land use requirements and inform the future Local Plan. These sites will include those with potential for housing, employment or other uses if applicable.

Purpose of the report

- 1.4 The HELAA is a key component of the evidence base that underpins strategic housing and employment policies and land allocations in the Local Plan.
- 1.5 The purpose of the HELAA is to;
 - Identify sites and broad locations with potential for development;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 1.6 The assessment will be used to support the emerging Sunderland Local Plan and subsequent examination. The evidence within it will inform decision-making and feed into the site selection strategy for the Plan.
- 1.7 The HELAA's role within the wider evidence base is to be used in conjunction with and alongside other evidence. At the planning application stage, any evidence from the HELAA should be considered alongside other factors and information gathered during pre-application discussions.
- 1.8 It should be noted that the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet local authority's requirements. It is for the development plan itself to determine which of those sites are the most suitable to meet requirements.

Structure of the report

- 1.9 This HELAA includes three sections.
 - **Section 1 Introduction**
 - **Section 2 Planning Policy context** – this section provides an overview of the national and local policy context.

- **Section 3 Methodology** – this section provides detail of the step-by-step process undertaken to identify and assess HELAA sites and the assumptions applied in the estimation of delivery of sites.

1.10 The final HELAA will include a further section which will detail the outcomes of sites and indicate whether a site is deliverable, developable or not current developable. It will also be accompanied by an interactive map. The map and associated site schedules will be available on the Council's website and include all sites that were considered as part of the assessment.

2 Planning Policy context

National context

- 2.1 The 2024 National Planning Policy Framework (NPPF¹) states that local planning authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.
- 2.2 Planning Practice Guidance (PPG) 2019 sets out the processes and inputs that LPAs are required to undertake in order to identify a future supply of housing and employment land.
- 2.3 In accordance with paragraph 32 of the NPPF, Local Planning Authorities should ensure that the preparation and review of all plan policies are underpinned by relevant and up-to-date evidence. This evidence should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and take into account relevant market signals.
- 2.4 In line with the NPPF, local planning authorities need to ensure that they identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. In addition to this, the Strategic Housing Land Availability Assessment (SHLAA) should identify specific, developable sites or broad locations for growth for years 6-10 and where possible, for years 11-15 of the plan.
- 2.5 Plan makers should have regard to the PPG in preparing their assessments to ensure a robust assessment of land availability. Where they depart from the guidance, plan makers will have to set out reasons for doing so. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.

Sunderland's Local Plan

- 2.6 The Local Plan comprises of two key documents:
 - Part 1: The Core Strategy and Development Plan (CSDP), which was adopted in January 2020. This sets out the overarching spatial strategy for development within the city over the plan period from 2015-2033, as well as containing more specific detailed Development Management policies and strategic allocations and designations.

A review of the CSDP was undertaken in December 2024, this concluded that the policies within the plan continue to be in general conformity with the NPPF and PPG, remain broadly effective in delivering the overall CSDP's vision and objectives and form an appropriate basis on which to determine planning applications.

- Part 2: The International Advanced Manufacturing Park Area Action Plan (IAMP), which was prepared jointly with South Tyneside to enable the delivery of a new

¹ [National Planning Policy Framework](#)

International Advanced Manufacturing Park on land to the north of the existing Nissan car manufacturing plant. This plan was adopted in November 2017.

A review of the IAMP AAP was undertaken in October 2022, where it was concluded that the policies within the plan remained effective and up to date. Following designation of the site as part of the North East Investment Zone (IZ), consultation on a new IAMP AAP was undertaken in September 2024 and a second round of consultation undertaken in March 2025.

- 2.7 In the main, the Local Plan supersedes policies within the Unitary Development Plan (UDP) 1998 and the UDP Alteration No.2 (2007). However, some policies of the UDP and UDP Alteration No. 2 remain as saved policies to be considered alongside the CSDP. As such, saved policies will continue to be applied and treated as a material consideration in the determination of planning applications.
- 2.8 In support of the Local Plan, a suite of Supplementary Planning Documents sits alongside the Local Plan to guide the development of specific uses or of specific development sites.

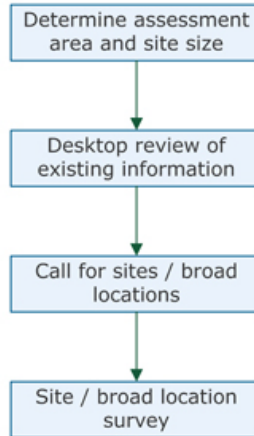
3 Methodology

Introduction

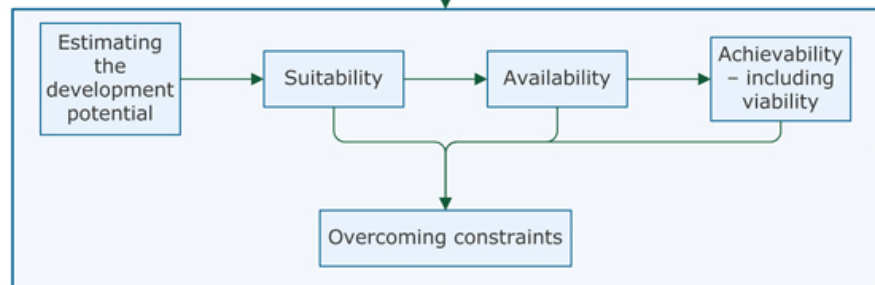
- 3.1 This is the 2025 version of the methodology for undertaking a HELAA and calculating the future housing and employment land supply for the city.
- 3.2 The PPG details the methodology that should be implemented to produce a robust assessment of land availability². Figure 1 illustrates the inputs and processes which should be undertaken to produce a robust assessment.

² [Housing and economic land availability assessment - GOV.UK](#)

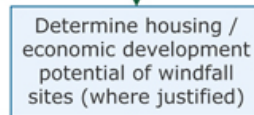
Stage 1- Site / broad location identification



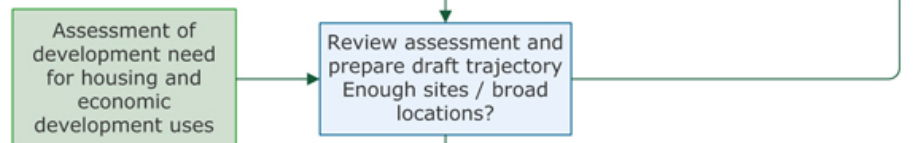
Stage 2 - Site / broad location assessment



Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base

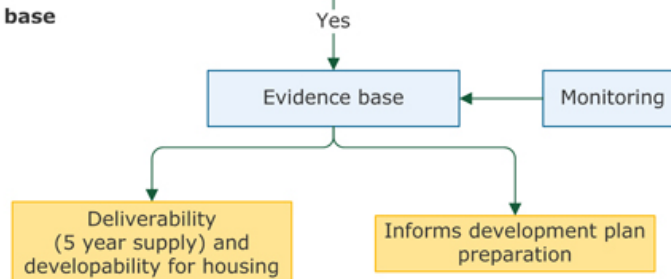


Figure 1: PPG Methodology flow chart

Stage 1 – Site/broad location identification

Determining the assessment area

- 3.3 The assessment covers the geographical area of land within Sunderland City Council's administrative boundary. The area is subdivided into five localised sub areas: Washington, Sunderland North, Urban Core, Sunderland South and the Coalfield (as shown in Figure 2).

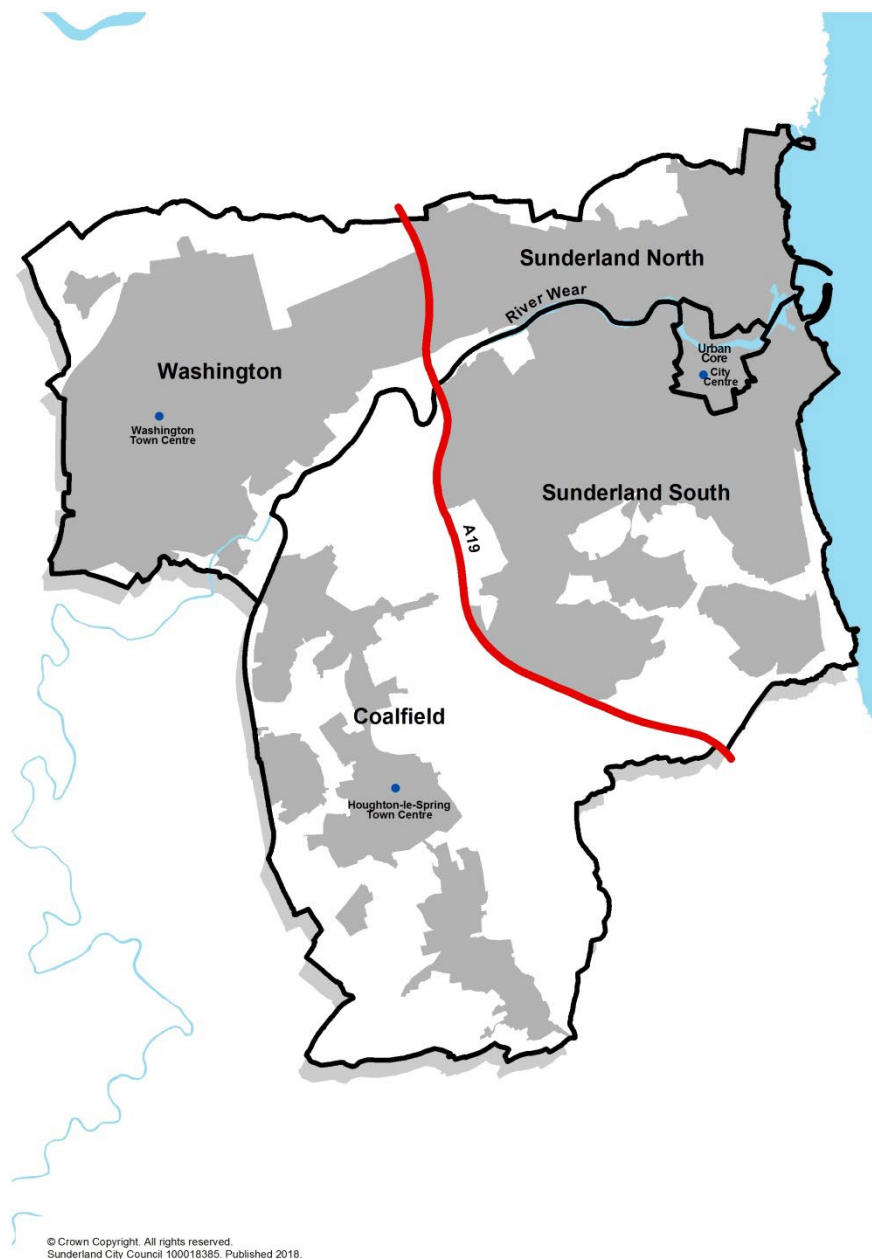


Figure 2: Map of Sunderland Administrative Boundary

Site types

3.4 Paragraph 011 of the PPG provides a list of types of sites that may be relevant in the assessment process, which includes:

- Existing allocations and site development briefs not yet with planning permission.
- Planning permissions for housing or employment development that are unimplemented or under construction.
- Planning applications that have been refused or withdrawn.
- Land in the local authority's ownership.
- Surplus and likely to become surplus public sector land.
- Sites with permission in principle and identified brownfield land.
- Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential).
- Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks).
- Business requirement and aspirations.
- Sites in rural locations.
- Large scale redevelopment and redesign of existing residential or economic areas.
- Sites in adjoining villages and rural exceptions sites.
- Potential urban extensions and new free-standing settlements.

Site size

3.5 Planning Policy Guidance advocates the consideration of all sites or broad locations capable of delivering five or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. This assessment takes forward this PPG guidance in relation to site size.

Desktop review of existing information

3.6 The Stage 1 desktop review provides a baseline position and the starting point for sites to be considered as part of the HELAA. The HELAA will proactively identify sites from as wide a range of sources as possible. Regard has been given to the potential sources of sites set out in the PPG. The following site sources will be used for identification of sites for this assessment:

Type of site	Data sources
Planning applications Planning applications are regularly reviewed and planning application information inputted into the Sunderland HELAA database.	Planning applications records (outline/full planning permissions) Prior notifications Pending applications (including awaiting S106 agreements) Expired and withdrawn applications Development starts and completions records
HELAA sites Sites (including previous and most recent call for sites) will be reviewed to ensure the site assessments are up to date and accurate.	Previous SHLAA Previous ELR
Brownfield and vacant/derelict land and buildings Brownfield land which is currently considered to be underutilised is a further source of potential development sites. Derelict and vacant sites will be identified through a site search process carried out by planning officers using a variety of methods including desktop survey, local knowledge and suggestions from residents through consultation exercises.	Local authority records Brownfield Land Register Commercial property database (e.g. estate/property agents)
Allocated sites Undeveloped Plan allocations will be assessed to ascertain their current suitability and deliverability for housing and employment uses. Sites identified within masterplans, development briefs and area action plans will also be identified and assessed.	Information and progress of sites monitored against planning applications and completions and commencements data. Additional information will be sourced from relevant internal colleagues.
Local Authority land surplus to requirements Sites which are surplus to the Council's requirements will be assessed for their housing potential.	Local authority records Council's Capital Programme
Development sites put forward during a "call for sites" consultation Sites submitted to the Council for assessment in the HELAA which have not already been identified through other site types above, will be assessed.	Any sites/broad locations submitted directly to the Council for consideration through periods of consultation and/or submitted independently e.g. from landowners, agents, RPs and developers etc.
Internal site suggestions from council officers e.g. Planning, Housing, Economic Development, Leisure, Education etc.	Development Briefs Technical Assessments Council Disposal Strategies

Table 1: Types of Sites with Potential for Housing and Data Sources³

³ [190718_paragraph_012_table_PUBLICATION_FINAL.pdf](#)

- 3.7 The HELAA provides an assessment of a site at a specific point in time, based upon best information available to make the assessment. A site's position can inevitably change between HELAA publications, for example as a result of grant of planning permission for housing on a site. In such instances, changes to a site's status will be updated in the next HELAA update. However, if data is factually inaccurate, the Council welcomes early engagement and accepts comments regarding inaccuracies at the earliest opportunity.

Call for sites/broad location surveys

- 3.8 A call for sites/broad locations for development will be undertaken summer 2025. The Council will publicise this via letter, email and the Council's webpage, inviting new sites to be submitted for assessment in the HELAA. A requirement of this call will be the submission of detailed information via a proforma, which will then be checked for accuracy, to the best of the Council's knowledge, and transposed into the HELAA database.

- 3.9 To assess a site, as a minimum, the following information will be required to be submitted for each site via completion of a site proforma.

- Details of the location and size of the site including an appropriately scaled site location plan.
- Ownership details.
- The current and suggest potential type of development (including tenure, type and different housing need groups for residential).
- The scale of development.
- The timescale for bringing development forward.
- Details of any ownership, legal or financial constraints.
- Details of infrastructure or other physical constraints.

- 3.10 New sites submitted to the Council will be held on file and will continue to be included and assessed in updates to the HELAA.

Desk and site survey

- 3.11 All sites submitted for assessment in the HELAA will be digitised in mapping software and information about sites recorded in a HELAA database.

Desktop survey

- 3.12 A desk top survey will be undertaken in which sites are assessed against national policies and designations to establish which sites have a reasonable potential for development. The PPG advises that assessments should reflect the policies in footnote 7 of the NPPF, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area. The following sites, known as Category 1 sites, are deemed to have no development potential. As such, sites are sieved out where the site is significantly covered by one or more of the designations below.

- Habitat sites (Local Wildlife Sites).
- Special Protection Areas (SPAs).

- Special Areas of Conservation (SACs).
- Sites of Special Scientific Interest (SSSIs).
- Green Belt.
- Heritage Coast.
- Irreplaceable habitats.
- Scheduled Ancient Monuments
- Historic Parks and Gardens.
- Areas at risk of flooding or coastal change.

3.13 If only a small area of a site is identified by one of the above designations, the remainder of the site will be subject to an assessment to demonstrate if mitigation of the impact of development on the designation can be achieved.

3.14 In addition to the above the Council plans on excluding the following sites.

- ***Greenfield sites in designated Open Countryside.*** National and local policies promote development within and adjacent to settlements as this provides access services and facilities and promotes more sustainable methods of travel. Greenfield sites in the designated Open Countryside are considered to be disconnected from existing settlements and are unlikely to be granted planning consent for this reason and considered not suitable for development.
- ***Purpose built student accommodation (PBSA).*** This is a niche housing market, and properties are not generally available within the mainstream housing market. If these PBSA units get converted to market housing, these units will be reintroduced into the trajectory in the future.

3.15 The PPG suggests that when carrying out a desktop review, plan makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites which have constraints need to be included within the assessment for the sake of comprehensiveness, but these constraints need to be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to identify sites and their constraints, rather than simply rule out sites outright which are known to have constraints.

Site survey

3.16 In accordance with the PPG, the following information will be recorded (or checked if previously submitted) by Planning Officers at the site survey stage. Site visits will supplement desktop survey where needed.

- Site size, boundaries, and location.
- Current land use and character.
- Land uses and character of the surrounding area.
- Physical constraints and potential environmental constraints (e.g. access, contamination, steep slopes, flood risk, natural features of significance and location of infrastructure/utilities).
- Consistency with development plan policies.

- Proximity to services and other infrastructure, such as public transport.
- An initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- Where relevant, development progress.
- Any obvious viability issues.

3.17 All sites within the HELAA will have a site survey undertaken, either through the HELAA process or through the formal process of determining a planning application. Where a site has an extant planning permission, site survey information will be informed by the Case Officer's Report and assessment of the site.

Stage 2 – Site/broad location assessment

3.18 Further to the site survey process sites will be assessed for their suitability, availability and achievability for development. In accordance with the PPG, sites will be assessed against the existing development plan, national policy, emerging policy and the market and industry requirements for housing and employment land in the market area to determine a site's development potential.

Estimating the development potential of a site

3.19 The PPG indicates an estimate of the development potential of a site should be guided by existing or emerging planning policy. When assessing development potential, plan makers should seek to make the most efficient use of land in line with policies set out within the NPPF.

Density

3.20 Adopted CSDP Policy H1 Housing Mix states that residential developments should create mixed and sustainable communities by achieving an appropriate density for its location, which considers the character of the area and the level of accessibility. Where information is available from sources such as planning applications, pre-application discussions, development briefs, masterplans or allocations, the known density information will be used.

3.21 The HELAA Methodology will utilise Policy H1 for residential development and take a site-by-site approach to ensure densities are reflective of individual sites, their constraints and level of accessibility. As a baseline, 30 dwellings per hectare is an assumed starting point for a site. The planning application history of a site will be taken into account, alongside on and off-site constraints, site viability issues and the types of development likely to be achieved on the site and where deemed appropriate, a higher density of development will be applied. This approach is considered to be more responsive to density requirements as it is site specific.

3.22 Since the introduction of mandatory biodiversity net gain and the adoption of space standards in the Core Strategy, this is an additional impact on the amount of space required on site for residential development. Integration of on-site mitigation will most likely result in lower densities and a lower gross developable area.

Gross and net developable area

- 3.23 The development area is the likely proportion of the site which will be available for residential or employment development, after considering the provision of infrastructure, open space, on-site BNG mitigation and other land uses designed to complement the development. For larger sites, a greater percentage of the total site area is deducted to determine the developable area that can be used for the proposed use. This considers other site requirements that are likely to be incorporated into larger housing or employment schemes.
- 3.24 The figures set out in Table 2 below are used for estimating the net developable area for residential development. Planning Officers will make an informed judgement regarding the percentage net to apply to a gross site area, based upon the type and level of constraints identified on a site. For example, a site over 2 hectares in size with multiple significant constraints including ecology and typology constraints, may have a percentage net of 50% applied to account for mitigation measures required such as ecology buffers, on-site BNG mitigation and available developable land which would make the site suitable for development.

Gross site area (ha)	Percentage net
Less than 0.4 ha	90- 100%
0.4 to 2 ha	75-90%
Over 2 ha	50-75%

Table 2: Site Gross to Net Ratios

- 3.25 The net developable area of an employment site is identified in a different way to that of housing and will typically be recorded on a plot-by-plot basis, equating to a net developable area. Therefore, for some sites, gross to net adjustments may be appropriate.

Estimating the housing potential of each site – Capacity yield

- 3.26 Where site capacity information is identified from planning applications, through the call for sites process or through discussions with Council officers, this will be considered. Where no such information has been provided, site capacity will be based on informed estimates, which may be subject to change as a detailed scheme is developed for a site. This is principally calculated from the 'developable area' multiplied by an appropriate housing density.

Assessing suitability

- 3.27 In accordance with the PPG, a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. The suitability of sites or broad locations for development should be guided by:
- The development plan, emerging plan policy and national policy.

- Appropriateness and likely market attractiveness for the type of development proposed.
 - Contribution to regeneration in priority areas.
 - Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.
 - Physical limitations or problems such as access, infrastructure, ground conditions, flood risk and
 - Hazardous risks, pollution or contamination.
- 3.28 Sites allocated in existing development plans or with planning permission can generally be considered suitable for development, although it may be necessary to assess whether circumstances have changed which could alter their suitability.
- 3.29 Information gathered at Stage 1 of the HELAA methodology (desk top survey, site survey and information submitted as part of the site submission) also informs the suitability assessment.
- 3.30 In addition to Category 1 sites as detailed at paragraph 3.13, other policy designations from the Core Strategy and Development Plan and National Guidance known as Category 2, such as open space and historic buildings may affect the scale and type of development. Category 2 sites are not considered to be unsuitable, however, there may be instances where the designations may affect the nature or extent of a development site, or the cumulative impact of Category 2 designations may render a site unsuitable. Category 2 sites will be assessed for suitability on a site-by-site basis.
- 3.31 Consultation with statutory bodies and infrastructure providers has historically been undertaken for all SHLAA sites to ascertain a sites suitability from a statutory bodies' perspective. This will be updated through consultation with the following statutory bodies for existing sites and any new sites added to the wider HELAA database.
- The Mining Remediation Authority (Formerly Coal Authority).
 - National Highways.
 - Historic England.
 - Northumbrian Water.
 - Sport England.
 - Environment Agency.
 - Natural England.
 - Northern Powergrid.
 - Homes England.
 - North East Combined Authority.
- 3.32 Previously, some bodies have provided site specific responses, whereas others provided a higher level, strategic response. Responses are entered into the HELAA database and inform a site's assessment of suitability.

Assessing availability

- 3.33 A site is considered available for development when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate) that land is available for development and there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. In such circumstances, this will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Although the existence of a planning permission suggests a site is available, there may be instances where it does not, and this is identified in the availability conclusion for a site. The PPG states that sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise.
- 3.34 In addition to the above, a site's existing use is also considered in terms of its availability. Where an existing use is in operation on a site that requires relocation or needs to be wound down, the Council consider this on a site-by-site basis. A site is considered deliverable only where it can be demonstrated clearly, by a developer, agent or landowner, that the existing use would cease operation speedily, allowing for development to come forward on the site in the five-year period. Where this cannot be demonstrated a site is assessed as developable.
- 3.35 Where potential issues arise regarding a site's availability an assessment is made, using best available information submitted by the developer/agent/landowner, as to how and when such issues could be realistically overcome. Consideration is given to the delivery record of the developers or landowners putting forward sites and whether the planning background of a site demonstrates a history of unimplemented permissions. In such instances, a history of unimplemented permissions requires dialogue with the developer to ascertain their intent for the site and timescales for implementation of a scheme. Where clear implementation of a scheme cannot be demonstrated, a site is assessed as 'not available'.
- 3.36 To ensure a transparent and reasonable process, all sites are treated equally regardless of whether they are in public or private ownership. Sites lacking in precise ownership information will be assessed as 'not currently available' until evidence is provided to the contrary.

Assessing achievability – including viability

- 3.37 In accordance with the PPG, a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period.
- 3.38 Achievability will be affected by:

- Market factors – such as adjacent uses; economic viability of existing, proposed and alternative uses in terms of land values; attractiveness of the locality; level of potential market demand and projected rate of sales (particularly important for larger sites).
- Cost factors – including site preparation costs relating to any physical constraints; any exceptional works necessary; relevant planning standards or obligations; prospect of funding or investment to address identified constraints or assist development; and
- Delivery factors – including the developer’s own phasing; the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates); whether there is a single developer or several developers offering different housing products; and the size and capacity of the developer.

3.39 Local housing market factors form part of various components of planning evidence bases, including the Viability Assessment, Employment Land Assessment and Strategic Housing Market Assessment. This evidence will be used to underpin the assessment of sites as part of the HELAA. The evidence includes examination of sales values, levels of sales, and market demand. Consideration will be given to precise localities and the attractiveness of areas as places to live. The achievability assessment is also informed by other information which is gathered during the site survey or the desktop review.

3.40 The evidence underpinning the adopted Core Strategy and Development Plan is currently the latest evidence available in relation to viability. This included the modelling of a range of site typologies with the capability of delivering different house types and varying yields around Sunderland (Sunderland City Council – Whole Plan Viability Assessment). The site typologies and outcomes are still considered relevant and as such are to be used as a starting point with regards demonstrating viability. Table 4 below sets out the site typologies. Cost factors are also informed by site surveys and desk-top reviews, which consider site specific characteristics and the potential for abnormal costs.

Site typology	Dwelling numbers	Site typology	Dwelling numbers
Large Green	350	Medium Brown	15
Large Green	175	Small Green	7
Large Green	175 LD	Small Green	4
Large Green	75	Green Plot	1
Medium Green	35	Small Brown	11
Medium Green	35 LD	Small Brown	7
Medium Green	15	Small Brown	4
Large Brown	500	Brown Plot	1
Large Brown	150	Urban Flats	75
Large Brown	60	Urban Flats	20
Medium Brown	25		

Table 3: Sunderland Viability Assessment Site Typologies

- 3.41 The Viability Assessment provided a broad indication of whether a site was likely to be viable or not. The outcomes of the assessment indicated that greenfield sites within the city are viable, however brownfield land typologies in all areas are challenging and therefore caution should be taken on relying on the delivery of brownfield sites.
- 3.42 A further viability update which was undertaken as part of the CSDP noted that brownfield sites are coming forward and whilst some of these may have benefitted from some public intervention, others are coming forward as the developer may have purchased the site at a lower cost or is able to develop the site at less than the costs used in the study.
- 3.43 The Council can, where necessary, accept land receipts below those values identified in the Viability Assessment, where the wider benefits can be demonstrated, making what may be considered unviable brownfield sites viable and deliverable.
- 3.44 In accordance with the PPG, the achievability assessment takes into consideration the capacity of a developer(s) to complete and let or sell the development over a certain time period.

Delivery of development

- 3.45 Once the suitability, availability and achievability of sites had been assessed and the constraints identified, the likely timescale and rate of development for each site is then identified. The timescale and rate of development is assessed at a point in time and will be continuously updated throughout the Local Plan process, with advice being sought from developers on likely timetables for construction start up, site preparation, site delivery rates and of any further constraints that may arise.

Deliverable sites (Housing)

- 3.46 The NPPF indicates that for sites to be considered deliverable they should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:
- a) Sites which do not involve major development and have a planning permission and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
 - b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 3.47 In accordance with the NPPF, all sites which fall into the above two categories (a & b) will be considered deliverable in this HELAA.
- 3.48 Notwithstanding the above and the five-year land supply position set out through the most recently adopted position statement⁴, the HELAA also includes sites that do not fall into either category 'a' or 'b' but it has been demonstrated that they expect to start to deliver within five years, (however these are not included within the five-year land supply). These sites are:
- sites where an application is expected to be submitted within 12 months; and
 - sites where there is a pending application recommended for approval and is likely to progress (this includes sites with a resolution to approve subject to a S106 agreement).

Developable sites (Housing)

- 3.49 To be considered developable, sites should be in a suitable location for housing development, with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 3.50 Sites that are not expected to be delivered in the first five years will be assumed to start to deliver within 6-10 years. Where significant constraints are identified, or sites appear to represent a later phase of an adjacent development, they will be assumed to start to deliver within 11-15 years.

Delivery and build out rate

- 3.51 Table 5 shows the delivery and build out rate assumptions that are applied to HELAA housing sites where no information about delivery rates has been received. A standard rate of 30 dwellings per annum is used for a single developer site. It is however, acknowledged that delivery rates for single developer sites may be higher where market demand is higher for the product on offer. Where developers indicate that a higher delivery rate is possible for their site, this will be taken into consideration and reflected in delivery forecasts for the site. Similarly, lower delivery rates in lower market areas will be considered where indicated.

⁴[5YHLS Report 2025](#)

Site category	Assumption
Sites under construction	Delivery of units will continue at the previous rate. If there is no delivery history, delivery of units will start from year 1 at a rate of no more than 30 dwellings per annum
Small sites under construction or with extant permission	Delivery of units will be determined by the application of an average delivery rate, based on historical small site delivery rates, and will start to deliver from year 1. This is referred to as a small site allowance
Sites with full planning consent (including recent permissions since HELAA base date)	Delivery of units will start from year 2 at a rate of no more than 30 dwellings per annum
Sites with outline planning consent (including recent permissions since HELAA base date)	Delivery of units will start from year 3 at a rate of no more than 30 dwellings per annum
Developable sites with applications pending a decision (including those subject to S106 agreement)	Delivery of units will start from year 4 at a rate of no more than 30 dwellings per annum
Allocated housing sites with known recent developer interest	Delivery of units will start from year 4 at a rate of no more than 30 dwellings per annum
Developable sites on which an application is expected within 12 months	Delivery of units will start from year 4 at a rate of no more than 30 dwellings per annum
Other developable HELAA sites	Delivery of units will start from year 6 at a rate of no more than 30 dwellings per annum.

Table 4: HELAA Sites - Delivery Assumptions

- 3.52 Where it is known that there are two developers on a site, an assumption is made that housing will be delivered at a rate of 40-50 dwellings per annum (20-25 dwellings per annum each). This assumption has been made as two outlets on one site are likely to deliver units at a higher rate overall than a site with only one outlet. A similar housing offer is likely to be offered on a dual outlet site and therefore, sale and take up of the units is distributed between the two outlets. Similarly, multi developer sites with three or more outlets have assumed a delivery rate of 20 dwellings per annum, per outlet. Where developers have indicated higher rates of delivery, this will be reflected in the delivery forecasts for a site.
- 3.53 The Council will continue to keep these delivery assumptions under review and seek advice from the development industry to ensure they remain appropriate.

Stage 3 – Windfall sites, small sites, demolitions & empty homes

Windfall sites and small sites (residential)

- 3.54 Paragraph 75 of the NPPF states that local planning authorities may make an allowance for windfall sites as part of anticipated supply if they have compelling evidence that they provide a reliable source of supply. Any allowance should be realistic having regard to the historic windfall delivery rate and expected future trends.
- 3.55 The HELAA is sufficiently comprehensive enough that sites of five units or more are identified through the HELAA process and those sites that come forward with planning permission are included through annual updates. As there is no compelling evidence that windfall sites will consistently become available in the next five-year period, a windfall allowance for sites over 5 units will not be accounted for within the supply, however this will be kept under annual review.
- 3.56 However, small housing sites (4 units or less) that are not identified through the Local Plan process may become available, therefore an allowance will be calculated annually to forecast housing delivery on small sites based on historic trends. A 10-year average is used to gain a comprehensive picture of small site delivery. Small sites will be forecast from year 1, as the HELAA site threshold of 0.25 hectares, or 5 units or more, results in their exclusion from the housing land supply. It is appropriate to make an allowance for a nominal number of small site units that would come forward per annum, from year 1 onwards which will be kept under annual review.
- 3.57 Small site assessments will be made and published annually through the Council's Authority Monitoring Report (AMR). This will include an assessment of historic small sites delivery rates as well as the expected future trend. Small sites allowances will be monitored annually and adjusted upwards or downwards accordingly, depending on the delivery rate and incorporated into subsequent HELAA updates.

Demolitions

- 3.58 The approach the Council takes with regards demolitions is the same approach that was considered sound by the Planning Inspector during the Examination of the CSDP. This approach accounts for any known demolitions for the first five years, as these are largely known through discussions with Gentoo and other key stakeholders. As demolitions/losses can unexpectedly come forward through the planning process, from year 6 onwards an average annual figure is included, which is derived from the previous 10 years demolition data.
- 3.59 Demolitions and net losses to housing stock will be monitored on an annual basis through the AMR. Demolition forecasting and the annual figure will continue to be kept under review through the HELAA process and will be adjusted accordingly.

Empty homes

- 3.60 The NPPF identifies that Local Planning Authorities should identify and bring back into use empty housing and buildings and where appropriate, acquire properties under compulsory purchase powers.
- 3.61 The Council recognises the existing housing stock in Sunderland remains an important asset. Bringing empty properties back into residential use or modernising an older property is considered more sustainable than its loss, as it not only contributes to the housing supply but helps to rejuvenate streets, areas and communities blighted by long term empty properties.
- 3.62 The number of long-term empty properties fluctuates over short periods of time, however, historically the net number of empty properties returned to use has been minimal and as such no allowance is to be made for empty properties within the supply.
- 3.63 Long term empty homes brought back into use will be monitored on an annual basis through the AMR.

Stage 4 – Assessment review

- 3.64 Following the assessment of all sites, the development potential of all sites will be collected. This data can be used to produce an indicative trajectory setting out how much housing and the amount of economic development that can be provided and at what point in the future.
- 3.65 If insufficient sites are identified against the need for either housing or employment uses, then the Council will revisit its assumptions. Following the review, if there are still insufficient sites, then it will be necessary to investigate how this shortfall could be planned for, including how needs might be met in adjoining areas in accordance with the duty to cooperate.

Stage 5 – Final evidence base

HELAA data outputs

- 3.66 This HELAA report will produce the following outputs:
- A list of all sites, or broad locations considered, cross-referenced to their locations on maps. This will include lists of deliverable sites (1-5 years), developable sites (6+ years) and sites not considered developable.
 - An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site is viable) to determine whether a site is realistically expected to be developed and when. (Where sites have been discounted, evidence justifying the reasons will be set out).

- The potential type and quantity of development that could be delivered on each site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when.
- An indicative trajectory of anticipated development based on the evidence available.

**Sunderland
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