

Sunderland City Council Response to Matters, Issues & Questions

Matter 9 - Generic Policies of the Plan

1. Health Impact Assessments

1.1 Is the requirement for a Health Impact Assessment (Policy SP7) for developments of more than 100 dwellings or 100 student bedspaces justified and consistent with national policy?

It is considered that the requirement for a Health Impact Assessment for developments of more than 100 dwellings or 100 student bedspaces is justified and consistent with national policy, as set out within the Compliance Paper (SD.66; paras. 7.15-7.39; pgs. 215-221).

2. Design Quality

2.1 Are the requirements for good design within Policy BH1 (Design Quality) positively prepared and consistent with national policy (particularly criteria 8, 10 and 13 and the requirement for masterplans and design codes for larger scale developments)?

It is considered that the requirements for good design in Policy BH1 are positively prepared and consistent with national policy, which is explained in Paragraphs 11.2-11.38 of the Compliance Statement (SD.66, pgs. 363-371).

Paragraph 58 of the NPPF states local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Justification for parts 8 (paras. 11.19-11.20; pgs. 366-367), 10 (paras. 11.21-11.22; pg. 367) and 13 (para. 11.23; pg. 367) is set out in the Compliance Statement (SD.66).

In relation to point 8, Paragraph 58 of the NPPF states that Local Plan Policies should ensure developments are visually attractive as a result of good architecture and appropriate landscaping, as well as incorporate green and other public space as part of schemes.

In relation to point 10, Paragraph 58 of the NPPF states that Local Plan Policies should respond to local character and history and reflect the identity of local surroundings and materials.

In relation to point 13, Paragraph 17 of the NPPF states that policies and decision taking should secure high-quality design for all existing and future occupants whilst encouraging the re-use of existing resources, including conversion of existing buildings.

In relation to the requirement for masterplans and design codes, paragraph 57 of the NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development. Paragraph 58 of the Framework goes on to

state that policies and decisions should aim to ensure that new developments optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses. Paragraph 59 of the NPPF also encourages LPAs to consider using design codes. It is therefore considered that the requirements for masterplans and design codes, as well as criteria of Policy BH1 overall, are positively prepared and consistent with national policy, in particular the paragraphs identified above.

3. Heritage Assets

3.1 Are Policies BH8 (Heritage Assets) and BH9 (Archaeology), as proposed to be modified, consistent with national policy in respect of non-designated heritage assets and assets of archaeological interest?

Policy BH8, as proposed to be modified in the updated Schedule of Main Modifications (MM31), is consistent with national policy. The proposed modifications will ensure consistency with paragraph 128 of the NPPF specifically.

Policy BH9, as proposed to be modified in the updated Schedule of Main Modifications (MM32), is consistent with national policy. The proposed modification will ensure consistency with paragraph 132 and paragraph 139 of the NPPF specifically.

The Council has signed a Statement of Common Ground with Historic England (SD.8k) that indicates that they find the Plan sound, subject to the agreed proposed modifications.

4. Green Infrastructure

4.1 Are the requirements for GI corridors within Policy NE1 (GI) reflective of a positively prepared policy that is consistent with national policy?

The Council considers that the requirements for GI corridors within Policy NE1 is reflective of a policy which has been positively prepared and is consistent with national policy. It supports the retention and enhancement of GI corridors and only restricts development where it would significantly reduce or sever GI corridors (thereby damaging the overall purpose, integrity and connectivity of the GI corridor). This approach follows NPPF paragraph 114, which states that “local planning authorities should... set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”. This approach is explained more fully in paragraphs 12.20-12.27 of the Compliance Statement (SD.66; pgs. 403-405).

Statutory bodies such as Historic England, Natural England and the Environment Agency are supportive of the policy (SD.8k, pgs. 9, 80 and 116), as are local residents, other organisations such as the CPRE as well as a developer (SD.66; paras. 12.6-12.10; pg. 402).

The neighbouring authorities of Gateshead, South Tyneside and Durham had all raised initial concerns regarding the need to appropriately safeguard cross-boundary

GI corridors. All 3 authorities are now satisfied with the approach, recognising that Housing Growth Areas do not impact on corridor integrity and contain specific policy criteria to address such issues. Now that an additional policy relating to the Heritage Coast has been created, Durham County Council is now satisfied with the Plan approach (paragraphs 12.12-12.15 of the Compliance Statement, SD.66, pgs. 402-403) and see also Duty to Cooperate Statement (SD.11, pg. 31).

5. Biodiversity

5.1 Does Policy NE2 (Biodiversity and Geodiversity), as proposed to be modified, ensure sufficient distinction between the hierarchy of nature conservation sites?

The Council considers that the revised approach (as outlined in the updated Schedule of Main Modifications (MM34)) provides sufficient distinction between the hierarchy of nature conservation sites. In particular, the alteration proposed strengthens the approach regarding Sites of Special Scientific Interest (SSSI), and the distinction between SSSI, Local Wildlife Sites (LWS) and Local Nature Reserves (LNR). A joint approach to Biodiversity policy has been sought from Gateshead MBC and other neighbouring authorities, and as a result of this revised approach, the respective policies on Biodiversity in each authority is now very closely aligned.