

THE CABINET reports as follows:-

1. Youth Justice Plan 2008-2009

That they have given consideration to a report of the Director of Children's Services (copy attached) seeking approval to the publication and distribution of the Youth Justice Plan 2008-2009. The report outlines the background, purpose and intentions of the Plan and provides the Plan intended for publication.

They also referred the report to the Children's Services Review Committee for further advice and consideration. The Review Committee considered and endorsed the Youth Justice Plan prior to its submission to the Youth Justice Board.

Accordingly the Cabinet recommends the Council to consider the contents of the report and approve the Youth Justice Plan 2008-2009 and agree to its publication and distribution.

N.B. Members are requested to bring their copies of the Youth Justice Plan which were circulated in the Cabinet Agenda of 10th September, 2008 or alternatively the document can be viewed on-line at:-

<http://www.sunderland.gov.uk/committees/CmisWebPublic/Binary.ashx?Document=7847>

2. Capital Programme Outturn 2007/2008 and First Capital Programme Review 2008/2009

That they have given consideration to a report of the City Treasurer on the Capital Programme Outturn for 2007/2008 and the outcome of the First Capital Programme Review for 2008/2009, taking account of the Capital Programme Outturn 2007/2008 and changes made to the Capital Programme 2008/2009 since its approval.

The Cabinet recommends the Council to approve the proposed additional schemes and changes / adjustments for 2007/2008 and 2008/2009, detailed in the attached extract, which had arisen since its approval in March, 2008.

They also referred the matter to the Policy and Co-ordination Review Committee, for advice and consideration in the context of the additional schemes for 2008/2009. The comments of the Committee will be reported to the meeting.

3. Revenue Budget and Trading Services Outturn for 2007/2008 and First Revenue Review for 2008/2009

That they have given consideration to a report of the City Treasurer on the Revenue Budget and Trading Services Outturn for 2007/2008 and First Revenue Review 2008/2009, namely requesting approval to the virement of funds.

The Cabinet recommends the Council to approve the virement of funds and transfers from reserves and contingencies as detailed in the attached extract.

They also referred the matter to the Policy and Co-ordination Review Committee, for advice and consideration on the issues of virement detailed in the attached extract. The comments of the Committee will be reported to the meeting.

4. Sunderland City Council Local Development Framework : Development Plan Document (DPD) Preferred Options : Report of Public Consultation

That they have given consideration to a report of the Director of Development and Regeneration (copy attached) on the comments received following the consultation exercise on the Preferred Options Stage of the Development Plan Document and to agree the next steps.

The Cabinet recommends the Council to:-

- (i) note the representations received and the responses being considered; and,
- (ii) agree the next steps to progress the Development Plan Document as set out in Appendix 1 of the report be agreed.

They also referred the report to the Environmental and Planning Review Committee and the Planning and Highways Committee for further advice and consideration. The comments of the Committees will be reported to the meeting.

N.B. Members are requested to note that a copy of the Local Development Framework Core Strategy – Schedule of Responses to Consultation – June 2008 Document is available to view on-line at:-

<http://www.sunderland.gov.uk/committees/CmisWebPublic/Meeting.aspx?meetingID=814>

5. Sunderland City Council Local Development Framework : Housing Allocations Development Plan Document (HADPD) Issues and Options : Report of Public Consultation

That they have given consideration to a report of the Director of Development and Regeneration (copy attached) on the comments received following the consultation exercise on the Issues and Options stage of the Housing Allocations Development Plan Document (HADPD) and to agree the next steps.

The Cabinet recommends the Council to:-

- (i) note the key issues received from the consultation exercise on the Issues and Options Stage of the HADPD; and
- (ii) agree the next steps to progress the HADPD.

They also referred the report to the Environmental and Planning Review Committee and the Planning and Highways Committee for further advice and consideration. The comments of the Committees will be reported to the meeting.

N.B. Members are requested to note that a copy of the Housing Allocations Summary of Responses to Consultation – March 2008 Document is available to view on-line at:-

<http://www.sunderland.gov.uk/committees/CmisWebPublic/Meeting.aspx?meetingID=814>

6. Food Law Plan 2008/2009

That they have given consideration to a report of the Director of Community and Cultural Services (copy attached) on the Services Food Law Service Plan for 2008/2009 and to seek approval of the Plan.

The Cabinet recommended the Council approve the Food Law Enforcement Service Plan.

They also referred the report to the Regeneration and Community Review Committee for advice and consideration. The comments of the Review Committee will be reported to the meeting.

N.B. Members are requested to note that a copy of the Food Law Service Plan 2008/2009 Document is available to view on-line at:-

<http://www.sunderland.gov.uk/committees/CmisWebPublic/Meeting.aspx?meetingID=814>

YOUTH JUSTICE PLAN 2008/2009

REPORT OF THE DIRECTOR OF CHILDREN'S SERVICES

PURPOSE OF REPORT

1. The Youth Justice Plan is an Article 4 plan which requires full Council approval.
2. The report informs Cabinet of the background, purpose and intentions of the plan and seeks approval of Cabinet to forward the plan for full Council approval on 24 September 2008, prior to publication and distribution.

DESCRIPTION OF DECISION (RECOMMENDATIONS)

3. Cabinet is recommended to consider the contents of the report and the Youth Justice Plan 2008/2009 (attached at Appendix A) and agree that the plan be sent for full Council approval, prior to publication and distribution.

BACKGROUND

4. The Youth Justice Board (YJB) oversees the youth justice system in England and Wales and works to prevent offending and re-offending by children and young people under the age of 18.
5. The YJB is required to monitor and report on the performance of the youth justice system to the Home Secretary. It does this through Youth Justice Plans submitted annually by each Youth Offending Team (YOT) and through the collection of performance data. Regional Teams of the YJB receive submission of the Youth Justice Plan.
6. The Youth Justice Plan is an article 4 plan under the Constitution of Sunderland City Council.
7. Sunderland Youth Offending Service has published Youth Offending Plans since 2001. This is the 8th plan to be published within the local area.
8. In late 2007 and during the first 4 months of 2008 the Youth Justice Board reviewed the whole performance framework and radically revised the youth justice planning guidance. The new framework reflects the new streamlined and simplified performance framework that supports the LAA process (six of the YJB indicators are included in the national indicator set).
9. The new Youth Justice Planning Framework requires YOT's to make a self-assessment of effectiveness in achieving the principle aim of the youth justice system which is to *prevent offending by children and young persons*. YOT's are required to report on the outcomes they achieve in their local areas and the

10. framework emphasises the importance of planning and delivering services that meet local need and address local problems.
11. A draft of the plan was approved by Cabinet on 16/07/08 for submission to the YJB. Since that time, the plan has also been considered and endorsed by the Children's Services Review Committee prior to submission to the YJB.
12. The plan was submitted to the YJB by the statutory deadline of 11th August 2008, as agreed by Cabinet, subject to full Council approval. The YJB has until 13th October 2008 to validate the plan.

CURRENT POSITION

13. Sunderland Youth Offending Service (YOS), is a multi-agency service that works with Northumbria Police, National Probation Service, Sunderland Health Authority, Sunderland Housing Group and Sunderland City Council. Representatives of these agencies form a YOS Board, which governs the YOS.
14. Sunderland has once again delivered outstanding performance achieving the highest performance level rating in the national performance tables (one of only 8 YOT's to achieve a level 5 performance rating out of 156 YOT's nationally). In addition :-
 - Through working in partnership with others Sunderland City Council and its partners have achieved Beacon status for reducing re-offending across both youth and adults.
 - Reducing re-offending (the Rate of Proven Re-offending – National Indicator 19) is identified as a priority under the Local Area Agreement (LAA). In the most recent youth re-offending performance returns submitted to the YJB Sunderland made an overall reduction of 8.5%, far exceeding the 5% target set by the YJB.
 - For the most recent audit of compliance with national standards, Sunderland achieved an excellent performance of 98.4%.
 - Sunderland YOS achieved an excellent outcome from the national Joint Inspection of the YOS (published in May 2007). Sunderland achieved the highest possible rating of 4 for Management and Leadership. The report concluded that the YOS *“benefited from both a strong Management Board and Senior Management Team.*
15. The YOS has set out its Youth Justice Plan for 2008/2009. The plan sets out the strategic aims of the YOS Board and the operational delivery plan for the YOS to prevent offending and re-offending by children and young people in Sunderland and to support their families and victims of their offending. Specifically, the plan sets out:
 - a. **The national and local context of Youth Justice:** this section sets out strategic aims and priorities of the local youth justice in England and Wales

- b. and the local aims and priorities for Sunderland YOS. It sets out the positioning of the YOS within the local authority, the context of the YOS as a criminal justice agency working with partners to promote community safety and crime reduction and the context of the YOS in relation to its integration into local Children's Trust arrangements.
 - c. **Use of resources and value for money:** this section sets out the financial, staff, programme and ICT resources that have been used to deliver quality youth justice services.
 - d. **First time entrants:** this section assesses the extent to which the YOT partnership has contributed to reducing first time entrants to the youth justice system and reducing any disproportionality including children and young people from Black Minority Ethnic (BME) backgrounds. It also covers :-
 - i. Contribution of partnership to reducing re-offending.
 - ii. Contribution of partnership to reducing use of custodial remands.
 - iii. Contribution of partnership to addressing risk of serious harm.
 - iv. Contribution of partnership to keeping children and young people safe from harm.
 - v. Contribution of partnership to improving public confidence in the fairness and effectiveness of dealing with youth crime in the Criminal Justice System.
 - vi. Contribution of partnership to improving satisfaction in the Criminal Justice System for those who have been victims of youth crime.
 - e. **Business change and innovation:** this section sets out the key business changes on the horizon for Youth Offending Teams and Services nationally in 2008-09, including the Youth Rehabilitation Order and 'Simple, Speedy, Summary Criminal Justice' as well as the workforce development strategy and a risk to future delivery assessment from the Youth Offending Service Management Board Chair.
15. Sunderland Youth Justice Plan 2008/2009 was submitted to the YJB for England and Wales on 11th August 2008, and is intended for publication on the YOS website and for circulation to partner agencies, following full Council approval.

REASONS FOR THE DECISION

- 16. The Youth Justice Plan is an Article 4 plan under the Constitution of the Council and is the primary document for YOT partnerships to set out how they will deliver against the Youth Justice Board (YJB) performance management framework for Youth Offending Teams (YOT's) and is a key source for local planning.
- 17. The plan was submitted to the YJB by the statutory deadline of 11th August 2008, as agreed by Cabinet, in advance of full Council approval. The YJB has until 13 October 2008 to ratify the plan.

ALTERNATIVE OPTIONS TO BE CONSIDERED AND REJECTED

18. The alternative option is not to submit the Youth Justice Plan to full Council. This would have a negative impact on local youth justice planning, and the service's ability to deliver against its action plans.

RELEVANT CONSULTATIONS

19. The YOS Board, YOS Strategic Managers, YOS Operational Managers, Corporate Performance Team, Community Safety Team and Children's Services Review Committee have been consulted on the plan and have provided input accordingly.

FINANCIAL IMPLICATIONS

20. Sunderland YOS has a complex budget structure made up of partner agency cash and in-kind financial contributions, core government funding from the YJB for England and Wales and a range of time limited funding. The Youth Justice Plan is funded from the YOS core budget.

LEGAL ISSUES

21. The plan is an Article 4 Plan under the Constitution of Sunderland City Council.

BACKGROUND PAPERS

22.
 - Youth Justice Plan 2007/2008.
 - Youth Justice Planning Framework 2008/2009.
 - Cabinet Report April 2007 re Youth Justice Plan 2007/08.
 - Cabinet Report August 2008 re Youth Justice Plan 2008/2009



Youth Justice Board
Bwrdd Cyfiawnder Ieuenctid

Youth Justice Planning Tool 2008/2009 - England

SUNDERLAND

04/08/08

Youth Justice Plan 2008/2009

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SECTION A – THE NATIONAL AND LOCAL CONTEXT OF YOUTH JUSTICE

A1 The Strategic aims and priorities of the youth justice system in England and Wales

The 2008-2011 strategic aims are to:

- Prevent offending.
- Reduce reoffending.
- Ensure the safe and effective use of custody.
- Increase victim and public confidence.

A2 The strategic aims and priorities of the local youth justice system

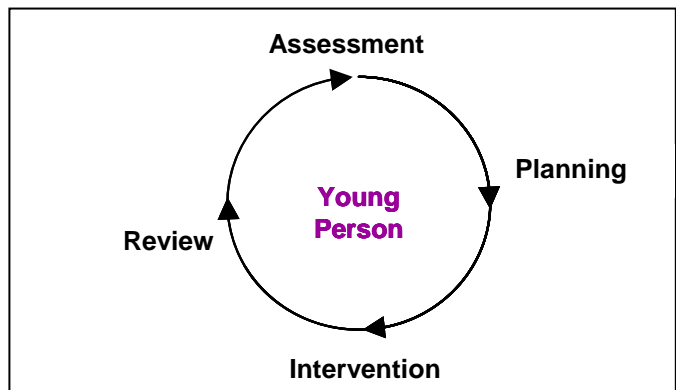
This section of the Youth Justice Plan (YJP) sets out the local and national context for Sunderland Youth Offending Service (YOS) including:

- Local vision and priorities.
- The positioning of the YOS within the local authority.
- The context of the YOS as a criminal justice agency working with other organisations to promote community safety and crime reduction.
- The context of the YOS as a formally aligned partnership with the Children's Trust.
- Population, local youth justice trends and performance of the Sunderland YOS Partnership.

Local vision and priorities

Our vision as a Youth Offending Service (YOS) is to deliver high quality services in partnership with others to achieve our core purpose of preventing offending and reducing re-offending. We believe that high quality assessment and analysis combined with robust risk management processes are the essential building blocks of effective planning, intervention and service delivery. We believe it is vital that our service challenges and supports young offenders and those at risk of offending to change their behaviour and make positive choices. We will therefore work hard to engage and motivate young people whilst meeting their assessed risk and needs in order to maximise the likelihood of achieving sustained attitudinal and behavioural changes. We also believe it is important to offer victims the opportunity to be involved in the process so that young people who have offended can fully understand the impact of their behaviours and to ensure that reparation takes victims views into account. Our priorities for 2008/2009 are:

- **Prevention of offending and re-offending** and in particular intervening early to prevent the escalation of offending.
- **Assessment** as the foundation to effective service planning and delivery.
- **Risk Management** to manage offender risks of re-offending, harm to others and vulnerability / safeguarding.
- **Engagement** as the key to achieving behaviour change with robust enforcement arrangements for those who refuse to comply.



Underpinning our key priorities is an emphasis on **evaluation and review** with strong performance management arrangements to ensure the achievement of outcomes. Our priorities are also underpinned by a commitment to developing our workforce and innovation in practice as a **learning organisation** (see Section E1 Workforce Development).

Our priorities are aimed at achieving our over-arching outcome areas of reducing the numbers of children and young people entering the criminal justice system (National Indicator 111 - First Time Entrants (FTE)) and reducing re-offending by children and young people (National Indicator 19 – Rate of Proven Re-offending). We will support the delivery of safe and effective custody through working with partners to achieve effective end-to-end case management for those young people receiving a custodial sentence. We will also work alongside partners to increase victim and public confidence in the youth justice service. As a service we intend to deliver high quality assessments, effectively manage risk, identify and address safeguarding issues, intervene early, engage young people, their families and communities and involve victims. We will maintain strong information management and quality assurance processes in order to support our ability to continually develop and improve the services we deliver.

The YJP 2008/2009 is set within the wider planning context of the Children and Young People's Plan 2006-2009, Safer Sunderland Strategy 2008-2023 and the Sunderland Strategy 2008-2025; and the outcome of reducing re-offending by children and young people as a key priority is incorporated within the Sunderland Local Area Agreement (LAA). Sunderland YOS is fully committed to outcomes based planning and commissioning. Our priorities for 2008/2009 have direct resonance with the **Children's Trust Planning and Commissioning Framework** based on the principles of **Assess, Plan, Do and Review**.

Our capacity and capability assessment, improvement plans and workforce development plans as they relate to our local priorities are set out below.

Local Vision and Priorities		
Priority	Capacity and Capability Assessment and Improvement Plans	Workforce Development
<i>Prevention of Offending and Re-offending</i>	Our capacity and capability and improvement plans for the prevention of offending and re-offending are clearly set out in Sections C1 and C2 – FTE and Re-offending. Our particular focus is to prevent offending and re-offending through effective assessment, planning, intervention and review. A key improvement plan in relation to reducing re-offending under this priority is ensuring early planning for release from custody to enable partnership responses to complex resettlement needs. A further key priority is the expansion of offending behaviour resources for specific offence patterns e.g. racially motivated offenders.	Our workforce development plans for this priority are set out in Sections C1 and C2 – FTE and Re-offending. A key area of training and development is ensuring youth justice practitioners are trained in cognitive behavioural interventions and group work techniques.
<i>Assessment</i>	Effective assessment is the foundation for outcome based planning, delivery and review. By placing improvement in assessment at the heart of our business planning we aim to achieve across the Every Child Matters (ECM) outcomes for children and young people. Our improvement plans for assessment focus on ensuring that robust quality assurance arrangements for assessment exist at all levels of the service (individual, management and service level).	Our workforce plans for assessment focus on enabling youth justice practitioners to undertake holistic assessments that provide a comprehensive offender analysis. YOS staff have received Common Assessment Framework (CAF) training. The Prevention Team (Wear Kids) has already implemented the CAF in readiness for the Targeted Youth Support (TYS) roll-out across the city in 2008/2009. The introduction of practice workshops will provide an opportunity for practitioners working across services to share experiences of assessment practice and learn from each other. A further key area of training and development is PSR (PSR) refresher training.
<i>Risk Management</i>	Our priority around risk management has clear resonance with our other priorities of prevention of offending and re-offending, assessment and engagement. We have already made much progress in reviewing and revising our risk management arrangements and developing quality assurance arrangements. Our improvement plans for 2008/2009 focus on robust performance monitoring of risk assessment and risk plans.	Our workforce development plans for risk management are set out in Sections C4 and C5 – Risk of Serious Harm and Safeguarding. Key priorities are ensuring staff have a thorough understanding of the YOS Public Protection and Risk Management Policy and the Local Safeguarding Children Board (LSCB) procedures.
<i>Engagement</i>	Our priority around engagement sits across the seven capacity and capability themes set out in Section C – Delivery Plan. Our vision is to ensure that youth justice practitioners have the skills and techniques to engage families in services without compromising on enforcement – particularly for those families who persistently disengage with the service resulting in clear risks of offending and re-offending due to unmet needs.	Our workforce plans for engagement focus on ensuring youth justice practitioners have the skills to motivate even the most disengaged children, young people and families. Training plans around solution focused techniques and building respect with children and young people are identified in our workforce plans in Sections C1 and C2 – FTE and Re-offending.

The positioning of the YOS within the local authority and links with key strategic partnerships and plans

The multi-agency YOS Management Board provides the strategic oversight and governance of youth justice services delivered by the YOS. As an identified ‘significant partnership’ for Sunderland it also provides the strategic links with other significant partnerships across children’s services, criminal justice and community safety. The Director of Children’s Services continues to Chair the YOS Management Board and reports progress directly to the Chief

Executive of Sunderland City Council, who in turn highlights issues for consideration at each Board via the Chair. Structurally the operational YOS sits within the Positive Contribution and Economic Wellbeing Service within Sunderland Children's Services.

The context of the YOS as a Criminal Justice Agency working with other organisations to promote community safety and crime reduction

The YOS Management Board functions as one of the key delivery theme groups of the Safer Sunderland Partnership. It feeds in through the Safer Sunderland Partnership Business Support Group to the Safer Sunderland Partnership Board and up to the Sunderland Partnership (LSP). Sunderland YOS shares the aspirations of the Safer Sunderland Strategy 2008-2023 to ensure that ***everyone in Sunderland will be and feel safe and secure.***

We will support the Safer Sunderland priority to ensure ***feelings of safety are at their highest*** and ***perceptions of anti-social behaviour at their lowest*** through our work to ensure public confidence (see Section C6 – Public Confidence) and to prevent offending (see Section C1 - FTE). Work and commitment to reducing re-offending (see Section C2 – Re-offending) will also support the strategy's priority to achieve the ***lowest ever recorded crime rates*** and the ***lowest levels of proven re-offending***. Other key priorities of the Safer Sunderland Strategy supported by the YJP are to ensure:

- More people than ever perceive that parents take responsibility for the offending behaviour of their children (see Sections C2 and C6 – Re-offending and Public Confidence).
- Level of repeat incidents / victims of domestic violence and assault with injury will be at their lowest levels (see Section C7 – Improving Victim Satisfaction).
- No one will perceive attacks or harassment because of race, colour, religion or sexual orientation to be a very serious problem in Sunderland (see Section C2 – Re-offending).

This YJP supports all five of the Sunderland Strategy 2008-2023 aims of Prosperous City, Healthy City, Safe City, Learning City and Attractive City but has particular resonance with the Safe City aim to ***'make Sunderland the place where everyone feels welcome and can be part of a safe and inclusive community, where people will feel secure and can enjoy life without worrying about becoming a victim of crime'***.

As a partner of the Local Criminal Justice Board (LCJB) supporting the work of the Sunderland Local Delivery Group (LDG), Sunderland YOS supports a range of joint criminal justice priorities and performance targets. Our work with partners to implement Simple, Speedy and Summary Criminal Justice (CJSSS) is outlined further in Section D2 – The Scaled Approach. Section C1 of this YJP sets out the work of the YOS in partnership with others to reduce FTEs, which is also a statutory performance indicator for the Assessment of Police and Community Safety (APACS). Section C1 gives an overview of work being undertaken to address the conflict between the police 'Offenders Brought to Justice (OBJ)' and 'FTE' performance indicators.

The context of the YOS integrated into the local Children's Trust arrangements.

In 2006/2007 the YOS Management Board, as a significant Children's Partnership, formally aligned with the Children's Trust and its vision to work together to improve the life chances and aspirations for each child and young person in Sunderland. Our priorities for children and young people are set within the context of the Children's Services Directorate Plans and the Children and Young People's Plan 2007-2009. The YJP supports all 10 of the Children and Young People's Plan priorities across the ECM outcomes but has particular resonance with the priorities identified under ***Making a Positive Contribution*** which are about enabling children and young people to:

- Be aware of how their behaviour affects others and the importance of staying out of trouble.
- Be strong individuals, proud of their city and contribute to its future.

Our plans which contribute to these priorities are outlined in Section C – Delivery Plan.

Population, local youth justice trends and performance of the Sunderland YOS Partnership

Sunderland is the largest city in England's North East region, with a population of 283,700, of which 68,300 are children and young people, and 28,989 are aged 10-17. The minority ethnic population, and the number of asylum seeker families is small but growing, with the largest sub-group being Bangladeshi. Local ethnic monitoring indicates that there is no evidence of over representation of black and ethnic minority children and young people in the local criminal justice system.

The River Wear runs through the heart of Sunderland, which covers an area of 13,737 hectares. The city boundary includes the former new town of Washington and the former coal mining areas of Houghton and Hetton. Some areas of the city, located largely around the city centre, have a higher rate of offending by young people and are also often the

most deprived areas. There is a similar geographical pattern for offending by adults, strengthening the need for a whole family approach to dealing with offending to help break the cycle of intergenerational crime. Significant areas of deprivation persist with 46.1% of the city's resident population living in the 20% most deprived areas of England.

The Sunderland YOS partnership has performed well against national performance indicators by consistently achieving one of the highest overall performance ratings for Youth Offending Teams (YOTs) in England and Wales. An overall reduction of 8.5% in youth re-offending was achieved in the most recent performance reporting for re-offending and the partnership has been successful in achieving national targets across the range of reducing re-offending pathways including Parenting, Accommodation, Education, Substance Misuse and Mental Health. In 2007/2008 5% of the city's 10-17 year old population offended thus **95% of children and young people in Sunderland don't offend.**

Sunderland YOS partnership aims to deliver the best possible service to reduce the risks of the minority who do.

Following a highly positive report by the national Joint Inspection Team for YOTs, Sunderland YOS in partnership with others has been awarded the prestigious Beacon award for Sunderland's ability to deliver innovative, award-winning and nationally recognised approaches to criminal justice. Key aspects for which Sunderland was recognised as a Beacon Council were:

"Sunderland has demonstrated improved outcomes on youth offending, and against the national trend, the rate of custody for young offenders has dropped from 12 per cent in 1999 to a current figure of 2.8 per cent, with no negative impact on levels of offending. This has been achieved through tackling issues such as access to accommodation and mental health services...the authority has demonstrated innovative actions for both adult and young offenders, and a willingness to re-shape services to meet the needs of service users."

Martyn Lewis CBE, presenter of the Beacon Council Awards 2008

In 2008/2009 the performance framework for YOTs nationally has been reduced to a smaller set of six key outcome areas which are included in the National Indicator set for local authorities (198 indicators). These are set out below.

YJB Identifier	National Indicator	National Indicator Set Definition
Recidivism	19	Rate of proven re-offending by young offenders
Use of Custody	43	Young people within the Youth Justice System receiving a conviction in court who are sentenced to custody
Diversity	44	Ethnic composition of offenders on Youth Justice System disposals
ETE	45	Youth offenders engagement in suitable education, employment or training (ETE)
Accommodation	46	Young offenders access to suitable accommodation
First Time Entrants	111	First time entrants to Youth Justice System aged 10-17

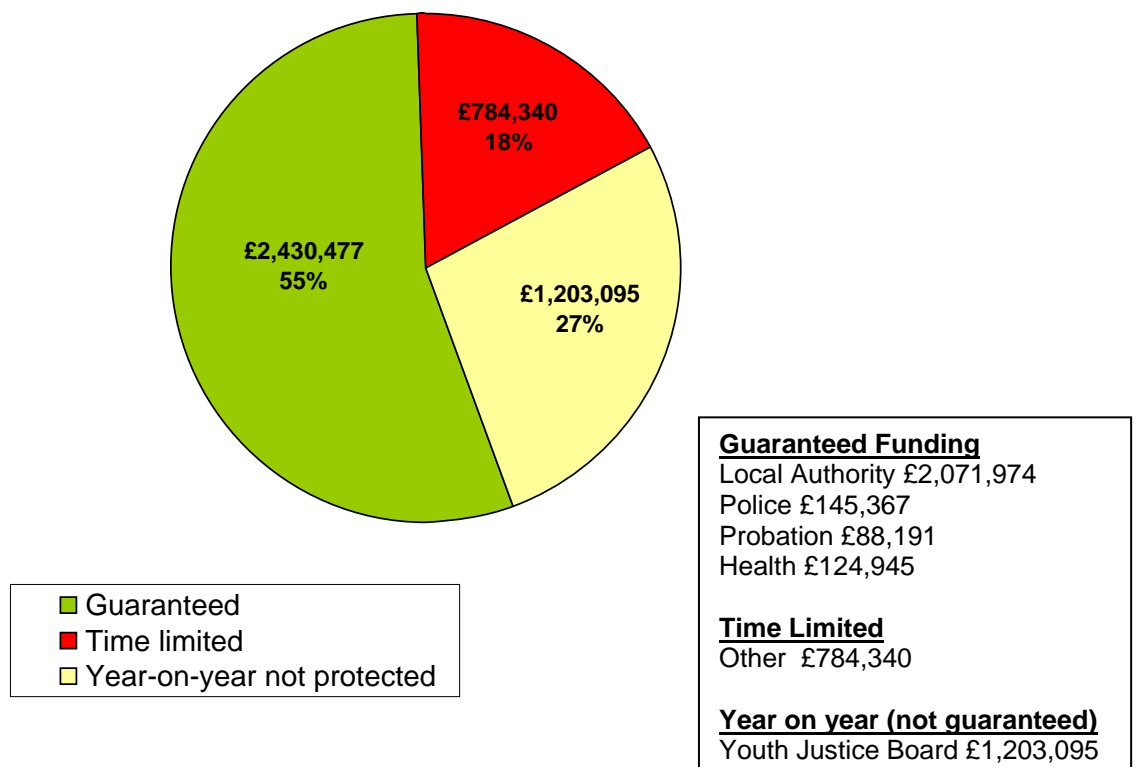
SECTION B - USE OF RESOURCES AND VALUE FOR MONEY

B1 Assess the extent to which the YOT's financial, staff, programme and ICT resources have been used to deliver quality youth justice services.

Financial Resources

Sunderland YOS has a complex budget structure made up of partner agency cash and in-kind financial contributions, core government funding from the YJB for England and Wales and a range of time-limited grant funding. Partner contributions to the YOS budget are set out in table B4. There are no significant changes to the contributions of partner agencies. There has been a marginal reduction in the overall budget of the YOS due to the ending of pump priming funds through the Local Public Service Agreement II (LPSA II), a reduced Prevention Grant (having received roll over funding in 2006/2007 from the previous year) and efficiency savings made by the service (achieving value for money). New income is reflected in the 2008/2009 budget as a result of New Deal for Communities (Back on the Map) funding.

Over a number of years Sunderland YOS has been successful in attracting significant funds to the service through grant applications for specific initiatives. Grant funding obtained by Sunderland YOS for 2008/2009 includes YJB Intensive Supervision and Surveillance Programme (ISSP) and Resettlement and Aftercare Programme (RAP) funding, Area Based Grant funding (formerly Children's Fund), On Track, New Deal for Communities (Back on the Map) and Youth Task Force funding (see 'Other funding in table B4). Sunderland YOS intends to apply for Working Neighbourhood Funding (WNF) to replace the funding provided through the Neighbourhood Renewal Fund (NRF) which ended in March 2008. As a result of these funds Sunderland YOS is a **well resourced service** (see Programme Resources below), providing **a range of additional and specialist services** to compliment statutory youth justice provision. Table B4 sets out funding for each grant, some grants (Area Based Grant and WNF) have been confirmed for a year only with further funding subject to the outcome of a review of all services funded under the grant. The chart below sets out the funding position in relation to guaranteed, time limited (at risk) funding and year-on-year but not protected funding.



Spending on youth justice services across preventative services, PACE, pre-court and remand services, court-based services, community based penalties, and work in custody are set out in table B5. There are no significant changes to spending on youth justice services other than prevention where there have been changes to income (see above). Sunderland YOS has a dedicated Business Support Unit and a specialist Planning and Information Team for premises management, finance, human resources and performance management functions that support the range of youth justice services set out in table B5.

Staff Resources

The staffing resources (as at 31st March 2008) of Sunderland YOS are set out in tables B7 and B8. There have been no major changes to the staffing composition of the YOS in the last year with a total of 112 paid employees (excluding sessional support staff). There has been an increase in the number of sessional workers due to successful recruitment initiatives; however, there has been a decrease in the number of volunteers as a consequence of a review of volunteer mentors that resulted in the resignation of a number of inactive volunteers. The service employs slightly more females across the total paid and volunteer staff group at 63%. At 3% of the total staffing, the seven black and ethnic minority staff employed by the service reflects the city's low BME population.

Sunderland YOS has a dedicated Training and Development budget to ensure the continued development of the paid and volunteer workforce (see Section E1 – Workforce Development) as well as a separate training and development budget for the three authority consortium ISSP scheme (for which Sunderland has the budgetary responsibility). Sunderland also makes a contribution to the regional training budget enabling the purchase of approximately 60 training places for 2008/2009. Although the training budget represents a very small proportion of the overall budget, this is supplemented by 'in-kind' training delivery contributions from partner agencies. Sunderland YOS has in place the full range of multi-agency staff as required by the Crime and Disorder Act 1998, though a vacancy continues to exist for the position of Health Worker.

Programme Resources

The financial resources section above highlights the significant grant funding Sunderland YOS has secured enabling the delivery of a number of added value and specialist prevention and offending behaviour programmes. The full range of programme resources offered by Sunderland YOS is set out in Appendix 2 – Glossary of Programmes Resources. These include:

Prevention – Sunderland YOS continues to deliver the Wear Kids Prevention Service which co-ordinates service provision for young people identified as at risk of offending through the area Youth Inclusion and Support Panels (YISPs). There are also a number of geographically based and targeted projects including the Phoenix Fire Safety Project (in partnership with Tyne and Wear Fire and Rescue Service), Looked After Children and On Track (in partnership with Sunderland Children's Services), the Youth Inclusion Project (YIP, in partnership with voluntary sector provider Crime Concern) and the 'Tackle It' programme (founded in partnership with Sunderland's Premier League football club, through Sunderland Football Foundation, and since delivered with a range of other partners including the Eagles Basketball Team and Tyne and Wear Museums Outreach Online). The long established Mentoring Scheme has also been expanded with peer mentoring through targeted recruitment of young mentors. A number of the Sunderland YOS Prevention initiatives were recognised in the **Regional Youth Justice Awards 2007**.

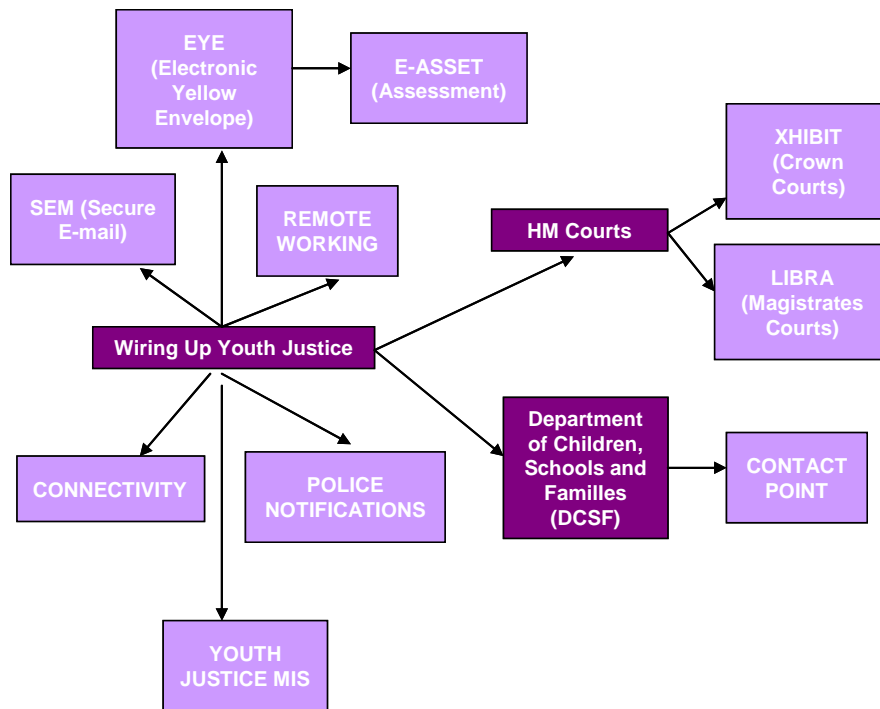
Offending – In March 2008 Sunderland YOS, in conjunction with other partners, was awarded the highest accolade for the effectiveness of services to reduce re-offending. The **Beacon** award recognised the YOS for its ability to deliver innovative, award-winning and nationally recognised approaches to criminal justice. As well as delivering outcomes through mainstream services across the range of reducing re-offending pathways Sunderland also has in place RAP, ISSP (winner of the Howard League Award 2007 and Youth Justice Award 2007), Restorative Justice (winner of the Regional Monitor Excellence Awards 2007 and Big Recycle Awards 2007), and Keeping Young People Engaged Programme.

As well as established programmes Sunderland YOS has introduced new schemes. The recently developed **Revolving Door Project** in partnership with the area Youth Offender Institutions (YOI's) was identified as a particular area of good practice by the Beacon Authority and despite the continued vacancy for a Health Worker Sunderland YOS continues to ensure targeted health initiatives are in place. In spring 2008 the three authorities ISSP introduced a Healthy Cooking project into Sunderland, following successful delivery at Gateshead (winner of the Howard League Award 2008) and is working with the Sunderland Risk and Resilience Board for young people to ensure a Chlamydia screening programme is effectively targeted at young people at risk.

As well as mainstream services delivered through partners and additional specialist provision through grant funding, Sunderland YOS has built up a substantive **Resources Library**, recognised as good practice both by the national Joint Inspection Team (Sunderland Inspection Report, published May 2007) and by the Beacon Council. The library includes a wide range of focused resources for workers to use when engaging a young person on a programme or on a court based order. Examples include one-to-one paper-based activities, board games, videos, DVDs, etc. The YOS holds an electronic directory and evaluation matrix of all resources available to practitioners (segmented by location, type, target group and method of delivery). This ensures that the practitioners are able to plan and deliver the most effective intervention for the child or young person.

ICT Resources

This section of the plan sets out the ICT resources of the YOS and highlights significant ICT changes which continue to be implemented in 2008/2009. The national Wiring up Youth Justice (WUYJ) Programme is changing the way the youth justice system operates bringing about better connectivity with other criminal justice organisations and there are also developments in ICT being lead by the Department of Children, Schools and Families to promote joined up working. Key developments in ICT for Sunderland YOS are set out below:



Sunderland YOS has the foundations in place necessary to adapt to technological changes with a dedicated Planning and Information Team, a comprehensive ICT development programme (including a renewal and disposal policy for the replacement of PCs and Office Platforms on a regular basis), and embedded case management systems: Youth Offending Information System (YOIS) and Universal Management Information System (UMIS). YOIS and UMIS are operating at full complement for the service, following large scale investment and implementation and both systems provide for performance monitoring, management information, data analysis and case management.

Sunderland has well developed and embedded performance management arrangements in place, and employs expertise in data analysis and data segmentation via a specialist Planning and Information Team (who also provide the monitoring, maintenance and training support of the case management systems). Examples of using local management information systems to analyse data and inform strategic developments and practice improvements include (i) the analysis of Multi-Agency Public Protection Arrangements (MAPPA) that identified children at risk of offending due to association with adult offenders (addressing intergenerational crime) and (ii) the Hate Crime analysis in conjunction with the Safer Sunderland Partnership that has resulted in increased targeted hate crime resources and the implementation of a Hate Crime Working Group after the analysis found that young people committed the most offences of hate crime. The YJB's Graham Robb has expressed praise for the YOS's analysis capacity and said "***the way in which the YOS is able to identify and then work with the most troubled young people and their families is producing results for the community in reducing the harm cause by a very few young people***". Success in using the systems to inform developments and practice improvements contributed to the 2008 award of Beacon Status for Reducing Re-offending.

Two significant ICT developments have been implemented during 2007/2008, namely Electronic Yellow Envelope (EYE) and Remote Working. Implementation of EYE in May 2007 has allowed for swifter sharing of information with the secure estate via the YJB Placements Team using secure email. Implementation of Remote Working early 2008 is allowing court staff to access normal office applications whilst at court, including access to the case management system (YOIS) and Secure Email (enabling the speedy delivery of EYEs directly from the court at the time of remand or custodial sentencing).

During 2007/2008, Sunderland YOS also implemented E-Asset to securely allow for joint assessment, planning (including advanced planning before arrival to custody) and continuity from YOS to custody to community. The secure estate receives E-Asset as part of the fully implemented EYE process and updates it accordingly during the young person's custodial phase.

ICT is utilised at Sunderland YOS to ensure effective consultation of children and young people, their parents/carers and their victims. For example:

- The interactive game-style **Viewpoint** System used to elicit the views of young people about the services they receive from the YOS.
- A **What Do You Think** questionnaire routinely used to enable children and young people to contribute to the planning of services they receive.
- The YOS website with a **dedicated young person's webpage** (with links to 'LetsGo' Sunderland, a directory for young people) and a dedicated parent's page. Our website can be accessed at www.sunderland.gov.uk/yos.

B2 Identify risks to future use of resources and value for money and plans to overcome the risks

Financial and Staff Resources – We have already highlighted that Sunderland YOS has been successful in attracting significant funding for specialist and additional programmes, and as a result almost half of the budget for the service comprises time limited or year-on-year not protected funding. In turn almost half (45%) of the 112 paid staff (excluding sessional workers) are employed on fixed term (time limited) contracts. The YOS budget is therefore complex to manage with risks to future delivery in relation to sustainability. To address these risks Sunderland YOS has in place robust arrangements around financial monitoring and performance management to ensure good financial planning and value for money. Budget clinics and performance surgeries are held monthly with managers across strategic and operational levels within the YOS and these feed into wider financial and performance management arrangements for the local authority. Although there has been no increase to the income of the YOS marginal increased costs have been identified in relation to premises management (internal and external maintenance for office premises) and direct commissioning from the Open University for Youth Justice Qualifications (see Section D3 - Workforce Development).

Programme Resources - To ensure the YOS is fully resourced a review has been undertaken to identify any significant gaps in programme resources. A need to expand resources in relation to racially motivated offenders, work with black and ethnic minority offenders and in relation to specialist parenting provision (relating to ADHD) were identified. Plans for 2008/2009 to address these identified gaps are set out below in the table below.

ICT Resources - There are no significant barriers to the use of ICT, however, in a period of considerable ICT development and business change the main risks to future delivery lie in the YOS capacity to maximise the benefits of WUYJ and other key technological developments. Other ICT development plans are to improve the effectiveness and efficiency of Video Conferencing and Viewpoint and to ensure the YOS case management systems are able to support developments such as the implementation of the CAF. To enable the realisation of priorities the YOS will undertake an audit of staff ICT skills with a view to ensuring that staff are able to use the ICT necessary for service delivery.

Identify plans to overcome the risks to future use of resources and value for money

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that 'health' in-kind staffing financial contributions are not maximised.	Develop a Service Level Agreement with Sunderland Primary Care Trust that enables young people involved with the YOS to receive advice and guidance on health related matters and to receive comprehensive physical health assessments where required from a qualified health worker.	Primary health care services are targeted at young offenders identified as having needs on ASSET assessment.	YOS Manager	31/10/08
There is a risk of limited resources for racially motivated offenders.	Expand the range of resources available for work with racially motivated offenders and other hate crimes.	Intervention plans for racially motivated offenders include SMART targets utilising specific resources to address racially motivated attitudes and behaviour.	Team Manager (CAST)	31/03/09

There is a risk of limited culturally sensitive resources for intervention with black and ethnic minority offenders.	Expand the range of culturally sensitive resources for work with black and ethnic minority offenders.	Intervention plans for work with black and ethnic minority offenders include SMART targets with interventions sensitive to their diverse needs.	Team Manager (CAST)	31/03/09
There is a risk that parenting programmes are not sensitive to the needs of parents of young people who offend with learning disability / difficulty.	Support the ADHD Parenting Programme pilot (being undertaken by the YOS contracted parenting provider).	Evaluation provides evidence of the effectiveness of specialist parenting provision for parents of young people who offend with learning disability / difficulty.	Team Manager (CAST)	31/03/10
There is a risk that specific offending behaviour programme pathways are not identified for Persistent and Prolific Offenders (PPOs).	Review internal arrangements for managing PPOs and investigate accredited programmes for this group.	There is reduced re-offending for PPO's.	Operations Manager (AS)	30/09/08
There is a risk that WUYJ developments are not fully implemented.	Support developments in the WUYJ programme for 2008/2009, including Connectivity, the YJB Management Information System, Police notifications and ContactPoint.	There is evidence of benefits realisation from the WUYJ.	Policy and Performance Manager	31/03/09
There is a risk that service consultation through viewpoint is not efficient or effective.	Review the Viewpoint consultation process to improve analysis of service user views.	Service user views inform individual intervention and service planning and delivery.	Assistant Planning and Performance Manager	31/10/08
There is a risk that managers are not able to maximise the use of management information systems to quality assure ASSET assessment.	Commission from the service software supplier Management Training Workshops to develop manager's knowledge and skills in using case management tools to quality assure service delivery.	There are improvements in the quality and managerial oversight of ASSET assessment.	Policy and Performance Manager	31/07/08
There is a risk that Video Conferencing does not provide value for money.	Review the efficiency and effectiveness of Video Conferencing for young people in custody.	The costs of Video Conferencing represent value for money in relation to outcomes achieved.	ISSP Programme Manager	31.12.2008
There is a risk that management arrangements for mentors and volunteers are not sufficiently well co-ordinated to deliver value for money and provide a sufficient level of oversight to support staff.	Align the overall management and co-ordination of mentors, volunteers and sessional workers.	Clear alignment is in place to manage these areas in a co-ordinated way achieving demonstrable outcomes and value for money.	Operations Manager (AS)	31/12/09

B3 YJB risk to future delivery assessment comments

B4 Youth offending team budget sources for the financial year 2008/2009

Agency	Staffing Costs	Payments in Kind	Other Delegated Funds	Total
Police	£105,300	-	£40,067	£145,367
Probation	£42,586	-	£45,605	£88,191
Health	£48,988	-	£75,957	£124,945
Local Authority	£1,330,909	-	£741,065	£2,071,974
YJB	£638,329	-	£564,766	£1,203,095*
Other	£617,691	-	£166,649	£784,340**
Total	£2,783,803	-	£1,634,109	£4,417,912

* YJB Funding is made up as follows:

ISSP £412,875
 Core Grant £317,898
 KYPE £41,830
 RAP £208,090
 Prevention £222,402

** Other funding includes the following:

Working Neighbourhood Fund £200,000
 Youth Task Force Funding £64,000
 On Track £295,340
 Childrens Fund £150,000 (however only 6 months confirmed funding at present i.e. £75,000)
 New Deal for Communities (Back On the Map) £75,000

B5 Services planned for the financial year 2008/2009

Core Activity	Total Budget (£)
Preventive services	£1,059,144
PACE	£151,407
Pre-Court	£651,605
Remand	£293,208
Court	£198,120
Community	£1,384,420
Custody	£680,008
Miscellaneous	-
Other	-
Total	£4,417,912

B6 Probation Contributions

Cash Contribution	Payments in kind 1 excluding staff		Payments in kind 2 staffing		TOTAL (£)
	Item	Cash Value (£)	Grade and Number	Cash Value (£) including on costs	
£45,605	-	-	-	-	£45,605
-	-	-	1x Band 4	£42,586	£42,586

B8 Staff in the youth offending team by gender and ethnicity based on census 2001 categories																
	Strategic Manager		Operations Manager		Practitioner		Administration		Sessional		Student		Volunteer		Total	
	M	F	M	F	M	F	M	F	M	F	M	F	M	F	M	F
White British	3	3	5	2	33	42	1	18	44	64	0	1	24	55	110	185
White Irish	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other white	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White and Black Caribbean	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White and Black African	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
White and Asian	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other Mixed	-	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-
Indian	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pakistani	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Bangladeshi	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other Asian	-	-	-	-	-	-	-	-	1	-	-	-	-	1	1	1
Caribbean	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
African	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Other Black	-	-	-	-	-	-	1	-	-	-	-	-	-	1	1	1
Chinese	-	-	-	-	-	-	-	-	-	1	-	-	-	1	-	2
Other ethnic group	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Not given	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	3	3	5	2	33	42	2	18	45	65	-	1	25	58	113	189
Welsh Speakers	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

SECTION C1 – FIRST-TIME ENTRANTS

C1.1 Assess the extent to which the YOT partnership has contributed to reducing first-time entrants into the youth justice system and reducing any disproportionality including children and young people from Black Minority Ethnic (BME) backgrounds

Performance

A 4.3% reduction against the National Indicator 111 for FTE's was reported for 2007/2008 falling, just short of the 5% target. A national project, however, has identified under reporting of FTE's due to information sharing between YOT's and police. As such, work has been undertaken to re-profile performance against the target which changes Sunderland's outturn for 2007/2008 to a 1.7% increase in FTEs, against the 5% reduction target. Achieving a reduction in FTE's is expected to present a continuing challenge to Sunderland YOS in 2008/2009. A review is taking place in partnership with Northumbria Police to examine any conflict locally between the FTE indicator and the Police indicator for 'Offenders Brought to Justice (OBTJ)'. As part of this, both Sunderland YOS and Northumbria Police (Sunderland Area Command) have been tracking the national landscape in relation to pilot projects regionally and nationally to address this specific issue and agreements reached to monitor FTE's and review individual cases as appropriate. As a result work is taking place to explore options for diverting young people from the criminal justice system.

There is no evidence of any difference in ethnic composition of young people entering the youth justice system compared to the composition of the local population (National Indicator 44). Referrals to the YOS Prevention Service for black and ethnic minority children and young people are also consistent with the local population. Prevention practitioners have been trained in cultural awareness and the local Language Point service provides translation and interpretation services as required. The Mentoring Service has targeted recruitment at the local Bangladeshi community for volunteer mentors and the YIP has gender specific provision. There are no local youth justice issues around gang related offending or violent extremism.

Overview

The YOS Prevention Service includes a well-established multi-agency YISP (Wear Kids) that works with children and young people aged 8-17 across the city. The YISP takes a partnership approach to identifying children and young people at risk of offending with an option to self-refer. YOS Prevention Services are overseen by an Operations Group which links directly with the YOS Management Board, enabling strategic links across criminal justice, Children's Services and the wider authority. The YOS, as a significant partner, is working closely with the Children's Trust in the development and implementation of the Youth Strategy with senior management representation for each of the four elements of youth support (positive activities; targeted youth support; information, advice and guidance; citizenship and volunteering). 2008/2009 will bring a changing landscape to the way prevention services are delivered with the onset of the TYS agenda and the implementation of the CAF. The Prevention Team will continue to evolve as they are integrated into locality-based TYS Teams, based on the YISP model already embedded in Sunderland, with an identified lead practitioner for each young person. Pilots are already running in the south and east of the city, with plans scheduled to be citywide by December 2008 and proactive work is taking place to align PAYP (Positive Activities for Young People).

In 2006/2007 Sunderland YOS was inspected by the national Joint Inspection Team. The inspection included an assessment of work with children and young people in the community. The inspection report published in May 2007 concluded **"A wide range of preventative work was undertaken by the YOS, with a variety of partners that offered creative and challenging opportunities for children and young people to help them avoid offending and anti-social behaviour"**. The service works in partnership with statutory, voluntary and business sector organisations to develop and deliver schemes that appeal to and engage children and young people who are identified as at risk of offending. These include:

- Phoenix Fire Fighters in partnership with Tyne and Wear Fire and Rescue Service (commended by the Office of the Deputy Prime Minister).
- Looked After Children Project in partnership with Children Services Safeguarding Service.
- YISP Support Workers (Youth Taskforce Action Plan funded [formerly Home Office trailblazer]) linked with the Local Authority Anti-Social Behaviour Unit.
- 'Tackle It' initiatives in partnership with Sunderland Premier League Football Club linked with Education, Youth Sector and Children's Social Care (LAC).
- YIP and On Track based on the North Washington area of the city.
- Mentoring (incorporating youth peer mentors).

These services have attracted a number of **national awards and significant local media coverage** for their innovative work with young people.

The YOS Early Prevention Strategy is being reviewed for 2008-2010 to reflect the development of the youth support agenda and to drive further reductions in early prevention. This will be linked to the citywide Children's Service Prevention Strategy to be published in the summer of 2008 in which the YOS has played a key role. The YOS has high level representation, for example on Crime and Disorder Reduction Partnership (CDRP, Safer Sunderland Partnership), Local Multi-Agency Problem Solving Groups (LMAPS), Looked After Children Offenders Group, Respect Taskforce, Multi-Agency Looked After Partnership (MALAP) and the LCJB Delivery Group which manages the performance of the offending reductions across the city. Embedded arrangements are in place within local Children's Trust arrangements regarding targets, referral systems and information sharing agreements.

There are well-developed case management / monitoring systems (based on UMIS) alongside robust quality assurance linked with wider YOS performance management arrangements. Regular quality assurance groups monitor data and information across the Prevention Service and YOS Quality Assurance (QA) groups review ONSET assessments. Alongside this, the YOS is also involved in work to develop a Regional QA tool. As part of the improvements identified, further work will take place in 2008/2009 to review intervention planning in relation to anti-social behaviour and offending and the effectiveness of exit strategies for those young people who continue to have identified risks following their involvement with YOS Prevention Services. The YJB Self Assessment Quality Tool completed in March 2007 concluded:

“Sunderland are achieving a very high level of effective interventions in prevention, management systems are excellent [and] many elements of good practice exist including a Quality Assurance tool for ONSET, an ECM checklist for workers and several schemes for working with ethnic minority groups in the city.”

C1.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that attitudes and behaviours which place children and young people at risk of offending are not addressed.	Ensure 90% of integrated support plans for Wear Kids and YIP prevention programmes include individual objectives in relation to work to address anti-social behaviour or offending.	Attitudes and behaviours identified on the ONSET assessment that place children and young people at risk of offending are reduced following intervention by the YOS.	Team Manager (Prevention)	31/03/09
There is a risk that risks of offending are not fully addressed upon completion of intervention.	Ensure 90% of cases closed by Wear Kids where there is a score of 3 or more on any section of the end ONSET has a specific exit plan in place.	Young people with ongoing needs are signposted to relevant services and are monitored to ensure their engagement.	Team Manager (Prevention)	31/03/09
There is a risk that children and young people not engaged in prevention services enter the criminal justice system.	Ensure 100% of all Wear Kids cases closed due to non engagement will be reviewed and any workforce development issues identified in relation to engagement skills will be addressed.	Increased engagement on Wear Kids programmes.	Team Manager (Prevention)	31/03/09

C1.3 Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
Assessment skills.	All recently appointed staff who have not previously had training.	ONSET introduction (regional INSET training).	Team Manager (Prevention)	31/03/09
Risk assessment skills.	Prevention Practitioners identified through supervision and appraisal.	ONSET Further Skills (regional INSET training).	Team Manager (Prevention)	22/05/08
Engaging children and young people in services.	All Wear Kids Prevention Service Practitioners.	Solution Focused Training.	Team Manager (Prevention)	01/06/08
Engaging children and young people in services.	Prevention Practitioners identified through supervision and appraisal.	Total Respect Training – Children's Services Training Programme.	Team Manager (Prevention)	31/03/09
Cognitive behavioural intervention with children and young people.	All Wear Kids Prevention Service Practitioners.	Family Work and Junior Jigsaw Training.	Team Manager (Prevention)	02/05/08

C1.4 YJB risk to future delivery assessment comments

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SECTION C2 – REOFFENDING

C2.1 Assess the extent to which the YOT partnership has contributed to reducing proven reoffending by children and young people and reducing *any* disproportionality including children and young people from Black Minority Ethnic (BME) backgrounds

Performance

Reducing re-offending amongst children and young people has traditionally been measured by the YJB *Recidivism* performance measure which tracks an annual cohort of young people (taken in October to December each year) for re-offending over 12 months. The most recent performance return was reported to the YJB in March 2007 based on re-offending of the 2005 cohort tracked for re-offending after 12 months (until end of 2006). **There was an 8.5% reduction in re-offending** (when compared with the 2002 cohort), **far exceeding the national target of 5%**. Particularly good reductions were achieved for first tier penalties (14% reduction) and young offenders supervised in the community (10% reduction). This was achieved against the national, regional and YOT family trends for which the average rates were outside the 5% target reduction. Although there was no reduction in the re-offending rate for the small number of serious and persistent offenders which form the cohort of custodial sentences, there were substantial reductions in the frequency (71% reduction) and seriousness (also 71% reduction) of offending by this group. Reducing the number of children and young people re-offending following a pre-court decision is an area for improvement in 2008/2009. Improvement plans are set out at C2.2 below.

From 2008/2009 re-offending amongst children and young people will be measured by the national performance measure on the '*Rate of Proven Re-offending*' (National Indicator 19). More frequent monitoring of re-offending (quarterly) through national arrangements with the police service will provide an opportunity for a greater analysis of, and understanding around, local service delivery and practice and the re-offending rate. As highlighted in Section A – The National and Local Context of Youth Justice, our aspirations for Sunderland, as set out in the LAA are for a 'safe city' and the Rate of Proven Re-offending indicator has therefore been prioritised within the Sunderland LAA.

There is no evidence of differential sentencing or re-offending on the basis of ethnicity and therefore the national performance measure for Diversity National Indicator 44 has not been identified as a priority for the LAA.

Overview

Sunderland has achieved a reduction in youth re-offending and Beacon status through the delivery of innovative targeted programmes and through ensuring young people who offend access the services they need across the *National Reducing Re-offending Pathways* of Accommodation, Education, ETE, Mental and Physical Health, Substance Misuse, Finance, Family Support and Attitudes and Behaviour. In the last two years Sunderland YOS has placed a particular emphasis on increasing our capacity and capability to deliver effective offending behaviour work. Having previously appointed an Offending Behaviour Group Work Co-ordinator the service has acquired a range of new offending behaviour resources such as the Be Safe Weapons Programme targeted at offending that has involved weapons (an issue of both public concern and media interest) and 'Show Racism the Red Card' aimed at racially motivated offending. **Our offending behaviour resources library for practitioners has been identified as an area of good practice by both the national Joint Inspection Team and by Beacon.** A further focus has been an emphasis on direct restorative justice as a means of confronting offenders with the consequences of their offending, with an increase in direct restorative justice from 13 instances in 2005/2006 to 61 instances in 2007/2008. There have also been targeted approaches to restorative conferencing for children looked after, young people in custody and racially motivated offending in schools.

Sunderland has had success in engaging young people in mainstream services through innovative schemes which appeal to service users. Specific examples include RAP to engage children and young people in substance misuse services and the award winning ISSP New Directions Scheme to engage long-term unemployed offenders in training. As a result of this and other targeted work around ETE **performance against the ETE target (National Indicator 45) has improved** from below the national target of 90% with a performance of 87% for the period April to December 2006, to above the target with a 91% performance for the period April to December 2007. Whilst performance for referral and access to substance misuse intervention remains high, serious incident reviews and YOS Management Board case studies have identified difficulties in sustaining that engagement for a small minority of non-compliant offenders where substance misuse is a key factor in their offending behaviour. In 2007/2008 Sunderland YOS therefore introduced the delivery of substance misuse services under National Standards enforceable through the courts. Sunderland YOS has consistently met national targets for parenting interventions despite the increase in target from 10% to 20% from 2006/2007 to 2007/2008. Although no longer a YJB target or part of the national indicator set for local authorities, the delivery of parenting interventions remains a high priority in relation to the Children and Young People's Plan (2007-2009) and the city's Parenting Strategy. In March 2008

Sunderland YOS procured parenting services from the voluntary sector organisation Barnardos for a further three years. Although Sunderland has had **a consistently high performance against the national Accommodation indicator** (National Indicator 46), the accommodation needs of high-risk groups including sex offenders and those released from custody remains a priority for the YOS Management Board. Action has been taken with the purchase of an 'emergency bed' through a local accommodation provider and family support work through the RAP and ISSP to prevent family breakdown. Longer term plans are also in place in relation to a procured direct access accommodation provision. A review of the YOS Risk Management Policy in line with our annual review of all policies ensures that clear risk management arrangements are in place with arrangements for reporting to the YOS Management Board to ensure key services are in place (see Section C4 – Risk of Serious Harm).

The service works closely with the three centres in which the majority of its young offenders sentenced to custody are placed: Castington Youth Offender Institute, Hassockfield Secure Training Centre and Aycliffe Young Peoples Centre. Young offenders who receive custodial sentences are supervised by a specialist multi-agency Resettlement and Inclusion Team supported by the three tier authority ISSP Scheme. Developments in relation to E-Asset (see Section B4 – ICT including Wiring Up Youth Justice) and the Revolving Door Project (see Section C3 - Custody) are ensuring continuous improvement in the end-to-end management of young people sentenced to and released from custody. Sunderland YOS continues to deliver the Prevent and Deter strand of the Prolific and other Priority Offenders (PPO) scheme on behalf of the Safer Sunderland Partnership. During 2008/2009 the scheme will be reviewed and aligned with the new performance monitoring arrangements introduced by the YJB in April 2008.

Our strategy for reducing youth re-offending has been underpinned by a consistent approach to the engagement and compliance of young people who offend with **98% performance against the delivery of National Standards for youth justice**. Analysis of assessment data shows that 'motivation' continues to be one of the highest offending risk factors for young offenders commencing YOS interventions (see Appendix 1 – Assessment Profile) and thus engagement continues to be a key priority for the service in 2008/2009 (see Section A2 – The strategic aims and priorities of the local youth justice system).

C2.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risk

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that the causal link between risk identified on ASSET Assessment and those children and young people re-offending at each level of the cohort is not fully understood.	Review performance management arrangements to compare those re-offending in the recidivism cohorts with those not re-offending in relation to risks and needs on end ASSET assessment and agree a service plan.	The YOS is able to use the 'rate of proven re-offending' performance data to inform service planning and deliver and achieve further performance improvements.	Team Manager (FW/RO)	31/10/08
There is a risk that reductions in re-offending are not achieved for young people on the Deter strand of the PPO scheme.	Review the Prevent and Deter programme under the Sunderland PPOs scheme and ensure it is aligned with new YJB performance monitoring requirements.	Reductions in re-offending are achieved for young people on the 'deter' strand of the PPOs scheme.	Operations Manager (AS)	01/09/08
There is a risk that planned work with children and young people is not completed.	Monitor all interventions ending (excluding breaches, transferred cases and those re-sentenced prior to the conclusion of the intervention) to ensure that planned work is completed in 100% of cases.	Planning intervention work is completed resulting in a reduction in risk (as identified by ASSET Assessment).	Team Manager (CAST)	03/03/09
There is a risk that offending attitudes and behaviours are not appropriately targeted.	Ensure that 90% of cases from high risk Final Warnings to Detention and Training Orders include offending behaviour work.	Monitoring shows that all cases have offending behaviour interventions and as a result risks (on ASSET assessment) are reduced.	Team Manager (CAST)	03/03/09
There is a risk that young people are	Early Intervention and First Tier Penalties Cohorts - Ensure that	There is a reduction in end ASSET	Team Manager	03/03/09

C2.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risk				
Risk	Action	Success Criteria	Owner	Deadline
not engaged in voluntary final warning interventions.	any children and young people commencing Final Warning Intervention who have emerging or identified needs are referred to appropriate services and are monitored to ensure their engagement (score 2 or more on ASSET assessment.)	assessments showing continued risks of re-offending.	(FW/RO)	
There is a risk that children and young people receiving a first tier penalty re-offending due to a lack of clear exit plan for those with outstanding risk and needs at the end of statutory intervention.	Early Intervention and First Tier Penalties Cohorts - Ensure that any children and young people who have continuing identified needs at the end of a Referral Order intervention (score of 3 or more on any section of ASSET assessment) are referred to appropriate services through CAF.	Children and young people with outstanding risks and needs following YOS intervention access relevant mainstream services.	Team Manager (FW/RO)	03/03/09
There is a risk that looked after children are more likely to re-offend due to not successfully completing YOS intervention.	Community Based Penalties Cohorts - Develop an action plan to reduce the proportion of community based penalties for children looked after resulting in breach.	There is a reduction in breach rates for looked after children who offend.	Team Manager (CAST)	30/09/09
There is a risk that the high level of parenting support currently offered is not maintained.	Community Based Penalties Cohorts - Ensure that 20% of community based penalties include a parenting intervention.	Parents of children and young people who offend receive the support they need (as identified by ASSET).	Team Manager (CAST)	03/03/09
There is a risk that young people released from custody re-offend.	Custody Cohorts - Develop monitoring and escalation procedures for any young person where planned services by the local authority with respect of accommodation or looked after services are not in place six weeks prior to release.	There is reduction in the seriousness and frequency of offending for children released from custody.	Team Manager (RESET)	03/03/09
There is a risk that children and young people who offend become disengaged from education.	Custody Cohorts - Ensure that for 90% of school-age young people not engaged in education, there is a specific YOS ETE Plan in place to support them back into a suitable placement.	Performance against ETE is maintained.	Team Manager (RESET)	03/03/09
There is a risk that some serious and persistent offenders revolve in and out of custody due to failure to break the re-offending cycle of behaviour.	Custody Cohorts - Agree with HMYOI Castington and Hassockfield a protocol and procedures for the future development of the Revolving Door programme with a view to identifying and engaging at least ten young people over the course of the year.	There is reduction in the seriousness and frequency of offending for children released from custody.	Team Manager (RESET)	03/03/09

C2.3 Identify workforce development plans to overcome the risks to continuous improvement				
Skills to Develop	Target Group	Action	Owner	Deadline
Quality assurance of ASSET assessment.	All managers responsible for staff working with children and young people.	Regional Quality Assurance of ASSET Seminars (linked with Regional ASSET Audit).	Operations Manager (DL)	31/03/09
There is a risk that children and young people who offend are not engaged in services.	All staff working with children and young people who offend.	Solution Focused Training.	Operations Manager (DL)	01/06/08
There is a risk that targets set in interventions plans for children and young people are not SMART.	All case management staff.	Target Setting (regional INSET training).	Operations Manager (DL)	31/03/09

C2.4 YJB risk to future delivery assessment comments

SECTION C3 - CUSTODY

C3.1 Assess the extent to which the YOT partnership has contributed to reducing the use of youth custodial remands and sentences and reducing *any* disproportionality including children and young people from Black Minority Ethnic (BME) backgrounds

Performance

Sunderland YOS, working in partnership with the local courts and others, has ensured **substantial reductions in the use of custody and maintained rates below the national targets** of 5% for custodial sentencing and 9% for custodial remands. For the period 2007/2008 the custodial sentencing rate for Sunderland (National Indicator 43) was 3.6% and the rate of custodial remands was 8.8%, well below the national, regional and YOT family averages. This performance has been achieved against a history of Sunderland as a high custody use area with rates as high as 12% in 1999 prior to the inception of the YOS. The success of Sunderland in reducing the use of custody was one of the key factors for which Sunderland received the prestigious Beacon award. In presenting the Beacon award it was said "**Sunderland has demonstrated improved outcomes on youth offending, and against the national trend, the rate of custody for young offenders has dropped.....with no negative impact on levels of offending**". With a range of effective alternatives to custody in place this performance is expected to be maintained in 2008/2009.

There is no evidence of disproportionate sentencing to custody for black and ethnic minority children and young people (National Indicator 44) with only one young person of BME origin entering the secure estate since the inception of the YOS in 2000.

Overview

Confidence remains high in relation to our award winning ISSP scheme which provides alternatives to custody. Based on the international Youth Advocate Programme (YAP) model the ISSP uses a strength based family approach to support young people using ordinary people with extraordinary skills. Drawn from local communities, they provide support to young people and their families 24 hours a day, 7 days a week. Potential custodial remands are targeted by ISSP. Robust internal procedures are in place for reviewing remands to ensure robust Bail Supervision and Support packages or ISSP bail is offered at the next court hearing where appropriate. The programme seeks lasting change for young people and their families. As part of ISSP, young people undertake reparation activities, restoring the costs of crime and reintegrating them back into the community. In conjunction with this statutory service, the RAP Team whose support extends beyond the order on a voluntary basis, work closely with the young person and their families using constructive activities and family support. As a result there are significant examples of crisis intervention work and youth advocates providing support to achieve ECM outcomes. The development of the **Revolving Door Project** has seen Prison Officers supporting young people in the community to promote further continuity, another key area of innovation identified in our Beacon application. During 2008/2009, the scheme will be extended to offer more places for young people released from custody. The confidence of the courts in YOS assessments and interventions is reflected in the **high congruence rate** between sentencing proposals from the YOS and sentencing outcomes made by the court, which was 87.2% for 2007/2008.

Solid relationships with courts exist both at a strategic and operational level demonstrated by courts representation on the YOS Management Board and regular joint training with magistrates for the youth bench. A dedicated Court Team (including Bail and Remand) provides a comprehensive court service everyday ensuring a seamless service is in place between the youth, magistrates and crown courts. Court reports are prepared by experienced staff and are subject to robust gatekeeping and quality assurance processes. Considerable positive feedback is received from magistrates on the quality of court reports through court satisfaction surveys. Following the national Joint Inspection of the YOS published in May 2007, the service set out to ensure robust arrangements were in place for the quality assurance of PSRs to raise the standards of reports for the court. In addition to training for all PSR authors / gatekeepers and a service QA Group for service practitioners and team managers, arrangements were put in place for regular quality assurance of PSRs by the Strategic Management Team (SMT) led by the YOS Manager. Procedures for PSRs have been reviewed and amended. Refresher PSR training for PSR authors and PSR gatekeepers has been prioritised within the YOS Workforce Development Plan for 2008/2009. Supporting the Court Team, a dedicated and comprehensively trained Appropriate Adult (AA) scheme for all young people provides a 24/7 service. They are supervised and trained based on the YJB effective practice guidance including legal issues.

The YOS has high contact levels with children and young people (evidenced through the National Standards Audit) and YOS workers are trained in the use of motivational interviewing techniques that support them to ensure effective compliance. Where compliance issues exist, the YOS has robust procedures in place ensuring that swift and appropriate action is taken when young people breach the conditions of their order and a managerial group

regularly reviews breaches, breach enforcement practices and monitors outstanding warrants. Innovative solutions to breach via fast tracking have also been delivered through ISSP. An innovative scheme that provides restorative justice conferencing where young people are confronted with the consequences of their actions has seen productive results. Wider restorative justice approaches have been instigated by the YOS. The service is also involved in an innovative Looked After Children Diversionary / Restorative Justice Panel with Children's Services which has demonstrated positive impact in terms of diverting young people from prosecution and reducing offending within Children's Homes and was described as **'an exemplar of corporate parenting'**, by the LA Section 17 consultant.

A dedicated Accommodation Officer is seconded to the YOS who has won the **North East Youth Justice Individual Award 2007** for her outstanding commitment to preventing homelessness for young offenders, influencing regional developments and local practice and achieving a high performance outturn on accommodation. Although Sunderland has had **a consistently high performance against the national Accommodation indicator** (National Indicator 46), the accommodation needs of high-risk groups including those at risk of or released from custody remains a priority for the YOS Management Board (see Section C2 - Re-offending). During 2008/2009 remand episodes will be rigorously monitored to prevent young people being remanded as a result of a lack of appropriate bail address (see improvement plans below).

In recognising that the engagement of children and young people in ETE makes a significant contribution to their resettlement from custody or supporting them outside of custody, the YOS has made notable progress against the YJB indicator to ensure that 90% of young offenders supervised by YOTs are in suitable full-time ETE. An ETE Working Group enables managers, practitioners and specialist ETE staff from across the service to monitor ETE outcomes for children and young people and take forward practice issues with Children's Services, Connexions and the local training provider (Springboard). The YOS is also a member of the 14-19 Not in Education, Employment or Training (NEET) Strategy Group and has signed up to a partnership ETE plan for the city under this group. The YOS has worked closely with the group to attract funding from the European Social Fund to employ dedicated NEET support workers for the Sunderland area and works with Connexions to agree and provide NEET programmes in focused areas of the city. The YOS works in partnership with the Learning and Skills Council and Springboard to hold an E2E 'Hard to Place' Panel, ensuring that even the most disengaged children and young people are engaged in ETE. For 2008/2009, the YOS will pursue further improvement around re-integrating young people of school age identified as NEET within 3 months of being identified. The YOS has a Keeping Young People Engaged Project (KYPE) through which (i) support staff ensure young people attend the training places they are offered and (ii) activities are commissioned that develop the social and life skills some disengaged young people need to acquire the motivation, confidence and self esteem to re-engage with training and employment. The YOS national Joint Inspection report 2007 commented **"the education team were skilled at making referrals to appropriate agencies and brokering arrangements with education providers to facilitate smooth working relationships"**.

C3.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that, where remands to custody are prevented through effective alternatives, there is a reduced risk of a custodial sentence.	Monitor monthly the numbers and reasons for remands that do not result in a custodial sentence and work with partners to address any issues arising.	Clear monitoring arrangements are in place to identify any remand episodes which could have been prevented.	Assistant Pre & Post Court Team Manager	31/03/09
There is a risk that some young people are remanded to custody due to a lack of appropriate bail address.	Monitor any young people remanded to the secure estate due to lack of appropriate accommodation and work with partners to address any issues arising.	The YOS Management Board is aware of the circumstances under which children and young people are remanded due to a lack of appropriate accommodation and action is taken with partners to address relevant issues.	Assistant Pre & Post Court Team Manager	31/03/09

C3.3 Identify workforce development plans to overcome the risks to continuous improvement				
Skills to Develop	Target Group	Action	Owner	Deadline
'Reports for the Court' writing skills.	All designated PSR authors and designated management 'gatekeepers'.	PSR Refresher Training.	Team Manager (RESET)	31/03/09
Supporting the courts.	All court staff.	Court Training (in-house).	Assistant Pre & Post Court Team Manager	31/03/09

C3.4 YJB risk to future delivery assessment comments

SECTION C4 - RISK OF SERIOUS HARM

C4.1 Assess the extent to which the YOT partnership has contributed to addressing risk of serious harm to the public through local application of YJB risk of serious harm procedures

Performance

Over the last two financial years the YOS has completed ASSET Assessments in 99.8% of cases for young people starting an intervention or being released from custody.

The national Joint Inspection of Sunderland YOS published May 2007 found that **“a full risk of harm assessment was undertaken in 90% of the appropriate cases. Of those not reaching the threshold for assessment inspectors agreed with this in 89% of cases”**. Performance has been maintained in 2007/2008, with 88.1% of relevant cases having had a Risk of Serious Harm (ROSH) assessment. Of all ROSH assessments completed in the periods, just over 90% resulted in a rating of low to medium level of risk, with high-risk ratings increasing slightly from 7.2% in 2006/2007 to 7.3% in 2007/2008. In 2006/2007 there were no young people who were classified as ‘very high risk’ and only 3 in 2007/2008. 99% of people with a completed ROSH are White British or White European.

Overview

Sunderland YOS has robust arrangements in place for assessing and managing children and young people that present a risk to others and / or to the public. The procedure for managing risk in Sunderland is based on the principle that assessment scores (ONSET, ASSET and AIM2 where applicable), completion of a ROSH and specific vulnerabilities act as triggers for identifying risk and completing a Risk Management Plan. Any case determined to be high-risk or very high-risk is reviewed at the **YOS High Risk Strategy Group** and placed on the **YOS High Risk Register** to monitor the agreed action plan for managing the risks identified (see below). ROSH, regular supervision and regular case file sampling provides the ongoing practice arrangements for overseeing risk. Specifically, all team managers quality assure PSRs, ASSETS, ROSH forms and Risk Management Plans via the gatekeeping and countersigning process, and results of monthly ASSET and PSR QA Meetings are fed into the Operational Management Team and to Practitioners (including issues regarding assessments of dangerousness and risk). A High Risk Strategy Meeting monitors those cases that fall under any of the 3 MAPPA categories, and ensures appropriate referrals to MAPPA.

The High Risk Strategy Group is chaired by a member of SMT, who in turn reports weekly to the wider SMT and the YOS Manager to ensure risk is being managed effectively within available resources (including partner agencies). To ensure the high standard of the YOS risk of serious harm management process, the YOS will implement regular review arrangements for young people fitting MAPPA criteria and will launch the revised YOS **‘Risk Management and Public Protection Policy’** (see C4.3 below). This will involve embedding the policy through awareness raising sessions with practitioners and workshops to consider case studies; increasing understanding of ROSH (and its purpose); increasing use of the Serious Harm section of ASSET; enhancing staff ability to identify young people with risk of serious harm; enhancing monitoring arrangements for sex offenders; reinforcing the timeliness, accuracy and consistency of recording; and better management of young people subject to MAPPA. Successful implementation will result in 100% of young people presenting a risk of harm having a Risk Management Plan (signed by line management) that is regularly reviewed; 100% of young people requiring a referral to MAPPA are referred; and regular systematic reviews taking place for the thematic groups.

The YOS has conducted **an internal review of its management of offenders who present a risk of serious harm to the public** (overseen by the governing YOS Management Board) and found that during the period 2007/2008 the YOS managed five young people fitting MAPPA Category 1 (all managed at level 1), five fitting MAPPA Category 2 and seven fitting MAPPA Category 3. The review found that the assessment and management of risk was of a good standard; there was appropriate use of ASSET, ROSH and the High Risk Meeting; and MAPPA processes were adhered to. The review also found some areas for improvement in relation to (i) monitoring completions of the serious harm section of ASSET and ROSH assessment (see Section C4.2 below) and (ii) ensuring young people presenting medium or above risks on the ROSH assessment have a robust Risk Management Plan in place.

Corporate ownership of risk of serious harm management by the YOS Management Board ensures a rolling programme of review and development. During 2007/2008 the YOS Management Board agreed a thematic review of ROSH cases managed by Sunderland YOS, in order to bring partners together to analyse gaps in service provision and ensure appropriate responses to the gaps. The Board agreed to a review of how well procedures and joint working arrangements were being applied by the YOS by (i) exploring the links between, and respective roles of, involved agencies in assessing risk and ensuring clear joint working takes place in relation to

young offenders and (ii) reviewing partner understanding of and awareness of the duty to cooperate within the MAPPA framework. As a result of the review the Board went on to agree that further reviews take place in relation to engagement and end-to-end case management of high risk cases.

Sunderland YOS won the national **Alarm Risk Management Awards 2007** for its risk management systems in the category of 'people'.

The YOS is represented at Level 2 MAPPA and Level 3 MAPPP. Level 2 MAPPPAs are attended by Case Managers, whilst Level 3 MAPPPs are attended by Strategic Managers. The YOS is also a member of the MAPPA Steering Group which exists to ensure that the responsible authority and those authorities and social care agencies who have a duty to co-operate (as identified in the Criminal Justice Act 2000) work together to assess and manage the risk posed by sexual and violent offenders who reside in Wearside.

C4.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that quality assurance arrangements for assessment are not consistently implemented at all levels of the service.	Ensure robust quality assurance arrangements for assessment at individual, management and service level.	Quality assurance arrangements show quality completion of ASSET assessment and associated risk assessments.	Operations Manager (DL)	31/03/09
There is a risk that ROSH assessments are not completed in all relevant cases.	Implement monitoring arrangements to ensure that 100% of children and young people presenting a medium or above risk on their ROSH assessment have a risk management plan in place.	ROSH assessments are completed in all cases.	Operations Manager (DL)	31/03/09
There is a risk that risk levels are not appropriately assessed if not quality assured.	Undertake six monthly reviews of those young people who fit the criteria for MAPPA to ensure the relevant arrangements are in place and their risk is managed appropriately.	Quality assurance evidences that risk levels have been appropriately identified.	Operations Manager (DL)	31/03/09
There is a risk that risk is not adequately assessed if the risk assessment is not completed in full.	Implement monitoring to ensure that all parts of the indicators of serious harm section of ASSET is fully and comprehensively completed and where the assessment triggers a ROSH all sections of the ROSH are also fully and comprehensively completed.	ROSH assessments are fully completed ensuring a robust assessment of risk.	Operations Manager (DL)	31/03/09
There is a risk that specialist assessment is not undertaken on all children and young people who commit sexual offences.	Ensure aim assessment is completed in 100% of cases where a young person assessed has committed a sexual offence.	Specialist assessment for sex offenders results in risk led intervention.	Operations Manager (DL)	31/03/09

C4.3 Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
Working within MAPPA.	YOS Practitioners identified through supervision and appraisal.	Sunderland LSCB MAPPA Training.	Operations Manager (DL)	11/12/09
Understanding of revised YOS Risk Management and Public Protection Policy.	All YOS Managers and Practitioners.	YOS Risk Management and Public Protection Policy Training (in-house).	Operations Manager (DL)	331/03/09
Understanding of specialist assessment for sex	100% of case management staff	Specialist assessment for risk offenders results in	Operations Manager (DL)	31/03/09

offenders.	trained in AIM2 assessment.	risk based intervention.		
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C4.4 YJB risk to future delivery assessment comments

SECTION C5 - SAFEGUARDING

C5.1 Assess the extent to which the YOT partnership has contributed to keeping children and young people safe from harm

Performance

The proportion of young people for whom indicators of vulnerability has been flagged in ASSET was 43% in 2007/2008, representing little change on the previous year when it was 45%. The percentage rated as high/very high was 6% in 2007/2008 (3:1 male/female ratio). The proportion assessed as low risk has increased from 60% in 2006/2007 to 77% in 2007/2008. There are inconsistencies in recording of vulnerability plans with some plans recorded on case files and some plans recorded on the YOS case management system resulting in a need to improve recording to enable robust monitoring arrangements (see C5.2 - Improvement Plan).

The focus in this plan on supporting staff to develop and strengthen their assessment skills and managing risk is intended to achieve greater consistency in the identification of and planning to address risk, vulnerability and safeguarding issues so that children and young people are kept safe from harm and from harming others through their actions.

Children and young people who are looked after are identified both nationally and locally as more likely to offend. With offending by looked after children historically at three times the rate of offending (ratio of 3) against the general population of children and young people in Sunderland, a stretch performance target was agreed under the city's Local Public Service Agreement II (LPSA II). The aim was to reduce the numbers of looked after children from 47 children to 26 (ratio of 2) by the end of the LPSA II in September 2008. At the end of September 2007, the number of looked after children offending had been reduced to 35 (equating to a ratio of 2.4), thereby meeting the *interim* LPSA II target. This has been achieved by a range of strategies and interventions for looked after children, overseen by a Performance and Strategy Children Looked After Offending Group, chaired by the Head of Safeguarding for Children's Services and attended by YOS and Police. Our strategy for reducing offending by looked after children has included the introduction of ONSET prevention of offending assessment across the Looked After Children Service, dedicated YOS LAC Practitioners to work with those identified as at risk and Restorative Justice in looked after children establishments to divert young people from the criminal justice system.

Overview

Sunderland YOS has a duty under Section 11 of the Children Act 2004 to safeguard and promote the welfare of children and young people, particularly those who have suffered or who are likely to suffer significant harm. Through in-depth assessment at the very outset via the assessment tools of ONSET and ASSET, Vulnerability Management Plans are triggered for young people that have medium / high levels of vulnerability risk because of their own or other's behaviour or because of circumstances / events. The Vulnerability Management Plans provide the plan of intervention to address the safeguarding need (including work with external agencies), which are quality assured through management countersigning and gatekeeping, regular case file sampling arrangements and monthly QA Meetings. Young people presenting high levels of vulnerability are placed on a High Risk Register and are reviewed by the internal High Risk Strategy Group to ensure the highest level of monitoring and management of their intervention plan and to ensure access to relevant mainstream agencies.

Sunderland YOS is a statutory member of the LSCB and operates according to its local safeguarding procedures, with associated responsibilities to contribute to the recognition, handling and monitoring of children in need, and Child Protection. The YOS Manager represents the service at the LSCB, and an Operations Managers represents the service at its subgroups of 'Hidden Harm', 'Management and Policy', and 'Audit and Good Practice', 'Procedures and Prevention'. Examples of joint working via the LSCB and its subgroups include (i) YOS has worked with the group to identify hidden harm for young people active to the YOS who have parents who misuse substances. A multi-agency action plan was set to establish a specific training course for the agencies involved (ii) YOS has worked with the group to analyse young people committing sexual offences enabling sign-up to the AIM2 model for managing those cases.

The YOS national Joint Inspection 2007 found that "***the YOT refers cases where safeguarding concerns have been identified, to the local Children's Services and contributes to Child Protection Plans on a case-by-case basis***". For all young people with welfare concerns, the YOS works in partnership with other agencies to safeguard the child or young person, including attendance at strategy meetings, child protection conferences and making referrals. In all cases of contribution, the YOS clearly documents its roles and responsibilities in respect of the young person to ensure effective partnership working e.g. worked with local children's homes to document the roles and responsibilities of both agencies in reducing breaches by ensuring looked after young people attend court.

Young people with complex needs requiring a multi-agency response are routinely referred to the Complex Case Forum (CCF) by the High Risk Strategy Group. The Forum is attended by the YOS Operations Manager and multi-agency plans are enabled via this forum. For example (i) CCF jointly explored and secured a suitable placement for a young person with self-harm, and suicide risks and (ii) young person with ADHD had their needs reassessed and considered by the forum and due to the range of partner support and information, the forum was able to mobilise access to Tier 3 mental health services. The YOS identifies gaps in meeting need through such forums and makes appropriate referrals for drug intervention, mental health intervention, etc. During 2007/2008 the YOS will implement arrangements for ensuring there are written plans of intervention for all Child and Adolescent Mental Health Services (CAMHS) cases and ensure that high numbers of young people access YDAP's mandatory intervention programme within six weeks (see C5.2 - Improvement Plan).

The YOS adheres to regularly reviewed child protection procedures, a local risk management plan and the Sunderland LSCB Procedures for Safeguarding Children, which provides a comprehensive framework for the management of safeguarding in Sunderland. Within the procedures, the threshold criteria for making and responding to safeguarding referrals are clear and widely understood by staff from both the YOS and Children's Services and management structures have responsibility for generating and monitoring awareness. Safeguarding forms part of the induction process for all new practitioners, sessional and volunteers, and practitioners have access to formal training in relation to children in need, safeguarding and completion of Child in Need Referrals. During 2007/2008, the YOS will ensure that all staff, volunteers and sessionals working with children and young people have had appropriate safeguarding training (see C5.2 - Improvement Plan).

The YOS Management Board takes corporate ownership of vulnerability management through the receipt of quarterly safeguarding reports that include statistics, safeguarding development updates and an associated thematic report. During the last year the thematic safeguarding reports have included 'Safeguarding for Persistent Young Offenders', 'Children known to the YOS on the Child Protection Register', 'Offending by Looked After Children' and another is scheduled on 'Domestic Violence' as part of the rolling programme of reporting in this area. In addition, the YOS Management Board uses a case study approach to review policy, procedure and partnership working by Sunderland YOS. This was identified as an area of good practice in the YOS Inspection 2007 ***"at each Management Board meeting, case studies were presented to members to illustrate the work of the YOS. Board members felt that this was a good way of helping them focus on the core business of the Board and have the opportunity of seeing policies in practice."***

During 2007/2008, Sunderland YOS implemented E-Asset to securely allow for joint assessment, planning (including advanced planning before arrival to custody) and continuity from YOS to custody to community. The secure estate receives E-Asset as part of the fully implemented EYE process and is able to update accordingly during the young person's custodial phase. Relevant practitioners attend planning meetings during the custodial term to feed into interventions for mental health, substance misuse, self-harm, etc.

C5.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that vulnerability assessments are not fully completed in all cases.	Implement monitoring to ensure that all parts of the vulnerability assessment section of the ASSET is fully and comprehensively completed.	Comprehensive vulnerability assessments ensure young people are safeguarded.	Operations Manager (DL)	31/03/09
There is a risk that vulnerability plans are not recorded electronically to ensure swift and speedy information sharing.	Ensure that vulnerability plans are in place and recorded on the service's case management system in 100% of cases where the vulnerability level is assessed as a medium or above.	Vulnerability plans are in place for all vulnerable children and young people.	Operations Manager (DL)	31/03/09
There is a risk that mental health outcomes are not achieved for all children and young people offending with identified mental health needs.	Ensure that 90% of referrals to the YOS CAMHS specialist result in a specific CAMHS intervention plan and that the outcome of the intervention is confirmed with the family and relevant professionals in writing.	Outcomes are achieved and recorded for all children and young people offending with identified mental health needs.	Team Manager (RESET)	31/03/09
There is a risk that positive substance misuse outcomes are not achieved for all offending children and young people that are identified as misusing substances.	Achieve successful completion rates for 75% of young people referred to the YDAP five week intervention programme.	Outcomes are achieved for all offending children and young people that are identified as misusing substances.	Operations Manager (DL)	31/03/09
There is a risk that not all staff fully understand safeguarding procedures.	Ensure that 100% of YOS employees working with children and young people have had safeguarding training.	Safeguarding procedures are fully understood by all staff.	Operations Manager (DL)	31/03/09
There is a risk that not all sessional staff and volunteers fully understand safeguarding procedures.	Ensure that 90% of volunteers and sessional workers who have contact with children and young people in 2008/2009 have refresher safeguarding during this period.	Safeguarding procedures are fully understood by all staff.	Operations Manager (DL)	31/03/09

C5.3 Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
Understanding of safeguarding children and young people.	All YOS and Prevention Service Practitioners and all Volunteers.	LSCB Awareness Raising Training.	Operations Manager (DL)	10/02/09
Understanding of safeguarding children and young people.	All YOS and Prevention Service Practitioners.	LSCB Introduction to Working Together.	Operations Manager (DL)	26/02/09
Understanding of safeguarding procedures.	All Managers and YOS and Prevention Service Practitioners.	Familiarisation event for LSCB procedures.	Operations Manager (DL)	31/03/09
Understanding of safeguarding children in custody.	Selected YOS Practitioner Staff.	Regional YJB safeguarding seminar – Lessons learnt from serious incidents in custody.	Operations Manager (DL)	31/03/09
Understanding of safeguarding children who offend who are supervised in the community.	Selected YOS Practitioner Staff.	Regional YJB safeguarding seminar – Lessons learnt from serious incidents involving deaths in the community.	Operations Manager (DL)	31/03/09

C5.4 YJB risk to future delivery assessment comments

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SECTION C6 – PUBLIC CONFIDENCE

C6.1 Assess the extent to which the YOT partnership has contributed to improving public confidence in the fairness and effectiveness of dealing with youth crime in the Criminal Justice System

Performance

As highlighted in Section C2 for Re-offending, there is no evidence of over representation of black and ethnic minorities in the local youth justice system (National Indicator 44), and no indications that this will change over the forthcoming year. The YOS has, however, alongside the Safer Sunderland Partnership undertaken extensive analysis of 'hate crime' which highlighted that 70% of hate crimes were perpetrated by young people aged 20 years old or younger - the majority aged 16/17. In 2007 Sunderland YOS set up a practice group to research and identify programme resources for racially motivated offending and other hate crime. This has resulted in a range of targeted offending behaviour work including young offenders attending a racial awareness workshop and drama performance in partnership with by the Banner Theatre Company. Sunderland YOS has also supported the work in the city to set up a Hate Crime Incidents Reporting system aimed at enabling hate crime to be reported and responded to. Sunderland has participated in the national research undertaken by Huddersfield University and the YJB which aims to identify good practice in this area and we hope to learn from the findings of the research. An improvement has been identified for 2008/2009 to continue to expand offending behaviour resources for hate crime.

Overview

Sunderland contributes in a range of ways to the national PSA 24 *"To deliver a more effective, transparent and responsive Criminal Justice System for victims and the public"*.

Sunderland YOS has the **confidence of the local magistrates' court** with high overall congruence rates of 87.2% (between sentencing proposals from the YOS and sentencing outcomes made by the court), regular feedback from magistrates in court, positive feedback through court surveys and regular joint training. The confidence of the courts is reflected in the low custodial sentencing rate and the use of the local ISSP scheme which offers an effective alternative to custody (see Section C3 - Custody).

Sunderland YOS has a **proactive and successful media strategy** aimed at increasing public awareness of the work of the YOS to address youth offending, addressing the fear of crime and narrowing the gap between perceptions and the reality of crime and combating disproportional and negative coverage of young people. In 2007/2008 Sunderland has had a number of positive stories covered in the local newspaper and has worked in partnership with a number of organisations under the Safer Sunderland Partnership on a specific media campaign titled 'Not in our City'. Focus groups with members of the public (conducted by independent researchers) found that most participants in the focus groups had seen the media coverage and that the campaign had been successful in raising awareness of the work of local criminal justice agencies. One participant said *"It says to me that someone somewhere is thinking about safety and security and they are making an effort to do something about it – that the safety and security of the people in Sunderland is somebody's concern"*. Twice winner of the YJB media / communication awards Sunderland YOS aims to continue this successful work in 2008/2009 with a minimum of eight good news stories published by the local media.

Sunderland YOS has actively sought to engage service users in the design and development of services as well as **effective arrangements for monitoring, evaluation and service user feedback**. To consult young people who offend, many of whom have low levels of literacy, numeracy and maturity, Sunderland YOS utilises Viewpoint, an interactive 'game-style' questionnaire about the needs of young people who offend and the best way of meeting those needs. Satisfaction ratings are undertaken with parents and victims of youth crime and satisfaction ratings are high with 100% satisfaction for victims against the YJB target of 85%. The YOS well publicised Comments, Compliments and Complaints Policy, provides a vehicle for service users views to be heard and acted upon and there are examples of letters from victims evidencing the closure they feel they have attained as a result of victim services. Service users are involved in the governance arrangements of the YOS through separate youth and adult scrutiny panel for Making a Positive Contribution Services, under which the YOS sits. Young people have been trained in, and involved in, the recruitment of YOS employees including the appointment of the YOS Manager. In 2007/2008 Sunderland YOS participated in the national '11 Million Take Over' aimed at enabling young people to make decisions for the day.

As a member of the Safer Sunderland Partnership Sunderland YOS has **good links with corporate arrangements for community consultation** relating to community safety and is an active member of LMAPS. Good community links has enabled the development of a number community payback schemes specifically linked to local community priorities. Strong links have been forged across the public, private and voluntary sectors, and community groups. There are 60 restorative justice agreements in place with corporate victims subject to repeat victimisation (particularly

in relation to retail crime and criminal damage), enabling regular reparation to take place. Local communities are enabled to identify local community projects and schemes which could benefit from community payback activity and there have been a number of successful community led schemes in 2007/2008. Sunderland has won the **Regional Monitor Excellence Award 2007** for its community payback partnership work with a local recycling company and a Sunderland ISSP Advocate won the **Youth Justice Award 2007** for his work in engaging young offenders ETE on community projects.

C6.2 identify risks to future delivery and continuous improvement and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk of no positive media coverage of the work of the YOS.	Undertake a media campaign on the key themes set out in the YOS Media Strategy 2008/2009 to achieve positive local media coverage on at least eight separate occasions in 2008/2009.	Positive media coverage is achieved on at least eight occasions.	Policy and Performance Manager	31/03/09

C6.3 Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
Working with the media.	Managers who have not previously received media training.	Media training.	YOS Manager	31/03/09
Work with the courts.	Managers and selected Practitioners.	Joint training with magistrates.	ISSP Manager	31/03/09

C6.4 YJB risk to future delivery assessment comments

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SECTION C7 – IMPROVING VICTIM SATISFACTION

C7.1 Assess the extent to which the YOT partnership has contributed to improving satisfaction in the Criminal Justice System for those who have been victims of youth crime

Performance

Work with victims of crime, through the award winning restorative justice scheme, is well embedded within Sunderland YOS. There are high levels of effective support and consultation to both corporate and individual victims, and a wide range of restorative interventions available to support them.

Testimony to the success of the scheme's work, Sunderland has once again performed against the targets set by the YJB, with victim participation and satisfaction targets hit across all four reporting periods of 2007/2008. In 2007/2008 victims participated in 31.1% (203 of 652) relevant disposals referred to the YOS against a national target of 25%. There were **very high levels of victim satisfaction at 100%**, against a national target of 85%.

Overview

At Sunderland YOS, work with victims is individualised to their needs in line with the **Code of Practice for Victims of Crime**, allowing the victim to access reparation and restorative justice initiatives. This is particularly in respect on initiating contact with 100% of identified and appropriate victims (including corporate); undertaking full assessments of victims needs by trained designated workers; providing the opportunity for voluntary involvement in the restorative justice process; securely processing victim information; and keeping the victim updated at every stage as set out in the regularly reviewed Restorative Justice Procedure. In 2007/2008 Sunderland YOS reviewed its practice against the Code of Practice for Victims which identified **a high level of compliance**. The review identified one area for improvement around work with Victim Support, which has since been addressed. New and reviewed agreements have been forged the Victim Support Unit, Probation, Witness Care, British Transport Police and Family Liaison Officers. Over the last year, further links have been forged with Northumbria Police, to agree a Service Level Agreement for restorative justice that will deliver against jointly agreed local targets.

Victim attendance to Referral Order Panels has remained steady at approximately 1 in 4 (25%) in 2007/2008. Of the 203 victims who participated in relevant disposals during 2007/2008, 30.1% participated in direct reparation and 69.9% in indirect reparation, including Community Payback. Local targets for community payback have been exceeded under the NRF, with 51 schemes facilitated in 2006/2007 and 76 in 2007/2008 representing an overall increase of 63% against the 2-year target. Recognising a service gap for the involvement of victims in cases where young people have been sentenced to the secure estate, the YOS has implemented a groundbreaking Restorative Justice Conference arrangement that takes place in the secure estate.

Over the last year, Sunderland YOS has delivered a number of innovative and unique projects in partnership with the local community and business sector. Examples include the award winning (**Regional Monitor Excellence Award 2007**) link up with the local recycling plant as part of the national Big Recycle Week where young people received educational messages about the importance of recycling, collected discarded recyclable litter throughout the city and developed skills for employment; working with a local department store where young people have painted, decorated and cleaned the store, as well one young person assisting with a store promotion; and working with a community project where young people transformed the garden of a new home for a community group. In 2008/2009, the YOS will build on the positive work in this area by exploring further links between community payback and training and development (see Section C7.2 below). The national Joint Inspection of Sunderland YOS published in May 2007 commented **"Restorative Justice was seen as a core element of the work of the YOS, which had been able to gain positive media coverage to challenge negative views held by the public about children and young people in the city"**. Prominently placed headlines have included **"Payback scheme bringing community benefits"**, **"Big recycle proves big success"**, and **"Youngster helps redecorate charity's new base - Offenders' paint job is fantastic"**.

The Restorative Justice Team, were highly commended in the **North East Youth Justice Assembly Awards 2007** for making a significant impact on work with victims and the effective use of direct and indirect reparation. Beneficiaries of reparation have also commended work in this area, with regular letters of appreciation for reparation work carried out in schools, churches, communities and residents areas i.e. gardening, litter picking, decorating, etc.

C7.2 Identify risks to future delivery and continuous improvement and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that victim involvement is not maintained at current high levels.	Ensure victim involvement in 35% of all relevant disposals (based on former YJB KPI)	Victim involvement in 35% of all relevant disposals.	RJ Co-ordinator	31/03/09
There is a risk that victims are not given maximum support to enable direct reparation where appropriate.	Ensure 25% of interventions include direct restorative justice.	25% of interventions include direct restorative justice.	RJ Co-ordinator	31/03/09
There is a risk that restorative justice 'unpaid work' / community payback services do not support longer term ETE outcomes.	Pilot at least one community payback scheme with direct links to an NVQ training provider.	Young people undertaking community payback are supported to achieve longer term ETE outcomes.	RJ Co-ordinator	31/03/09

C7.3 Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
Understanding of RJ principles.	Selected RJ staff.	Introduction to RJ Regional INSET training.	RJ Co-ordinator	01/05/09
Understanding of RJ practice.	Selected RJ staff.	RJ – The Next Step Regional INSET training.	RJ Co-ordinator	31/03/09

C7.4 YJB risk to future delivery assessment comments

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SECTION D – BUSINESS CHANGE AND INNOVATION

This section of the YJ Plan sets out the key business changes on the horizon for YOTs and Services nationally in 2008/2009. Sunderland YOS continues to be a dynamic and developing service with a proven track record of developing new ways of work, delivering innovation and re-shaping services to meet needs. We are therefore confident that required change management capacity exists within the service to deliver against:

- New legislation arising from the Criminal Justice and Immigration Act 2007.
- New criminal justice processes arising from national policy on Simple, Speedy, Summary Justice (CJSSS).
- New commissioning arrangements for workforce development.

D1a Describe the proposed business change or innovation – Criminal Justice: Simple, Speedy, Summary

From April 2008, youth courts across England and Wales will be adopting, through a phased implementation, a revised model of the established court process within the adult magistrates court. Simple Speedy Summary Justice (CJSSS) is based upon three principles:

- Better proportionate preparation for first hearing in court.
- Ensuring that pleas are heard at first hearing and guilty pleas are dealt with on the day.
- Contested trials should proceed straight to trial within a reasonable timeframe.

The Referral Order process remains unchanged as most young people are dealt with on their first appearance however the level of change in practice and procedures for each YOT will vary according to their individual agreements and relationship with their local youth court.

CJSSS In Sunderland - CJSSS is designed to make justice faster, more efficient and more effective. In simple terms it aims to reduce the number of magistrates' courts hearings and cut the time taken to deal with cases. Although CJSSS will be implemented in the Youth Courts from April 2008, the Northumbria area (including Sunderland) has been an **early adopter**, thus the local area youth justice system has been working to the principles of CJSSS in the Youth Court for sometime.

Sunderland YOS has a strong and positive relationship with the local area courts with court representation on the YOS Management Board, a long established Court User Group, Case Management Meetings and regular joint training with magistrates to address local issues. The YOS is also an active partner of the LDG of the LCJB ensuring good communication and working relationships with local criminal justice partners. A comprehensive service is provided to the courts including weekends and bank holidays with experienced and trained staff available at court for the completion of stand down reports. Sunderland has consistently performed well against *National standards for Youth Justice* in relation to timely preparation of PSRs. Sunderland YOS is therefore in a good position with regards to the requirements of CJSSS.

Assessment and Reports for the Courts - The YJB grant for WUYJ (see Section B4 – ICT including Wiring Up Youth Justice) provided in 2007/2008 has enabled Sunderland YOS to install remote working technology at the two area courts (Sunderland and Houghton-le-Spring) which is enabling staff servicing the courts to have secure and instant access to the YOS information system and is enhancing the YOS capacity to deliver stand down reports at court.

The use of a Court Update Report has provided magistrates with a level of information that supports swift decision-making without the need for either stand-down or full PSRs. To date this has been restricted for those appearing in court who have re-offended whilst on an existing Referral Order. Sunderland YOS will implement this practice across the YOS in 2008/2009 to ensure swift decision making in all such cases. Sunderland YOS has also identified an area for improvement in relation to advanced information regarding pleas for young people at first hearing. Sunderland YOS has an excellent track record of providing PSRs for the courts within national standards timescales.

Decision Making for Final Warnings - There has been a reduction in the extent to which the court has referred cases back to the YOS for consideration of Final Warning as an alternative to prosecution. This is attributed to a more rigorous scrutiny of eligibility at the point of charge by the Police and Crown Prosecution Service (CPS).

Victims - Sunderland YOS has worked closely with the area courts to ensure that in the implementation of CJSSS, victims views continue to be taken into consideration in court decisions regarding young people who have offended. In April 2008 joint training was undertaken with the magistrates' court regarding restorative justice options available to the court.

D2a Identify risks to implementing the business change or innovation and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that the YOS does not having information regarding guilty pleas at first hearing.	Work with local criminal justice partners to develop arrangements to enable the YOS to have improved information regarding guilty pleas at first court appearance.	Young people are dealt with swiftly at first hearing.	Operations Manager (AS)	31/12/09

D3a Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
Assessment and presentation skills for stand down reports to the court.	Designated YOS officers for court stand down reports.	Stand down report training.	ISSP Manager	31/03/09

D4a YJB risk to future delivery assessment comments

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D1b Describe the proposed business change or innovation – Youth Rehabilitation Order and Youth Justice: The Scaled Approach

Youth Justice: the Scaled Approach is designed to assist youth justice services to direct time and resources to young people appropriately, in accordance with their risk assessment, YOTs will be expected to implement the scaled approach model from April 2009, which will coincide with the introduction of the provisions arising from the Criminal Justice and Immigration Act. The most significant youth justice provision in the Act relates to the Youth Rehabilitation Order (YRO).

YRO and the Scaled Approach - From April 2009 the Criminal Justice and Immigration Act will be implemented. The most significant youth justice provision in the bill relates to the YRO which replaces most of the current community based court orders with a generic order comprising 14 different requirements. It will require a more targeted approach to the proposals made in PSRs. The scaled approach supports the effective implementation of the YRO as it allows interventions to be tailored on the basis of assessed risk, with more intensive interventions for higher risk cases.

Assessment and Risk Management - The priority for Sunderland YOS for 2008 is to ensure effective quality assurance arrangements are in place for Assessment and Risk Management as the basis for case management under the new YRO. Our capacity and capability assessment for risk of serious harm and plans for improvement in 2008/2009 are set out in Section C4 - Risk of Serious Harm. This includes performance in relation to completion of ASSET assessment and ROSH assessment. Under the direction of the YOS Management Board Sunderland YOS has undertaken a review of our effectiveness in managing young people presenting a risk of harm to the public with specific reference to our role in relation to MAPPA. The review of young people subject to MAPPA found that practitioners working with children and young people had a good understanding of MAPPA arrangements; that young people meeting MAPPA criteria had been clearly identified; and effective management arrangements were in place for those offenders. The review identified, however, the need to improve case management recording, particularly in relation to Level 1 MAPPA. Sunderland YOS will repeat the review, reporting to the YOS Management Board on a six monthly basis (see Section C4 –Delivery Plan).

Interventions Based on Risk - As a well resourced service Sunderland YOS has an extensive range of interventions to meet varying levels of risk with plans to extend the range of resources available for the most persistent and serious offenders. Our resources library and accompanying offending behaviour matrix enables practitioners to easily identify appropriate resources based on risk levels (see Section B – Use of Resources and Value for Money).

Change Management Capacity and Workforce Development - In January 2008 the YOS Management Board and operational YOS commenced a service review to ensure that the YOS service structures continue to be fit for purpose to meet changes to the delivery of youth justice service brought about by the Criminal Justice Act, Scaled Approach and other local and national developments. Through the YOS Management Board the review will ensure that the necessary partnership working arrangements and resources are in place to deliver services for the YRO under the scaled approach. For the operational YOS the review will ensure that managers, at all levels, undertake the necessary planning and development to deliver youth justice services under the new arrangements from April 2009. The YJB are expected to release web-based training around risk based assessment and intervention as well as the provisions of the YRO and scaled approach framework.

Work with Partners – The YOS Management Board includes membership from the key partners in the delivery of the YRO enabling partnership working to be developed to ensure the effective implementation of the YRO. Regular joint training with magistrates (already established) will also provide for effective partnership working around YRO implementation.

D2b Identify risks to implementing the business change or innovation and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that service structures do not facilitate effective working for the introduction of the YRO.	Complete a service review to ensure service structures remain 'fit for purpose'.	Service structures effectively support the new provision of the YRO.	YOS Manager	31/03/09

D3b Identify workforce development plans to overcome the risks to continuous improvement				
Skills to Develop	Target Group	Action	Owner	Deadline
Risk based intervention based on ASSET assessment.	All YOS managers and staff.	YJB Assessment and ASSET (web-based Open University course).	Operations Manager (DL)	31/03/09
Understanding of the YRO and Scaled Approach to Youth Justice in Practice.	All YOS managers and staff.	Youth Justice: A Scaled Approach and the YRO (web based Open University course).	Operations Manager (DL)	31/03/09

D4b YJB risk to future delivery assessment comments

D1c Describe the proposed business change or innovation – Workforce Development

Due to the new local focus and improved workforce development infrastructure in youth justice services, YOTs will be expected to commission directly from the Open University (OU) using local budgets in 2009–2011, maintaining an equivalent level of workforce development opportunities as provided by the YJB during 2008/2009.

Planning for Direct Commissioning - Sunderland YOS has a strong presence at the regional YJB Workforce Development Forum and has a good relationship with the HR and Learning Advisor for the Region. The YOS remains fully informed of the developments around direct commissioning to meet the YJB’s *Workforce Strategy: A framework for strategic development 2008-2011*. During 2008/2009 the YOS will need to prepare for direct commissioning by ensuring there is a clear understanding of those staff who have accessed the National Qualifications Framework through previous providers (see improvement plans below).

Resourcing and Work with Partners - There are financial implications for Sunderland in 2008/2009 from the direct commissioning requirements which take effect from 2009. Sunderland YOS currently has a number of staff studying toward the Youth Justice Foundation Degree (previously funded by the YJB) which the YOS will directly fund. These costs will be met from the YOS Training and Development budget with no additional funding available (see Section B1 – Financial Resources). Significant in-kind partner contributions to the training and development activity of the YOS will become increasingly important in future years, thus Sunderland YOS will actively seek opportunities for YOS staff to access training offered by partner agencies. During 2008/2009 Sunderland YOS will seek to develop a fuller understanding of the commissioning needs post 2009. During 2008/2009 a number of staff will complete the Youth Justice Foundation Degree and Sunderland has made a commitment to supporting the continued professional development of staff through funding of a further year of study which will enable those staff to acquire a BA Honours Degree in Youth Justice.

D2c Identify risks to implementing the business change or innovation and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk of ineffective targeting of training if there is not a clear understanding of those who have accessed the National Qualifications Framework through previous providers.	Undertake an audit of staff who have completed elements of the Youth Justice Qualification Framework and assess future training needs beyond 2008/2009.	YOS is able to effectively identify relevant staff for Youth Justice Qualifications.	Operations Manager (DL)	31/03/09
There is a risk of the training and development budget not being sufficient to support the ongoing development of YOS staff.	Identify the costs of current and future needs and profile into the budget through the budget review process.	The budget required to fulfil workforce development needs is understood and secured.	YOS Manager	31/03/09

D3c Identify workforce development plans to overcome the risks to continuous improvement

Skills to Develop	Target Group	Action	Owner	Deadline
The full range of knowledge and skills required to work in a youth justice setting.	All staff	Ensure staff access specialist training offered as an ‘in kind’ financial contribution by partner agencies.	Operations Manager (DL)	31/03/09

D4c YJB risk to future delivery assessment comments

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SECTION E1 – WORKFORCE DEVELOPMENT

E1.1 Assess the extent to which the YOT Workforce Development Strategy has helped the YOT partnership to effectively manage risks to future delivery

Sunderland YOS is committed to developing a 'learning organisational culture', with a confident, competent and skilled workforce that continuously strives to improve the quality of services it provides. The Sunderland YOS Workforce Development Strategy for 2008/2009 sets out how the service will deliver this commitment against a background of the national workforce strategies of the YJB and the Department for Children Schools and Families. The strategy is aimed at developing the skills and knowledge in our workforce to meet our key priorities of **prevention of offending and re-offending, assessment, risk management and engagement**. Workforce development needs identified under these priorities include:

- **Prevention of Offending and re-offending** – In 2007/2008 a training priority was identified and delivered in relation to 'Managing Conflict'. This continues to be a training priority in 2008/2009. There will also be an emphasis on training in offending behaviour programmes linked with our improvement plans set out in Section C – Delivery Plan.
- **Assessment** – Over the forthcoming year training and development in assessment and intervention will focus on developing practice in relation to offender and offending behaviour analysis. There will also be refresher PSR training, again with an emphasis on learning outcomes around offending analysis.
- **Risk Management** – The LSCB offers a comprehensive programme of safeguarding training. A particular priority for the year ahead is to ensure all staff working with children and young people have attended LSCB procedures training. MAPPA awareness training co-delivered by Northumbria Police and National Probation Service has also been identified as a training priority linked to our service priority of effective risk management.
- **Engagement** – In the last year practitioner staff across the YOS have undertaken 'motivational interviewing' in pursuit of developing effective engagement skills with children and young people. In 2008/2009 'solution focused' training will be delivered to staff to build skills in relation to our priority of effective engagement. We are also committed to effective engagement with families and victims of youth crime.

We will equip our workforce with the skills and knowledge to meet our priorities through the delivery of a comprehensive **Workforce Development Plan** and through the implementation of **practice workshops** which will enable staff to challenge and develop their practice in work undertaken to prevent offending and re-offending. The focus of the practice workshops will be on assessment practice as the foundation for effective intervention planning, delivery and review.

Core components of our Workforce Development Strategy for 2008/2009 are:

- **Induction, Supervision and Appraisal** - Robust arrangements are in place for the induction, supervision and appraisal of all staff in accordance with guidance of the City Council. In 2007/2008 all staff appraisals have been aligned to be concluded directly prior to the financial year, enabling more efficient and effective arrangements for identifying, analysing and delivering individual and service training needs. A training needs analysis has been undertaken from the 2007/2008 appraisals and used to inform the Workforce Development Plan for 2008/2009.
- **YJB Youth Justice Qualifications** - Staff from across the service (including volunteers) have completed or are currently undertaking Youth Justice Qualifications including the Professional Certificate in Effective Practice and the Foundation Degree for Youth Justice. From 2009 the YJB require YOT's to move to direct commissioning from the Open University for Youth Justice Qualifications (see Section D3 – Workforce Development).
- **Regional Youth Justice (INSET) Training** - For 2008/2009 Sunderland YOS has purchased 60 places for YJB regional INSET training across a range of INSET practice areas. Bespoke INSET training will also be delivered to staff across the service to ensure specific learning outcomes linked with our service priorities e.g. PSR writing and Risk Management Training.
- **YOS Partner Agency Training** - Secondments and Service Level Agreements/Contracts are in place and reviewed annually in respect of all seconded staff and for contracted services ensuring staff have access to training and development both through the YOS and/or their host agency. Children's Services offers a comprehensive training programme which represents an in-kind contribution to the YOS partnership and there are in-kind contributions in the form of specialist training from other key partners e.g. Solution Focused Training provided by CAMHS. A priority for the year ahead and beyond in relation to partner agency training is to ensure that all YOS staff working directly with children and young people have the relevant training and development to meet the requirements of *Every Child Matters: Common Core Skills and Knowledge for the Children's Workforce*. During 2007/2008 all staff within the YOS was targeted to undertake the local authority *Diversity and Equality* e-training module.
- **Specialist Directly Commissioned and YOS Training** - The YOS continues to deliver a comprehensive internal training programme including generic, specialist and refresher training. Where training needs

identified cannot be met from Regional YJB training or through partner agency provision the YOS will source relevant provision and funding through a dedicated training budget (specialist ICT training is sourced through this budget) (see Section B1 – Financial Resources). The inaugural YOS workforce conference held in March 2008, supported by the YJB, YOS Management Board and Council Portfolio Holder for Children, was a huge success. It provided staff with an opportunity to celebrate good practice and increase their awareness of new developments such as the YRO and Scaled Approach to Youth Justice. Sunderland YOS has a fully equipped conference provision for in-house training and YOS seminars delivered continue to offer an opportunity for staff from across the service to develop their knowledge on specific and current issues.

- **Volunteer Training** – Sunderland YOS continues to deliver a comprehensive induction programme for volunteers, which forms part of the recruitment and selection process as well as having access to the extensive training programme offered by Sunderland YOS. During 2008/2009 a re-accreditation process was introduced for Referral Order Panel members requiring attendance at compulsory training such as safeguarding and identifying risk.

E1.2 Identify risks to workforce development and plans to overcome the identified risks

Risk	Action	Success Criteria	Owner	Deadline
There is a risk that staff are not supported to develop improved offender analysis skills.	Develop practice workshops for staff across the service with a focus on assessment practice.	Practice workshops are implemented and evaluated.	Operations Manager (DL)	31/03/09
There is a risk that not all staff have the relevant training and development to acquire the <i>Every Child Matters: Common Core Skills and Knowledge for Children's workforce</i> .	Ensure that all YOS staff working directly with children and young people have the relevant training and development to meet the requirements of <i>Every Child Matters: Common Core Skills and Knowledge for Children's workforce</i> .	All staff have the required training and development for <i>Every Child Matters: Common Core Skills and Knowledge for Children's workforce</i> .	Operations Manager (DL)	31/03/09
There is a risk that the YOS is unable to attract staff with the relevant youth justice and managerial skills and knowledge for management positions.	Develop a structured approach to training and development for those staff aspiring to managerial roles.	The YOS is able to attract knowledgeable and experienced staff to management positions.	Operations Manager (DL)	31/03/09

E1.3 YJB risk to future delivery assessment comments

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SECTION E2 - RISK TO FUTURE DELIVERY ASSESSMENT SUMMARY

E2.1 Comments from risk to future delivery assessment from YOT management board chair

Following on from the successful outcome of inspection by the national Joint Inspection Team, the Sunderland YOS Partnership has had another successful year. Sunderland YOS has again achieved the highest performance level rating in the national performance tables (one of only 8 YOT's to achieve a level 5 performance rating of 156 YOTs nationally) and through working in partnership with others, Sunderland City Council and its partners have achieved Beacon status for reducing re-offending across both youth and adults. Our track record of **reducing custodial sentencing** (National Indicator 43) and maintaining this at well below the national YJB target was identified as an exemplar of best practice by the Beacon authority. In 2008/2009 we will continue to have a range of intensive programmes in place such as the ISSP scheme, RAP and the Revolving Door Project, ensuring high levels of intervention with the most persistent and serious young offenders. We are confident that our improvement plans as set out in this YJP will ensure continuous improvement in 2008/2009 and that Sunderland YOS will continue to deliver on performance outcomes for children and young people.

Our ambition is for a **safe city** in which everyone will be and feel safe and secure. Our ambition as a YOS is to ensure that the **public is protected** from the harm caused by a minority of children and young people who offend, that those children and young people who are vulnerable are effectively **safeguarded** and that the ECM outcomes are achieved for all children who come into contact with Sunderland YOS. In 2008/2009 our focus is on continuing to drive up the quality of assessment as the foundation for effective intervention planning, delivery and review. Our principal aim is to **prevent offending and re-offending** and to therefore achieve demonstrable reductions in FTE (National Indicator 111) to the criminal justice system and to achieve reductions in re-offending for those who do offend (National Indicator 19). The inclusion of the latter national indicator in the LAA demonstrates that we are continuing to achieve reductions in youth offending is a priority for Sunderland.

As a public service we recognise the need to achieve **value for money** in the services we deliver and thus performance management and financial probity remain at the top of the agenda for the governing YOS Management Board. As a significant partnership for the city, the Sunderland YOS Management Board continues to have the full commitment of partners and strong links with other significant partnerships including the Safer Sunderland Partnership (Crime Reduction Partnership) and the Children's Trust. We are committed to **equality** in provision across our service to meet diverse needs and will work with partners to ensure there continues to be no difference in the ethnic composition of young people in the local youth justice system compared with the local population (National Indicator 44).

As a Beacon authority we look forward to sharing our best practice with others and in doing so hope we can learn from others too as we continuously strive to improve services to children and young people, their parents / carers and families, victims of youth crime and the wider public.

E2.2 YJB risk to future delivery summary comments

E2.3 Review and sign-off					
Name:	Helen Paterson (Chair)	Job Title	Director of Children's Services, Sunderland City Council.	Date	15/07/08
Name:	Jane Hedley (Vice Chair)	Job Title	Senior Solicitor, Sunderland City Council	Date	15/07/08
Name:	Aidan Sloan	Job Title	Chief Inspector, Northumbria Police	Date	15/07/08
Name:	Alan Caddick	Job Title	Head of Housing, Sunderland City Council	Date	15/07/08
Name:	Janette Sherratt	Job Title	Children's Commissioning Lead / Head of Health Improvement, STPCT	Date	15/07/08
Name:	Judith Hay	Job Title	Head of Positive Contribution and Economic Well-being, Sunderland City Council	Date	15/07/08
Name:	Guy Kirk	Job Title	Youth Offending Service Manager, Sunderland City Council	Date	15/07/08
Name:	Keith Moore	Job Title	Deputy Director of Children's Services, Sunderland City Council	Date	15/07/08
Name:	Karen Embleton	Job Title	Deputy Justices Clerk for Houghton le Spring and Sunderland Magistrates' Court	Date	15/07/08
Name:	Karin O'Neill	Job Title	Divisional Director, National Probation Service	Date	15/07/08
Name:	Lynda Brown	Job Title	Head of Standards, Sunderland City Council	Date	15/07/08
Name:	Mick McCracken	Job Title	Head of Safeguarding, Sunderland City Council	Date	15/07/08
Name:	Pauline Piddington	Job Title	Director, Partnerships, Learning and Skills Council	Date	15/07/08

SECTION F – LESSONS LEARNT FROM COMPLETING THE YOUTH JUSTICE PLANNING TOOL

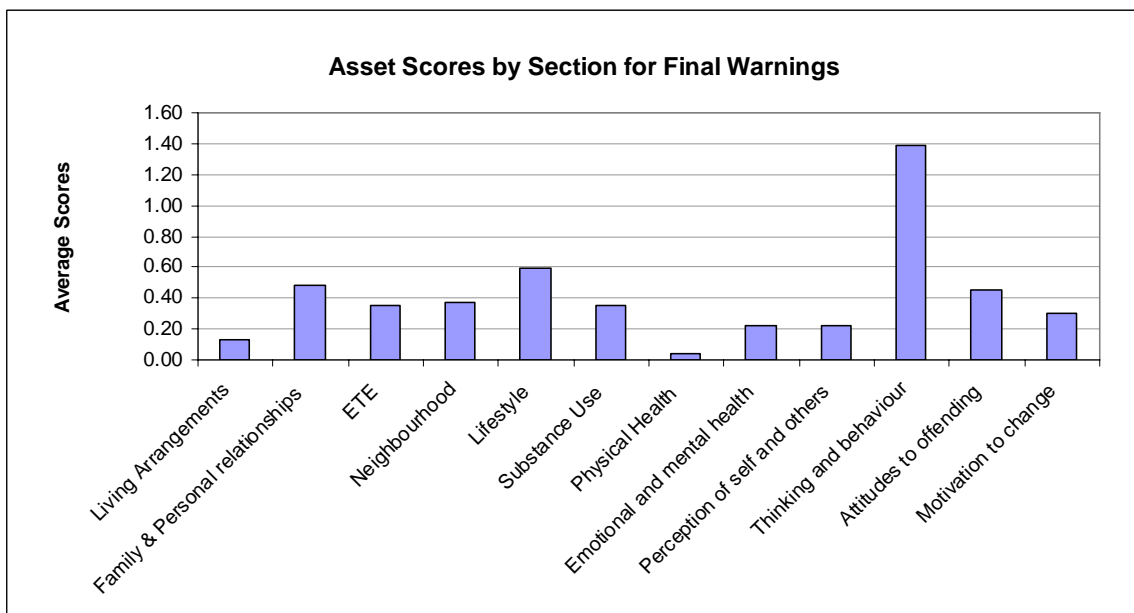
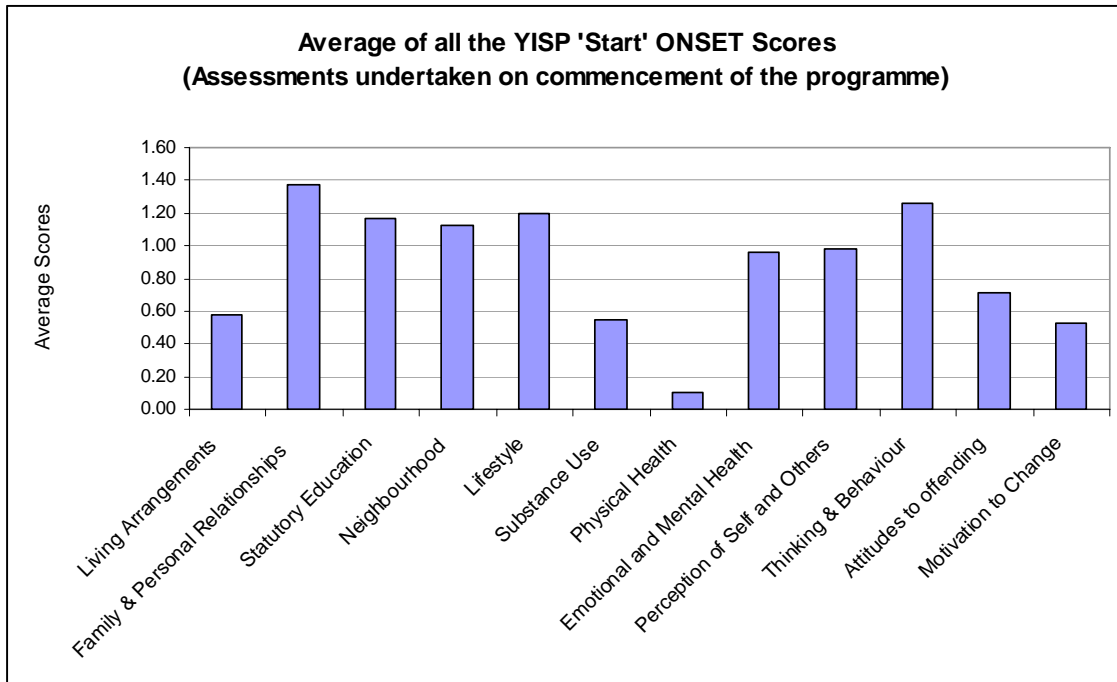
F1 What were the most valuable features of the youth justice planning framework and tool?

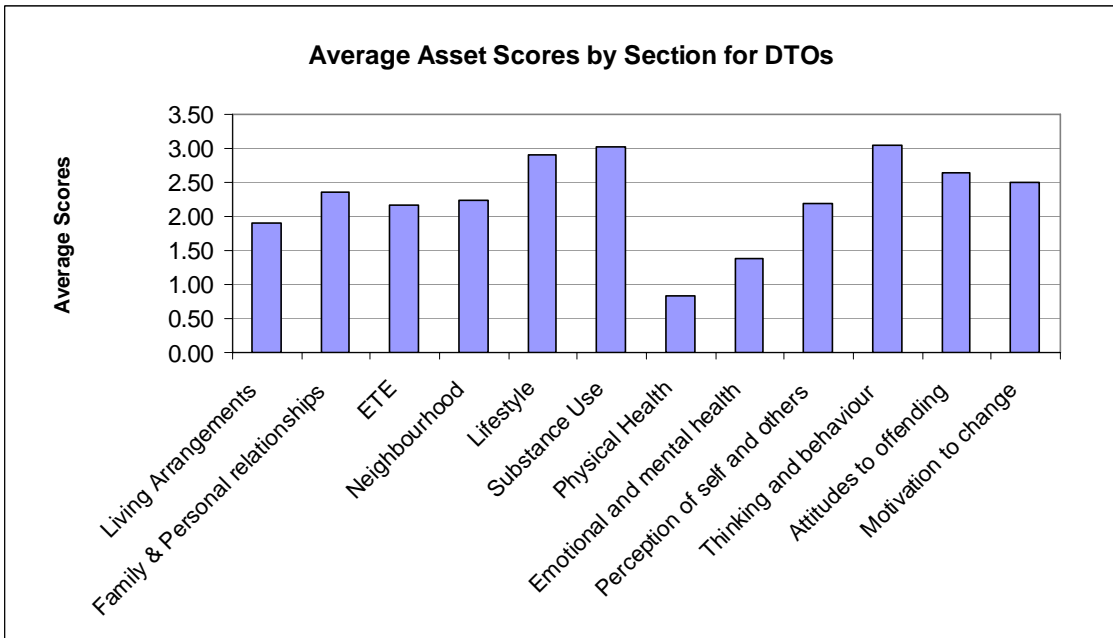
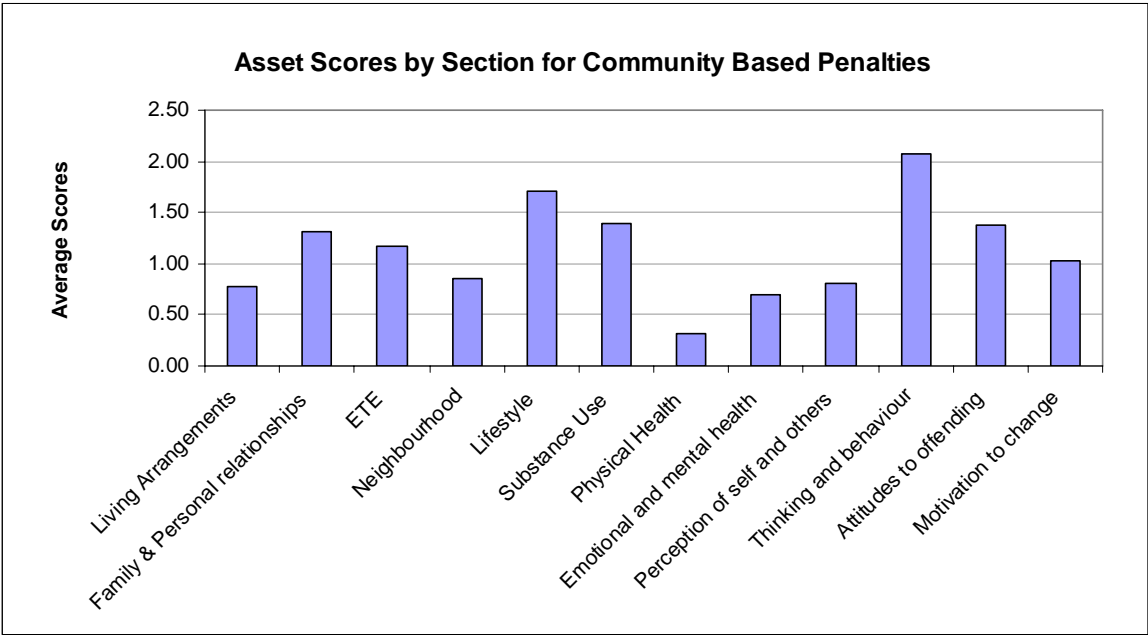
F2 What could have been developed further?

F3 What else would you like to be included in next year's youth justice planning framework?

F4 Do you have any other comments?

APPENDIX 1 – ASSESSMENT PROFILE





APPENDIX 2 – GLOSSARY OF PROGRAMME RESOURCES

Bail Supervision and Support Programme: Bail supervision and support programmes are used, with and without the use of ISSP, to offer community programmes to children and young people at high risk of a secure remand or already remanded to the secure estate.

Barnado's Sungate Parenting Project: Sungate is a parenting project run by Barnardos via a Service Level Agreement with the YOS. It assists parents/carers of 10-17 year old young people using a variety of evidenced based initiatives. The majority of people referred attend on a voluntary basis, although some are supervised on statutory parenting orders.

Diversity Programme: There are specific programmes of intervention for children and young people based on their diverse needs, including maturity and gender. For example, a programme about issues of self-esteem, called 'Through the Looking glass' has been used to work with girls and young women. There are also programmes looking at racial awareness and race hate issues, which have both undergone notable improvements over the last year.

Drug Treatment Programmes: Sunderland YOS operates an integrated model for the delivery of mainstream substance misuse services for children and young people. Intervention for young offenders in contact with the YOS and displaying substance misuse needs is provided through YDAP. The integrated substance misuse team is able to offer a full range of specialist substance misuse services including prescription, harm reduction, relapse prevention, solution-based therapy, group work, etc.

Education, Training and Employment (ETE) Intervention: The YOS supports young people to engage with ETE through seconded Education Inclusion Officers, a Connexions Worker and bespoke projects designed to meet individual needs i.e. KECO outdoor activities project, the Bunker Music and Visual Arts Project, the Fast Track Project for progression into trades, etc.

Homelessness Services: The YOS has a dedicated Accommodation Officer in post to ensure that accommodation does not negatively impact on criminal justice decisions, to ensure that accommodation issues are assessed and monitored in all cases and to find suitable accommodation for young people with housing needs.

Intensive Supervision and Surveillance Programme (ISSP): ISSP is a consortium arrangement across Sunderland, Gateshead and South Tyneside, providing intensive community-based surveillance with a focus on tackling factors that contribute to offending. This is the last intervention before custody, often as an alternative to custody. 2007 was a particularly outstanding year for the 'New Directions' initiative of this project (supporting young offenders to develop vocational skills in the community) and one of its staff members, attracting a Youth Justice Award, Regional Shine 'Unsung Hero' Award, Howard League for Penal Reform recognition, 'Highly Commended' in the North East Youth Justice Awards, and special mention in the Sunderland Council Employee of the Year Award.

Looked After Children Scheme: Two dedicated workers provide individual and group work interventions to looked after young people at risk of offending. The scheme works on a youth work principle encouraging citizenship and personal responsibility. The team were praised in the 2007 North East Youth Justice Assembly Awards for the innovation of practice they had developed in tackling this issue and the impact the team are having locally.

Mental Health Services: Sunderland YOS has a dedicated seconded Community Psychiatric Nurse (CPN) based within the YOS Offices. The role of the CAMHS worker, working across Prevention and the wider YOS, is supported by a jointly agreed protocol which sets out a clear operational procedure for the delivery of mental health services for young people referred by the YOS. The seconded practitioner is able to access the complete range of citywide mental health services up to Tier 4.

Offending Behaviour Programmes: Over the last year, the YOS has successfully implemented a wide range of Offending Behaviour Programmes, delivered by a dedicated Groupwork Coordinator. Specific programmes under this banner have included Hidden Harm for parents of young offenders who abuse substances; Arrive Alive for young people convicted of car crime; Substance Misuse workshops to motivate young people through drama; Give Racism the Red Card and Banner Theatre Drama Groups for young people convicted of racially motivated offences; Skills and Emotional Intelligence to guide young people away from peer pressure; etc. Group work sessions, underpinned by peer group dynamics, are a vital part of tackling the offending behaviour. They focus on changing thinking and encouraging consideration of the costs and consequences of offending behaviour on themselves, their families, victims, and the wider community. The YOS is currently engaging with a regional workshop, funded by the YJB, to link YOT resources in this area to those in the secure estate.

On Track: On Track is a project aimed at 4-12 year olds, living in North Washington, who are vulnerable and in need. It is a government funded project which is made up of a number of agencies, including Social Service,

Education, Health and Police. These agencies work with young people and parents to address their needs. These include parenting difficulties, behavioural difficulties, offending, mental ill health, education difficulties and emotional difficulties. One young person who attended the *On Track* programme because of problems with bullying designed a set of playing cards called *Fire Within*. These were focused on strategies that children and young people could use to deal with bullies. The cards were commercially produced and distributed within the city schools and subsequently won two awards for the young person and he was supported by YOS staff when attending the award events and in coping with the media attention he received. *On Track* won the Team of the Year Award in the 2007 North East Youth Justice Assembly Awards in recognition for innovation of practice.

Phoenix Fire Safety Programme: The Phoenix Programme is a pioneering award winning partnership between Sunderland YOS and Tyne and Wear Fire and Rescue Service offering youngsters an intensive fire fighters course providing work experience and education in the consequences of fire incidents / malicious fire setting. With evidenced outcomes of increased self-esteem, positive attitudes to education / employment and reduced re-offending, the programme is now influencing practice and policy elsewhere by duplication in other areas.

Resettlement and Aftercare Provision (RAP): The RAP programme ensures end-to-end provision for those in custody and engages with young offenders and prison staff to ensure 'wrap around' provision upon release. This programme was established in 2005 to provide additional resources to work with young people leaving custody who have identified substance misuse problems. The RAP team was awarded the regional YJ Award 2006 for their commitment to young people, having made great achievements such as partnering with the Bunker, a Sunderland based professional recording and rehearsal space that gives the RAP young people the chance to learn new skills through audio-visual engagement.

Restorative Justice (RJ): Restorative Justice enables young offenders to make amends (reparation) to the community for their offending through positive or constructive activities. Innovative partnerships have been forged with schools, community centres, charitable organisations and businesses; and links have been forged with Safer Sunderland Partnership Respect Action and the National Big Recycle Scheme. The RJ Team has won the 2007 Recycling Initiative of the Year Award for their work with a local recycling contractor to deliver reparation projects on recycling across the city. Restorative Justice attracts high levels of positive media coverage.

Specialist Resources: In conjunction with specific programmes, the YOS utilises a wide range of focused resources for workers to use when engaging a young person on a programme or on a court based order. Examples include one-to-one paper-based activities, board games, videos, DVDs, Teen Talk, etc. The YOS holds an electronic directory of all resources available to practitioners (segmented by location, type, target group and method of delivery). This ensures that the practitioners are able to plan and deliver the most effective intervention for the child or young person.

Tackle It: 'Tackle IT' is an exciting partnership initiative between Sunderland YOS and Sunderland Premiership Football Club, to tackle racism, antisocial behaviour, and bullying and promote good citizenship. Specific award winning projects have included Tackle It Ten Feet High (working with Newcastle Eagles Basketball captain to develop young peoples aspirations), SuperKrush Films (young people developing substance misuse videos to deliver key messages to peers), and Cap-a-Pie (looked after young people making videos to deliver message on alcohol abuse). The success of the programme has received wide spread acclaim from both schools, media and award bodies.

Volunteer Mentoring Scheme: This is a well-established YOS programme helping over 500 young people to date that are either involved in offending or at risk of doing so. The project offers vulnerable young people, between the ages of 5 and 17 years old, advice and support from an older, more experienced person, providing a protective factor against pressures linked to offending in a young person's life. One of the schemes volunteers was runner-up at the 2007 North East Youth Justice Assembly Awards for her contribution in this area.

Wear Kids: Wear Kids is a free voluntary support scheme for young people aged 8-17 and their families in Sunderland. The main aim is to help young people stay out of trouble and prevent anti-social behaviour. Young people can refer themselves directly to the scheme or can be referred by parents, carers, teachers or other professionals. Wear Kids work with young people to organise support and access to other services. These could include health advice, family and parenting support, mentoring, education or local projects. Once a referral has been made young people meet with their project worker, and a panel is organised where a plan will be developed to work with young people and support them through any difficulties.

Youth Inclusion Project (YIP): North Washington YIP, a partnership with Crime Concern, is a tailor made programme for some of the city's most at-risk teenagers. The youngsters involved with the programme receive one-to-one support, a safe place to go, and the opportunity to take part in activities with others. They also get careers and education help to reduce crime and anti-social behaviour through helping them grow and develop in order to improve their behaviour and so reduce youth crime and disorder.

APPENDIX 3 – GLOSSARY OF TERMS

AA	Appropriate Adult
APACS	Assessment of Police and Community Safety
CAF	Common Assessment Framework
CAMHS	Child and Adolescent Mental Health Service
CCF	Complex Case Forum
CDRP	Crime and Disorder Reduction Partnership
CJSSS	Simple, Speed and Summary Criminal Justice
CPN	Community Psychiatric Nurse
CPS	Crown Prosecution Service
DCSF	Department for Children, Schools and Families
ECM	Every Child Matters
EYE	Electronic Yellow Envelope
FTE	First Time Entrant
ICT	Information and Communications Technology
INSET	In-Service Education and Training
ISSP	Intensive Supervision and Surveillance
KYPE	Keeping Young People Engaged
LCJB	Local Criminal Justice Board
LDG	Local Delivery Group
LMAPS	Local Multi-Agency Problem Solving group
LPSA	Local Public Service Agreement
LSCB	Local Safeguarding Children Board
MALAP	Multi-Agency looked After Partnership
MAPPA	Multi-Agency Public Protection Arrangements
MAPPP	Multi-Agency Public Protection Panel
NEET	Not in Education, Employment or Training
NRF	Neighbourhood Renewal Fund
OBTJ	Offenders Brought to Justice
PACE	Police and Criminal Justice Act
PAYP	Positive Activities for Young People
PPO	Prolific and Priority Offender
PSR	Pre Sentence Report
RAP	Resettlement and Aftercare Programme
RJ	Restorative Justice
SMART	Specific, Measurable, Achievable and Realistic, and Timely
SMT	Strategic Management Team

TYS	Targeted Youth Support
QA	Quality Assurance
UMIS	Universal Management Information System
WNF	Working Neighbourhood Fund
WUYJ	Wiring Up Youth Justice
YAP	Youth Advocate Programme
YDAP	Youth Drug and Alcohol Project
YIP	Youth Inclusion Project
YISP	Youth Inclusion and Support Panel
YJB	Youth Justice Board
YJP	Youth Justice Plan
YOI	Youth Offender Institute
YOIS	Youth Offending Information System
YOS	Youth Offending Service
YOT	Youth Offending Team
YRO	Youth Rehabilitation Order

**CAPITAL PROGRAMME OUTTURN 2007/2008 AND FIRST CAPITAL PROGRAMME
REVIEW 2008/2009 – EXTRACT OF REPORT**

**Variations to the Capital Programme in 2007/2008 and 2008/2009 since approved in
March 2008**

	£000
2007/2008 - technical adjustments (all schemes approved and fully funded)	
Children's Services	
BSF Academy Co-Sponsor Contributions	1,000
Resources	
Disabled Access to Council Buildings	411
Regeneration and Community Cohesion	
South Hylton Community Building Project	280
Various Portfolios	
Local Public Service Agreement 2 - Capital Expenditure	638
2007/2008 - revisions to scheme costs - all fully funded	
Children's Services	
Highfield - New School	335
Devolved Formula Allocation - All Schools	314
Children's Centres	(263)
Culture and Leisure	
Sunderland Aquatic Centre	868
2008/2009 - technical adjustments (all schemes approved and fully funded)	
Children's Services	
BSF Academy Co-Sponsor Contributions	2,000
Planning and Transportation	
Port Warehousing Facilities	700
Resources	
Digital Challenge	2,085
2008/2009 - revisions to scheme costs - all fully funded	
Children's Services	
BSF Project Resource Costs	316
Adult Services	
Day Care Unit	422
Housing and Public Health	
SHIP Programme	(904)

**CAPITAL PROGRAMME OUTTURN 2007/2008 AND FIRST CAPITAL PROGRAMME
REVIEW 2008/2009 – EXTRACT OF REPORT**

**Variations to the Capital Programme in 2007/2008 and 2008/2009 since approved in
March 2008**

	£000	£000
2008/2009 - additional schemes - all fully funded		
Children's Services		
Computers in Schools	260	
Regeneration and Community Cohesion		
Sunniside Commercial Grants Scheme	490	

**REVENUE BUDGET AND TRADING SERVICES OUTTURN FOR 2007/2008 AND
FIRST REVENUE REVIEW FOR 2008/2009 – EXTRACT OF REPORT**

Cabinet Meeting – 26th June 2008

Virement over £55,000 for the Final Quarter 2007/2008 and First Quarter 2008/2009

Portfolio	Transfer From £	Transfer To £
2007/2008 Revenue Budget and Trading Services Outturn		
Resources		
Land Searches - Income Shortfall		398,000
Contingencies	398,000	
Adults		
Repayment of Temporary Financing	1,288,000	
Contingencies		1,288,000
Planning and Transportation		
Highways Maintenance		400,000
Contingencies	400,000	
Culture and Leisure		
Streetcare		300,000
Contingencies	300,000	
General Balances	9,228,000	
Earmarked Reserve for Budget Pressures and Approved Priorities		3,668,000
Transfer to the Strategic Investment Reserve to provide for capital programme pressures and financing and also potential equal pay / single status issues		5,560,000
2008/2009 Revenue Budget and Trading Services First Review		
Adults Services		
Independent Care - Contract Price Increases		1,914,000
Contingencies	1,914,000	

**SUNDERLAND CITY COUNCIL LOCAL DEVELOPMENT FRAMEWORK:
CORE STRATEGY DEVELOPMENT PLAN DOCUMENT (DPD)
PREFERRED OPTIONS: REPORT OF PUBLIC CONSULTATION**

REPORT OF THE DIRECTOR OF DEVELOPMENT AND REGENERATION

1.0 PURPOSE OF REPORT

1.1 This report is to update and inform Cabinet of comments received following the consultation exercise on the Preferred Options stage of the DPD, and to agree the next steps.

2.0 DESCRIPTION OF DECISION

2.1 Cabinet is requested to recommend Council to:

- i) Note the representations received and the responses being considered;
- ii) Agree the next steps to progress the DPD as set out in Appendix 1.

3.0 BACKGROUND

3.1 All local planning authorities are required to prepare and maintain a development plan for their area. The Unitary Development Plan (UDP) for Sunderland (adopted in 1998) originally set out the planning framework for the city until 2006 and these policies have largely been 'saved' to cover the transition to the adoption of the Local Development Framework (LDF). The Planning and Compulsory Purchase Act 2004 introduced major reforms to the planning system – principally the replacement of UDP's with LDF's. Once adopted, the LDF will be the starting point in the consideration of planning applications for the development or use of land in the city. Furthermore, the LDF will be a key delivery mechanism of both the Sunderland Strategy and the Local Area Agreements.

3.2 The Local Development Framework is an umbrella title. In effect, it comprises a series of themed planning documents that must all pass through a set of statutory stages, i.e:

- Issues and Options
- Preferred Options
- Submission
- Public Examination (before an independent Inspector)
- Adoption.

- 3.3 The Local Development Scheme (LDS) or project plan outlines the timetable for preparing the various documents that will make up the LDF. The current LDS was published in March 2007.
- 3.4 The Core Strategy Development Plan Document (DPD) lies at the heart of the LDF. It will set out the overarching strategic planning framework for the development of the city up to 2021 and draw from other strategies of the City Council (such as the Sunderland Strategy) and other organisations that have implications for the development and use of land. In the main it will not set out site-specific proposals or allocations, but instead will indicate the broad locations for delivering new development such as housing, employment and transport.
- 3.5 The Core Strategy DPD is now at the Preferred Options stage, having progressed from Issues and Options in 2005-06. Further consultation has taken place throughout the build-up to preparing Preferred Options, and has been accompanied by the preparation of 23 Topic Papers that provide supporting evidence.
- 3.6 The Preferred Options draft report was subject to a city-wide consultation exercise which began on 31 December 2007 and ended on 10 February 2008. The consultation undertaken was in accordance with the requirements as set out in the City Council's Statement of Community Involvement (adopted 2006) and involved the following:-
- Press notices formally placed in the Sunderland Echo on 31 December 2007 and 7 January 2008;
 - Copies of documents and posters to all libraries and Customer Service Centres, and the consultation website went live on 31 December 2007;
 - Copies of all documents and an on-line questionnaire were available on the City Council's website;
 - Letters were sent to stakeholders registered on the Council's database and to other non-statutory consultees, with copies of the document sent to statutory consultees;
 - Copies of the documents and posters were displayed at 3rd floor reception and on the ground floor of the Civic Centre.
- 3.7 Exhibitions (both static and staffed) were held across the city in libraries, contact centres, shopping centres, supermarkets and sports centres. The exhibitions were advertised by general awareness posters being placed in 76 locations across the city.
- 3.8 Throughout the formal consultation period, awareness raising presentations were also made to and discussions, or workshops, held with the following:-
- Local Strategic Partnership (LSP) Joint Partnership Group
 - LSP Management Group
 - LSP Partnership Board
 - North East Chamber of Commerce

- 'Local interest Groups'
- Home Builders Forum
- Sunderland Strategy Feedback Event
- Hetton Town Council
- Youth Parliament.

3.9 Seven residents meetings were organised throughout the city during January and February 2008, in areas identified with potential for housing growth:(Roker,Seaburn,Fulwell/Washington/SouthHylton/Chapelgarth/Ry hope/ Fence Houses and Easington Lane). The format of the residents meetings included a presentation outlining the role of the Local Development Framework, a summary of the Core Strategy and Housing Allocations DPD, including the various growth scenarios applicable to the locality where the meeting was being held.

3.10 The Sunderland Echo ran two separate items in its January editions raising awareness of these documents and giving further publicity to all of the above events.

4.0 CURRENT POSITION & KEY ISSUES

4.1 In response to the consultation exercise on the Core Strategy a total of 57 responses from organisations and individuals were received within the 6-week consultation period, making a total of 434 separate policy representations (267 in support, 167 objections). A further 3 representations were received outside of the 6-week period and therefore could not be accepted (as outlined by Regulations 26 and 27 of the Town and Country Planning (Local Development) (England) Regulations 2004). Acknowledgement letters have been sent out to all respondents and a schedule of the responses has been placed in all city libraries and on the dedicated web-page.

4.2 The schedule of comments and responses received and under consideration is attached as Appendix 1, however a summary of the key issues raised, mainly by the Government Office for the North East (GONE) is set out below:

- *The Housing Allocations DPD should be taking the lead from the Core Strategy and not vice versa*

This is presently being discussed with G.O.N.E. There is opportunity to make appropriate alterations to both reports given their parallel timeframes;

- *Local Housing Market Assessments are required to justify the proposed distribution of housing across the city, including housing renewal, required affordable housing levels, and the level of housing required at proposed growth points*

Both a local Housing Market Assessment (HMA) and a Strategic Housing Land Availability Assessment (SHLAA) are underway and due for completion later this year, and will be used for base evidence to inform the revised DPD's. This includes identification of a 5-year housing land supply. The assessments will provide evidence to support policies relating to overall housing requirements, including affordable housing and proposed growth points.

- *An Employment Land Review is required to justify employment land revisions*

An Employment Land Review is now under way and will be completed later this year;

- *Whether Houghton and Hetton should be regarded as “regeneration towns” as outlined in the Regional Spatial Strategy (RSS) or as part of the development of the Tyne and Wear conurbation*

The City Council will continue to request that these areas be included in the Tyne and Wear conurbation, and not as stand-alone towns;

- *A Retail Needs Assessment is required to provide evidence for retail requirements*

A Retail Needs Assessment is now under way and will be completed later this year;

- *The Core Strategy should consider specific policies for key strategic sites such as the Port of Sunderland, which is likely to be a major change in the revised LDF regulations (referred to in section 5 below).*

The City Council is seeking advice from GONE regarding the suitability of including separate specific policies for strategic sites such as the Port of Sunderland, the former Groves site, the City Centre etc;

- *The transport policy (CS9) has too much emphasis on road scheme delivery rather than rail development*

This comment was raised by a number of consultees, including Nexus, and will be investigated further this summer;

- *A Greenspace Strategy and Local Needs Assessment is required to provide evidence to support open space proposals*

A Greenspace Strategy is now under way and will be completed by the end of the year;

- *Further detailed evidence is required in relation to sites of biodiversity value*

It is acknowledged that a review of protected wildlife sites (including Sites of Special Scientific Interest – SSSI's- and Sites of Nature Conservation Importance – SNCI's) is needed, and will be considered in due course;

- *The city is setting a demanding target of 10% of energy usage to be met by renewable sources.*

Through the Climate Change Action Plan, the City Council has a strong evidence base available that can justify and demonstrate the impact that these energy requirements will make to local carbon reduction targets.

5.0 NEXT STEPS

- 5.1 The responses received are currently being analysed. The responses will be used to help inform the next stage of the document, the Submission stage, which is currently programmed for October 2008. However, it should be noted that new Regulations are anticipated in June 2008 that will introduce a series of changes designed to streamline the LDF system further. It is understood that these Regulations will *inter alia* remove the need for a formal Preferred Options consultation and introduce a two-stage submission process. Without the specific detail, it is not yet clear as to how this will affect the existing LDF programme. However, regular discussions at Officer level with GONE suggest that at this stage, some slippage to the adopted LDS will occur. It is therefore highly likely that amendments to the adopted Local Development Scheme will be required. Any such changes will be reported to Cabinet for approval.

6.0 REASON FOR DECISION

- 6.1 To progress the preparation of the Core Strategy DPD of the LDF.

7.0 ALTERNATIVE OPTIONS

- 7.1 The City Council has a statutory duty to prepare a Local Development Framework, consequently no alternative options can be recommended.

8.0 RELEVANT CONSULTATIONS/ CONSIDERATIONS

- a) **Financial Implications** – There are no direct costs arising from the reporting of representations. The main costs will arise from the Examination, which is scheduled for March 2009 and will be considered as part of the review of the Medium Term Financial Strategy covering 2009/2010 to 2012/2013. The City Treasurer has been consulted and his views incorporated into the body of this report.
- b) **Legal Implications** – The representations schedule has been prepared in accordance with the appropriate Planning Regulations. The City Solicitor has been consulted and his views incorporated into the body of this report.

- c) **Policy Implications** – The Core Strategy policies will in due course become part of the statutory development plan for Sunderland. In this context the policies will be taken into consideration in determining planning applications and will represent a guide for public and private investment. On approval by the City Council the policies will, in the interim, be a material consideration in determining planning applications in Sunderland.

- d) **Implications for other Services** – The Core Strategy when adopted will have implications for land and building projects in the city and it will underpin the Sunderland Strategy. The implications of responses received to the Preferred Options consultation stage will be discussed as appropriate with council services and other partner organisations and the results will be taken into consideration in preparing the DPD.

9.0 APPENDICES

LDF Core Strategy Development Plan Document: Preferred Options – Schedule of Responses to Consultation May 2008.

10.0 BACKGROUND PAPERS

LDF Statement of Community Involvement November 2006

LDF Local Development Scheme March 2007

LDF Core Strategy Development Plan Document: Preferred Options December 2007

Contact Officer: Clive Greenwood

Clive.greenwood@sunderland.gov.uk

Policy Section	Organisation	Support / Object / Concern or Comment	Action
General	GONE	In order to demonstrate without doubt at the examination that the Core Strategy is a spatial plan we would suggest that that relationship between the strategies and the policies are shown in tabular form.	Change. Propose to add to the spatial objectives table to demonstrate objective links to each of the policies (this is already done in the "Preferred Option policy supports" boxes.
	GONE	Needs better identification of how the emerging community strategy has been taken into account (confusion at times with older Community Strategy).	Change. The Core Strategy will review the newly published Community Strategy and update accordingly.
	GONE	Relationship with the Housing DPD needs clarity, too much lead from the Housing DPD that should be in the Core Strategy in the first instance.	Change. Currently being investigated and reviewed in line with the Housing Allocations DPD.
	GONE	Consistency needs to be demonstrated between CS and Gateshead and South Tyneside Councils DPD's.	Change. Consider adding a table and / or text into the CS to demonstrate what are the cross boundary issues and how they are to be resolved by the adjacent authorities.
	GONE	It is not clear what alternative strategies for spatial development have been considered in choosing the preferred option- needs a clear trail of options, generation, appraisal, selection or rejections and the role that the SA and community engagement have played in the process.	Change. Need to re-evaluate the audit trail and SA as to how the Preferred Options have been reached.
	National Offender Management	Would like to see a detailed policy (criteria based) that can be used should a prison proposal arise during the plan period	No change. No clear and robust evidence has been forwarded by the Objector as to the need for such a policy. The Objector would appear to request a catch-all policy in the event that such a scheme was to be required in the future which is contradictory to the inclusion of Policies.
Introduction	Natural England	Comprehensive response relating to CS not being in line with Government requirements/guidance in relation to the HRA and required role of Natural England. The draft AA has not been submitted to Natural England at the PO stage and no separate report on HRA is identifiable within the SA/SEA. Therefore there is no indication of how the HRA assessment has informed the choice of preferred options for each policy few references given in the "Preferred Option policy supports" box. The process should ultimately provide a set of preferred options that are proofed against any adverse impacts on Natura2000 sites and for which there is a clear SA audit showing how they fair in sustainability terms.	Change. While there is no legal requirement to produce Appropriate Assessment (AA) at the Preferred Options stage, the Council has commissioned development of an AA report including assessment against the Preferred Options policies and any ensuing recommendations.
	Sunderland arc	1.7 Believe that there should be a single "land allocations DPD" housing should not be separated out	Potential area for change. A separate Housing Allocations DPD and Allocations DPD is included in the LDS which has been agreed by Government, however, the proposal requires further evaluation given the new / emerging amendments to the LDF regulations.
Area Context	English Heritage	2.3 Paragraph should have mentioned heritage as well as biodiversity.	Change: Include heritage in the area context para 2.3 to say "For a city with a great industrial tradition and heritage".
	NHS South T&W	2.1-2.7 Include health in this section, shift in age of population and link between health and housing/environment.	Change. Will include a bullet in paragraph 2.5 of planning need to address an ageing population in Sunderland. However, comment relating to health and housing/environment is more debateable and too detailed for the Area Context.
Key Spatial Issues Text	English Heritage	3.3 Paragraph should mention cultural heritage as well as built and natural environment.	No Change: direct quote from the 2005 report.
	English Heritage	3.12 The sub-areas mention "growth" but should also reflect need for "safeguarding", for example in relation to historic assets. While Washington may need some "remodelling", this needs to be carried out without losing the New Town distinctiveness.	Change: to include some mention of retaining the character of the new town distinctiveness in para 3.12 Washington "Washington..... That will have witnessed modest housing growth on land not required for other purposes. Whilst Washington needs some remodelling, this must be done whilst still retaining and safeguarding the character and distinctiveness of the new town".
	Sunderland arc	3.7-3.9 Hope that the Sunderland Strategy can provide meaningful reference for the LDF Core Strategy	Change/review. These sections will be reviewed in light of the launch of the new Sunderland Strategy in June 2008.
Core Strategy Vision	Nexus	support the spatial vision.	No change. Support noted.
	Tyne and Wear PTA	Support the broad spatial vision	No change. Support noted.
	Natural England	The broad spatial vision should also include reference to protection and enhancement of the natural assets in the city	No change. This is considered to be an accepted strategic requirement, and is addressed in the strategic objectives and preferred option policies.
	O&H Properties	Spatial vision is deficient, does not clearly articulate how the area will develop spatially. Extra paragraph proposed for the vision, focusing on central Sunderland and the City Centre being the economic heart of the city.	No change. Considered to be too detailed for the spatial vision and more appropriate to Preferred Option policy CS1.
	English Heritage	No mention of the area's unique built environment, despite mention in the Foreword.	Change. Suggest no change to the vision but will include heritage mention in strategic objective 20.

	Highways Agency	Very supportive as it seeks to reduce car use	No change. Support noted.
	One NE	Supports the broad spatial vision and has noted the four sub-areas of the city as well as the 21 spatial objectives.	No change. Support noted.
	Sunderland arc	Fully support the approach and the preferred impact on the four-sub-areas and the vision for Central Sunderland	No change. Support noted.
	Springwell Gospel Hall	Vision is complementary to the regional vision in the emerging RSS review	No change. Support noted.
	Persimmon Homes	3.11 General support for the vision and its anticipated impacts on the South Sunderland, Central Sunderland and Coalfield sub areas.	No change. Support noted.
Draft Spatial Objectives	Nexus	especially support PDL, and 2 transport objectives	No change. Support noted.
	Natural England	Draft objective 4 should also recognise need for natural environment to adapt to consequences of climate change. Draft 7 should also include geological conservation. Draft 10 & 14 should also mention opportunities to link to informal recreation of wider countryside and coast. Draft 17 should recognise all sites and not just Natura2000 sites. Draft 7 & 17 should be integrated to ensure a consistent approach to plan area rather than distinguish between city and countryside.	Change. Will give consideration to appropriate amendments.
	English Heritage	Objective 1 - higher density is ok, but needs to be informed by character of locality and any heritage it possesses. Objective 6 - too much emphasis on recycling existing materials elsewhere, emphasis should be on re-using existing buildings too. Objective 12- conservation is likely to emerge as a key employment sector- repairing, adapting and converting. Objective 14 - supported. Objective 20- key to achieving this objective is better understanding of the nature and condition of the city's cultural assets.	Possible change: Objective 1 - comment noted, but considered to be too much detail for strategic policy. Objective 6 - Add to the end of the objective "To promote the recycling of existing building materials and existing buildings to minimise waste". Objective 12 - No Change - comment noted, but too much detail. Objective 14 - No Change. Objective 20 - no change - think the point that is made is covered sufficiently by 'raising awareness of the value of the city's historic buildings and areas' - if we added more there would be too much detail.
	Highways Agency	Support objectives 5, 8, 11 and 14. Objective 9 should add the word "sustainable" when proposing transport solutions to support economic competitiveness.	Change. Add the word "sustainable" to objective 9.
	Culture & Tourism	Objectives 20 and 21 - it is felt that these objectives also relate to the design, redevelopment and design of spaces that facilitate heritage and cultural amenities.	Change. Will give consideration to appropriate amendments.
	Land Securities	In principle support, however for draft objective 19 there should also be mention of "retail".	Change. Add the word "retail" to objective 19.
	Community Land Buisness Association	suggested that there should be two separate objectives i.e one on 'Greenspace and the Countryside' and one on 'Tourism, Culture, Sport and Recreation. Wish to see the greenspace objective separated out to reflect this.	Possible change. Will be reviewed.
	Sunderland City College	Support reference to Sunderland College. Reference should be made to the City Council giving assistance to education providers through consolidation and rationalisation of existing property.	Possible change. Will be reviewed.
	Sunderland arc	The spatial objectives and means of achieving these are all supported. Important that the population growth objective is fully reflected in the Sunderland Strategy and HMA	No change. Comment noted.
	Sunderland arc	Would like to see reference either within the 'centres' objective (19) or as a separate objective, to enhancing the retail function of the City Centre, focused on the Retail Core	Change. Objective 19 appropriate to include enhancement of retailing.
	NHS South T&W	Objective 10 - more emphasis needed on Sunderland Strategy Healthy City section.	Possible change. Will review in light of newly published Sunderland Strategy.

	Persimmon Homes	Spatial Objective comments: most are supported. Specific comments relate to: Spatial Development & Regeneration - general support but questions whether increased density standards are appropriate throughout the city, given the different types of housing required in certain area such as the Coalfield. Carbon Emissions and Energy-some of the issues are better dealt with by other regulations/legislation. Using PDL - general support, though this objective conflicts with the spatial objective relating to Employment Land Portfolio. Employment Portfolio- need qualitative assessment of employment portfolio- no benefit keeping unattractive sites that could be used for other purposes. Land for Housing - higher densities not always appropriate, such as the Coalfield area where larger family homes are needed to help re-balance housing choice in the area.	Change. Objective 1 - agree, will consider word amendment. Objective 3 will be reviewed. Disagree with view on objective 5 that this will cause conflict with spatial or employment land portfolio objectives. Disagree with view on objective 15- except for conservation considerations, higher densities should be pursued at all major transport nodes. This should not conflict with the ability to identify other sites for family housing.
	Springwell Gospel Hall	Support spatial objectives especially SO1, SO2, SO10, SO13, SO14 and SO21	No change. Support noted.
CS1	Nexus	In principle support, but concerns over development beside Leamside line and to existing rail and Metro lines. Need to make sure that development is not sited too close to railway or in such locations that future station sites are blocked. Development on the whole should focus more on where stations could be located, and new development should help to fund stations too.	Change. Considered too detailed an issue for the Policy, but will consider appropriate wording within the supporting text.
	Northumbrian Water	Agreement with the sustainable growth focus, though will need to be carefully planned to establish and address where the gaps in infrastructure are. A large increase in the number of dwellings in the city will require a detailed study of the water and sewerage infrastructure capacities. Planning obligations should be used to ensure that any gaps in infrastructure are addressed.	No change. Comment noted. Issues of infrastructure capacity will continue to be evidenced and monitored in liaison with the Utility providers to inform spatial development proposals / decisions.
	Tyne and Wear PTA	Support the policy. Believe that explicit reference to public transport in the policy will enhance it	Possible change. Sub-section (l) could be expanded to state "giving consideration to new and planned <u>road and public transport</u> routes".
	Network Rail	Network Rail has submitted proposals for South Dock rail line in Housing Allocations DPD. Also, for the Leamside Line, the Council should consider options for third party funding towards achieving long-term re-opening, e.g. from lineside developments that could provide locations for new stations. Increase frequency along Durham Coast Route are noted, though are subject to capacity and timetable issues-third party funding again could help.	Change to text. South Dock rail line is specifically mentioned in CS9 -wil consider the need for a similar reference in this policy having given further consideration to the policies for strategic site allocations. Paragraph required regarding Leamside Line and other public transport routes, including considering the potential for obtaining third party funding towards station/infrastructure.
	John Carruth, McInerney Homes, MMF, Mr Ray Luke, NAB Land	CS1 c)ii) - supports aim to reuse suitable and sustainable PDL.	No Change: Support policy
	John Carruth, McInerney Homes, MMF, Mr Ray Luke, NAB Land	CS1 c)vi) - supports aim to provide good quality housing in accessible locations in line with PPS3	No Change: Support policy
	MMF	Objects to final paragraph relating to planning obligations. States that recognition to the need for all planning obligations to be determined on a site by site basis and be formed through cooperation and negotiation between the council and the applicant/developer. Proposal for housing development at site 8-12 Murton Street, Sunderland, city centre.	No change. It is difficult to understand the relevance of the comment in relation to the final policy sentence. The reference is more applicable to policy CS20 and accompanying text, which incidentally refers to the continuation of a similar negotiating process.
	MMF, NAB Land	Part a). Supports concentration of development in city centre.	No Change: Comment noted.
	McInerney Homes	Objects to final paragraph relating to planning obligations. States that recognition to the need for all planning obligations to be determined on a site by site basis and be formed through cooperation and negotiation between the council and the applicant/developer. Proposal for housing on existing allotments at Lincoln Avenue, Silksworth.	No change. It is difficult to understand the relevance of the comment in relation to the final policy sentence. The reference is more applicable to policy CS20 and accompanying text, which incidentally refers to the continuation of a similar negotiating process.

	McInerney Homes	Part b). Supports policy to concentrate new development in built-up areas, and feels that Silksworth should be considered as part of the built up area.	No Change. Silksworth is part of the built-up area.
	NAB Land	Objects to final paragraph relating to planning obligations. States that recognition to the need for all planning obligations to be determined on a site by site basis and be formed through cooperation and negotiation between the council and the applicant/developer. In relation to land owned at former Sheepfolds Metals Site, Monkwearmouth, and also at Warren Lea, Springwell Village (some of the policy submissions are related to one site only).	No change. It is difficult to understand the relevance of the comment in relation to the final policy sentence. The reference is more applicable to policy CS20 and accompanying text, which incidentally refers to the continuation of a similar negotiating process.
	NAB Land	Supports sustainable growth of the main built-up areas of Sunderland, and that North Hylton should be considered as part of that built-up area.	No Change. North Hylton is part of the built-up area.
	Tescos Stores	Supports urban growth and growth along transport corridors.	No change. Support noted.
	Hellens, BDW Trading (Barratts), Land owners at Ditchburn Terrace	Support the growth areas, especially Sunderland Central (South) area which is felt to be ideal for housing and other related facilities.	No change. Comment noted.
	Natural England	Natural assets should be protected in their own right (section (vi). The reference to maintaining the Green Belt and open countryside for appropriate forms of development is unclear and may be wrongly interpreted. The accompanying "Preferred Option policy support" box should refer to the findings of the Habitats Regulations Assessment (HRA) screening of this policy.	Change: Statement noted- "Preferred option policy supports" box will include the findings of the Habitats Regulations Assessment HRA screening of this policy. Consider splitting point iv into two points - firstly "Protecting important natural assets and maintaining the broad extent of the Green Belt and open countryside" and secondly "Protecting important built assets and heritage assets" - consider deleting "for appropriate forms of development". While there is no legal requirement to produce Appropriate Assessment (AA) at the Preferred Options stage, the Council has commissioned development of an AA report including assessment against the Preferred Options policies and any ensuing recommendations.
	O&H Properties	Alterations to section a-c, more emphasis proposed on central Sunderland, and less focus on rest of city. Sections i-viii, proposal to increase locational focus on central area and existing centres in the first instance, then along strong public transport corridors. Also, the need to review the sustainability of road based transport corridors as priority locations for development.	Possible change. Comments noted. Consideration will be given to the emphasis on locations within this policy, taking account of responses and the new Sunderland Strategy.
	Barratts, Gladedale	Support in principle particularly in relation to point c and i. Leamside line	No change. Comment noted.
	Barratts, Gladedale	Object to part c point ii. Like additional text in support of greenfield sites that support regeneration and core strategy objectives for a particular ARF can be brought forward in advance of PDL in other ARF's of city	Possible change. To consider in relation to national and regional policy and upon completion of the Strategic Housing Land Availability Assessment.
	Friends of the Earth	Lack of sustainable growth already occurring in coalfield, e.g. greenfield development at Lyons Avenue. Further growth should be within urban area, with surrounding natural beauty safeguarded and promoted.	No change. Comment noted, especially in light of the above comment.
	Tree & Wildlife Action Group	Part iv. What is defined as an appropriate form of development? Policy is considered too wide. How can Sunderland advance when the quantity and quality of existing open space has not been ascertained i.e. how can we plan for open space needs. Principle is flawed, all open space assessed urgently	Change. Consider deleting "appropriate forms of development", and re-wording (iv) (see Natural England comment above). The Greenspace Strategy will assess the quality and quantity of all open spaces in the city this summer and will be used in the Core Strategy.
	English Heritage	Shouldn't over-concentrate on River Wear to the detriment of other areas. Reference of protecting important built and natural assets should be expanded to include heritage assets.	Change - see Natural England response for changes relevant to this comment. However, disagree that there is an over-emphasis on River Wear to the detriment of other areas- the emphasis on locations will be considered in relation to responses and the new Sunderland Strategy.
	Highways Agency	Supportive of sustainable transport and development growth towards PDL, main conurbations and key transport corridors. However, too many corridors are highways based- this does not properly reflect the overall aim reducing dependency of the private car.	Possible change. Needs to be reviewed in relation to proposed changes to CS9 (see Nexus comment).

	North East Assembly	Broad support but reference should be made to Houghton and Hetton as regeneration towns. Density (ii) is strongly supported, but suggested addition "ensuring that locations for development are selected in accordance with the sequential approach". The hierarchy of centres approach is welcomed, but reference to Sunderland as a sub-regional centre should be made. The supporting text should refer to the role of central Sunderland as a brownfield mixed-use development site.	Possible change. The City Council submitted representations to the Regional Spatial Strategy Further Proposed Changes in Feb. 2008 requesting that Houghton and Hetton form part of the Tyne & Wear City conurbation. Consideration will be given to this objection upon receipt of the adopted version of RSS. Change- other proposed alterations will be investigated in due course.
	One NE	Support for urban growth, and supports reference to focus on central Sunderland, sustainable growth of coalfield and via maximising potential of the port.	No change. Comment noted.
	Theatres Trust	Part v. Supports town and city centre role- need to provide retail, leisure, recreation and culture. The Cultural 'Quarter' should be identified in the Core Strategy.	Possible change. Consider addition of "recreation" to sub-section (v). Consider specific reference to city centre in light of this comment and Sunderland Arc (below).
	Culture & Tourism	The paragraph mentions the increase in employment within tourism sector but does not mention the cultural economy, especially as a broad range of features are noted elsewhere as important to attracting tourists, including sport, countryside and shops.	No Change: Point must relate to another section as there appears to be no connection to CS1.
	GONE	Reference to the strategic transport proposals in the policy fails to show how these relate to the 4 sub-areas outlined in 3.12.	Change. Consider inclusion of map in supporting text of the four sub-areas with the transport corridors shown.
	Sunderland City College	Part vii. Reference should also be given to education as well as employment and training.	Change. Add "education" into sub-section vii.
	Taylor Wimpey	Part c)l). Support part c criteria i. of the policy (Doxford Park - Ryhope Link Road)	No change. Comment noted.
	Sunderland arc	Support principle, however, would like to see CS1 part v extended to incorporate reference to building a vibrant employment function in the city centre	Possible change. Will be considered in due course.
	Dahlia Properties	Clearer and stronger reference in policy needed to redevelopment of the Port and associated land for a mixed use regeneration scheme that includes residential, employment, community and leisure uses along with a new Port Access Road	No change. The issue of whether the Port needs a separate policy of its own will be considered. At present, no change to CS1 or text paragraph 4.4
	Springwell Gospel Hall	Broadly support the policy, however, suggest paragraph v is expanded to include reference to provision for social infrastructure to meet the diverse needs of the population relating to health, community, spiritual, sport and recreation and emergency services	Possible change. Consideration will be given to expanding section (v). Comment relates to strategic objective for inclusivity and consideration will be given as to whether a further CS policy should be amended.
	Persimmon Homes	Support in principle. However, the inclusion of the A182 as a key transport corridor is questioned- the Central Route corridor is more appropriate, especially in relation to employment growth.	Change. Consider deleting reference to A182. Once complete, it is likely that the Central Route will be re-named the A182. The current A182 corridor will still be a focus for the 3 coalfield centres of Shiney Row, Houghton and Hetton, and will also be of local access benefit to existing housing (and potentially new housing developments too) - so it may be worth keeping both references and spelling-out their joint development nature.
CS1 text	Sunderland Civic Society	4.4 The Port has great potential for mixed development, leisure, business and residential.	No change. Comment noted. Future of the Port is directly related to its role in sustaining Port-related activity.
	Sunderland arc	4.4 Support the reference in policy to Central Sunderland and taking forward of the policies of UDP Alteration No. 2, also the roles of masterplans and action plans in Sunderland arc key growth area	No change. Support noted.
CS2	Nexus	Part ix). In principle, but needs to be stronger in policy terms as there have been less than optimally sited economic development sites in Sunderland in recent years.	Change. This is considered to be a justified comment as it is necessary to ensure that future economic development focuses toward the provision of sustainable transport. This sub-paragraph will be re-written as part of the re-writing of the overall policy to form a more robust policy statement.
	Northumbrian Water	General support for policy, though concern is expressed that potential alternative uses for allocated employment sites in the city could significantly increase the type and quantification of demand for sewerage and water services- especially the case when change of use from industrial to office, residential or mixed use is proposed. Close liaison required with NWL.	Potential area for change. Comment noted. The Re-allocations of existing employment sites will be informed by the emerging Employment Land Review. Issues of infrastructure capacity will continue to be evidenced and monitored in liaison with the Utility providers to inform spatial development proposals / decisions.
	Tyne and Wear PTA	Broadly supportive of the policy. Important that the allocation of employment land should be easily accessible and penetrable by public transport	No change. The comments are considered justified and link in with the re-writing of paragraph ix) as detailed above.

	NAB Land	Supports the proposal that there should be no new employment allocations in north Sunderland.	No change. This comment is met through the limited amount of employment land available in North Sunderland, although the policy will be further informed by the emerging Employment Land Review.
	NAB Land	Part x). Objects to proposal to resist development that may lead to loss of employment land. The policy should be revised to allow release of employment land where it can be demonstrated that there is need for other uses within the locality.	No change. Whilst it is recognised that the comment is highlighting the necessity to allow the development of land that is no longer required for employment uses, paragraph x) should remain and possibly be more robust? The comment relating to the re-allocation and / or de-allocation of employment land has been met through the plan / monitor / manage approach (including employment land reviews) as stated in the last paragraph of Policy CS2. The comment is considered unjustified as the policy already meets the proposed revision from the last paragraph of Policy CS2. The Policy will be further informed by the emerging Employment Land Review.
	Hellens, BDW Trading (Barratts), Land owners at Ditchburn Terrace	Object to CS2 part (x). The policy should recognise that some economic allocations are no longer suitable or economically viable, and should be redeveloped for alternative uses.	No change. The comment relating to the re-allocation and / or de-allocation of employment land has been met through the plan / monitor / manage approach (including employment land reviews) as stated in the last paragraph of Policy CS2. The comment is considered unjustified as the policy already meets the proposed revision from the last paragraph of Policy CS2. The Policy will be further informed by the emerging Employment Land Review.
	Country Land & Business	Generally supportive, but there needs to be greater emphasis on the promotion of tourism and culture, and for more provision of sport and recreation.	No change. Whilst the comment is recognised as relevant, it is very difficult to promote 'tourism' within employment land allocations as 'tourism' is not a recognised land use. Tourism is often considered as an umbrella definition for the services required by both leisure and business tourists, as this is almost an exhaustive list of services it is not considered possible to directly allocate areas of employment land for tourism. Tourism and culture land uses will be considered and may be brought forward in the emerging Allocations document as ancillary uses for individual sites where they meet the identified need of a site.
	O&H Properties	Part iii. Lack of clear evidence base for 50ha central area mixed use dev't. Need to ensure that "new allocations" do not undermine the existing strategy for the regeneration of the central area. Emphasis should be on numbers of jobs or floorspace within the central area rather than specific amounts of land.	General change to policy. This comment is considered to be unsound as the allocation of 50ha in Central Sunderland is evidenced in UDP Alteration No.2 and supports the existing strategy for the regeneration of the central area. Following the most recent revision of the Draft RSS the policy and related allocations will be comprehensively revised and this sub-paragraph will no longer exist as the employment allocations in the RSS do not include Regional Mixed Use Brownfield Allocations and has combined all the land allocations for authorities as "General Employment".
	Barratts, Gladedale	Support the policy particularly in relation to the Coalfield	No change. Comment noted as support for the policy.
	English Heritage	Supported.	No change. Comment noted as support for the policy.
	Highways Agency	Supportive, as long as economic growth is in line with RSS. There would also be concern should the proposed development lead to detrimental effects upon the Strategic Route Network (SRN). Concern with proposed use of brownfield sites if detrimental effect on SRN. Await more details with Allocations DPD.	Change. The comprehensive revision of the policy will result in general conformity with the RSS.
	North East Assembly	Broad support. The 262 hectare employment land figure is inconsistent with RSS figure of 225ha. Not necessarily in conflict with RSS but a plan;monitor;manage approach should be used to help phase land over periods 2004-11; 2011-16; 2016-21.	Change. The comprehensive revision of the policy will result in general conformity with the RSS, the policy already contains the plan / monitor / manage approach to ensure the phasing of employment land.
	North East Assembly	The split over the 5 sub areas- the penultimate paragraph of policy should refer to sequential approach in identifying sites in the Allocations DPD. In accordance with RPG1, development plans must critically re-examine all current employment land allocations against set criteria, and it must not be assumed that all allocations are taken forward - the policy should be amended to reflect this.	Change. The revision of the policy will ensure reference to the sequential approach in identifying sites in the Allocations DPD, the City Council is meeting RPG1 through re-examining the employment land portfolio against policy guidance including DP1, DP2, EL2, and EL3.
	North East Assembly	In the RSS, Hetton and Houghton remain as regeneration towns within the Durham Coalfield Communities Area. Therefore sustainable growth here should not impact on the regeneration initiatives of the Tyne and Wear conurbation.	Possible change. The City Council submitted representations to the Regional Spatial Strategy Further Proposed Changes in Feb. 2008 requesting that Houghton and Hetton form part of the Tyne & Wear City conurbation. Consideration will be given to this objection upon receipt of the adopted version of RSS.
	North East Assembly	Rather than stating that the 52 hectares of new allocations will be made either through intensification of existing sites or suitable extensions, RSS policy makes it clear that there should be a presumption in favour of regenerating existing sites in advance of allocating new sites on greenfield land.	Change. The revision of the policy will result in employment land allocations for the City (generally) conforming with the figures stated in the Draft RSS, therefore the primary comment is diffused. Through completing the citywide Employment Land Review, this will highlight the ability for the existing employment land portfolio to support guidance within RSS Policy 18 (e).
	One NE	The Agency considers that the City Council should be satisfied that there is adequate evidence relating to quantity, phasing and type of employment land- OneNE has no firm evidence that can be offered at present in this respect.	No change. Comment noted - this Policy will be further supported by evidence from the emerging Employment Land Review.

One NE	The identification of Houghton and Hetton as part of the Tyne and Wear urban core is noted, though OneNE believes that regeneration can be achieved here without it being part of the city region's urban core, and that there should be mention in the document of regeneration aspects relating to older established sites.	Possible Change. The City Council submitted representations to the Regional Spatial Strategy Further Proposed Changes in Feb. 2008 requesting that Houghton and Hetton form part of the Tyne & Wear City conurbation. Further consideration to alternatives will be given to this objection upon receipt of the adopted version of RSS.
One NE	Although Alteration No.2 recognises the Port as a specific site for employment generating uses, the City Council is urged to include specific reference to the strategic importance of this site and should take into account the DFT's Ports Policy Review (2007) and Eddington Transport Study (2006).	Change. The revision of the policy will aim to include reference to the comments provided.
Land Securities	In principle support, however sustainable economic growth should also mention "retail".	No change. The RSS allocation for the City's future employment land portfolio is for General Employment Land, this is for general employment (B1, B2 and B8) uses. Whilst retail is recognised as a form of economic development within the recent Draft PPS4 it is not a use traditionally encouraged on employment sites, hence the reason it has not been mentioned.
GONE	Policy does not show how the levels of economic development proposed in each area have been derived and how they relate to the overall strategy of Policy CS1 or the transport proposals in CS1 and CS9. Evidence is required to justify the proposed employment land allocations and the spatial distribution between sub-areas. The employment land allocation exceeds RSS and needs to be fully justified, along with allocations for each sub-area and evidenced. UDP allocations and new allocations should be presented as one figure for each sub-area to aid clarity. Greater clarity is required for sections vii) and viii).	Change. The comments have been noted and the comprehensive revision of the policy will follow the results of the emerging Employment Land Review which will demonstrate the spatial distribution of employment land / economic growth in the City.
Harworth Estates	Support for general thrust of policy more particularly the 12ha allocation of employment land in the Coalfield- believe that land located to the west of Rainton Bridge Industrial Estate should form some of this allocation. This should be put forward as a preferred option in the allocation DPD	No change. Comment noted as support for the policy.
Sunderland arc	Support principle, however, would like to see the policy extended to reflect more fully the criteria contained in Policy 18A of the RSS. Questions the evidence base as to why the council wish to see a higher employment land allocation (part iv of the policy). It is important that available land suitable for B2 and B8 uses is not diverted to B1 offices.	Change. The revision of the policy will aim to include draw on policy guidance at the national and regional level (PPS6 and Draft RSS Policy 18A) to support the preferred locations for office development toward existing City and Town centres.
Dahlia Properties	Policy should acknowledge in appropriate circumstances, for example redevelopment of Hendon Sidings land d land near Port that employment development comes forward as a mixed use scheme.	No change. The policy is not considered appropriate at this level, the Core Strategy provides policy guidance at a City level. The emerging Allocations DPD wil aim to provide more site specific allocations.
Springwell Gospel Hall	Support for economic growth and a vibrant economy - essential to underwrite community and social wellbeing.	No change. Comment noted as support for the policy.
Washington East Residents Action Group	Support principle of policy, but concerns with regard to its implementation. Shouldn't be used as just a guideline, SSSI's and SNCI's need to be protected from environmental destruction. Willows Pond SNCI, Tunstall SSSI, 7,000 trees at Newbottle Wood in the Great North Forest and Fulwell Quarries have suffered from such destruction. Protection policies should not be ignored otherwise Sunderland can never be the most environmentally friendly city.	No Change. The support is noted. It is considered there is adequate policy guidance towards the protection/enhancement of the built and natural environments, that would be considered in the allocation of future employment land. Including such references leads to unnecessary duplication.
Persimmon Homes	Support in principle. The RSS recommendations for land requirements for employment (and housing) should be treated as guidelines only and as a minimum level of requirement needed. A small 'oversupply' would not necessarily prejudice RSS objectives.	No change. This recognises that the employment land allocations are a guideline and that site specific allocations will be brought through the Allocations DPD. Their statement contradicts their next statement as a small oversupply would not prejudice the objectives of the RSS, and therefore not conflict with the RSS.

	Persimmon Homes	The policy is currently unsound as it conflicts with RSS . Additional land requirements should be provided through extensions to existing estates or new allocations in locations where such land would best meet emerging economic development needs. The Council should encourage reuse and regeneration of employment sites but not hold sites that are not considered "fit for purpose". The policy should provide greater emphasis on the need for employment land to be fit for purpose, as outlined in supporting Paragraphs 5.16 an 5.17 and the Economy Topic Paper. This qualitative assessment needs to be acknowledged in any assessment as to whether existing employment land should be protected from development (criterion x).	Change. The revision of the policy will deliver conformity with the RSS allocation. The emerging Employment Land Review will support the delivery of an employment land portfolio that is fit for purpose and able to the meet emerging economic needs of the City. The review of the policy will seek to offer support and emphasis toward employment sites being fit-for-purpose and managed through the plan / monitor / manage approach.
	Tree & Wildlife Action Group	Option 1 relates to existing employment areas - are these to be developed on Brownfield or greenfield sites? Green Open space must be protected from urban sprawl development. Travel distance must be discouraged to reduce greenhouse gas emissions.	Comment noted. The emerging Employment Land Review will provide evidence of the level and broad location of employment land required to meet the RSS requirements. Any need to allocate additional employment land will take into account the sequential approach and any relevant policy constraints associated with particular parcels of land.
CS2 text	Natural England	5.3 This policy should seek to deliver environmental benefit as part of good design, see PPS9 and TCPA2004 report 'Biodiversity by Design'.	Change: A statement similar to that proposed in CS3 (again for Natural England) should be included within the supporting text.
	Natural England	5.4 The last sentence should set sustainable economic growth in the context of the protection and enhancement of the natural environment. No reference is made to the 2 preferred options boxes as to the findings of the HRA screening of this policy.	Change. Include this in the review of the policy text.
	Culture & Tourism	5.3 The paragraph mentions the increase in employment within tourism sector but does not mention the cultural economy, especially as a broad range of features are noted elsewhere as important to attracting tourists, including sport, countryside and shops.	Change. Consider this in the revision of the policy text.
	Persimmon Homes	Paragraph 5.10 - strongly support. Disagree with RSS stance regarding growth of the Coalfield sub-area. The Coalfield offers numerous opprtunities for growth, especially beside the Central Route and A690.	No change. Comment noted as support for the policy.
	Persimmon Homes	Paragraph 5.12 - Option 2 is more appropriate than RSS option 1. Council needs to take an holistic quality and quantity approach, and allow struggling employment sites to be reallocated for other uses, such as housing or mixed use. New sites should be allocated in locations better suited to modern business needs - in the Coalfield sub-area this would be in relation to Central Route and A690- the former being explicitly recognised in paragraph 10.5 of Economy Topic Paper.	No change. Comment noted as support for the policy.
	Persimmon Homes	Paragraph 5.13 - support the Council's assessment that there is realistic potential for de-allocation of employment land in the Coalfield. This holds true even in the light of the RSS FPC figure which requires a small amount of additional land to be allocated in the city.	Comment Noted. It should be borne in mind that the emerging Employment Land Review will provide clear evidence as to the precise requiements (be they new allocations / de-allocations) by sub-area. This will inform a review of Policy CS3.
	Persimmon Homes	5.16&5.17: Strongly agree that "maintaining a fit for purpose employment land portfolio" is fundamental to the economic sustainability of the city. Industrial estates with low demand and accessibility should be considered in whole or part for housing or mixed use to benefit city regeneration.	No change. The re-allocation or de-allocation of employment land will only occur through the plan / monitor / manage approach and through regular employment land reviews. Any re or de allocation of employment will consider the most appropriate use for the land, this may not not be a specific use (i.e. housing).
CS3	McInerney Homes, MMF, Mr Ray Luke, NAB Land	Part i) should be revised to include reference to other relevant planning guidance when determining the standard of design in proposed developments, notably Regional Spatial Strategy and National Planning Policy.	No change. Would be repetition of national policy. PPS12 states in para 2.30 that1 'Generic policies should not repeat national planning policy statements but should explain how they apply to the local area.'
	Natural England	This policy should seek to deliver environmental benefit as part of good design, see PPS9 and TCPA2004 report 'Biodiversity by Design'.	Change: Section (v) of policy CS3 is considered sufficient to cover this issue. However it is considered appropriate to include a statement within 5.27 to state that 'the council also recognise the wider environmental benefits of design and developments should refer to PPS9 and TCPA 2004 'Biodiversity by Design'.

	English Heritage	Design and layouts should also make efficient and effective use of existing buildings as well as land.	Changes will be made to include statement in section (ii) that "Promoting designs and layouts which make efficient and effective use of land as well as the reuse of buildings".
	North East Assembly	Support, it is noted that energy efficiency is dealt with separately in policy CS15.	No action. Policy supported.
	Culture & Tourism	The Central Area Design Strategy also makes provision for access to tourist and cultural facilities. However, there is no mention of this in the housing plans for Sunderland in the Core Strategy. The Legible City initiative links all these facilities and should be mentioned.	No change. Legible City is referred to in CS3 text paragraph 5.29. This Policy is design led and relates to a particular area of the city. It is not considered necessary to make reference to this document within the housing policies of the Core Strategy.
	Safer Communities Manager	Reference should be made in the chapter to Section 17 of the Crime and Disorder Act (1998) which states that all local authorities and their employees must consider the impact, direct or indirect; their work might have on crime and disorder and community safety. Reference should also be made to "Secured by Design" as well.	No Change : References to the provision of safe environments are provided at both criterion (vi) and within the supporting text. It is considered unnecessary to further duplicate national and regional policy regarding the provision of direct and indirect consequences of planning decisions on public safety.
	Env. Services	Quality design should include consideration for future maintenance and repair of hard and soft landscapes in terms of cost effectiveness and ease of access.	No Action: issue is too specific for core strategy policy, but will be noted for Allocations DPD.
	GONE	Policy would be more locally distinctive by identifying specific or priority SPD's in (i).	Change. Provide reference to the existing list of emerging SPDs and other emerging documents at the point of the next draft at criterion (i) The Residential Design Guide, Design and Access Statements, Household Alterations and Extensions, and Central Area Urban Design Strategy.
	Sunderland City College	It is not appropriate to require development to be "in accordance" with SPD's as they provide guidance only.	Change. Section 38 (6) of the 2004 Planning and Compulsory Purchase Act requires the determination of planning applications to be made in accordance with the development plan. Although SPD's will form part of the planning framework for an area they are not part of the statutory development plan (PPS12 para. 2.42); but SPD's are a "material consideration" in the determination of planning applications (PPS12 para 5.23); Therefore because of the lower status of SPDs they do not have sufficient weight to require applications to strictly accord with them; but as a material consideration they need to be taken into account. Section (i) of CS3 will be changed to: 'Ensure that new development is of the highest standard of sustainable design and take into account the City Councils Supplementary Planning Documents (SPDs).'
	Persimmon Homes	Support the policy. Care is required regarding the definition of "highest possible quality of development" is not seen as an absolute measure, and that there will be flexibility regarding what is 'possible' across the city depending upon site and development circumstances.	No change, comment noted. SPDs provide further detailed guidance on design issues and every application is considered on its own merits.
	Sunderland arc	Support the policy approach. Extended policy requirements set out in UDP Alteration policies B2A and B2B should be reflected in the Submission Draft	No Change: The majority of the policy B2A has been replicated in CS3, there are also certain elements of this policy that cannot be used e.g. the section on renewable energy which is now been removed from the RSS. B2B - not enough justification to creating a city-wide tall buildings policy as there is no evidence of tall buildings being a problem outside the city centre.
CS3 text	English Heritage	5.24 Worth mentioning: By Design- CABE; Buildings in Context (Eng Heritage); Guidance on Tall Buildings (CABE/Eng Heritage).	Change. Reference will be made to By Design, Buildings in Context Guidance on tall buildings within paragraph 5.25.
	English Heritage	5.26 There is nothing inherently wrong with high quality contemporary architecture in a historic setting- in every case, developments must have sound understanding of character of area and context.	No change. Comment noted.
CS4	Nexus	In principle, PDL urban sites are usually in areas accessible by sustainable transport. However, some brownfield sites can be isolated areas (e.g. extractive industries) and are not very accessible by sustainable transport.	No change. Comment noted, although national, regional and local policy provide clear attributes to assess the suitability of sites for housing.
	Sunderland Civic Society	The proposed housing distribution would focus new population on the Coalfield and South Sunderland areas, to the detriment of Washington and North Sunderland.	No change. The coalfield area forms a large part of the city and has for a number of years been subject to regeneration aims, which need to continue to avoid decline. This can be seen by the amount of high amounts of committed dwellings within the first plan period. The coalfield can also help absorb other-sub areas housing needs. South Sunderland includes Central Sunderland allocations, as well as large numbers of committed dwellings on the southern periphery of the city which also include high numbers of completed and committed sites, particularly within the first plan period. Both Washington and Sunderland North are constrained by Green Belt boundaries and employment allocations (mainly Washington) and as such do not offer as much opportunity for development.
	Tyne and Wear PTA	Part iii. Support the requirement that higher density new housing should be in central Sunderland and in locations with good public transport access	No change. Comment noted.
	Northumbrian Water	Support in principle, however more specific information is required regarding location and phasing of where and when development would take place.	No change. This information will come forward through the Preferred Options stage of the HADPD.

	English Partnerships	Support brownfield land regeneration as well as lower density executive housing to diversify stock and tenure. Small-scale greenfield should be considered where overriding benefit is identified and would not prejudice a brownfield site. Policy should recognise importance of Cherry Knowle / Ryhope Hospital to support overall policy. Policy needs to consider phasing to ensure that schemes with planning permission are prioritised.	No change. Comment noted. More detailed consideration of the location of particular sites will be considered through the HADPD. The detailed phasing issues will again be a matter for the DPD and will be further informed by the emerging Strategic Housing Land Availability Assessment.
	McInerney Homes, MMF,NAB Land	Objects to the phasing of housing numbers for central Sunderland, stating that the 2004-11 figure should be revised up from 2293.	No change. The 2293 figure is the total for the 2004-2011 period for the whole of Sunderland South which incorporates Central Sunderland South. Central Sunderland North does not fall within this figure and is included within the 655 figure for overall Sunderland North. Notwithstanding this the South area as a whole through the C.S. is exceeded through completions and commitments within this first plan period and the HADPD through phasing and plan, monitor manage will need to consider this. Therefore to increase the figure upwards would only exacerbate this.
	NAB Land	Part iii. Supports higher density requirement for city centre.	No change. Comment noted.
	NAB Land	Objects to the phasing of housing numbers for central Sunderland, stating that the 2004-11 figure should be revised up from 655.	No change. The figure of 655 for the first plan period for the whole of Sunderland North includes Central Sunderland North. This figure is considered realistic when looking at the short term opportunities for housing development within the north area and the restraints in place for large development.
	Hellens, BDW Trading (Barratts), Land owners at Ditchburn Terrace	Support the 15,150 net additions to the housing stock. Support the distribution of housing across the four growth areas (North, South, Washington, Coalfield). Policy should include reference to demolitions, and that the total number of homes to be built is 15,150 plus 6,210 to replace demolitions.	The figures referred to in the policy are net builds, demolitions have not been included. With regards the demolitions, the 6,210 homes referred to to replace demolitions is based on 4,100 demolitions for Gentoo and the remaining 13 and a half years of private sector demolitions at approximately 156 per year. However, Gentoo replacements are approximately 3,800 in total (the residual of 300 dwellings abandonment????). The private sector demolitions which can not be replaced on site generally account for approximately 52 a year. As such, the total number of net dwellings to be built will still be 15,150 as there is no net difference from the private sector demolitions to new builds, just possibly a proportion to go on a different site. Agree, but could the policy make reference to net demolitions as well- would it be beneficial?
	Country Land & Business	Need to promote the development of executive housing. Developers should have an obligation to provide contributions toward the Great North Forest. Some small scale housing beside or within the Green Belt may be appropriate, potentially beside Burdon hamlet.	No change. Comments noted. It is recognised that the city has a shortfall of executive housing and policies to achieve this house type have been a priority of the council for a number of years and as such are contained within the C.S. Exceptional circumstances for using greenfield land for these types of dwellings has previously been used and is expected to continue. However, it is unlikely that Green Belt will be released for these purposes. Further work through the emerging HMA is being undertaken with regards executive housing needs within the city and as such will feed into the process when available. Site specifics are not considered through the Core Strategy.
	O&H Properties	To satisfy with RSS, a small reduction of scale of housing should be made. The housing apportionment is inconsistent, providing more details than the Core Strategy's "broad locations" intimate. There is no obvious "central Sunderland" priority area- mention should be made of Groves, Vaux and Sunnyside. The distribution reflects the UDP rather than anything emerging. There should be a commitment to deliver dwellings in three phases of the plan period. More flexibility is required regarding density targets.	No Change. The scale of housing the City Council considered appropriate for the city to develop is the 15,150 dwellings until 2021 (this is the subject of the city council's response to the RSS and as such more justification can be provided for this through RSS response submissions). However, the most recent draft of the RSS, February 2008 indicates housing numbers for the city to be 14,950, this being an increase rather than a decrease from the previous version. Importantly, the latest draft of RSS clearly states that its district apportionments are to be considered as minimas and not ceilings. The second and third point seems to be directed to the HADPD and the area split of housing numbers do have slight discrepancies, this however is due to the timing of the documents and will be rectified within the next stage of the HADPD. The SHLAA feeding into the DPD will look at the developability of sites, within the whole city, which includes those within Central Sunderland and as such the priorities and phasing will come about from this. Further consideration will be given to the specific allocation of strategically important sites within the Core Strategy. With regards density, the C.S stipulates a range of 30-50 which is realistic for the city, however it does allow for circumstances where dens
	Barratts, Gladedale	Support principle point i. for coalfield area and point vi and Fencehouses growth area	No change. Comment noted.
	Barratts, Gladedale	Policy fails to address cross boundary issues i.e. potential conflict with Chester le Street District Council	No Change. The emerging Housing Market Assessment will consider cross boundary housing market issues (as further outlined in the response to GONE's general response. It is difficult to see the conflict with Chester-le-Street District Council given no objection was received to this Core Strategy and that it too has not yet undertaken clear Housing Market Assessments / brought forward a more advanced draft of its Core Strategy.
	Tree & Wildlife Action Group	No housing should be constructed on sports areas or green open space unless the area has not been used for 30 years and is then declared surplus - No open space ascertainment completed	No change. Green space strategy is to be undertaken summer 2008 and as such the results of this will feed into the relevant policies within the C.S and site specifics in both the HADPD and the ADPD. Decisions regarding the use of sports areas or green open space are considered in accordance with advice contained within National Planning Policy Guidance Note PPG17. There is no national / regional policy or legal statement that confirms that no housing should be constructed on sports areas or green open space unless the area has not been used for a period of not less than 30 years and is then declared surplus.
	Highways Agency	In principle support, but housing levels should be in line with RSS. Concern if there was housing causing detrimental effect on SRN. Supports higher densities.	No change. Comment noted. Housing numbers are in general conformity with the emerging RSS (see the response from North East Assembly), and given that the RSS district apportionments are guides and not maximum requirements. Impact on SRN is an issue for the HADPD/SHLAA and site specifics.
	North East Assembly	Consistency with PDL and density. The 4 sub-area split is supported as it is conurbation oriented. The 15150 housing figure is supported.	No change. Comment noted..
	One NE	Supports the policy, recommends that policy should be aligned with the Sunderland Climate Change Action Plan to emphasise role of energy efficiency.	Possible addition to policy Possibility of doing this.

GONE	The policy does not identify the amount of population growth and explain how this target is translated into the housing provision figures, therefore conflicting with spatial objective 2. Policy does not show how the levels of housing development proposed in each area have been derived and how they relate to the overall strategy of Policy CS1 or the transport proposals in CS1 and CS9. HMA and SHLAA evidence is required to justify the proposed distribution of housing across the sub-areas, the level of housing for the growth points and the provision of replacement housing by Gentoo. The policy fails to identify the amount of housing to be provided within the city during the plan period and how this will be distributed (broken into 3 phases). No rationale has been given for the distribution of housing between sub-areas. A comprehensive list of Gentoo's renewal programmes is not given, including dwellings to be cleared and replacements to be provided. Criterion (vi) is imprecisely worded and could result in new housing sites being allocated in inappropriate locations.	Change : Policy CS4 will need to be revisited to take account of the emerging Housing Market Assessment and SHLAA evidence and revised to take on board the comments raised.
Taylor Wimpey	Support inclusion of paragraph in view of interest relating to a greenfield site in Ryhope	No change. Comment noted.
Marc & Gavyn Davis	Support the policy for distribution of housing relating to the coalfield. Would like to see land at Poultry Farm allocated for future housing development	No change. Comment noted.
Sunderland arc	Support in principle. Difficult to provide a substantive comment based on delays in finalising the HMA and the SoS's second stage Proposed modifications to the RSS.	No change. Comment noted.
NHS South T&W	The housing preferred option does not appear to consider the shift in population predicted in Sunderland by 2025 with an increasingly ageing population.	Additions to policy based on results of SHMA. Paragraph 5.58 considers the expected ageing population within the city. Policy CS5 states that the City Council will ensure a range and choice of houses types are provided to meet needs and aspirations of existing and future residents. It goes on to state that the results of the SHMA will help identify types and areas (which will help plan for the expected increasing ageing population).
EW Blaikie	Lack of proper consultation.	No change. Consultation was carried out in accordance with the adopted Statement of Community Involvement. This comment is a combined reference to both the HADPD and the C.S and a relevant response has been sent to the objector.
Nicola Flood	Question how removing recreational facilities and replacing these with housing would promote the seafront? Would have expected the council to have drawn up proposed plans of what density of housing it would expect to see in Sunderland.	No change. No specific housing allocations have been proposed in this Core Strategy. This comment was raised to the HADPD and as such has been dealt with through the responses to comments for that document. With regards the comment on density, the policy sets out density ranges.
Alison/Ian McConnell	Totally object to the building of any other houses in the Seaburn / South Bents area.	No change. No specific housing allocations have been proposed in this Core Strategy. This comment was raised to the HADPD and as such has been dealt with through the responses to comments for that document.
Dahlia Properties	Reference required to major contribution land at Hendon Sidings and vicinity of Port can make towards meeting housing requirements. Support for overall housing requirement in Central Sunderland South and South Sunderland	No change. Support noted. Consideration will be given to the inclusion of strategic sites within this Core Strategy. However, these will need to be fully assessed as to their real strategic value and merits in planning terms. Otherwise, housing site allocations will be considered and assessed primarily through the emerging HADPD.
Michael Hartnack	Housing proposals are ill-thought out at Seaburn and South Bents.	No change. No specific housing allocations have been proposed in this Core Strategy. This comment was raised to the HADPD and as such has been dealt with through the responses to comments for that document.
O&H Properties	In principle support, the core strategy sets out a higher housing allocation over the plan period than that set out in the draft RSS. Support small scale deletions of the green belt to accommodate new development.	No change. Comment noted.
Mr R Nichol	Part ii. This part of the policy conflicts with policy CS5 i.e. 80% development on brownfield sites will not lead to housing choice in respect of low density 'executive' type housing	No change. Executive housing does not necessarily need to be developed on Greenfield land, opportunities also arise for the use of PDL for this type of housing. In addition to this, a choice of housing can be achieved within a particular area with the use of both PDL and greenfield (possibly for executive housing), if not on PDL alone.
Springwell Gospel Hall	The adequacy of housing supply to meet national, regional and local requirements in a timely way is considered essential to social wellbeing.	No change. Comment noted.
David Downey	Fulwell/Roker/Seaburn growth area is identified for housing growth with insufficient information for the area. Any substantial development would impact on greenfield, open spaces and increase traffic congestion in area.	No change. This comment was raised to the HADPD and as such has been dealt with through the responses to comments for that document.

	Persimmon Homes	Support for the housing requirement, despite it exceeding RSS figure-figures should be treated as guidelines, and any higher levels proposed would not necessarily conflict with guidance. 80% housing on PDL is a very high figure and other CS policies must be supportive for the figure to be achieved (for example, releasing PDL employment land that is not "fit for purpose").	No change. Comment noted. Consideration of releasing previously developed employment land will need to be carefully assessed by the evidence from the emerging Employment Land Review.
	Persimmon Homes	Growth areas - the Fulwell/Roker/Seaburn and South Hylton areas are questioned- the areas are almost fully developed and Green Belt / open space incursions could not be justified. Growth in Washington is questioned- would mean the loss of good quality employment land or green belt land. These growth areas should be deleted. Support for Central Sunderland South, Ryhope, Fence Houses and Easington Lane growth areas. The growth area approach is sound but needs to be more selective and should not prevent other sites coming forward, especially where it would involve PDL.	No change. The growth areas identified have been subject to consultation through the HADPD and as such the growth capacities of each area is still under consideration. However, each area has been identified due to existing commitments, regeneration opportunities, PDL sites, transport corridors and housing market locations. Any consideration of utilising open space/Green Belt will be subject to rigorous assessment as well as need if employment land comes under consideration. The identification of growth areas will not prevent other PDL sites outside of the growth areas coming forward as still capacity as well as the plan, monitor and manage process.
CS4 text	Sunderland Civic Society	5.35 Too much greenfield land is being taken up for building.	No change. There is no evidence to support this assertion. In the last 5 years the city has consistently met and exceeded nationally set targets for meeting housing development on PDL with brownfield completions in excess of 90% for the last 3 years. As such it is not considered that too much greenfield land is being lost and in exceptional circumstances the use of some greenfield land can have wider benefits to the city.
	Mr Ray Luke, NAB Land	5.35 Support- there are some highly accessible and sustainable greenfield sites that can contribute to the city and RSS housing needs. Reference made to possible housing site within Green Belt.	No change. No site specific references will be made within the C.S, this will be left to the HADPD.
	Barratts, Gladedale	5.42 Policy fails to address cross boundary issues i.e. potential conflict with Chester le Street District Council	No Change. The emerging Housing Market Assessment will consider cross boundary housing market issues (as further outlined in the response to GONE's general response. It is difficult to see the conflict with Chester-le-Street District Council given no objection was received to this Core Strategy and that it too has not yet undertaken clear Housing Market Assessments / brought forward a more advanced draft of its Core Strategy.
	English Heritage	5.34 Reference should be made to both PDL and existing buildings.	Change: add to 5.34 "priority for developing land is given to previously developed land (PDL) including the re-use of existing buildings for housing where feasible".
	English Heritage	5.39 Concern that density increases might result in loss of high value family housing or well-treed neighbourhoods.	No Change. This is not an issue for the Core Strategy but will be considered through the HADPD.
	English Heritage	5.47 In line with the principles of sustainability, making best use of existing housing (existing fabric) should be sequentially pre-eminent.	No change. This paragraph does not suggest that empty properties will be demolished without consideration of its viability for improvement.
	Sunderland City College	5.42 Concern that "growth areas" might prejudice development coming forward in suitable and sustainable locations.	No change. Should high growth be the preferred option for each identified growth area the total amount of housing does not exceed the City Council's response figure of 15,150 (which is more in tune with latest RSS figures 14,950) and still allows for housing sites to come forward in other sustainable locations throughout the city.
	Taylor Wimpey	5.35 Support inclusion of paragraph in view of interest relating to a greenfield site in Ryhope	No change. Comment noted.
	Persimmon Homes	Paragraphs 5.32-5.36. Support the housing requirement of 15,150 dwellings and the broad distribution of housing as proposed. Also support view that some greenfield landtake will be necessary to achieve strategic objectives. The RSS figures are considered as "guidelines", not "ceilings", and therefore an even higher housing figure would not in itself prejudice RSS objectives. Persimmon does question the need for higher density rates, however, especially as there has been a disproportionate number of apartments built recently and it does not meet the need for family or executive homes.	Possible Change. When considering density consideration also has to be given to the character of the area as well as how sustainable the site is. In addition to this the results of the SHMA will give an indication of house types required through out the city, which will impact on densities.
CS5	English Partnerships	Support affordable housing where housing needs survey identifies a local need. The policy should also recognise site-specific constraints where affordable housing may impact upon site viability and deliverability. The policy should therefore provide flexibility for the Council to seek to negotiate with developers on site-by-site basis.	Possible change. Policy to be prepared in near future taking on board results of final SHMA. Consideration will be given to flexibility for site-specific constraints and look into appropriate wording to allow negotiation.

	John Carruth, McInerney Homes, MMF, Mr Ray Luke, NAB Land	The set figure for affordable dwellings in part i) is objected to. It should be revised to state that all levels of affordable new housing will be negotiated between the City Council and the developer and judged on a site-by-site basis.	Possible change. Policy to be prepared in near future taking on board results of final SHMA. It is considered that a set of figures are required to ensure the amount of affordable housing the city requires is provided.
	O&H Properties	The percentage of affordable housing proposed in section 1 prejudices the HMA and any evidence base. Do not support the inclusion of specific mix of dwellings to be achieved on development sites- if this goes through, then some flexibility is needed in the planning process.	Possible change. This part of the the policy states that the figures (percentages) will be dependent on the outcome of the HMA. Anecdotal evidence has indicated the city has a problem with affordability and as such contributes to the reasoning for the policy within the P.O draft. However, should the HMA not demonstrate a need then this section of the policy will be removed. PPS3 advises that a mix of dwellings should be achieved on housing sites, the policy aims to take into account local circumstances with regards house types the city lacks in, with the HMA providing the firmer evidence base. It is considered that flexibility will be built into the policy/supporting text, provided the overall aim of the policy is met.
	English Heritage	The policy should also make it clear that the loss of existing high quality or executive housing to create high density redevelopment schemes will be strongly resisted in order to do so.	No change. This is an issue which would be best dealt with by the emerging HADPD and will be similarly influenced by the evidence taken from the emerging SHMA.
	English Heritage	Support need for gypsy and traveller site's).	No change. Comment noted.
	Environment Agency	Support, but an addition should be made that in accordance with PPS25, no housing developments will take place in functional floodplain (flood zone 3b).	Change: Add text to say 'in accordance with PPS25 no housing developments will take place in functional floodplain (flood plain zone 3b).
	Highways Agency	Generally supportive of improved range of housing choice, which can help reduce need to travel.	No change. Comment noted.
	North East Assembly	Supports the percentage proposal for affordable homes and mixed type and tenure based on the HMA- this needs to be further clarified at submission to conform with regional policy.	Possible change. Comment noted.
	North East Assembly	Gypsy site is supported, needs to be tied to sequential test. RSS Para 3.89 states that there is a need for 19 pitches (by 2020) within Sunderland, Chester-I-S, Derwentside and Durham City.	Possible change: the Comment is noted, but the City Council has raised a series of objections to this reference within the RSS. Assessments are being carried out for this needs and will, if a need is identified be incorporated into the Policy.
	Env. Services	Housing design needs to address Joint Municipal Waste Management Strategy in providing for appropriate waste management services and recycling- often difficult to provide in high density communal tenures.	No change. Policy CS17 of the C.S considers waste and re-cycling. This issue of type/site waste and re-cycling systems will be dealt with through Design and access statements upon submission of the planning application.
	GONE	Evidence is required to establish an affordable housing target and identify a mix of housing and tenure type to be provided. CS5 fails to include a plan-wide affordable housing target. Criteria (ii) and (iii) of the policy fail to identify in precise terms the range and mix of house types to be provided and therefore do not provide guidance for the subsequent HADPD.	Change. This is accepted and the the results of the SHMA will inform a revision to this policy.
	Sunderland arc	Support proposed policy approach. However, the policy is severely constrained by limited evidence base namely HMA. Would like to see wording in policy CS5ii to apartments forming an important part of the overall housing mix, particularly within Central Sunderland. Also, in the absence of any generally agreed definition, the use of 'executive housing' should be avoided	Possible Change. The results of the SHMA will indicate the required house types and as such there is no evidence to support the requirement at this stage to incorporate 'apartments' into the policy. With regards the definition of executive housing, further work is being undertaken on this will again be used to inform this policy.
	Mr R Nichol	This policy conflicts with the aims of policy CS4 part ii and iii i.e. housing choice will not be delivered as use of brownfield land at higher densities is not suited to provision of low density 'executive' type housing	No change. Policy CS4 allows for lower densities for executive housing and this type of housing does not necessarily need to be developed on Greenfield land, opportunities do arise for the use of PDL for this type of housing. The policy states that minimum of 80% of land allocations should be on PDL, which allows scope for some greenfield development. In addition to this innovative design can help achieve different types of executive housing at higher densities.
	Persimmon Homes	Support the policy, though there needs to be robust and up-to-date evidence base available before the objectives of this policy can be delivered. The wording of sub-section (ii) is not clear- will a requirement for a mix of housing tenure, size etc only apply to sites over a certain size?	Under review. Comment noted, the results of the SHMA will inform this policy when available. Sub-section (ii) refers to a mix of housing type and tenure being required on sites over a particular size.
CS5 text	Sunderland Civic Society	5.51 and 5.52 By raising housing density the vast majority of new housing schemes will be unable to fulfil the council's proposed objective of broadening choice and reducing migration.	No change. Housing densities range from 30-50 dwellings per hectare, with provisions in place for lower-densities. This provides adequate opportunities for a mix of house types to be provided and widening housing choice.

	Sunderland Civic Society	5.62 Travellers and Gypsies should be offered permanent sites within the city as a priority.	No change. Comment noted. An assessment of current needs is expected autumn of this year and as such any site/pitch requirement will be built into the HADPD, complying with the criteria set out in the C.S policy.
CS6	Sport England	Agrees that sport & recreation is a town centre use, supporting the vitality and viability of centres, supporting the evening economy. However, provision needs to be backed by a sound evidence base.	No change. Comment noted.
	Jennings	Part i). Would like reference made in the policy to allocation of Bulky retail goods sites preferably in edge of centre locations.	No change. PPS6 does not distinguish between 'normal' comparison goods and 'bulky goods'. Both are currently subject to the rigorous tests needs and locational tests set out in PPS6. The Objector offers no evidence that there is a need for such a facility nor that there are sequentially more preferable sites. The Core Strategy will consider future retail capacity and where necessary identify broad locations for such needs to be met. The Allocations Development Plan Document will deal with specific land allocations.
	Tescos Stores	The Allocations DPD should identify further areas which are poorly served and could potentially benefit from further additional retail convenience.	No change. This will be considered through the Allocations DPD.
	Highways Agency	Supports local access to facilities, reduces need for travel. Supports facilities in main centres.	No change. Support noted
	North East Assembly	Houghton and Hetton are classed as regeneration towns and therefore should be classed in the same category in the hierarchy of centres. Sunderland should also be recognised in the supporting text as a sub-regional centre in line with RSS. More definition of the extent of development required in Sunderland, Washington and Houghton would add greater clarity.	No change. Whilst it is accepted that these towns have a role to play as centres of regeneration, there are significant differences between them which is reflected in their position in the retail hierarchy; most notably the wide difference in the physical size of their centres (particularly their retail centres) and therefore their respective ability to accommodate "town centre" uses; Houghton also has a greater range of higher order facilities and is on a main transport route (A690). Regarding reference to Sunderland as a sub-regional centre within the region, this can be incorporated into the supporting text. Figures for floorspace reflect those in the most recent Retail Study (2006); the forthcoming Retail Needs Assessment will provide additional information and this will be used to inform the revisions to this policy.
	Theatres Trust	Leisure and entertainment should be concentrated in city centre.	No change. Whilst the City Centre will continue to be a focus for leisure and entertainment uses, there is a role for such facilities in other Main Centres and Local Centres where there is good accessibility by a variety of modes of transport.
	Culture & Tourism	This policy supports the Attractive and Inclusive City directive under the new Sunderland Strategy. The cultural economy is also significant as are the centres of tourism and heritage within the city centre.	Change. Reference could be made to the cultural economy in the text of the policy.
	Env. Services	Particular regard must be had to operational issues which can be created in areas of mixed development, particular with regards to physical access and quality design.	No change. Specific reference to be considered in Allocations DPD.
	Montagu Evans	In principle support, but 3 issues: firstly there is implication that new floorspace will be achieved in the city centre by 2010 (Para 5.80 and 5.81) - not realistic with Holmeside Triangle and Crowtree. Second, this part of policy needs updating to reflect more recent assessments of retail capacity. Third, capacity estimates should relate to beyond 2010, such as UDP Alteration No.2 spare capacity of 39,141 up to 2015. Estimates should run to 2021.	No change. It is clear that the Core Strategy only refers to "broad requirements" for new retail floorspace in the City; this is in line with the approach advocated in PPS6. The Holmeside site is situated in the City Centre Retail Core (i.e. is sequentially preferable in terms of PPS6) and can physically accommodate the estimated need for new floorspace. A preferred developer was identified to take the site forward and the process of site assembly has progressed. Development of this site could still commence by 2010; the development of Crowtree is less certain. The 39,141sqm figure provided by the Alteration Inspector was only intended to establish the extent of the City Centre Retail Core and he emphasises that this should not be regarded as definitive and should be the subject of further detailed work. The quoted figures for floorspace in the Core Strategy reflect those in the most recent Retail Study (2006); the forthcoming Retail Needs Assessment will provide additional information and this will be used to inform the revisions to this policy as well as the Allocations DPD thus ensuring consistency. This Assessment will look to the period up to 2021.
	GONE	Policy fails to identify how much additional retail floorspace will be required within the city, how it should be distributed and when it will be required. Evidence is required. The policy should list all the town centre uses listed in the PPS. The policy fails to identify the amount of new retail floorspace required in the city, city centre, town and district centres.	Forthcoming update. Figures for floorspace reflect those in the most recent Retail Study (2006); the forthcoming Retail Needs Assessment will provide additional information and this will be used to inform the revisions to this policy.
	Sunderland arc	Strongly support policy approach, however, it is considered particularly important that the evidence in relation to retailing is firmed up in time of submission draft and the issues and options relating to the 'Other Allocation' DPD	No change. Note the support and the forthcoming Retail Needs Assessment will provide this information.
	Mrs EM Holmes	City Centre has lost its range of shopping facilities and needs considerable improvement. It also needs more accessible car parking, closer to the shops themselves. Sainsbury's (Elstob) would be a good location for a district centre shopping area.	No change. The City Centre is the second largest in the region and contains a broad range of shopping facilities. In recent years the convenience service (day to day shopping requirements) in the City Centre has declined, though the durable service has increased. There is a need to maintain the City Centre's attractiveness and viability. Opportunities for new retail development have been identified through UDP Alteration No. 2, particularly at Holmeside where a new convenience store is envisaged. The City Centre is a compact area and public car parks are located at convenient locations in close proximity to shopping facilities e.g. Bridges rooftop; additional consideration is being given to improving the public realm and pedestrian routes in the City Centre and this could be extended to car parks.

	Peel Investments	Support in principle, but object to omission within the policy text of reference to the role of existing "out of centre" retail facilities in meeting the evolving shopping and service needs of local communities. Wish to see policy amended to reflect the omission	No change. In accordance with PPS6 (Planning for Town Centres) the focus of this policy is on existing City and Town Centres as these are major centres of the community and as such have a key role in delivering the Government's efforts to promote social inclusion. Whilst it is acknowledged that out-of-town facilities have a role in the retail hierarchy these should only be considered where there are no available and suitable sites in existing centres and where they are well-served by a choice of means of transport.
CS6 text	Sport England	5.67 Agrees that sport & recreation is a town centre use, supporting the vitality and viability of centres, supporting the evening economy. However, provision needs to be backed by a sound evidence base.	No change.
	Sunderland Civic Society	5.67 Agree that the city centre is appropriate for sport and recreation uses, therefore should the Crowtree be removed, a replacement facility should be sited south of the river and within the city centre.	No Change. Comments are noted, in the absense of any decision on the future use of Crowtree Leisure Centre.
	Tescos Stores	5.82 The Allocations DPD should identify further areas which are poorly served and could potentially benefit from further additional retail convenience.	No change. The forthcoming Retail Needs Assessment will provide this information
	Safer Communities Manager	5.75 There is already a strong City Centre LMAP group in place to support this paragraph.	No change. Comment noted.
	Land Securities	5.81 Paragraph should mention Crowtree in line with Holmeside as being able to provide retail floorspace.	No change. The Holmeside site is specifically referred to in UDP Alteration No.2 as the preferred site for new retail floorspace in the City Centre Retail Core; the Alteration does acknowledge that potential exists at other sites "adjacent to The Bridges", however these are not specifically allocated for retailing. .
CS7	Nexus	In principle, but emphasis on improving service distribution across the city should also emphasise need to locate beside public transport corridors.	No change. Public transport is not discounted by this statement, it is looking specifically to support more active lifestyles and quality environments.
	Sport England	Supports the protection of sports facilities if genuinely required- but this can only be determined through a sound evidence base, understanding community need. As this is not in place, policy is objected to. Also supports the principle of Active Design, ensuring that new housing and mixed use development promotes sport and physical activity.	Forthcoming update. Greenspace Strategy will provide evidence base.
	Natural England	Both policy and paragraph should more explicitly recognise the multiple benefits of green space, and not just refer to public realm. It should also encourage active community involvement in the management and use of green space.	No change. The references in question do not refer solely to public realm. Further evidence from Greenspace Strategy will help to review this policy. The involvement of community in the management and use of green space is considered too detailed to be included at the Core Strategy stage.
	Highways Agency	Supports local access to facilities, reduces need for travel. Supports facilities in main centres.	No change.
	North East Assembly	Supported.	No change.
	Theatres Trust	More emphasis is needed to recognise need to promote and protect existing community facilities. Loss of such facilities should be resisted unless demonstrated that need no longer exists or an alternative suitable facility can be provided.	No change. Comment noted, will be considered at Allocations DPD stage. (See also Gospel Hall comment). The City Council in the past has sought to ensure that land and buildings are available for community use and this will continue to be the case. As community facilities are a limited resource, it is important to safeguard against their loss. When land or buildings currently in community use become surplus to requirements, priority will be given to alternative public or community use. Owners of the land or premises which have become surplus to community use will have to provide evidence of attempts to find alternative community uses prior to seeking permission for a change of use. Evidence will be sought particularly when the lands or buildings are in a sustainable location for example easily accessed by public transport or along routes, which carry significant flows of traffic. Community consultation should take place as widely as possible in the catchment area.
	Safer Communities Manager	Reference should be made to the National Community Safety Plan 2008 2011 which refers to 'building more cohesive, empowered and active communities'. There are a number of Local Multi Agency Problem Solving Groups (LMAPS) across the ARF's working within the Safer Sunderland Partnership.	Possible change. To be investigated, comments noted.
	Env. Services	Quality design (in terms of plantations) are relevant here, as is need to consider community safety issues in relation to subway provision.	No change. Detail appropriate at Allocations DPD level.

	GONE	Where possible, the CS should provide an integrated approach to the implementation of aspects of other strategies such as for health- it does not go far enough in seeking to deliver its spatial elements.	Possible Change. To be further investigated and amended as necessary.
	Sunderland City College	Part iv. Revised wording suggested "appropriately located" educational and community facilities.	Change. Amend criterion accordingly.
	Sunderland arc	The Proposed approach is fully supported	No change. Support noted.
	NHS South T&W	Needs to have a positive planning approach - shops and facilities that promote health, rather than areas dominated by take aways. Increased mention needed of planning to improve mental health, and contributing to reduction in obesity levels. Education and community facilities developed throughout the city, with HIA's part of the planning, and they need to incorporate opportunities to maximise health. The term "quality public realm" need explaining. Mention should be made of "Choosing Health" white paper- key links to planning.	First comment - is not for the Core Strategy nor the planning system to intervene. The second and third comments, are to be further assessed and revised where appropriate. Agree that reference to the term "Quality public realm" requires further explanation - " <i>The public realm is made up of the parts of the city which are available for use by everyone. These can include streets, parks, squares, arcades and public buildings. The standard and condition of public realm is a key factor shaping the quality of life for those living and working within the city and has an important role in attracting those wishing to visit. Public realm therefore has the potential to act as an important catalyst for regeneration</i> ".
	NHS South T&W	The health section could be re-written to reflect the life course approach taken in Sunderland Strategy and the focus on reducing the life expectancy gap between Sunderland and England, and be explicit on how the CS will address this.	Comments noted. This will be further assessed against the recently published Sunderland Strategy. Where appropriate the policy will be revised.
	Springwell Gospel Hall	Request an additional paragraph vi - supporting our diverse voluntary and community organisations including faith communities in order to provide new social infrastructure to meet the needs of the population, including spiritual, sport and recreational facilities and the needs of the emergency services	Possible change. Consider addition of a part (vi). The City Council will support a spatial approach when providing community facilities across the city by ensuring that essential services are available in all parts of the city, and by promoting social inclusiveness and easy access for all. The City Council will also allocate land for places of worship and other community facilities. This will be looked at in the Other Allocations DPD which the Council will produce shortly.
CS7 text	Natural England	5.86 Both policy and paragraph should more explicitly recognise the multiple benefits of green space, and not just refer to public realm. It should also encourage active community involvement in the management and use of green space.	No change. The references in question do not refer solely to public realm. Further evidence from Greenspace Strategy will help to review this policy. The involvement of community in the management and use of green space is considered too detailed to be included at the Core Strategy stage.
	English Heritage	5.86 Reference to the contribution that heritage can make too.	Probable change. Extend 5.86 "by rejuvenating Sunderland's public spaces <u>and historic environment</u> ".
	English Heritage	5.94 Need to protect school buildings of historic value rather than simply demolish for redevelopment.	No change. Statement noted. Building protection is addressed in Policy CS3.
	Sunderland City College	5.95 Revised wording- insert "property strategy" after "College".	Change. Add "property strategy" after "college" in paragraph 5.95
CS8	Nexus	In principle, but section i)a) implies that only densely developed areas are those served by public transport. Section i)c) should be strengthened- all developments should be permeable to pedestrians and public transport in their design.	Possible change. Disagree with section i)a)- the point makes the point the development should be focused in built-up and accessible areas, thereby reducing the need to travel. Section i)c) - the word "built-up" might imply "higher density", it means to refer to urban areas. Consider swapping the word from "built-up" to "urban" (see also Natural England, below).
	Sunderland Civic Society	Support, but reference to Doxford International Business Park as a key retail centre is a mis-definition.	Change. Reference is direct quote from T&W LTP. Remove reference to Doxford and Galleries and just retain "key retail centres"?
	Tyne and Wear PTA	Support the policy	No change.
	Natural England	Part c). Both policy and paragraph should also recognise the need to ensure access to the countryside and coast for local communities and visitors.	Change. Amend criterion 1(c) to "...walking and cycling access between urban areas and to the countryside and coast"
	Highways Agency	Support, but puts forward that all major developments should require travel plans and transport assessments.	Possible change. Possible final sentence of policy: "All major developments will require travel plans and transport assessments"
	North East Assembly	Supported, though reference to the wider principles of demand management and use of travel plans should be made in the policy.	Possible change. Possible final sentence of policy: "All major developments will require travel plans and transport assessments"
	One NE	Broad support. Clarity needed regarding what is meant by Sunderland being a "strategic transport hub" (see RSS policy 52).	Change. Final sentence of policy will say: "This approach will complement the role of Sunderland as a Strategic Transport Hub, and will be applied throughout the city and in particular to the following list as identified in the T&W LTP:"
	Env. Services	Quality design for cycling and walking to enable effective maintenance and cleansing.	No change. This is too detailed for a Core Strategy Policy.

	GONE	The policy is not locally distinctive. The CS fails to explain the meaning of the term 'public realm'. The policy also incorrectly lists Doxford International Business Park as a key retail centre (see LTP!)	Potential change. The policy is locally distinctive in that it highlights the centres and corridors approach to the Tyne and Wear LTP (however this will be considered in further detail with GONE). Agree that there is a greater need to explain the definition and focus of "public realm" in the text. Change text to state- "The public realm is made up of the parts of the city which are available for use by everyone. These can include streets, parks, squares, arcades and public buildings. The standard and condition of public realm is a key factor shaping the quality of life for those living and working within the city and has an important role in attracting those wishing to visit. Public realm therefore has the potential to act as an important catalyst for regeneration".
	CTC	Efforts need to be made to improve cycling and walking for all, and not just for those without access to a car. Cycle commuting distances should have read 5 miles rather than 5 kilometres- however, while this figure could focus on 5 miles it should also ensure that commuting up to 10 miles distance is explored, and also connections between main towns throughout the Tyne and Wear City Region. Mention should be made of improving road and junction crossings, especially of main roads and roundabouts.	No change. Suggest that this level of detail is more appropriate to the Allocations DPD. However, points noted and will be addressed in revisions to topic paper, which will need to provide more depth on issues.
	Persimmon Homes	Support the policy. Housing development should be located in highly accessible areas to shops and services. Equitable access to jobs is more difficult to achieve as employment uses have different locational requirements to housing.	No change.
CS8 text	Sunderland Civic Society	6.8 In principle support, but there should be further reference to disabled access.	No change. Paragraph is considered to be a reasonable reflection of the current outputs of the T&W LTP. However, further emphasis on inclusive and sustainable transport development in a spatial setting is needed- needs to be considered for Allocations DPD.
	Sunderland arc	Fully support policy. Would like to see recognition in paragraph 6.4 to the link with regeneration	Change. Alter sentence to: "Transport improvements also need to enhance the city's profile and support economic competitiveness and regeneration, ..."
	Natural England	6.3 Both policy and paragraph should also recognise the need to ensure access to the countryside and coast for local communities and visitors.	Change. Make commensurate changes to the supporting text at para. 6.3 to complement the changes proposed in the Policy 1(c).
CS9	Nexus	In principle support, but there appears to be bias towards road schemes over rail schemes. Road schemes are to be 'completed', while rail schemes will be 'explored'.	Change. Significant issue raised. Part (i) needs to expand to mention the bus lanes and cycle lanes proposed in the development. Part (v) should be moved forward and made more definite - "Further develop high quality public transport within Sunderland, including improvements to the Tyne and Wear Metro system and developing quality bus infrastructure. Opportunities to develop Park & Ride will be explored as well as opportunities to key trip generators in the city region etc.." Part (vi) could follow. Part (ii) could be 4th listed, and this needs to be altered to point out that development of the CRR will follow hand-in-hand with public transport, walking and cycling improvements to the existing A182 corridor. Part (iii) could be expanded to state that it will provide multi-modal access to the development area. Part (iv) cannot really be altered given that Central Government is in control and not the Council. Finally, there may also be need to refer to the lapsed UDP transport (mainly road schemes) referred to in the topic paper- if they are not mentioned in the policy, then text reference may be necessary.
	Tyne and Wear PTA	Support the policy, pleased to see emphasis on the Congestion Reduction Strategy. It would be useful to state that coupled to improvements to the Sunderland Strategic Transport Corridor and the Coalfields regeneration route that public transport enhancements and demand management measures should be incorporated.	Change. Agree, see response to Nexus comment - part (i).
	Network Rail	Network Rail has submitted proposals for South Dock rail line in Housing Allocations DPD. Also, for the Leamside Line, the Council should consider options for third party funding towards achieving long-term re-opening, e.g. from lineside developments that could provide locations for new stations. Increase frequency along Durham Coast Route are noted, though are subject to capacity and timetable issues- third party funding again could help.	Consider text change. While SCC believe that it is Central Government that need to improve conditions for rail re-opening, the City Council could consider a development 'pot' whereby developer contributions could be stored to pay for public transport improvements, perhaps specifically to a route (eg Leamside Line) or more generally. This could apply to whole of the city or just to specific land sites in proximity to former rail alignments/stations.
	English Heritage	CS9 - Concern that the first 3 initiatives involve road building - despite promoting reduction in need to travel.	Change. See response to Nexus (above).
	Natural England	Many of the transport links may have adverse impact on biodiversity, though also offer opportunity to deliver biodiversity benefit. The LA needs to ensure it delivers its Biodiversity Duty.	Potential policy change. Consider additional sentence at end of policy to state that "Initiatives will need to undertake Environmental, Traffic and Health Impact Assessments to demonstrate scheme suitability".

	Country Land & Business	Need to promote electric non-polluting bus services.	No change. Included in section (v) 'high quality public transport' and 'quality bus infrastructure'. Further detail will follow in Allocations DPD.
	Barratts, Gladedale	Part ii. Support part of policy relating to coalfield regeneration route	No change.
	Barratts, Gladedale	Support the corridors identified particularly the re-use of Leamside line	No change.
	Friends of the Earth	Objection to the completion of the Coalfield Regeneration Route - not environmentally sustainable.	No change. There would be both environmental benefits and disbenefits, and there would also be further social and economic sustainability benefits including community improvements to the existing corridor of the A182, and improved access to employment areas which would help to sustain local jobs.
	Highways Agency	Supportive, can help to encourage effects on SRN.	No change.
	North East Assembly	Supported, but reference to the Central Route should be included in part (ii) of the policy. Part (vii) should refer to the sustainable growth of the Port.	Change. Part (ii) will include reference to both the Central Route and Hetton Link Road.
	One NE	Broad support. The topic paper contains an Appendix of transport schemes "not programmed" - these need clarifying for the CS policy if they are not brought forward. Other transport aspirations need to be appropriately backed up by evidence, and should refer to the T&W TIF People in motion report.	Possible change. This will be considered in more detail and amended as necessary.
	GONE	The policy fails to demonstrate how the strategic development policies integrate fully with the transport policies, i.e. how the transport proposals relate to the sub-areas and will deliver spatial strategy.	Change. Amendments to be made to complement revisions that are to be made to Policy CS1.
	Sunderland arc	Fully support policy. Would like to see strengthening to intention in section v of 'exploring further opportunities' for high quality public transport provision within the city	Change (see Nexus comment above). Consistent comment reflecting need for City Council to firm-up proposals / intervention to improve public transport services within the city.
	CTC	Bikes should be allowed on the Metro- encourage integration of different transport modes. Whilst the long-term aim of the Leamside Line is to re-open for rail use, it should in the short-term be converted into a cycleway/walking route.	No change. Outside of LDF remit to lobby Nexus to consider cycle carriage on Metro trains. Leamside Line cycleway will be considered in Allocations DPD.
	Dahlia Properties	Reference required to provision of Port access road through Hendon Sidings site and need for this to be facilitated through a major regenerative mixed use development scheme	Possible change. The issue of whether the Port needs a separate policy of its own will be considered in conjunction with associated access arrangements. At present, no change to CS9.
	Persimmon Homes	Support the policy, and in particular to the commitment to the Coalfield Regeneration Route which will support the Fence Houses and Easington Lane growth areas, and employment at Rainton Bridge.	No change.
CS9 text	Sunderland Civic Society	6.12 In principle support for Metro, but a better route would be to Doxford International from the city centre, instead of to South Shields.	Possible change. The Doxford link has been examined in the past and is seen as prohibitively expensive- however, perhaps an additional bullet point should be included relating to other former mineral and rail alignments generally, though this would need to be further investigated to ensure that it was deliverable. The link to South Shields has some potential as a short freight link is proposed for implementation at Biddick Hall which will effectively allow direct running from Sunderland to Tyne Dock (and thereby in principle to South Shields- notwithstanding the logistics of track running capacity and use of freight and Metro).
	Barratts, Gladedale	6.12 Support the corridors identified particularly the re-use of Leamside line	No change.
	North East Assembly	6.9 The supporting text should refer to the RSS exploring the feasibility of a further crossing of the River Wear.	Change. Alter text after "Port of Sunderland" to add ", a new crossing of the River Wear (in line with RSS proposals),".
			Change. To paragraph 6.15 (see CS18 comment from Highways Agency)
CS10	Natural England	Support in principle. However, the delivery of the Durham BAP needs to relate to and inform the policy. Both the policy and the text should make clear that development proposals meet statutory proposals for protected species.	Change. Noted, phrase to be included will be "development proposals need to meet the statutory proposals for protected species"
	Friends of the Earth	Final sentence in policy is objected to. No development that threatens biodiversity and geodiversity is justified	No change. No such objection from Natural England, provided that the policy and text clearly state development proposals will meet statutory proposals for protected species.
	Tree & Wildlife Action Group	Support	No change.

	North East Assembly	Supported, and reference to green infrastructure is particularly welcomed. The policy should also recognise potential impacts (particularly air quality- RSS policy 38A) on SPA/SAC from new development.	No change. SPA/SAC are to be specifically mentioned in CS11 in terms of countryside character. Not sure why air pollution should be singled out over other types of pollution and why there is a need to replicate RSS policy.
	GONE	The policy is not locally distinctive.	Change. Base evidence is required, the lack of an evidence base has been highlighted and is now being undertaken by Natural England for both DBAP and NE BAP which will include all local references.
	Sunderland arc	Fully support the policy	No change.
CS10 text	English Heritage	7.5 Further emphasis perhaps needed to reflect respondent's thoughts that the area's heritage and cultural facilities were important factors in attracting visitors to Sunderland.	Change. To include a sentence in para (2) How we reached preferred option with reference to heritage and cultural facilities and policy CS10 (ii) heritage and cultural facilities protection.
	Washington Residents Action Group	Policy is considered ok, but it is not sustainable. Issue with granting of planning permission on the SNCI at Willow Pond (it is pointed out that there is an error in the topic paper in paragraph 3.17 i.e. the SNCI at Willow Pond will receive environmental damage due to the planning permission). Policy shouldn't be ignored	No change. This was erroneously referred to under CS7. Comment should be noted regarding the topic paper, but otherwise no action needed for Core Strategy.
CS11	Sport England	In principle support for the improvement of rights of way and sport-related development appropriate to rural areas. The Rights of Way network should be developed to enable appropriate sporting events to take place, including running and cycling competitions and horse endurance trials. It is recommended that the Policy is amended to include protection to the rights of way network- full support for the policy would then be made by Sport England.	Change. Add "Protect and..." to the start of section (vii) of the policy. Encouraging the use of the Rights of Way network for other uses is beyond the remit of the LDF, however, this is certainly an issue that will be considered by the Rights of Way Officer for the city council.
	John Carruth	Stated policy objection. The Green Belt boundary should be revised around Springwell village and omit the site at Springwell Trust Meeting Hall, Peareth Hall Road. Reference should also be made to the fact that any proposed developments on PDL within the Green Belt will be permitted if the total development does not exceed the existing buildings in accordance with PPG2.	No change. Section (i) states that the 'broad extent' of the Green Belt will be protected and enhanced. This does not discount the opportunity to consider minor amendments to the Green Belt boundary (see section 7.13), as part of the more detailed Allocations DPD. Regardless of whether a site within the Green Belt is PDL or not, any proposal would have to comply with the strict guidance set out in PPG2 as a starting point. It is unnecessary to repeat PPG2 in setting out the forms of development appropriate within the Green Belt.
	NAB Land	Stated policy objection. The Green Belt boundary should be revised around Springwell village and omit the site at Rear of Warren Lea, Springwell Village.	No change. Section (i) states that the 'broad extent' of the Green Belt will be protected and enhanced. This does not discount the opportunity to consider minor amendments to the Green Belt boundary (see section 7.13), as part of the more detailed Allocations DPD.
	Mr Ray Luke	Stated policy objection. The Green Belt boundary should be revised around Springwell village and omit the site at Peareth Hall Farm, Springwell. Reference should also be made to the fact that any proposed developments on PDL within the Green Belt will be permitted if the total development does not exceed the existing buildings in accordance with PPG2.	No change. Section (i) states that the 'broad extent' of the Green Belt will be protected and enhanced. This does not discount the opportunity to consider minor amendments to the Green Belt boundary (see section 7.13), as part of the more detailed Allocations DPD. Regardless of whether a site within the Green Belt is PDL or not, any proposal would have to comply with the strict guidance set out in PPG2 as a starting point. It is unnecessary to repeat PPG2 in setting out the forms of development appropriate within the Green Belt.
	Natural England	Support in principle, however cross reference to the Landscape Character Assessment SPD should be made. In view of the protection of the Durham Heritage Coast this should have been given a separate sub-section. Paragraphs 7.13-7.14- alternative sentences proposed, replacing Countryside Agency with Natural England.	Change. Statement noted and cross references will be included. All references to the Countryside Agency will be changed to Natural England. The River and Coast is a separate chapter within the Core Strategy.
	Friends of the Earth	Final sentence in policy is objected to. No development that threatens countryside and landscape character is justified	No change. In theory, all non-urban development will alter the countryside and landscape character in some way or another.
	Tree & Wildlife Action Group	Policy does not add sufficient weight as to the benefit of woodland. Reference to 'trees under 30 years old will not be recognised' is the wrong position for the Council to adopt. Issue with loss of 7,000 trees in Newbottle Village in the Great North Forest - considered scandalous. Wrong to centralise mini-soccer anywhere as it deprives local communities and allows developers to snatch away green open space. The area is identified as 'white land' on the UDP leaving it at risk - vast landscapes of the Great North Forest are classed as 'white land' this is beyond belief. The Great North Forest functions as green open space.	No change. It is considered the policy is in general conformity with national and regional policy. The Objection relates to an earlier out line application, whilst the one granted permission in 2005 was a full permission. All but 2 conditions (both relating to contaminated land) have been discharged. The outcome of the legal challenge by the Tree and Wildlife Action Group, supported by the Friends of the Earth, was that the Forestry Commission must ask for an EIA before granting a felling licence for the trees on site. The Forestry Commission were considering a further challenge to that decision, but to avoid delay Durham Estates have volunteered the EIA. The Council is not involved in this and neither the process nor outcome will affect the planning permission. The work on the EIA is nearing completion and will then be submitted to the Forestry Commission.
	English Heritage	Acknowledgement required that heritage has helped to shape and form countryside and landscape character.	No change. The point is acknowledged, but it is one of many key attributes included as part of the Landscape Character Assessment, so there is no need to include its reference within the Policy.
	North East Assembly	Supported.	No change.

	GONE	Policy would be more locally distinctive by identifying the strategic open breaks and wedges within and between settlements. Evidence base requires strengthening.	Change. Proposed identification of settlement breaks into the policy - the Greenspace Strategy will help to support the identification of green corridors and settlement breaks.
	Mr T R Browell	Part i. Representation relates to policy CS12 part i. and paragraph 7.13. Would like rewording of paragraph 7.13 to following effect - " Only minor development incursions into the Green Belt and/or minor revisions to the boundaries of the Green Belt would be considered that demonstrated significant local regeneration benefit and/or provided more durable boundaries".	No change. This is not a strategic issue for the Core Strategy and will be reviewed in the context of the Allocations DPD in line with PPG2.
	Taylor Wimpey	Support settlement break/open break policy and great north forest initiative policy	No change.
	Sunderland arc	Support in principle. Would like to see a clearer commitment to retention of the Green Belt in entirety (section i. of policy) and a more explicit recognition of the 'green infrastructure' concept	No change. Will review further in due course.
	Washington East Residents Action Group	Object to lack of reference to the international importance and significance of Washington Village. It should have local conservation status and greater importance to the international significance of the Old Hall.	No change. This should be considered as a heritage (CG13) issue rather than countryside (CS11). Consideration is being given to listing and mapping the 14 Conservation Areas in the text accompanying CS13. The specific details of Washington Village will be more appropriately examined in the Allocations DPD.
	Persimmon Homes	Support the policy, including ongoing Green Belt protection except where minor amendments to inner boundaries are required. The Council should undertake a thorough review of the current boundaries of settlement breaks- often too broad and can prejudice sustainable development options.	Change- see GONE comments relating to settlement breaks. Agree that a review of Green Belt and Settlement Breaks is necessary, and the breadth of settlement breaks needs to be considered (partly via the Greenspace Strategy).
CS11 text	Natural England	7.13-7.14 Support in principle, however cross reference to the Landscape Character Assessment SPD should be made. In view of the protection of the Durham Heritage Coast this should have been given a separate sub-section. Paragraphs 7.13-7.14- alternative sentences proposed, replacing Countryside Agency with Natural England.	Change. River and Coast is dealt with in another section of the Core Strategy, however cross references will be made to the landscape character assessment and the River and Coast. Suggest inclusion to 7.13 of alternative Natural England sentence: 'City-wide Landscape Character Assessments will be used in line with Natural England guidance to provide sufficient protection to those areas of landscape outside of nationally defined areas (such as Durham Heritage Coast), but which are highly valued locally such as the Magnesian Limestone Escarpment and the River Wear Estuary.' Paragraph 7.13/7.14 Reference to the Countryside Agency will be replaced by Natural England.
	Natural England	The Core Strategy objectives and targets should include reference to the Magnesian Limestone Natural Area Partnership.	Possible change. Suggest reference to end of paragraph 7.14.
	English Heritage	7.12 Further emphasis perhaps needed (and perhaps elsewhere in CS) to reflect respondent's thoughts of the importance to re-use and conversion of existing land and buildings.	Possible change. Suggest new sentence after sentence 2: "This should include a presumption in favour of the retention, re-use and conversion of existing land and buildings unless proven to be infeasible."
	Mr T R Browell	7.13 Representation relates to policy CS12 part i. and paragraph 7.13. Would like rewording of paragraph 7.13 to following effect - " Only minor development incursions into the Green Belt and/or minor revisions to the boundaries of the Green Belt would be considered that demonstrated significant local regeneration benefit and/or provided more durable boundaries".	No change. This is not a strategic issue for the Core Strategy and will be reviewed in the context of the Allocations DPD in line with PPG2.
CS12	Sport England	Unable to support the policy due to absence of PPG17 Local Needs Assessment (i.e. evidence base). In principle support for the protection of open spaces, including sports sites, and creation and maintenance of open space.	Action needed. The council will be undertaking a PPG17 compliant local needs assessment during summer 2008. The assessment will form part of an overall greenspace strategy and will provide much needed evidence in order to implement the policy.
	Natural England	Support in principle, though greenspace needs to be clearly recognised in the context of 'green infrastructure' and integrated multi-use of green space. Specific comments on CS12 iv a, and CS12 iv c.	Change to policy required. Add additional text/part to policy i.e. part iii. Supporting the green infrastructure concept. With regard to part iv. a- the function and integration of land use will be considered in the audit of value and quality of greenspace. Further policy change- add new policy part d. 'will not disturb the integrity of existing or new habitat networks or lead to fragmentation i.e. sever linkages between substantial but otherwise disconnect areas of habitat'.
	Country Land and Business	Generally supportive, but there needs to be greater emphasis on the promotion of tourism and culture, and for more provision of sport and recreation.	Possible change. While the policy spells out the benefits to safe, healthy and sustainable communities, it could also mention the tourism, sport and multi-use function of certain sites.

	English Heritage	Part iv. Loss of green space should only (also) be considered where there is no heritage loss or effect.	No change to policy , but change required to policy text i.e. insert new paragraph stating what indicators should be used to measure the degree to which a green space possesses high value and high quality. Where a site possesses any one of these indicators to an important or high degree then it will be protected and improved where necessary. One indicator will be whether a green space is an integral part of the historic environment, if so, such green space will be protected from loss or harm to its intrinsic value in this context.
	North East Assembly	Supported, but needs Green space Strategy. Should mention green space in the glossary.	Action needed. The council will be undertaking an audit of the amount and quality/value of existing green space and also a local needs based assessment compliant with PPG17 in which to derive local standards during summer 2008. The glossary includes a definition of open space/greenspace - however, a change should be made i.e. amend reference show it reads green space/open space and insert into relevant part of the glossary.
	Env. Services	Part iv. Support for proposal that under utilised green space (in areas not deficient of its type) may be removed in order to use the proceeds to improve, enhance or protect similar nearby provision.	Support noted. This is provided that a green space will have no value in being converted into another green space of different function i.e. due to local needs or in terms of delivering the implementation of the policy and provided the effect of removal will result in net benefits to delivery of other strategic development and spatial objectives then such action will be supported.
	GONE	Policy would be more locally distinctive by demonstrating how criterion (iv) applies to the city, rather than repeating PPG17. Evidence base requires strengthening.	Action needed. In the absence of robust evidence base detailing local needs and opportunities i.e. green space strategy, specific reference within the policy to local circumstances where loss of green space will be allowed can not be given. Where/when such evidence can be supplied, relevant changes to part iv of the policy will be made.
	Colin Wakefield	The Core Strategy Issues and Option report confirmed need to promote quality as well as quantity of green space. Much public support for better countryside links, tree and woodland cover, walking and cycling improvements, supporting the Great North Forest. Yet at Newbottle, a scheme to remove 7000 trees to create football pitches can be allowed- this conflicts with the policy.	Comment noted. The earlier application was an out line application, whilst the one granted permission in 2005 was a full permission. All but 2 conditions (both relating to contaminated land) have been discharged. The outcome of the legal challenge by the Tree and Wildlife Action Group, supported by the Friends of the Earth, was that the Forestry Commission must ask for an EIA before granting a felling licence for the trees on site. The Forestry Commission were considering a further challenge to that decision, but to avoid delay Durham Estates have volunteered the EIA. The Council is not involved in this and neither the process nor outcome will affect the planning permission. The work on the EIA is nearing completion and will then be submitted to the Forestry Commission.
	Taylor Wimpey	Support paragraph 7.19 relating to recognition of the need that some development on greenfield land may be required to achieve strategic development objectives	Comment Noted. No action needed.
	Marc & Gavyn Davis	Support the policy. Would like to see land at Poultry Farm 'deallocated' as open space. This is considered to be in accord with the policy as the land is of poor quality, would not have a detrimental affect and would not cause a deficiency	No action required. The issue of allocating or de allocating land for other purposes will be covered in the 'Allocations DPD'. The comment is noted and the opportunity to make a further representation on this matter will be available on commencement of Issues and Options consultation on the Allocations DPD.
	Sunderland arc	Support. Would like to see more explicit recognition of the 'Green Infrastructure' concept	Change to policy required. Add additional text/part to policy i.e. part iii. Supporting the green infrastructure concept. With regard to part iv. a- the function and integration of land use will be considered in the audit of value and quality of greenspace. Further policy change- add new policy part d. 'will not disturb the integrity of existing or new habitat networks or lead to fragmentation i.e. sever linkages between substantial but otherwise disconnect areas of habitat'.
	Lee Hall	The topic paper supporting the CS policy is flawed as it makes conclusions regarding shortage of junior soccer pitches in the Coalfield area even though there is acknowledgement that there is lack of data/analysis. Particularly pertinent at Newbottle junior soccer pitch site.	The reference to shortage of junior soccer pitches is from the 2002-2011 Playing Pitch Strategy which was updated in 2004. The strategy was undertaken by consultants McApline, Thorpe and Warrior on behalf of Sport England, Tyne and Wear Sport and Sunderland City Council. It focused on formal playing fields only (along with cricket, rugby and hockey). The strategy identified that the Coalfield as a whole at the time was short in junior soccer pitches. The Strategy identified that by 2011 there will be a shortage of 3 junior soccer pitches. The calculation being based on growth rates in participation between 2002-2011 applied to the 2011 population and the number of additional matches requested by the football clubs from a survey. It should be noted that the findings from the strategy identified that the issue of lack of junior soccer pitches by 2011 is pertinent city -wide not unique to the coalfield. Further work regarding playing pitch provision requirements will be explored within the green space strategy and Allocation DPD. Also the issue of where new pitches will be sited and localised consultation will be the subject of Local Area Plans that will be driven forward by
CS12 text	Sunderland Civic Society	7.13-7.20 There should be a clear statement of priorities (similar to a Local Needs Assessment) in order that judgements regarding loss of green space to strategic objectives are transparent.	Action needed. It is agreed that transparency is required where any decision involving loss of green space occurs. This will be informed and set out by Greenspace Strategy audit that is currently being prepared.

	English Heritage	7.16 Should recognise heritage importance of green space in many cases, formal parks and gardens, within settings of listed buildings, part of conservation areas.	Change. Reference would probably be more appropriate in paragraph 7.17, with additional text inserted at the end of the first sentence i.e. 'and its heritage value'. Policy CS13 relates specifically to heritage, this in addition to policy CS12 will secure the protection of any site, feature or other location that contributes to the historical environment.
	Taylor Wimpey	Support paragraph 7.19 relating to recognition of the need that some development on greenfield land may be required to achieve strategic development objectives	No Change. Support noted.
CS13	English Partnerships	Support. However, policy should recognise where proven that retention of a historic or heritage building is economically unviable then redevelopment of sites/buildings may be suitable in certain circumstances.	Change: The supporting statement and policy require re-wording to include references to include "where proven that retention of a historic or heritage building is economically unviable then redevelopment of sites/buildings may be suitable in appropriate circumstances".
	Country Land and Business	Generally supportive, but there needs to be greater emphasis on the promotion of tourism and culture, and for more provision of sport and recreation.	Comments noted: No action required
	English Heritage	The policy does not address all tasks identified in RSS policy 34 on Historic Environment- should specifically mention safeguarding Grade II buildings at risk and the preparation of conservation area character appraisals.	Possible Change. Care needs to be taken not to duplicate national / regional policy requirements. The preparation and review of Conservation Character Appraisals and Management Plans is being undertaken. Consideration could be given to rewording criterion (ii) to state "Preparing conservation area character appraisals and a list of locally, important and significant buildings, protecting those listed from inappropriate development". This will need further consideration against the Heritage Bill.
	North East Assembly	The Council should consider whether the preparation of conservation area appraisals and management plans are required.	Possible Change. Care needs to be taken not to duplicate national / regional policy requirements. The preparation and review of Conservation Character Appraisals and Management Plans is being undertaken. Consideration could be given to rewording criterion (ii) to state "Preparing conservation area character appraisals and a list of locally, important and significant buildings, protecting those listed from inappropriate development". This will need further consideration against the Heritage Bill.
	One NE	Welcomes the reference to Wearmouth-Jarrow WHS.	No action required.
	Theatres Trust	Support protection of existing and development of new cultural venues and features to support tourism in Sunderland. Facilities benefit from being clustered- can provide a magnet for visitors. New facilities need to be of the highest quality.	Change: Comment is noted, although not all such facilities benefit from clustering due to the nature of their operations. Therefore insert "and quality" at criterion (iii).
	Culture & Tourism	No specific mention is made in preferred options summary on ensuring transport links to heritage sites are improved within the strategy.	Change. Consider the insertion of new criterion (v) along the lines of "improving access to heritage where feasible, especially via better public realm".
	GONE	The policy lacks local distinctiveness, apart from criterion 4.	Change: The preparation of the conservation character appraisals will be included in (ii). Also potentially list and map the 14 Conservation Areas in the text.
	Sunderland arc	Fully support the policy	No Action required.
CS13 text	English Heritage	7.28 Important that the distinction is also made between the Buffer Zone and the wider setting of the WHS from a planning point of view.	Possible change: Paragraph may need further clarification of planning terms relating to the Buffer Zone and the wider setting of the WHS.
CS14	Sport England	In principle support, but the policy should be expanded to recognise the benefits that can be derived from water sport related uses.	Possible change to policy. The benefits that can be derived from water sport related uses is embedded within the policy in terms of how promoting such uses ties into the building of the recreational value of the coast and river that can boost its capital as a cultural and economic resource. Whether specific reference to such uses is warranted within the policy is questionable, but, the topic paper does stress that such related use will be encouraged and supported along the river east of the A19 bridge and the coast north of the river wear.
	Natural England	For coastal regeneration, the policy should ensure that the requirements of the Habitats Regulations will be met in any consequent development to enable the authority to ascertain no adverse effect before the DPD can be adopted. If there is likely significant effects on the European sites, an Appropriate Assessment process should be undertaken. iv) River Wear should also mention improving geological as well as biodiversity value.	Policy change required. It is recognised that the outcome of the appropriate assessment could have implications in terms of the direction of the policy and thus any changes that may need to be made to the policy will reflect the outcome of the assessment. An additional part to the policy should be included similar to policy CS10 i.e. 'Development will not be allowed if this would be detrimental to wildlife habitat and/or species, unless the need for development outweighs these considerations etc'. With respect to part iv. add additional text at end 'and geological value'.
	North East Assembly	Proposals for tourism will need to be guided by sustainability principles and informed by market demand. Future intentions of the Port should be addressed.	Action required. Further work required to ascertain the nature of any tourism-led regeneration initiatives for the coast, which will be considered as part of the Seafront Regeneration Framework. Any strategy for this part of the coast will be guided by the principle of sustainability and in respect to 'tourism development'.
	GONE	The Port warrants a policy in its own right as it is identified as a strategic development site in policy CS1 and Alteration No.2- a policy should be included addressing its future use.	Possible change to policy. Consideration to including a range of strategic site allocations is being evaluated following the publication of PPS12.
	Sunderland arc	Fully support the policy	No Change. Support noted.

	Claire Veitch	Part I). Support principle of regeneration framework/vision for the coast north of the wear if this encourages development of leisure and tourist facilities - not housing	No action required. The policy supports the implementation of initiatives that will help to enhance the amenity, recreation and biodiversity value of the coast which would therefore support in principle additional tourist and leisure facilities subject to testing of other policies. The nature of such initiatives and indeed defined strategy for the area will be subject to the outcome of the Seafront Regeneration Framework. However, the issue of whether housing is appropriate in this location should be considered as part of the Housing Allocation Development Plan Document.
	Nicola Flood	Support the strategy for an improvement in the facilities, recreational resources and activities for all ages along the seafront in North Sunderland	No action required. The policy supports the implementation of initiatives that will help to enhance the amenity, recreation and biodiversity value of the coast which would therefore support in principle additional tourist and leisure facilities in this location subject to testing of other policies. Any strategy regardless of its subject matter or location should be borne with a clear objective of delivering social inclusion and therefore meeting the needs of all ages.
	Dahlia Properties	Reference required in the policy to clarify that the Council not only supports port-related uses and other employment generating uses but that it will also support major mixed use development on Hendon Sidings.	Possible change to policy. Consideration to including a range of strategic site allocations is being evaluated following the publication of PPS12. Consideration will be given to the Port and the extent of the boundaries.
CS14 text			
CS15	Northumbrian Water	Part iii. Support in principle, however an explicit reference should be made to the BREEAM standard for water efficiency in new developments.	No change. Water efficiency is one of several target areas within Code for Sustainable Homes, and it is not possible to enforce one component, only to ensure overall scores meet the Code Level 3 requirements, which is made up of composite scores from each target area.)
	Barratts / Gladedale	Part I. Policy is considered to be sufficiently ineffective as target emission reductions TERs are a matter of Building Regulations	Change to policy. TER are enforced through Building Regulations, but are included to set the context on which Part ii is based. To make this clearer, suggest merging Parts i and ii.
	Barratts, Gladedale	Part ii. Criterion is not in accord with PPS12 paragraph 2.30 i.e. it is too generic and repeats national planning policy statement	No change. No national planning policy statement requires developments to meet 10% of energy from renewable sources, and the RSS has been amended recently, to remove this requirement, so the policy is necessary. Part ii to remain as is, which offers local clarity over how development can meet 10% renewable requirement within the context of national Building Regulations and RSS.
	Barratts, Gladedale	Part iii. This part of the policy is considered to be a reproduction of national planning policy i.e. the code for sustainable homes will become a mandatory application	No change. National Planning policy only makes the rating of homes mandatory under Code for Sustainable Homes, from April 2008, not attainment of Code for Sustainable Homes, which is expected through the next revision to Building Regulations due in 2010. While this Core Strategy will be adopted in 2010, its inclusion is to add weight to the policy in the intervening period, and to allow for future increases in construction standards. And no mandatory rating of non-domestic development through BREEAM is expected.
	Barratts, Gladedale	Part iv. Considered to not be in conformity with national or regional policy - no mechanism at national and regional level to apply it and no evidence to suggest that the issue of particular importance to the LA	Disagree. PPS1 Supplement, Planning and Climate Change, encourages LAs to "ensure a significant portion the energy supply of substantial new development is gained on site and renewable and or from a decentralised, renewable or low carbon energy supply". PPS23, Annex 1 also suggests LAs can request energy statements, as a means of providing evidence for the above. Possible change - need to reword policy background to make it clear that the contribution from renewable / low carbon energy is significant with regard to LA carbon emission targets.
	Friends of the Earth	The Council should aim towards the Climate Chaos Coalition and FoE 80% carbon reduction target by 2050.	Possible change. Target is set through Climate Change Action Plan, and follows current Energy White Paper and UK Climate Change Programme targets - but needs to keep pace with forthcoming Climate Change Bill.
	English Heritage	Before intrusive micro-renewable energy is used – improve insulation.	No Change. Energy efficiency measures for new developments are already prescribed through Building Regulations, and improved on through Code for Sustainable Homes / BREEAM requirements. The Climate Change Action Plan already includes, and analyses the impact of, insulation of existing properties as a priority, and concludes that to reach local targets for reducing carbon emissions, the use of renewable energy is required in addition to insulation.
	North East Assembly	Renewable energy developments - reference needed to give significant weight to the wider environmental, economic and social benefits arising from higher levels of renewable energy.	Policy Change. Need to make revision to policy to make these wider benefits clearer, and produce framework for all Sustainable Energy issues, to be detailed in an SPD.
	One NE	Supports the carbon target of 60% and recommends flexibility in case that figure rises to 80% with the new Climate Change bill. Supports carbon innovation and action to reduce energy costs.	Possible change. Target is set through Climate Change Action Plan, and follows current Energy White Paper and UK Climate Change Programme targets - but needs to keep pace with forthcoming Climate Change Bill.
	GONE	The policy conflicts with item (iv) of PPS22 because it fails to give significant weight to the wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale. The policy should therefore be reworded and provide a framework for the consideration of planning applications for renewable energy projects in the city.	Policy Change. Need to make revision to policy to make these wider benefits clearer, and produce framework for all Sustainable Energy issues, to be detailed in an SPD.

	Sunderland arc	Support the proposed policy approach. However, it is considered rather demanding compared to emerging RSS and other north east authorities. The submission draft should be worded to reflect the available evidence base and compatibility with other authorities in the region and the RSS	Policy change. More evidence needed to support the contribution that low carbon and renewable energy systems will make to local and national carbon reduction targets. The position is that we have a better evidence base in Sunderland to demonstrate the impact that these energy requirements will make to local carbon reduction targets, which explains our exceeding RSS and other LA policies. The Policy should also make reference for the the wider benefits and produce framework for all Sustainable Energy issues, to be detailed in an SPD.
	Springwell Gospel Hall	Support Council's approach to Sustainable Construction which is in line with national Building Regulations	No change.
	Persimmon Homes	Section (i) is superfluous as it is covered by Building Regulations. Section (ii) needs reviewing in light of PPS1 supplementary guidance- the council need to provide evidence to justify the objectives proposed. Section (iii) must not contradict the Code for Sustainable Homes as it becomes mandatory. The policy does not define what it means by "major developments".	Change to policy. Merge Parts i and ii, to remove TER duplication, and add evidence to support 10% target (its impact). Insert reference to glossary, where major development is defined. Retain CSH reference - National Planning policy only makes the rating of homes mandatory under Code for Sustainable Homes, from April 2008, not attainment of Code for Sustainable Homes, which is expected through the next revision to Building Regulations due in 2010. While this Core Strategy will be adopted in 2010, its inclusion is to add weight to the policy in the intervening period, and to allow for future increases in construction standards. And no mandatory rating of non-domestic development through BREEAM is expected.
CS16	Northumbrian Water	Supports and promotes explicit reference to SUDS in section vi). Explicit reference should also be made to consider flooding from 'other sources', particularly sewers, in appraising flood risk (PPS25).	Change: Alter part (v) "All developments should assess and manage risk from other climate impacts, including extreme heat, surface water flooding and flooding from sewers".
	Environment Agency	Support, but statement saying that development will be encouraged in flood zones 1 and 2 should be amended to Zone 1 only.	Change: Amend sentence to say Zone 1 only.
	North East Assembly	Supported, subject to Environment Agency's satisfaction.	Change: in response to the amendments suggested by the Environment Agency.
	GONE	The implications from the results of the Strategic Flood Risk Assessment are not identified for the strategic employment and housing provisions in CS2 and CS4.	Probable change. Consider listing the flood areas in the policy. This could then feed into CS2 and CS4. Also add a map to the text.
	Sunderland arc	Fully support the policy	No change: Support policy
CS16 text	Tree & Wildlife Action Group	Part iv. Strongly object to the wording of paragraph iv. Is this a cloak to site a mega - incinerator in Sunderland, my village neighbours one of the most dangerous land fill sites in the UK.	No change. Objector refers to CS16 but this is in fact related to Policy CS17. Note comments. If a strategic waste facility was to be proposed in the city as part of the South Tyne and Wear Waste Management Partnership (STWWMP) then it would be subject to the most rigorous scrutiny and consultation.
CS17	Sunderland Civic Society	Support for recycling- should be made compulsory to all households. However, policy does not make clear what alternative solutions to the disposal of waste are being considered, other than landfill.	No Change. Change to text. Clarify waste hierarchy in para 8.17. The Council seeks to achieve government recycling targets by ensuring recycling schemes and facilities are available to all residents. Work is currently ongoing to examine waste management solutions for the council.
	Northumbrian Water	Support in principle, but request that explicit reference be made to sewerage waste in the waste hierarchy identified in policy.	No Change. Further clarification of this comment has been requested and is still awaited.
	Country Land and Business	Need to identify further means of waste disposal arrangements and recycling promotion to safeguard landfill sites.	No change. The core strategy recognises landfill as a resource within the context of the waste hierarchy. The core strategy is informed by the joint municipal waste management strategy for Gateshead, South Tyneside and Sunderland councils. This seeks to deal with waste in a sustainable manner by diverting waste from landfill. Work is on-going to examine waste management solutions for the council.
	Friends of the Earth	Landfill should not be an option. The use as well as recycling should be encouraged as an option. City Council should promote the need for less food waste and aim for fortnightly refuse collection to encourage people to recycle and re-use.	No change. In accordance with the waste strategy for England 2007 the core strategy seeks to accord with the waste hierarchy and reduce the amount of waste going to landfill. The Council is seeking to achieve the national waste strategy target and recycle & compost 50% of household waste by 2020. Comments regarding refuse collection have been forwarded to the relevant department.
	Tree & Wildlife Action Group	Part ii. Sunderland Council is not expected by its own figures 'to meet the Governments targets for recycling waste until 2014. On that basis it is not correct to state 'Building upon the City Council's success in meeting.....!'	No change. Unclear of reference to 2014? For clarity the city has met its short term target for recycling, but longer term targets will not be met without a change in waste management arrangements and new infrastructure.
	English Heritage	Repairing existing built fabric is an effective way to minimise waste arising and this should be reflected.	No change. The core strategy takes a sustainable approach to development minimising the use of natural resources. It recognises that the city's housing stock for example, will remain its most important asset, however, the clearance, renewal and refurbishment is a major contribution to the housing stock and achieving the Councils strategic vision. The core strategy recognises the preference for redevelopment of existing employment sites to reduce waste.
	Highways Agency	Supportive, but need to minimise unnecessary movement due to waste.	No change. The council recognise the proximity principle when planning for waste and would seek to minimise the impact on the strategic road network. The Agency is a statutory consultee and will be contacted on proposals which could impact on the SRN.

	North East Assembly	It is important to specify criteria for the location of waste management facilities to reflect RSS policy. Policy note requiring major development sites to incorporate recycling facilities for domestic waste collection - LDF's should require the submission of a waste audit for major developments.	Change. The core strategy recognises landfill as a resource within the context of the waste hierarchy. The core strategy is informed by the joint municipal waste management strategy for Gateshead, South Tyneside and Sunderland councils. This seeks to deal with waste in a sustainable manner by diverting waste from landfill. Work is on-going to examine waste management solutions for the council. Change to policy- the LDF should require the submission of a waste audit for major developments.
	Env. Services	Final policy sentence should be altered to extended so that it relates to any development, residential or otherwise.	Change to policy. Amend final sentence and re-number (v) to ensure the design and layout of new development supports sustainable waste management (para 3 PPS10).
	GONE	Evidence base requires strengthening. The policy fails to provide sufficient guidance for the provision of waste management facilities in the proposed Allocations DPD. It should also identify in strategic terms the facilities required to address this capacity gap- if this means a strategic waste facility in the city then this should be identified in the policy.	Note comments- The core strategy recognises landfill as a resource within the context of the waste hierarchy. The core strategy is informed by the joint municipal waste management strategy for Gateshead, South Tyneside and Sunderland councils. This seeks to deal with waste in a sustainable manner by diverting waste from landfill. Work is on-going to examine waste management solutions for the council. Once completed this will inform the LDF. Annual rates are included in para 8.19 & 8.20. The core strategy will draw upon the information contained in the regional apportionment study to assist in identifying the capacity gap and need for waste management facilities.
	Sunderland arc	Fully support the policy	No change. Support noted.
	Washington East Residents Action Group	Agree with the reduction of landfill. Disagree with any idea of waste incineration and would object strongly to any incinerator being placed in the confines of the city. Should be more recycling facilities for plastic and batteries. Majority of arterial roads are places to be ashamed of - set a poor image. Fear for future generations for the health risks associated with the chosen strategies and the burden of cost for these misguided policies	No change. The comments are noted. The core strategy recognises landfill as a resource within the context of the waste hierarchy. The core strategy is informed by the joint municipal waste management strategy for Gateshead, South Tyneside and Sunderland councils. This seeks to deal with waste in a sustainable manner by diverting waste from landfill. Work is on-going to examine waste management solutions for the council.
CS17 text	Env. Services	8.21 The Joint Municipal Waste Management Strategy is no longer a draft, and reference should be made to policies 6 and 13 of this report.	Change. Amend text para 8.21 JMWMS is no longer a draft.
CS18	Natural England	The impact on SSSI's and priority habitats must be assessed in relation to the broad locations for Minerals Safeguarding Areas. DPD's should ensure that long term benefits are sought as mitigation.	No change to policy. The impact on ecology will be assessed in the event of development. There is no presumption that mineral safeguarding areas will be worked, just not needlessly sterilised. The preferred options sustainability appraisal recognises that full consideration is given to environmental impacts associated with potential projects and that further detailed assessment is undertaken as proposals are brought forward. It is expected that criteria for assessing development and impact on sites and securing long term benefits will be contained in the allocations policies DPD.
	Highways Agency	In principle, but extraction should be restricted to most suitable sites, especially where minerals can be transported by rail or water.	Change. Note comments regarding sustainable sites. Suggest amending para 6.15 to reflect sustainable transport options such as the port. The Agency are a statutory consultee and will be consulted on proposals which could impact on the SRN. Support the supply of minerals to local markets which reflects the regional approach to minerals production/demand.
	North East Assembly	Supported.	No change.
	Eppleton Quarry	Would like the policy to include provision for defining new mineral extraction areas in relation to future mineral extraction of basal Permian sand and limestone reserves on land north of Eppleton quarry - policy does not define/allocate such areas of land	No change, comments noted. Mineral extraction areas will be reviewed in the allocations policies DPD.
	Sunderland arc	Fully support the policy	No change.
CS18 text			
CS19	Sunderland Civic Society	In principle support, but concern as to what constitutes a 'sensitive location' and an acceptable level of pollution.	Change to text. This comment seems to relate particularly to CS19(ii)- which discusses potentially polluting developments in sensitive locations- and the final policy statement. Action in response - additional supporting text relating to sensitive developments which could be added either after para 8.33 or after final numbered point in Policy CS19 itself. Query concerning acceptable levels of pollution is felt to be already covered by final paragraph of text at end of Policy CS19. Further guidance can be found in PPS23 and PPG24. New text proposed: "While not a comprehensive list, sensitive uses would include, for example, housing, schools, and hospitals/care centres/facilities for the young or elderly. Features of the natural environment sensitive to the impacts of pollution would also be included, e.g. air quality, high quality landscape and soils, nature conservation sites, ground and surface waters and water supply including source protection zones, archaeological designations and the need to protect natural resources. Further guidance can be found in PPS23 and PPG24".
	Tyne and Wear PTA	Welcome the policy, however, the environmental effects of traffic stated in the 'how we reached our preferred option' do not seem to have been interpreted into policy. Would like to see the mention of the role that public transport can play in helping contribute to reductions in pollution in the policy, by encouraging more people to travel on bus, train and metro	Change. Policy CS8 (Accessibility & Transport, page 52) considers the role of public transport along with wider issues relating to sustainable transport and reducing the need to travel. Action - a new point will be added to CS19 supporting action in line with CS8. Proposed text: "(viii) Work to reduce pollution from motor vehicles and to support sustainable travel in line with Policy CS8."
	Northumbrian Water	Support. Also welcome the inclusion of sustainable construction methods in new developments wherever appropriate.	No action needed.

	Natural England	Request for the CS to address the issue of waste release from former landfill sites- example ongoing issue being at a site along the coast.	No change. Comment noted. Problem of exposure from coastal erosion is being specifically investigated by the City Council, and would not require mention in this policy.
	Tree & Wildlife Action Group	Policy needs to be rigorously applied - not just to projects requiring Environmental Impact Assessment but for a common sense 'but for' test for developers to provide evidence that development will not have a significant impact on the environment.	No change. Comment noted that policy needs to be rigorously applied. No action required in terms of policy wording.
	Environment Agency	Support, though policy should probably also include "protecting and improving coastal waters", since the Council would need to address any unfavourable condition to the environment of the estuary and the coast up to 1 mile out to sea (2008 Water Framework Directive).	Change. Action - amend wording of item (iii) of CS19 policy to include clearer reference. Also amend para 8.36 to say 'estuarial and coastal waters up to 1 mile out to sea' to further clarify the issue. New proposed wording for CS19 (iii): "Take account of the guidance of the Water Framework Directive and the Northumbria River Basin Management Plan (2008-2009), to protect and improve water quality of the city's surface and groundwaters including river, estuary and coastal waters up to 1 mile out to sea. Ensure that new development along river corridors takes account of its potential polluting effects or opportunities for improving water quality".
	North East Assembly	Supported, but water should be added to (v), and to emphasise the importance of ensuring that new development along river corridors takes account of its potential polluting effects or opportunities for improving water quality.	Change. Action - CS19 (iii) relates to water issues. This item has now been amended and strengthened, including new reference to the concerns relating to river corridors. It was not felt appropriate to add to CS19 (v), which had been intended specifically to cover those issues not covered elsewhere.
	Sunderland arc	Fully support the policy	No action needed.
	Persimmon Homes	Persimmon Homes would support this policy which provides balanced general guidance on this issue.	No action needed.
	CS19 text		
CS20	Nexus	In principle, but specific mention to sustainable transport modes should be included in ii).	Possible change to supporting text. The policy states that the council will seek financial contributions to the cost of providing the necessary infrastructure. Although there is no specific example given within the policy, several are mentioned in the supporting text. The list of examples is not exhaustive and this issue will be looked at more clearly in the Developer Contributions SPD.
	Sport England	Supports the policy and refers to Sport England's "Interim Statement 2005, Planning for Sport and Active Recreation: Objectives and Opportunities". To best understand local need, a PPG17 Local Needs Assessment should be produced. The policy should include details requesting sporting requirements from housing and other development and how this will be addressed- or be included within a Developer Contributions DPD.	No change. The policy does not include details requesting sporting requirements from housing and other developments. However, this issue will be looked at more closely in the Developer Contributions SPD which will draw upon all relevant evidence including the Green Space Audit.
	Northumbrian Water	Support. Explicit reference should also be made to promoting financial contributions from developers towards water and sewerage infrastructure 'gaps' in areas where NWL have identified constraints.	Possible change to supporting text. The policy states that the council will seek financial contributions to the cost of providing the necessary infrastructure. Although there is no specific example given within the policy, several are mentioned in the supporting text. The list of examples is not exhaustive and this issue will be looked at more clearly in the Developer Contributions SPD.
	English Partnerships	Support. Sufficient flexibility in policy wording is needed to allow for site by-site negotiations where site-specific constraints exist.	Possible change. Comment noted.
	John Carruth, McInerney Homes, MMF, Mr Ray Luke, NAB Land	Stated policy objection. All planning obligations must be discussed with the applicant and any contributions to an identified need must be negotiated with the developer. There should be no set pro-forma for planning obligations, and these should be negotiated on a site-by-site basis.	Possible change. Comment noted. All planning obligations will be discussed beforehand with the applicant/ agent/ developer. Obligations will be negotiated on a site by site basis. This procedure will be reviewed in the Developer Contributions SPD.
	Natural England	PPS9 advocates the use of planning obligations both to secure the integrity of protected sites and maximising opportunities for biodiversity and geological conservation benefit. This should be addressed in the policy.	Possible change to supporting text. PPS 9 does state that LA's should use planning obligations to mitigate the harmful aspect of development and to ensure the conservation and enhancement of the site's biodiversity or geological interest. This is not addressed in the policy as the policy does not seek to repeat national planning policy statements. The Councils Developer Contributions SPD will look at this issue more closely and will address the PPS9 statement in more depth.
	Barratts, Gladedale	Overall thrust of policy is acceptable, however, would like the policy amended to state when planning obligations can be sought. As it reads the policy implies that contributions are sought regardless of necessity and relation to the type of development - this is not in accord with Circular 05/2005	Possible change. The policy states that a developer will be asked to contribute "where an identified need arises from a development proposal". Nevertheless, comment will be reviewed further in due course.

	Tree & Wildlife Action Group	Concern over the loss of Green Space to development	No change. Comment noted.
	English Heritage	Ensure that policy of subsequent DPD addresses where historic assets may be affected by development it is legitimate to seek obligations in respect of their repair and restoration.	Possible change to supporting text. The Councils Developer Contributions SPD will look at this issue more closely and will address national policy statement in more depth.
	Highways Agency	Supportive	No change.
	North East Assembly	Supported.	No change.
	One NE	Urges the Council to consider developer contributions towards training.	Possible change to supporting text. The supporting text gives examples where developer contributions will be sought. This list is not exhaustive and will be looked at in more detail in the Council's Developer Contributions SPD.
	Theatres Trust	Also need to ensure that contributions are identified for community and cultural activities.	Possible change to supporting text. The supporting text gives examples where developer contributions will be sought, including community facilities. This list is not exhaustive and will be looked at in more detail in the Council's Developer Contributions SPD.
	Land Securities	The policy should allow for wider regeneration benefits, such as city centre.	No change. Comment noted.
	Sunderland arc	Fully support the approach, the issue is considered very important particularly with respect to transport infrastructure	No change. Comment noted.
	Persimmon Homes	In seeking planning obligations, it is essential that the Council has an up to date evidence base to justify proposals. All obligations will also need to abide by the guidance in the circular.	No change. Comment noted. Evidence is being gathered (for example undertaking a Greenspace Strategy) to help to justify developer contribution proposals.
CS20 text	Nexus	9.1 This should also include possibility of revenue contributions to support the operation of start-up public transport and/or capital contributions toward transport infrastructure.	Possible change. The supporting text gives examples where developer contributions will be sought, including new roads. This list is not exhaustive and will be looked at in more detail in the Council's Developer Contributions SPD.
Key Diagram			
Monitoring & Implementation Framework	Natural England	Support in principle regarding implementation and monitoring framework. However, Policy CS10 should identify targets more closely related to policy outcomes; CS12 should include an indicator relating to green space accessibility; CS14 indicators should reflect targets to deliver biodiversity assets in coast and river areas; CS16 should include number of planning permissions granted that sever or enhance habitat network integrity; and CS20 should indicate the number of planning permissions granted securing nature conservation improvement through developer contributions. Policy CS18 needs to define Mineral Safeguarding Areas that can be worked in a sustainable manner.	Change. Will be reviewed in due course.
	English Heritage	Policy CS13 should monitor Grade I, II* and II listed buildings. Further risk monitoring will be required in line with advent of Heritage Protection Reform. The second indicator should relate to all listed buildings and not just dwellings.	Change. Will be reviewed in due course.
	Env. Services	Reference under CS12 to the indicator "Green Flag Status" should be removed, as the indicator has been withdrawn by Government. Questions use of BVPI indicators under CS17 as their success is highly dependent upon external factors such a finance available. Reference should be to the "South" T&WWMP.	Change. Will be updated accordingly.
	GONE	The monitoring and implementation framework fails to include a comprehensive set of targets and indicators for all the policies and this should be addressed.	Change. The framework will be updated accordingly.
Sustainability Appraisal	Natural England	In relation to policy CS9, the LA needs to ensure to deliver its Biodiversity Duty in addition to the identified concerns regarding the consideration of any dredging of the Wear under the Habitats Regulations, as amended. The SA should ensure that SSSI's etc are safeguarded with regards to Policy CS18 and Mineral safeguarding Areas. Policy CS19 could also recognise issue of addressing leakage from former landfill sites.	Comments noted and will be examined in further detail in due course.

English Heritage	Current wording states that policy on heritage would have little impact on sustainability. This would provide clear benefits.	Possible change: Change wording to indicate that heritage policy would have clear positive impacts on sustainability issues - needs further clarification. Comments noted and will be examined in further detail in due course.
Springwell Gospel Hall	SA overlooks the WHO definition of health, close linkages between crime reduction and confident communities in a secure Britain. SA would be strengthened by reference to social impacts of Christian heritage and address issues of diversity and equality. Confusion between sustainable communities and sustainable construction. SA should recognise the role of private sector education provision in order to raise educational achievement	Comments noted and will be examined in further detail in due course.
Springwell Gospel Hall	Typographical Errors in response form. Further references proposed for inclusion in the SA.	Change. Will be updated accordingly. Comments noted and will be examined in further detail in due course.

**SUNDERLAND CITY COUNCIL LOCAL DEVELOPMENT FRAMEWORK:
HOUSING ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (HADPD)
ISSUES AND OPTIONS: REPORT OF PUBLIC CONSULTATION**

REPORT OF THE DIRECTOR OF DEVELOPMENT AND REGENERATION

1.0 PURPOSE OF REPORT

1.1 This report is to inform the Cabinet of comments received following the consultation exercise on the Issues and Options stage of the HADPD and agree the next steps.

2.0 DESCRIPTION OF DECISION

2.1 Cabinet is requested to:

- i) Note the key issues received from the consultation exercise on the Issues and Options stage of the HADPD;
- ii) Agree the next steps to progress the HADPD

3.0 BACKGROUND

3.1 Since 1991, all local planning authorities have been required to prepare and maintain a development plan for their area. The Unitary Development Plan (UDP) for Sunderland (adopted in 1998) sets out the planning framework for the City until 2006. The Planning and Compulsory Purchase Act 2004, introduced major reforms to the planning system - principally, the replacement of UDP's with "Local Development Frameworks". Once adopted, the LDF will be the starting point in the consideration of planning applications for the development or use of land in the City. Furthermore, the LDF will be a key delivery mechanism of both the Sunderland Strategy and the Local Area Agreements.

3.2 The Local Development Framework is an umbrella title. In effect, it comprises a series of themed planning documents that must all pass through a set of statutory stages ie: -

- Issues and Options
- Preferred Options
- Submission
- Public Examination (before an independent Inspector)
- Adoption

3.3 The **Local Development Scheme** (LDS) or project plan outlines the timetable for preparing the various documents which will make up the LDF. The current LDS was published in March 2007.

At the heart of the LDF is the Core Strategy which will provide broad strategic policies for development and restraint (without being site specific). Members will be aware that Core Strategy Preferred Options draft was the subject of a formal consultation between December 2007 and February 2008. A report on the Core Strategy DPD also appears on this agenda.

3.4 The Housing Allocations DPD will take its 'lead' from the Core Strategy and will, in due course allocate land for housing sites and provide a suite of housing related policies. The Issues and Options stage of the Housing Allocations DPD is the first such stage in taking this document forward. It sets out a number of key issues and questions for consideration, which include, the scale, extent and priority of areas for new housing growth, the development of mixed-use sites, dwelling types and tenures, exceptions for developing on greenfield land, density levels, affordable and special needs housing and housing design and environments. The draft is intentionally not site specific (as governed by good practice). However, as part of the consultation the opportunity was also given for developers / landowners to put forward housing sites to be considered for inclusion in the next stage of the document's formal preparation (currently the Preferred Options draft).

3.5 The content of the document was subject to a city-wide consultation exercise which started on 31 October 2007 and ended on 10 February 2008. The consultation undertaken was in accordance with the requirements as set out in the City Council's Statement of Community Involvement (adopted 2006). The consultation process involved the following:-

- Press notices formally placed in the Sunderland Echo on 31 October and 7 November 2007;
- Copies of documents and posters to all libraries and the consultation website went live on 31st Oct 2007. (The web page dedicated to the document received 558 hits throughout the consultation period).
- Copies of all documents and an on-line questionnaire were available on the City Council's website;
- Letters were sent to 233 stakeholders registered on the Council's database on 31st October 2007, with copies of the document sent to statutory consultees.
- Copies of the documents and posters were displayed at 3rd floor reception and on the ground floor of the Civic Centre.

3.6 In addition to the above, a joint consultation exercise was undertaken between 31 December 2007 and 10 February 2008 between the HADPD and the Core Strategy Preferred Options document.

3.7 As part of the consultation exercise, exhibitions (both static and staffed), were held across the city in libraries, contact centres, shopping centres, supermarkets and sports centres. The exhibitions were advertised by general awareness posters being placed in 76 locations across the city.

3.8 Throughout the formal consultation period, awareness raising presentations were also made to and discussions held with the following:-

- Local Strategic Partnership (LSP) Joint Partnership Group
- LSP Management Group
- LSP Partnership Board
- North East Chamber of Commerce
- 'Local interest Groups'
- Home Builders Forum
- Sunderland Strategy Feedback Event
- Hetton Town Council
- Youth Parliament

3.9 Seven residents meetings were organised throughout the city during January and February 2008, in the areas proposed for housing growth (Roker, Seaburn, Fulwell/Washington/South Hylton/Chapelgarth/Ryhope/Fence Houses and Easington Lane). The format of the residents meetings included a presentation outlining the role of the Local Development Framework, a summary of the Core Strategy and Housing Allocations DPD, including the various growth scenarios applicable to the locality where the meeting was being held.

3.10 The Sunderland Echo ran two separate items in its January editions raising awareness of these documents and giving further publicity to all of the above events.

4.0 CURRENT POSITION

4.1 In response to the consultation exercise on the HADPD a total of 140 individual letters were received and 30 on-line questionnaires were submitted. Acknowledgement letters were sent out to all respondents and a 255 page schedule of the responses has been placed in all city libraries and on the dedicated web-page. A summary of the comments is attached as appendix 1. The full schedule of individual responses has been placed in the Members' Room and may also be read on the City Council's web site at <http://www.sunderland.gov.uk/housingdpd/> The main issues raised are set out below.

4.2 *Housing type and tenure:-* responses were varied and covered matters such as executive housing and housing for the elderly. It is clear that there is a need to ensure that a wide range of house types is provided in the city and that this reflects actual requirements. This should be based on robust evidence; the Strategic Housing Market Assessment (SHMA) will be valuable in this context. It is important that any policy is flexible to cater for a variety of circumstances.

4.3 *Greenfield/ brownfield land:-* responses were sought as to when greenfield land should be released for housing. There was a wide range of responses. There is a continuing need to protect greenfield land but its development could not be ruled out - in some cases it was suggested

that where it “performed” better than brownfield land in terms of promoting sustainable development, and provided its release was carefully managed it could provide opportunities where brownfield land was in short supply.

- 4.4 *Density*:- government guidance outlines standards for residential development (usually at a minimum density of 30 dwellings to the hectare), however the Council can promote different standards where circumstances dictate. A wide variety of responses were received. It was suggested that each site should be considered on its merits; policy should be driven by housing types and the site requirements, context and character of an area. Development at higher densities could be appropriate near rail and metro links.
- 4.5 *Affordable housing*:- current policy requires consideration of affordable housing as part of major housing developments (50+ houses). Whilst the need to specify a threshold for affordable housing provision was generally accepted, this was the subject of many responses. Generalising, there was a view that policy should be flexible and allow for negotiation and should be based on the evidence gained from the emerging Housing Market Assessment.
- 4.6 *Housing design/ environments*:- the matter of housing design drew specific comment. High quality design should be sought. Specific architectural styles should not be restricted to certain areas, need flexibility and choice. There is a need to encourage sustainable design and construction methods (BREEAM, Eco Homes). A policy restricting development within back gardens could be required.
- 4.7 *Gypsies and Travellers*:- The HADPD provided a list of possible locations for new site provision and a mix of responses were received as to where to locate gypsies and travellers should a need be identified, with no one location being favoured. Additional suggestions from the public included the City Centre and Seaburn/Roker/Fulwell –close to the boundary with South Tyneside.
- 4.8 In addition to comments on specific topics, representations were also received on the proposed growth areas along with feedback from the growth area meetings. The following gives an indication of the main concerns for each growth area.
- 4.9 *Seaburn/Fulwell/Roker*:- A comparatively large volume of comments were received resisting any more housing development within the Seaburn area. The main concerns related to the loss of open spaces, facilities and playing fields and the impact on access points and increased traffic generation. The key message was that the area should be developed for tourism and leisure, focussing on the seafront location and the local character and not developed for housing.

4.10 Other comments in relation to this area included:-

- Whether the services in the area could cope along with possible under use of resources elsewhere, resulting in negative impacts on other regeneration initiatives.
- A suggestion was put forward for the area to be developed for high growth (1,000 dwellings), but to include areas to the west (particularly Southwick).
- Sewage system may require upgrading.
- Possibly consider medium housing growth (500 dwellings) at low densities.
- Consideration should be given to housing on the former railway line, Newcastle Road- North Dock.
- No scope for new housing in this area to justify it as a growth area.

4.11 *Chapelgarth*: High growth was considered favourable for this area, with housing types being mainly family and executive dwellings. The requirement for schools and community facilities was also noted should housing be developed in this area, with a particular requirement for a church.

4.12 Other comments on the Chapelgarth area relate to:

- Developing housing to the capacity of the lower scenario (650 dwellings) is considered the favourable option for this area. However, further growth may need to be considered in order to provide for much needed road link to Ryhope.
- Social/affordable housing is also required in this area.
- Concerns with more development in this area resulting in loss of greenfield sites which is not very sustainable, with no justification made for their release.
- Large scale development would require an assessment of the existing surface water and sewer network.
- Measures need to be taken to protect amenity and wildlife habitat value within this area.
- Archaeological assessments and investigations need to be undertaken in this area.
- Development within this area should contain significant affordable housing provision to meet specific housing needs of the population.

4.13 *Ryhope*:- Comments vary from planning for low growth (1,111 dwellings) to planning for high growth (1,500 dwellings). The main issues relate to:

- Providing the required road link.
- Difficulties for sewage system if over 800 dwellings were developed
- Higher growth (1,500 dwellings) raises issues with market viability and delivering existing consented sites. Phasing would be required if this option was to be taken.

- Development within this area should contain significant affordable housing provision to meet specific housing needs of the population.
- The settlement break needs to be protected and open space. Woodland and the natural environment should be preserved at all costs.

4.14 *South Hylton*:- There was limited support for large scale new housing mainly due to the size of the village and residents wanting to retain the unique character of the village. It was thought that proposals should include the wider area, such as Ford.

4.15 Other comments for South Hylton relate to:

- Existing capacity constraint on sewage system, which may require upgrading.
- Concerns over adequacy of local facilities/loss of playing fields/amenity open space.
- Major concerns were raised over road infrastructure/poor access
- Sheltered housing was needed for the elderly.
- High growth will encourage links with public transport.
- There was no scope for the scale of housing options suggested or even having the areas proposed as a growth area/ as South Hylton is currently over capacity.
- There was also the suggestion that medium and high growth scenarios would conflict with other LDF objectives.

4.16 *Central Sunderland*:- Both planning for high growth (3,800 dwellings) and limiting the housing numbers to current planning consents (2,931 dwellings) were suggested as the best way forward, however comments also related to:

- Concerns with high growth (3,800 dwellings) relate to ensuring a mix of house types and avoid over reliance on flatted developments.
- There was a need to ensure the high growth scenario (3,800 dwellings) does not prejudice natural regeneration elsewhere or lead to under use of facilities.
- There should not be a limit on the capacity of this area.
- Concerns regarding development in or around the Candidate World Heritage Site.
- Improvements are required to public transport.
- Concerns over the South Central Sunderland area numbers not allowing sufficient free development to meet needs elsewhere.

4.17 *Washington*:- There was a mix of opinion as to whether Washington should accommodate the suggested scenarios for high growth (1,400 dwellings), medium growth (1,000 dwellings) and low growth (800 dwellings). However the main comments related to:

- Careful assessment needs to be given to existing infrastructure.
- The need for a railway system into Washington.

- Additional housing in Washington at the expense of further growth of Fence Houses
- High growth (1,400 dwellings) could open up new employment opportunities on existing allocations and help house prices.
- Washington is a good location for executive housing.
- Natural environment needs maintaining and protecting.
- Make use of greenfield industrial areas to accommodate growth.
- No scope for new housing in this area and no justification for being a growth area.
- Low growth (800 dwellings) would help reduce pressure on employment and open space land.
- Certain employment areas could be utilised for housing development.

4.18 *Fence Houses*:- There was general acceptance that new housing would be positive for the area, however, there is a need to ensure affordable housing is provided and facilities and services to accompany new housing. The main comments related to :

- The capacity limit on sewage and water system. Possible problems with sizing and drainage systems.
- High growth (1,000 dwellings) would not benefit from city's facilities and possibly lead to facilities on peripheral locations which will not be of benefit to whole city. Also concerns over benefits of increased population in this area flowing to Chester-le-street, rather than Sunderland.
- Concerns over appropriateness of the area being a growth area. Higher growth option (1,000 dwellings) may not allow adequately for new development elsewhere.
- High growth (1,000 dwellings) needed to enable a step change and meet regeneration objectives.
- Consideration must be given to cross-boundary relationship.
- Development should be limited to avoid greenfield development/protect Green Belt/maintain settlement breaks/preserve Great North Forest.
- Hetton is a more sustainable growth area.
- There is no over riding need for prioritising development in this location.
- Road and transport infrastructure do not support a high population.
- High growth (1,000 dwellings) makes use of PDL and Central Route, Rainton Bridge and encourage improvements to local shops and service provision.

4.19 *Easington Lane*:- Additional housing would be supported as it would bring benefits in the form of new facilities, however, concerns were raised over the amount of empty properties currently within the area. The requirement for a new by-pass was also seen as a key issue to aid regeneration and help with the traffic problems in the area main comments received were:

- The limited capacity on the sewage and water system. Possible problems with sizing and drainage systems.
- Low growth or around 1,100 dwellings as peripheral location to city would undermine potential of economic benefits.
- Demand in area is limited, high growth unrealistic.
- Development should be limited so as to avoid Greenfield developments.
- Concerns over the area identified as a growth area, Hetton is a more sustainable growth area.
- Preserve natural environment/ green open spaces.
- High growth would assist in regeneration of area and reflects consents and development framework proposals.
- Higher growth option may not allow adequately for new development elsewhere.

4.20 The consultation exercise also identified a number of other areas throughout the city which respondents thought should be considered for housing growth, however the number of responses were limited. These areas are set out in the summary attached as an appendix.

4.21 In addition to the specific comments on the growth areas, a number of comments were also received on housing locations in general. One of the main points stated by Government Office for the North East was that the growth areas are unsuitable for the DPD and should be established through Core Strategy, as this could result in additional dwellings being identified within specific sub-areas, which could exceed Core Strategy figures. This matter is subject of discussion with GO-NE.

4.22 Other points related to issues such as the requirement for all housing locations to be assessed for flood risk, and the growth area impacts on the strategic road network. A number of comments related to ensuring that consideration was given to particular assessments, guidance and action plans of different bodies. The requirement for community facilities and services, along with maintaining open spaces/ settlement breaks/open space and woodland were strong points that were made in relation to the location of housing.

5.0 NEXT STEPS

5.1 The responses received are currently being analysed and will be used to help inform the next stage of the document, the Preferred Options draft which is currently programmed for October 2008.

5.2 However, it should be noted that new Regulations are anticipated in June 2008 that will introduce a series of changes designed to streamline the LDF system further. It is understood that these Regulations will among other things remove the need for a formal Preferred Options consultation and introduce a two stage submission process. Without the specific detail, it is not yet clear as to how this will affect the existing LDF programme. However, regular discussions at Officer level with GONE

suggest that at this stage, some slippage to the adopted LDS will occur. It is therefore highly likely that amendments to the adopted Local Development Scheme will be required. Any such changes will be reported to Cabinet for approval at the appropriate time.

6.0 REASON FOR DECISION

6.1 To continue the process of preparing the LDF Housing Allocations DPD.

7.0 ALTERNATIVE OPTIONS

7.1 The City Council has a statutory duty to prepare a Local Development Framework. The programme for preparation of the DPD is included in the Sunderland Local Development Scheme approved by Council in March 2007. Consequently no alternative options can be recommended.

8.0 RELEVANT CONSULTATIONS/ CONSIDERATIONS

- a) **Financial Implications** – There are no direct costs arising from the reporting of representations. The main costs will arise from the Examination, which is scheduled for February 2010 and will be considered as part of the review of the Medium Term Financial Strategy covering 2009/2010 to 2012/2013. The City Treasurer has been consulted and his views incorporated into the body of this report.
- b) **Legal Implications** – The representations schedule has been prepared in accordance with the appropriate Planning Regulations. The City Solicitor has been consulted and his views incorporated into the body of this report.
- c) **Policy Implications** – The Housing policies will in due course become part of the statutory development plan for Sunderland. In this context the Policies will be taken into consideration in determining planning applications and will represent a guide for public and private investment. On approval by the Council the policies will, in the interim, be a material consideration in determining planning applications in Sunderland.
- d) **Implications for other Services** – None are identified at this stage. Any Service issues which emerge during consultation will be taken into consideration in preparing the DPD.

9.0 APPENDICES

LDF Housing Allocations Development Plan Document: Issues and Options – Summary of Responses to Consultation March 2008

10.0 BACKGROUND PAPERS

LDF Statement of Community Involvement November 2006
LDF Local Development Scheme March 2007

LDF Housing Allocations Development Plan Document: Issues and Options October 2007
LDF Core Strategy Preferred Options December 2007
Full schedule of responses to Issues and Options consultation - March 2008

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Housing Allocations

Schedule of responses to
consultation - March 2008

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
NEA	1	-	-		A number of strategic policy issues raised in the document are considered to be more appropriate to include in the Core Strategy.		
					It is recognised that there is some overlap between this document and certain policies contained within the C.S and it will be important to ensure that the housing allocations made in this document reflect the strategic policies for housing in the C.S.		
					Approach to utilising the HMA and SHLAA to inform the HADPD is supported and consistent with RSS proposed changes policies 31 and 32. However it is essential that such evidence is used to inform the broad objectives for housing in the C.S.		
					It will be important to ensure that the allocations made within the sub-areas reflect the anticipated level of housing development planned for in the four sub-areas as established in the C.S. It is noted that there are some inconsistencies between the housing distribution figures for the sub-areas in the C.S (Policy CS4) and those outlined on the DPD (Table 3). These inconsistencies should be rectified for the purposes of clarity.		
					Sites which take advantage of the existing public transport facilities such as the metro system would be consistent with the objectives of RSS proposed changes policy 24, subject to other considerations.		
					RSS proposed changes policy 2 establishes a number of sustainability principles which should be taken into consideration in allocating sites for development; these include making better use of resources, protecting the region's cultural heritage and reducing crime and fear of crime.		
					Some of the options propose the release of land within the greenbelt; the greenbelt has been established to prevent the merging of Sunderland with Seaham, Washington, Tyneside and Houghton-le-Spring. In accordance with RPG1 policies GB1, GB3 and RSS proposed changes Policy 6 the boundaries of the greenbelt should be maintained and only in exceptional circumstances should these boundaries be altered. Even locally significant changes to the greenbelt, without justification on the basis of exceptional circumstances would present conflict with regional planning policy.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>In order to ensure the provision for a range of dwelling type, size and tenure to need the needs of the community it is considered that a suitable approach would be to identify the need and plan for house types in particular areas, rather than establishing a blanket approach to housing mix across the district, without taking into consideration specific area deficiencies or overprovision. The HMA should provide the evidence base. A policy outlining the strategic approach to housing mix should however be contained in the C.S rather than an allocations document.</p>		
					<p>The approach to a policy which seeks to address an imbalance in the tenure by identifying and planning for shortfalls in particular areas is considered to be consistent with RSS proposed changes policy 32. However, any strategic policy approach to housing tenure should be addressed through policies in the C.S.</p>		
					<p>It is unclear what is meant by the definition of executive housing/specialist housing. Both the RSS proposed changes and the Regional Housing Strategy (2007) define it as any type, size or age but crucially at the highest end of the market. The allocation of sites should be based on delivering a mix of households to meet the needs of a range of households, rather than just one type of household. Sites within defined settlements should be prioritised. These should preferably be PDL but will not always be. Therefore there is no need for such an exception approach to accommodate executive/specialist housing. Certain affordable housing can be provided in locations where it would not otherwise be under the exceptions policy set out in PPS3. A site allocation in an LDF should be justified in policy terms by demonstrating consideration of RPG1 policies DP1 and DP2 and RSS proposed changes policies 2,3,24 AND 30. Any approach to exempt executive housing from this approach would not be consistent with delivering RPG1 or RSS objectives. Overall executive housing is one part of a much larger approach to deliver a better housing stock so that more people choose to live and work in Sunderland, an exception policy is unlikely to achieve this. Both the C.S and the HADPD need to reflect and deliver these regional objectives.</p>		
					<p>Establishing a suitable approach to density requirements is a detailed matter for the Council to consider, taking into consideration the evidence base as informed by the SHMA and the need to deliver a range of house types.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					In accordance with RSS proposed changes policy 30, the LDF should define circumstances where provision of lower densities is needed for dwellings to better provide for future households and a better mix of dwelling type, size and tenure. It is however considered that outlining the broad expectations for housing density is a strategic policy matter which should be incorporated into the C.S. Generally this should be 30 or more dwellings per hectare unless an alternative can be justified.		
					It will be appropriate to establish the approach to affordable housing policy based on the findings of the HMA. Regional planning policy does not specify whether it is most appropriate to define thresholds based on site size or the number of dwellings. NEA welcomes reference to providing affordable special needs homes and affordable housing for the elderly.		
					Any allocations made for the provision of gypsy and travellers sites should be in accordance with criteria which should be established in the C.S and based on the plan, monitor, manage and sequential approaches.		
					The approach to incorporating home zones principles within residential layouts and encouraging a variety of architectural styles are supported and consistent with regional planning policies. Establishing the appropriate style of architecture on specific sites is however a matter for determination.		
					The range of issues which require specific development control policies is a matter for local determination. It is important to ensure that these policies are locally specific and do not simply repeat national guidance.		
					It is noted that there are a number of strategic policy issues raised in this consultation document (for example housing density, mix and PDL) which are considered to be more appropriate to include in the C.S. It is recognised that there is some overlap between this consultation document and certain policies in the C.S and it will be important to ensure that the housing allocations made in this document reflect the strategic policies for housing in the C.S.		
Sport England	19	-			Housing Environments - Active design is an innovative set of design guidelines to promote opportunities through sport and physical activity in the design and layout of development. The guidance promotes sport and activity through three key active design principles of improving accessibility, enhancing amenity and increasing awareness.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Accessibility: improving accessibility refers to the provision of easy safe and convenient access to a choice of opportunities for participating in sport, active travel and physical activity for the whole community.		
					Amenity: Enhancing amenity involves the promotion of environmental quality in the design and layout of new sports and recreational facilities, the links to them and their relationship to other development and the wider public realm.		
					Awareness: Increasing awareness highlights the need for increased prominence and legibility of sports and recreation facilities and opportunities for exercises through the layout of the development.		
					The HADPD should include reference to Active Design and promote the general principles of Active Design in the development of housing in and around the city.		
					D.C Policies - This chapter makes no specific mention to sports requirements and facilities that will be required to serve the needs of residents living in new houses. Sport England considers the due regard must be given to addressing the sport and recreational needs that will arise through the promotion of new housing. To best understand and quantify what sport requirements are required a PPG17 Local needs assessment should be produced. It is possible that this assessment may identify certain sporting shortfalls in the local area and the new housing could address this shortfall. The document should include details requesting sporting requirements from housing development and how this will be addressed either through a S106 or via on site sport provision. That sport provision should be based on the sporting needs assessment as a sound evidence base. It may well be better suited to produce developer contributions DPD.		
Civic Society Sandra Lane (Chair)	21			Seaburn/Roker/Fulwell: - High Growth, approximately 1,000 dwellings Could services cope with higher levels of development in already densely developed areas? Would resources elsewhere be underused?			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Chapelgarth: - Current planning consents/known ISHL sites approximately 650 dwellings. Chapelgarth & Ryhope are major growth areas but the infrastructure between e.g. roads between Ryhope & Moorside is dependent on certain schemes. High growth may have to be allowed in order to benefit from infrastructure development very necessary to take pressure off Tunstall Hope.			
				Ryhope: - High Growth, approximately 1,400 dwellings Option 2 has 35% brownfield sites as opposed to option 1s 60% greenfield. 1400 dwellings would however intrude into settlement break and possibly compromise resources in the rest of South Sunderland.			
				South Hylton:-Current planning consents / known ISHL sites approximately 370 dwellings South Hylton may have limited potential as a growth point but much depends on whether existing facilities can cope and improving access to existing facilities.			
				Central Sunderland:-Current planning consents/known ISHL sites approximately 2,931 dwellings Where will employment areas be relocated? If in suburban locations could lead to problems with travelling to work			
				Washington:- Medium Growth, approximately 1,000 dwellings			
				Fence Houses: - Current planning consents/identified sites approximately 180 dwellings Fencehouses peripheral to City boundaries and if major development were to take place the benefits would go to CHESTER LE STREET. Diverting development to Houghton and Washington might be a better option			
				Easington Lane: - Current planning consents/identified sites additional 780 dwellings. Locality needs regeneration.			
				Inner Sunderland Houghton Washington Southern periphery infrastructure			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					On larger sites only with accessible transport links. Employment opportunities should be created on former industrial sites to benefit local people.		
					Have a city wide policy which aims to achieve a mix of house types on all sites A mix on all sites would in theory give a balance but would be difficult to achieve in certain locations.		
					Policies should be flexible to adapt to each set of circumstances.		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock There could be a strong developer/occupier resistance to certain house types		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield The Society is against the use of greenfield land in principle but recognizes that in some cases there may be no other option in order to meet housing demands		
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances. Retaining the character of areas such as Conservation area is important but so is protecting close-knit communities.		
					Creating housing within 200metres of public transport routes which have a regular service.		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					No keep the existing threshold for affordable housing		
					both defined threshold be based on the size of the site and the number of dwellings		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Set percentages based on the findings or the HMA and need Perhaps a collaboration of both depending on local circumstances		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site. Appropriate circumstances:- City Centre Upper floor conversions Dedicated developments		
					Criteria based approach to special needs housing Depends on needs of residents, if mobile they need high accessibility to facilities.		
					Identify potential sites on a city –wide basis for gypsies and travellers. Permanent sites should be considered although there may be an advantage in working with our neighbours		
					Yes home zones should be encouraged. Although this is current thinking it sounds sensible		
					Yes variety of architectural styles encouraged. Housing styles are another way of keeping community feeling		
					No specific architectural styles should not be restricted to certain areas of the city. Modern design in 19th century Sunderland has given us the conservation areas of today. Designs should be considered on their own merit especially with a view to energy saving features.		
					Yes agree with range of D.C issues		
Prestige Car Direct Properties Ltd		England and Lyle	40			Land west of Ferryboat Lane	
Northumbrian Water	274	England and Lyle	40	Seaburn/Roker/Fulwell: The issue is the location and phasing of where and when high levels of growth would take place. The sewerage system for the area heavily reliant on pumping stations which have existing capacity constraints and which as a result of future levels of growth may require upgrading. In addition the disposal of surface water from developments may be a critical factor depending on whether the development is inland or nearer the coast.	Where should our new housing be built? The HADPD proposes a significant increase in the number of dwellings in the city than previously envisaged. Such a large increase would require a detailed study of the water infrastructure capacities to assess the implications for the company's future investment programmes.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Chapelgarth: Future large scale development in excess of that already allowed and planned for in this area would require an assessment of the sizing of the existing surface water sewer network.</p>			
				<p>Ryhope: Growth over and above the proposed development in the masterplan (800 new houses) would need careful assessment. This is due to difficulties for the sewage system in eth south and west of Ryhope to drain new development.</p>			
				<p>South Hylton: Issue is the location and phasing of where and when the higher levels of growth would take place. The sewerage system for the area is heavily reliant on the pumping station at Pottery Lane which has an existing capacity constraint and may require upgrading.</p>			
				<p>Washington: Issue is the location and phasing of where and when the higher levels of growth would take place. Previous consultation for housing indicated that development opportunities in Washington were limited and that the town had been developed out. NWL's strategic infrastructure has been planned and put in place for the master plan of the former new town and any additional development would require careful assessment in relation to this existing infrastructure.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Fence Houses: The issue is where the higher levels of growth would take place and the impact on capacity of the water and sewage infrastructure. Development on the outer edges of the catchment could cause problems with sizing of the drainage system. The area drains to Sedgelethch Sewage Treatment Works which itself will have a capacity limit.</p>			
				<p>Easington Lane: The issue is where the higher levels of growth would take place and the impact on capacity of the water and sewage infrastructure. Development on the outer edges of the catchment could cause problems with sizing of the drainage system. The area drains to Sedgelethch Sewage Treatment Works which itself will have a capacity limit.</p>			
							<p>Issue 8: Draft SHLAA methodology: Q13. Access to utilities. NWL is always willing to provide information regarding capacity issues and provision and would request that this site assessment methodology is further enhanced with a sentence stating that close liaison /discussion will take place with NWL (and other service providers) at an early stage prior to the allocation of potential housing sites. Information is important but discussions in relation to context and investment requirements can provide more certainty on meeting infrastructure requirements and ensure that development can be phased appropriately. NWL is particularly keen to advise and work with the council in using the criteria set out on pg105 of the HADPD. NWL would support the criteria in principle on the understanding that a standard policy basis must be in place to assess potential housing sites. However, the above criteria are limited in scope; they only consider the proximity of services for development to connect to. Whilst the -2 (substantial off site works required for utilities) and -5 (No utilities available -remote site) scores could be used to asses sites where there is</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							No capacity or there are other costs, NWL does not have the resources to assess individual sites using a standard form. NWL did not use the criteria in its response to previous UCS consultations for this reason. NWL assessed existing water supply and sewage capacity issues at the settlement level and provided this assessment to the council. This then allowed the council to assess the sites individually, with NWL providing a copy of GIS plans for the council to assess the sites proximity to existing services and whether existing services crossing the sites would require a diversion on individual sites. NWL would request that the policy wording and criteria scoring reflects the above approach.
							Reference to Northumbria Water: NWL welcomes the inclusion of its company title in par (Q13) but suggest that it would reflect better on the LDF if the company referred to as Northumbrian Water Limited, its full title.
Persimmon Homes	851	England and Lyle	40			Hendon Sidings	
Persimmon Homes	851	England and Lyle	40		Persimmon Homes agree that it is vital that the RSS net housing requirement is met within the plan period. In line with guidance however the LDF should not interpret this figure as a ceiling but as a guideline that can be exceeded so long as overall RSS objectives are not compromised. This is also true of the five year rolling housing land supply. Both the Housing Green paper and the DCLG Advice on calculating the five year supply make it explicitly clear that this figure should not be a ceiling but a starting point. Greater emphasis needs to be given in this section to deliverability of housing sites which is not mentioned.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					References in Paragraphs 6.9 should be amended to Strategic Housing Market Assessments in line with PPS3 and the recently published guidelines on their preparation. The Housing Green Paper and the DCLG advice on calculating the five year housing land supply should be added to this key document list		
					RSS Further Proposed Changes have now been published and these should be used as guidelines for the LDF. However the City Council's figures are only marginally above the revised RSS figures and as such Persimmon homes would support the overall net housing requirement of 15,150 as proposed by the City Council.		
					Persimmon Homes considers that there is a need to review the ISHL sites/figures in the light of the requirement for each authority to prepare a Strategic Housing Land Availability Assessment (SHLAA) and PPS3. The ISHL is a good start but is getting out of date and certain of the assumptions about the delivery timescale for identified sites need revisiting. Other suitable sites have also come forward in the interim. In line with guidance in PPS3 the City should not include an allowance for windfalls in its overall calculation of housing land supply but should focus on identifying deliverable/developable sites through the SHLAA.		
					It is also noted that the footnote for Table 2 states that it has been assumed that demolitions by Gentoo will be replaced on a like for like basis i.e. 100%. This conflicts with Paragraph 5.38 of the Core Strategy and Paragraph 9.2 of the HADPD which states that Gentoo will demolish some 4100 dwellings and replace them with 3800 new dwellings. Which is correct?		
					Overall the City should not treat the RSS net housing allocation as a ceiling. It is a guideline which the Council should deliver as a minimum. Over provision is acceptable so long as it does not prejudice wider RSS objectives.		
					Paragraph 10.1 should include references to deliverability and developability of sites.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Para 10.4 Persimmon Homes would support mixed use development where this is deliverable and achieves a real planning objective. It is not always appropriate.		
				<p>Para 10.5 As part of submission on the Core Strategy Preferred Options Persimmon Homes whilst supporting the overall sub area and growth area approach has queried the inclusion of Fulwell/Roker/Seaburn, South Hylton and Washington as Growth Areas. There does not appear to be the scope for the scale of new housing development in these areas that would justify them being classified as Growth Areas. Persimmon Homes would however particularly support the identification of: Central Sunderland South, Ryhope, Fencehouses and Easington Lane as Growth Areas. New housing should not of course be confined to these growth areas especially where it proposed the re-use of PDL.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Para 11.3 We disagree with the assertion that releasing employment land for housing development will undoubtedly require the re-allocation of employment land elsewhere. Much depends on the location of the employment land and it's whether it is still 'fit for purpose'. Partial redevelopment of an employment site for housing may release funds that can be reinvested in the remaining employment land thereby bringing it up to modern standards and making it fit for purpose. There can be little to be gained by perpetuating employment estates/allocations that are no longer attractive to modern businesses when full or partial redevelopment would help achieve other LDF objectives. It must also be borne in mind that redundant employment land is the principal source of PDL for housing. If the Council is to protect all such land it will not be able to meet the 80% PDL target for housing</p>		
				<p>Persimmon Homes welcome the acknowledgement in this paragraph that land outside the Growth Areas will be needed to meet the net housing requirement.</p>			
				<p>Seaburn/ Fulwell/ Roker: Persimmon Homes consider that given the constraints to development in this area that the Low or Medium growth scenarios identified are the only realistic options and that neither would justify the identification of this area as a Growth Area</p>			
				<p>Chapelgarth: Persimmon Homes consider that existing consents scenario is the most appropriate scenario for this area bearing in mind the supply of land in the nearby Ryhope Growth Area. The high growth scenario is not appropriate and there is no justification for further greenfield releases in Chapelgarth</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Ryhope: Persimmon Homes would support the high growth scenario in the Ryhope Growth Area. Ryhope is a sustainable option for this scale of development and this level of housing will be needed to deliver the required infrastructure investment</p>			
				<p>South Hylton: The Low Growth scenario is considered the most appropriate for South Hylton. The medium and high growth scenarios would lead to an unacceptable loss of amenity green space and conflict with other LDF objectives. The scale of development that would result from the low growth scenario is not sufficient to justify Growth Area designation.</p>			
				<p>Central Sunderland: High Growth Scenario is supported although care needs to be taken both now and throughout the LDF period to ensure a mix of house types and avoid over reliance on high density flatted schemes that are generally not attractive to families.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>A further concern is that over reliance on larger flatted schemes can severely distort the housing land supply. As shown recently in Leeds, and indeed in Sunderland itself, the confidence that one can attribute to the deliverability of such schemes is less than for conventional housing, because of the upfront investment needed and the vulnerability of such schemes to market fluctuations. Large scale flatted schemes are more liable to cancellation and simple non-delivery. Failure to deliver will create large holes in the housing land supply that the Council will need to fill from other more reliable sources. Very careful consideration therefore needs to be given to the deliverability of such schemes before they should be relied upon in the housing land supply.</p>		
				<p>Washington: Low Growth Scenario supported to reduce pressure on for re-allocations of existing good quality, well located, fit for purpose employment land allocations and open space, and to direct development towards the Coalfield.</p>			
				<p>Fencehouses: High Growth scenario supported to make use of PDL and improved accessibility resulting from the Central Route, compliment recent strong employment growth at Rainton Bridge and encourage improvement in local shops and service provision etc. Details of suggested sites already submitted to the Council at earlier stage.</p>			
				<p>Easington Lane: High Growth Scenario supported as this reflects recent consents and Development Framework proposals.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Persimmon Homes consider that Central Sunderland South, Ryhope, Fencehouses Growth Areas should be prioritised for new housing development as they represent the most sustainable and deliverable options. Progress is already well advance in Easington Lane</p>			
				<p>Other areas of the City that should be brought forward for development includes land at the Philadelphia Workshops. This is already partially allocated for housing but a more comprehensive mixed use development is more appropriate and would better deliver wider housing and regeneration objectives.</p>			
				<p>No. Mixed use is not always possible and a blanket requirement for mixed use could prejudice the delivery of the much needed housing land and other benefits. The locational requirements for modern employment uses are not always the same as for housing. There is no point seeking to direct employment uses to locations that are simply unsuitable from a business perspective</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>The City Council should seek to deliver a wide range of house types and tenures to meet housing needs and aspirations. What this mix is will vary across the City and from site to site. A mix of house types should be encouraged on all sites over 10 dwellings and this should be negotiated at the application stage. It is not realistic for the City Council to unilaterally seek to enforce a particular range and mix on any given site. The evidence base is simply not available or sensitive enough to provide realistic guidance on this issue and circumstances change over time. The judgement of what is and what is not appropriate can only be made at the time of the application in the light of all prevailing factors.</p> <p>In terms of whether there should be a policy to control the mix of tenures depends upon the findings of the SHMA. If there is clear, robust and up to date evidence to support such an approach then it may be appropriate.</p>		
					<p>It would however be incumbent upon the City to make sure that this evidence base is kept up to date for such a policy to be credible and deliver the required tenure mix. In both instances therefore there is a need for both a policy and to negotiate with the developer</p>		
					<p>Persimmon Homes is strongly of the opinion that whilst priority should be given to the re-use of PDL there will be circumstances where reliance on PDL is not appropriate and there is a need to release greenfield land for development. The 80% PDL target is challenging and it will be important to have the option available to release greenfield land should PDL not be available or not come forward as anticipated in order to maintain an adequate rolling housing land supply of at least five years, as required by PPS3 and the Housing Green Paper.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					The phasing/release of green field site for development should be programmed in the LDF and any sustainability assessment should be undertaken at the time the site is included in the LDF. Where a greenfield site performs better than a PDL site e.g. where it is deliverable and the PDL site is only developable in PPS3 terms then this program should allow for the greenfield a site to be developed before the PDL site. As highlighted in PPS3 and the Housing Green paper, deliverability of the housing requirement is a key issue. There is no benefit in local planning authorities holding unreal development expectations about previously developed sites if this means they cannot deliver the housing requirement.		
					Persimmon Homes would support Option 2 i.e. the setting of different density levels for different part of the City as this would best reflect the particular needs in each part of the City. It is now common practice for most new housing development to exceed 30 d.p.h.		
					Persimmon Homes would support a policy that sought to deliver lower density executive type homes in certain parts of the city where it would help rebalance the housing stock or compliment local character. The definition of executive need close attention. What might constitute executive in one part of the city might be inappropriate for another. The ISHL definition of executive as dwellings as >£500,000 is not appropriate in lower value areas such as the coalfield.		
					Only the main urban area represents and appropriate location for large scale higher density apartment developments. Smaller scale apartment development may be appropriate in smaller centres		
					No. Such an approach would contradict efforts to deliver a mix of properties on a given site that are indistinguishable from each other irrespective of tenure		
					No. Design guidance should suffice		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>This paragraph states that there is anecdotal evidence of emerging affordability problems in parts of the City. However there has always been areas within the city that are less affordable than others and it would be unreasonable to base any policy on affordable housing on the basis that not everyone can afford to purchase/rent properties in the higher value parts of the City. The Council is undertaking a SHMA. Persimmon Homes would reserve their position on the issues and questions raised in this Chapter until the findings of this exercise are known. There is little point in speculating at this point in time</p>		
					<p>The City Council should only encourage the provision of Home Zones in new residential development if it is willing to accept the consequences and adopt the resultant roads etc. Experience to date suggest that the City Council's engineers are not yet prepared to do this.</p>		
					<p>The Council should promote a wide variety of architectural styles including contemporary styles throughout the City. What is appropriate for one area might not be appropriate in another. There is not one strong vernacular style in Sunderland and as such a mix of styles is appropriate so long as development is of a good quality</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>We note that the DPD gives little or no consideration to how the LDF might control the delivery of housing land throughout the plan period and in particular the requirement to maintain a rolling five year housing land supply within the City required by PPS3. Given the importance of the Deliverability Agenda the Housing DPD should contain a policy on this issue which takes into account guidance in the Housing Green Paper and the DCLG Guidance Note of Calculating the Five Year Housing Land Supply i.e. that the provision of such a supply is the starting point and the existence of a five year supply is not a ceiling to the grant of further consents. This policy should detail how the Council will respond to under/over supply</p>		
							<p>Persimmon Homes would support the use of a scoring system to initially assess the comparative merits of housing sites. However this support is caveated by the following consideration i.e. such a system must only be used as a broad guide to site assessment. It is a starting point for such an assessment to be used in conjunction with other qualitative assessments and Planning Judgement. Great care need to be taken in constructing such a methodology to ensure that the correct measures are addressed and the correct weighting is given to individual measures. The assessment process must also be capable of replication by others and deliver consistent results within accepted confidence levels. Particular problems identified with the methodology suggested by the Council include:</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							<ul style="list-style-type: none"> • Lack of any allowance for 'fatal exceptions' i.e. the ability to discount sites where development would be wholly inappropriate • Question 1 - Scoring bands are too crude a site that is 51% greenfield would score -5 whilst a site that is 49% Greenfield would score +5 • Question 5 – Given the work the Council has done on accessibility to, local services and the importance it attaches to this issue in the Core Strategy mean that the weighting for this issue should be increased, • Question 6 – This should consider whether the site can be remediated. A site should not be marked down because it is highly likely to be contaminated. Remediation of such a site is beneficial. • Question 7 – How important is this issue? Does the fact that a site is stable really carry as much weight in the scoring as its accessibility? • Question 8 - does a site's location in a functional flood plan result in a 'fatal exception'? • Question 10 if a development would result in a beneficial use or improvements to a listed building it this not a benefit? This issue is not just a constraint – as with Q11 • Should deliverability be scored?

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							Paragraph 26.18 + 26.19 The proportions detailed in table 1, derived from Tapping the Potential, are not an appropriate basis for the consideration of the net to gross ratio. The Council in its SHLAA should undertake a more robust assessment of this ratio in discussion with developers and house builders. Paragraph 26.20 Given the flexibility that is inherent in the housing requirement figure it is not important that the City Council identify all small sites that might be developed. It is the role of the SHLAA to identify those sites that the City Council can be confident will deliver the required housing numbers. Subsequent small scale windfalls are unlikely to be so numerous as to prejudice the overall level of supply. Paragraph 28.22 Persimmon Homes would agree with the density multiplier approach i.e. applying a density of 30-50dph to each site depending upon circumstances, as an initial guide, so long as this is done in consultation with the developer promoting the site.
Network Rail	60	-	-		Main focus is on the potential release of land no longer required for railway purposes or, as is the case of Sunderland South branch line, a re-orientation of the line to permit the release of a greater area of land for other purposes.		
						Holmeside, Central Sunderland	
						North Hendon (Sunderland South Docks) Branch	
English Partnerships	530	GVA Grimley	61	Ryhope: Support scenario 1. The alternative scenario would generate issues set out at pg 38 of the HADPD. In addition there would be a concern that a higher growth scenario would raise market and viability issues which may cause constrain the successful delivery of the existing consented sites.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The DPD should make allowances for increases in housing numbers arising from potential future changes to the existing planning consents. The Council should therefore make an allowance (e.g. 10% of existing consented dwelling numbers) for a small increase in dwelling numbers resulting from any pre-development review of approved site layouts.</p>			
				<p>The existing consented sites are constrained in part by existing buildings and by the significant infrastructure costs that it is required to facilitate (Doxford- Ryhope link rd contributions). If these sites are to be delivered it is essential that the market conditions remain favourable, this would not be the case in a higher growth scenario where the market would potentially look first to the easier greenfield options. However, if the council are minded to pursue the higher growth scenario, due consideration should be given to the adoption of a phasing strategy.</p>			
					<p>House types: A blend of both elements would best deliver the councils aspirations to provide a range and choice of housing types and tenures. A city-wide approach which identifies the need for a range of house types would be a reasonable base-line position. Whilst it would not be unreasonable to adopt such an approach on the largest sites, there would be some doubt as to whether this mix can be achieved on all sites without reference to the constraints presented by the site size, development cost/value, market requirements, etc. Where there is a particular perceived sector shortfall (e.g. executive housing) then it would not be unreasonable for a policy to identify such a requirement and plan proactively to address.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Housing Tenure: English Partnerships supports the development of a specific planning policy which sets minimum thresholds in accordance with up-to date government guidance. However, the policy should recognise the financial constraints some sites face in delivering mixed-tenure housing and therefore the policy should provide sufficient flexibility for negotiation on a site-by site basis to reflect site-specific constraints. (E.g. potentially lower contribution if a site is significantly constrained or requires significant off-site infrastructure costs).		
					Greenfield Land: Q23. Given the existing brownfield land resource within the city, ENGLISH PARTNERSHIPS consider that greenfield land should only be released where an over-riding regeneration need exists and site-specific circumstances are appropriate. Ordinarily priority should be given to suitable brownfield sites for residential development.		
					Option 2 - Given the over-riding need to diversify the housing stock within the city, with particular emphasis on providing lower density executive housing ENGLISH PARTNERSHIPS considers that different levels of development density should be set.		
					ENGLISH PARTNERSHIPS agree with having exception in place for densities lower than 30dph. Setting variable housing densities to meet specific housing needs and requirements will assist in delivering executive housing. Lowering housing densities in traditional residential areas will significantly assist in delivering such areas and complement ongoing regeneration initiatives.		
					Agree with lower densities for allowing lower densities for the provision of affordable housing, subject to appropriate locations, key sites within the city should not be under-utilised unless site-specific constraints suggest otherwise.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					A maximum density policy should not be set. ENGLISH PARTNERSHIPS agree that design standards should control site-specific layout constraints.		
					Affordable housing policy should determine the appropriate threshold on a site-by-site basis, so long as underpinned by a robust and up-to-date evidence base. However, due consideration should be given to the need for the council to negotiate on a site-specific basis (e.g. heavily contaminated sites) where imposition of 'blanket' affordable housing requirements would impinge on the overall viability of a scheme. Affordable housing thresholds should be used a minimum guide and allow for flexibility.		
					ENGLISH PARTNERSHIPS consider that minimum thresholds should be set but that there should be sufficient flexibility to allow negotiation having regard to site-specific constraints. In all instances, appropriate affordable housing provision should be based on up-to-date housing needs, which is kept under regular review.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered. However, appropriate recognition in planning policy on maintenance and adoption regimes for Home Zones.		
					Yes the council should encourage a variety of architectural styles. The council should promote good design which seeks to have regard to the local vernacular. However, design guidance should not be overly prescriptive and should allow for innovation in design, encouraging design where appropriate.		
					Yes ENGLISH PARTNERSHIPS agree with range of issues to be covered by D.C. policies.		
Mr Ray Luke		John Potts	67	Springwell Village area of the city should be considered for housing growth			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Mr Luke objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Mr Luke states proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
						Land at Peareth Hall Farm, Peareth Hall Road, Springwell Village	
					Negotiate with developer for provision of mix of house tenure.		
					Set different levels of density in different locations, based on distances from centres and transport hubs.		
					A maximum density policy should not be set. Design standards should control this.		
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered.		
					Reserve sites for special needs housing.		
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to certain areas of the city (e.g. city centre).		
							Conditionally support the methodology providing Paragraph 26.10 is amended to take into account paragraph 38 of PPS3. Additionally, Para 26.15 should be amended to include green belt allocations within the site selection methodology.
Mr John Carruth		John Potts	67	Springwell Village area of the city should be considered for housing growth			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
						Land at the Springwell Trust Meeting Hall, Peareth Hall Road, Springwell Village	
						Land at Usworth House Farm, Springwell Village	
					Negotiate with developer for provision of mix of house tenure.		
					Set different levels of density in different locations, based on distances from centres and transport hubs.		
					A maximum density policy should not be set. Design standards should control this.		
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered.		
					Reserve sites for special needs housing.		
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to certain areas of the city (e.g. city centre).		
							Conditionally support the methodology providing Paragraph 26.10 is amended to take into account paragraph 38 of PPS3. Additionally, Para 26.15 should be amended to include green belt allocations within the site selection methodology.

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
MMF (UK)		John Potts	67	Support option 2 for high level growth.			
				Murton Street site should be considered as a site which will contribute towards housing numbers within Central Sunderland			
				Central Sunderland area should be prioritised for housing development above all other areas of the city.			
						8-12 Murton street, Sunderland	
					Objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
					Negotiate with developer for provision of mix of house tenure.		
					Option 2. Set different levels of density in different locations, based on distances from centres and transport hubs. Support the Council's aim in Para 22.6 for higher densities in the Central Area.		
					The site at 8-12 Murton Street is within a highly accessible City Centre location. As such the site should be considered as suitable to support higher densities.		
					A maximum density policy should not be set. Design standards should control this.		
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered. Financial contributions for any identified need are viable in cases where the physical constraints and viability of a site means on-site provision is difficult.		
					Reserve sites for special needs housing.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to specific locations.		
							Conditionally support the site selection methodology providing Paragraph 26.10 is amended to take into account paragraph 38 of PPS3.
NAB Land Ltd		John Potts	67	Support option 2 for high level growth.			
				Former site of Sheepfolds Metals, sheepfolds Road should be considered as a site which will contribute towards housing numbers within Central Sunderland			
				Central Sunderland area should be prioritised for housing development above all other areas of the city.			
					Objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
						Former Sheepfolds Metals Site, Sheepfold Road, Monkwearmouth	
					Negotiate with developer for provision of mix of house tenure.		
					Option 2. Set different levels of density in different locations, based on distances from centres and transport hubs. Support the Council's aim in Para 22.6 for higher densities in the Central Area.		
					The site at Former Sheepfolds Metals, Sheepfolds Road is within a highly accessible City Centre location. As such the site should be considered as suitable to support higher densities.		
					A maximum density policy should not be set. Design standards should control this.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered. Financial contributions for any identified need are viable in cases where the physical constraints and viability of a site means on-site provision is difficult to provide.		
					Reserve sites for special needs housing.		
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to specific locations.		
							Conditionally support the site selection methodology providing Paragraph 26.10 is amended to take into account paragraph 38 of PPS3.
NAB Land Ltd		John Potts	67	North Hylton area should be considered as a growth area			
					Objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
						Former Arriva Depot, North Hylton Road, Sunderland	
					Negotiate with developer for provision of mix of house tenure.		
					Set different levels of density in different locations, based on distances from centres and transport hubs.		
					A maximum density policy should not be set. Design standards should control this.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered. Financial contributions for any identified need are viable in cases where the physical constraints and viability of a site means on-site provision is difficult to provide.		
					Reserve sites for special needs housing.		
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to specific locations.		
							Conditionally support the site selection methodology providing Para. 26.10 is amended to take into account Para 38 of pps3
McInerney Homes	104	John Potts	67	The Silksworth area should be considered for housing growth			
					Objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
						Lincoln Avenue, Silksworth, Sunderland	
					Negotiate with developer for provision of mix of house tenure.		
					Set different levels of density in different locations, based on distances from centres and transport hubs.		
					A maximum density policy should not be set. Design standards should control this.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered. Financial contributions for any identified need are viable in cases where the physical constraints and viability of a site means on-site provision is difficult to provide.		
					Reserve sites for special needs housing.		
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to specific locations.		
							Conditionally support the site selection methodology providing Para. 26.10 is amended to take into account Para 38 of pps3
NAB Land Ltd		John Potts	67	Springwell Village area of the city should be considered for housing growth			
					Objects to the proposal that the council insists on mixed-use for locations within the city and local centres and take advantage of locations which are in close proximity to public transport hubs and facilities. Proposals for mixed-use developments should be judged on the merits of the site and its ability to support mixed use development.		
						Read of Warren Lea, Springwell Road, Springwell Village	
					Negotiate with developer for provision of mix of house tenure.		
					Thinks that greenfield land could be developed in exceptional circumstances where those circumstances can be demonstrated		
					Feel that where a greenfield site performs better than a brownfield site it should have priority for development		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Set different levels of density in different locations, based on distances from centres and transport hubs.		
					Support executive type housing where the proposed site is suitable for such a development		
					A maximum density policy should not be set. Design standards should control this.		
					Support the retention of the existing UDP threshold for provision of affordable housing.		
					Defined threshold be based on site size.		
					Continue with negotiation on the amount of affordable homes to be provided on sites.		
					Yes financial contributions for construction of affordable, special needs and extra care homes off site should be considered. Financial contributions for any identified need are viable in cases where the physical constraints and viability of a site means on-site provision is difficult to provide.		
					Reserve sites for special needs housing.		
					Council should not encourage house builders to incorporate Home Zones within new residential layouts.		
					Yes the council should encourage a variety of architectural styles.		
					No. Specific architectural styles should not be restricted to specific locations.		
							Conditionally support the site selection methodology providing Para. 26.10 is amended to take into account Para 38 of pps3
Edward Thompson Group Ltd	649	GVA Grimley	68			Paper Mill, Commercial Road, Hendon	
Barratt Newcastle	846	Nathaniel Lichfield and Partners	72			Land at Southern House, Rainton Bridge	
Barratt Newcastle	846	Nathaniel Lichfield and Partners	72			Land at Low Moorsley - Coalbank Farm	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Barratt Newcastle	846	Nathaniel Lichfield and Partners	72				<p>Strong concerns over the appropriateness of the existing methodology as the basis for the SHLAA methodology. Do not consider a scoring approach to be appropriate for the SHLAA. Purpose of the SHLAA is to identify sites that are deliverable/developable in absolute rather than relative terms. Opposed to the intention (Para 26.42) that an SHLAA final assessment report will indicate "which sites are most suitable for including as housing allocations" The SHLAA is not to make decisions on which sites to allocate. It could be very difficult for a developer to comment on his or her site without commenting upon other sites. The contentious nature of a scoring system will like make for a very protracted debate no doubt touching upon the soundness of the evidence base.</p>
							<p>Directing resources to scoring sites, many of which are likely to be needed to meet housing requirements due to the districts ambitious housing target emerging through RSS, is not sensible.</p>
							<p>It would have been preferable for the SHLAA results including the sites to been available at this stage of the allocations DPD. The exclusion of certain land types from the SHLAA at odds with the scenarios which contemplate the development of each of these land types for new housing. Having established the scale of the housing requirement we consider it premature to unduly restrict the survey area as we believe this runs a high risk of preventing the identification of appropriate sites to meet housing needs.</p>
							<p>Strongly opposed to the proposed "do not pass go" test of excluded proposed sites which do not "fall within or adjacent to a settlement where further housing allocations are required" There is no explanation of how these settlements will be identified nor how stakeholders can comment on this matter. This seems to be another example of unduly restricting the site search area at the outset of the SHLAA exercise. CLG advice states a SHLAA "should aim to identify as many sites with housing potential in and around as many settlements as possible".</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							<p>Pages 92 to 93. We are confused as to how the "suitability" is proposed to be established. Paragraph 26.50 states that the aim of the final part 4 is to "identify all sites that are suitable" however, on the appended pro-forma part 4 considers only "availability" and "deliverability". There is no reference to scoring exercises that are involved with parts 2 and 3. In the text of the DPD (26.44) part 2 is titled "initial ranking" however on the appended pro-forma part 2 is titled site-suitability.</p>
							<p>In short -term the ultimate role of the scoring exercise is unclear and this presents real problems for commenting on the whole exercise's validity. As far as the individual criteria for assessment are concerned our main concern is that there seems to be something of a fluctuating approach to scoring. Some factors are treated as constraints and others as constraints/opportunities where mitigation potential is rewarded. E.G A proposal that would see the removal of contamination would score -5 despite removal of contamination being recognised in planning terms as a positive material consideration. A greenfield site with no contamination would score +5 for other assessment criteria the opportunity for an enhancement allows a score of +5 (e.g. trees and wildlife) this is confusing.</p>
							<p>There are some occasions where the document retains the language of PPG3 including a reference to "maximising" previously developed land (para26.51) and to the superseded guidance of Para 31 of PPG3. For all the reasons set out we would request that stakeholders are given a further opportunity to comment upon the SHLAA methodology.</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>On the basis of the timescales information set down in the LDS they will be a need for the LDF to make provision for a further 4 years, to 2025. Using the approach of policy 30 of FPCRSS there would be a need to provide for an additional 3,520 dwellings (880x4) in addition to the LPA identified residual of 3,500. These two figures total some 7,000 dwellings over and above the LPA's expected supply sources as highlighted in table 2. Further increases to the residual requirement must be likely to result from the SHLAA's detailed interrogation of the deliverability of other supply sources, including unimplemented planning permissions and sites identified in the ISHL that have yet to secure planning permission. This comment is made in the context of the relevant advice in PPS3 on the need for robust evidence on such sites coming forward. We would query the proposed small sites allowance of 100 dwellings amounting to 1,400 dwellings to 2021 in light of advice in PPS3.</p>		
					<p>Policies relating to house type and tenure will be informed by the SHLAA. We would request that our client has the opportunity to input into this SHLAA document.</p>		
					<p>In determining the need for greenfield land release to meet housing needs, it should be recognised that the sequential search sequence of PPS3 has been deleted as should the need for realistic assumptions about the delivery of some previously developed sites. It is likely that there will be both quantitative and qualitative justification for greenfield release in the district. We agree that executive housing provision often requires specific locational attributes that are not always evident on previously developed land.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					We agree that densities lower than 30 d.p.h will be required to facilitate the delivery of executive housing which is clearly one of the council's principal housing aspirations. There is strong possibility that some sites will involve greenfield land beyond the existing urban area and in locations where the delivery of such house types is realistic in market terms.		
					Reserve the right to comment in absence of the SHMA		
					No objection to the council encouraging a variety of architectural styles, rather than insisting upon them, nor the incorporation of home zones into appropriate layouts.		
Barratt Newcastle	846	Nathaniel Lichfield and Partners	72			Land at Lisburn Terrace Triangle	
John Tumman	80			Seaburn/Roker/Fulwell - Option 2 - Low growth. This will avoid too dense a form of development on an already densely built up area and may avoid undue pressure on facilities. It will also allow the reasonable levels of natural regeneration elsewhere in the sub-area. It is not clear what effect focussing development here may have on the need for regeneration initiatives elsewhere. The area is established, popular and relatively stable, whilst areas currently in decline or of deprivation are located to the west of whether the local infrastructure is capable of accommodating such additional development.			
				Chapelgarth: Option 1 - current planning consents/ISHL sites plus any other needed to provide for the road link to Ryhope hence the southern radial, to relieve Tunstall hope road of traffic. The problem with any further development			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				at Chapelgarth is that all development will be greenfield. The appropriateness of the maximum proposed levels of development in this location is queried as yet more greenfield land would be involved and the question of the overall sustainability of development in this location needs to be addressed.			
				Ryhope: Option 1 current planning consents/ISHL sites along with other developments necessary to provide the road link referred to in connection with Chapelgarth. The appropriateness of the maximum proposed levels of development in this location is queried as yet more greenfield land would be involved and the question of the overall sustainability of development in this location needs to be addressed.			
				South Hylton: - Option 1 current planning consents/ISHL sites or option 2. Concerned about adequacy of local facilities to meet demands especially at higher development levels and the question of their accessibility from South Hylton. Although located on the Metro it is a somewhat isolated community. Therefore its desirability as a growth point for up to 800 houses is debatable, evidence of acceptable level of local facilities to be able to accommodate such growth may be desirable, along with an appraisal of the accessibility of such facilities to the resulting population and the scope for further development in the wider area to make maximum use of existing infrastructure.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Central Sunderland; Option 1, option 2 acceptable provided that in conjunction with selected options for Chapelgarth, Ryhope and South Hylton, it would not prejudice a reasonable level of natural regeneration elsewhere in south Sunderland or lead to under use of facilities there.</p>			
				<p>Washington: Option 4 - High growth reflecting the potential for new employment opportunities on existing allocations, which are greater than elsewhere in the city and the outside possibility of a strategic site in the vicinity, combine to give it potential. Additional housing at Washington at the expense of some of that proposed at Fencehouses in the higher growth options. Require some clarification as to where growth is likely to be desirable within Washington.</p>			
				<p>Fence houses: - Option 1 given its peripheral location higher development routes would be unlikely to either benefit the cities facilities or be sustainable. Higher growth may also lead to requirements for more facilities in a peripheral location, of limited wider benefit. The area is not really accessible to many of the city's facilities. Where major development is proposed there it is likely that many of the benefits would flow to Chester-le-street and development may not prove to be sustainable in reducing the need to travel. Whilst conceding that Fencehouses is not the most</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>prosperous part of the city I am not aware of any over-riding need to give priority to development there to achieve regeneration objectives. I wonder about the appropriateness of identifying it as a growth point, especially as central Houghton with high levels of access to a wide range of facilities is nearby.</p>			
				<p>Easington Lane: Option 1 is preferred or possibly a new option of medium growth say 1,100 dwellings to bring about regeneration. It is peripheral in relation to the city and coalfields facilities, thereby potentially undermining certain aspects of the potential economic benefits and the sustainability of development. However, this may be balanced by the need for regeneration in this locality which has a history of relative deprivation. In recent years housing demand in the locality has been limited so potential growth at the upper limit suggested may prove unrealistic.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Central Sunderland should have priority for housing development			
				<p>Potential growth area - The Port: Given the evidence from the previous studies that there is doubt about the long term viability of the port I would like to suggest that it be considered for housing development in the long term as part of the south central Sunderland area. Notwithstanding the environmental constraints it is my opinion that there is scope to create a high quality urban village here based on the water area of the dock and the seafront location. This could exploit the assets of the location and bring major regeneration into the Hendon east end area; one of the city's most deprived areas.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Potential growth area - Houghton: The omission of central Houghton as a growth point is surprising. Not only would significant new housing development help underpin the existing town centre it would also be highly accessible to the emerging major new employment opportunities at Rainton bridge and benefit from high levels of access provided by the transportation infrastructure, thus making it potentially highly sustainable. A growth point could be created here by downgrading the status of both fence houses and Easington lane growth points, particularly the former.</p>			
				<p>Potential growth area: Washington Instead of the whole of Washington being identified, they may be advantages in focussing new housing in locations accessible to major potential foci for further employment related development and perhaps in greater number than the 935-1435 proposed. Higher housing development levels here may be achieved by diverting some of the development proposed at growth points in the coalfield areas, particularly fence houses.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Only insist on mixed-use on larger sites and /or when an acceptable residential environment will result.		
					In relation to house types suggest that overall objective should be to achieve a mix of housing city wide and the means of delivering this by seeking to encourage types and housing which are underrepresented in more localised areas. In practice the potential to achieve these may well be limited at the extremes, particularly in trying to attract high value housing to low value areas, though the potential of the port in relation to the east end and Hendon should be noted (i.e. a city - wide policy applied to meet local imbalances.		
					In relation to housing tenure, the practical way forward is to have a flexible policy in place setting the parameters then using this as a basis for negotiation with developers.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Should consider a policy for tenure which seeks to address any imbalance, although it is unlikely that it can be rigidly adhered to in either high or very low value areas as developer will be concerned about returns /level of risk involved.		
					Option 3 - Greenfield land should only be released as a last resort, although suspect the exceptional circumstances referred to in option 1 will often come into play in practice. The easiest way of meeting the strategic objective of encouraging low density executive housing is by greenfield development, but the best way may be trying brownfield first.		
					Yes sustainability assessments should be used to determine at what point in the DPD process greenfield land should be released.		
					Option 2 - Set different levels of density in different locations, based on distances from centres and transport hubs. Subject to meeting the needs of different sectors of the market (e.g. if executive housing is to be built some will of necessity be low density to appeal to the market, this could require lower densities than 30dph).		
					Yes agree with the exceptions for lower densities. Environmental quality and executive housing may often co-exist in any event in urban conservation areas where replacement of sizeable gardens with blocks of flats could actually be counter-productive to supply of executive housing and environmental quality.		
					Restrict development of flats in Ashbrooke and around Queen Alexandra Rd (low density). Care over types of development in conservation areas in general. Higher densities as in Q25.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No, no need for a maximum density policy innovative design could allow for quality high density urban living. The important thing is to ensure privacy daylight amenity and other space is provided to an acceptable standard.		
					Depends on the relevance of the existing threshold to the results of the HMA.		
					Both site size and dwellings proposed should be used to define threshold for affordable housing to provide flexibility.		
					Percentages should be set regarding the amount of affordable housing that should be provided. It would surely be logical to use the results of the HMA to determine policy. In any event it is likely that at the planning application stage there will be some form of negotiation.		
					Yes consideration should be given to circumstances where affordable, special needs and extra care homes can be provided on another site. Where locationally the site may not be suitable for special needs housing (away from bus routes or shops, conversions of listed buildings preclude disabled access) the developer should still meet their obligations.		
					Option 2 - A criteria based approach should be adopted for special needs housing as more flexibility to individual circumstances and opportunities with a criteria based approach.		
					Option 3 - Consider opportunities for sub-regional sites for gypsy and travellers. Any need is likely to be shared with Chester-le-street and Durham city council.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Option 1 - yes home zones should be encouraged in new residential layouts.		
					Option 1- yes a variety of architectural styles should be considered. Variety of styles in different localities could reinforce the distinctive character of different parts of the city. Care must be taken in conservation areas and in the vicinity of listed buildings.		
					Yes - specific architectural styles should be restricted to certain areas of the city. Central Sunderland sites provide opportunities for large scale development with contemporary designs (not standard developer house types) to provide quality identifiable distinctive environments for new communities. Have very mixed views on high rise development - ideally would only be located to punctuate skyline/create landmark at focal points and care must be taken over sensitive environments, e.g. conservation areas, listed buildings, river corridor.		
					Agree with range of issues covered by D.C. policies		
					No other issues need to be considered in detail for possible inclusion in the DPD in relation to planning applications.		
					Housing numbers: The council is still arguing for a higher level of new housing through RSS. The lower figure as stated in table 1 (p20) is more realistic in the light of previous experience in the context of attempting to stem out migration and should form the basis of the LDF housing allocations until such a time as there is evidence of a slowdown in out migration, at which time housing need should be reviewed.		
					Fundamental flaw in table 2 relating to the over provision/shortfall of sites figures for both the RSS requirement and SCC response requirement in the periods 2011-2016 and 2016-202. The figures do not carry forward the over provision figure in 2004-		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					201, this has only be factored in the 'total' figures. Therefore the shortfalls in the two latter periods are not considered 'real'		
					Sub Areas: The allocation of new housing to each sub area should be based on a more tactical strategic approach based on varying levels of housing according to factors such as for example accessibility to employment opportunities. In this respect the growing role of employment at Rainton Bridge may be relevant, as is the potential for development of existing (and possibly new) employment sites in (and possibly in the vicinity of) Washington		
					Growth areas South Sunderland: Debatable whether in aggregate the figures for potential new houses in the defined South Central Sunderland area (upper end) will allow sufficient 'free' development to meet local needs elsewhere. Therefore the appropriateness of the upper figures is queried		
					Growth areas figures for Coalfield: The higher growth option proportion figure is such that it may not allow adequately for new development elsewhere in the area. Therefore the appropriateness of the upper figures is queried		
Chris Mullin MP	83				Yes the Council needs a policy that encourages a mix of housing tenures. Proposed developments along the river should contain elements of both social and affordable housing. Council should be making more use of section 106 agreements if they are not doing so already		
					Favour option 2, no further release of greenfield sites for the foreseeable future. Problem with creating exceptions is that voracious developers will always find a way through. There is plentiful supply of brownfield land that can also accommodate 'executive' housing. Do not accept that Sunderland is short of 'executive housing' plentiful supply in Ashbrooke, Roker and Thornhill. No more car-dependent new developments in green fields on the periphery of the city		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes happy to see a variety of architectural styles on sites that do not clash with the better quality traditional housing provided quality is the outcome. It would be nice to build something that is environmentally sustainable and which doesn't have to be knocked down in 30 years time		
					Would like an issue raised with regard to whether gardens should be treat as brownfield land and consequently whether there is a need to bring such sites forward for housing use in view of the large supply of non- garden brownfield land in the city. Proposed that the Local Development Framework should include a statement that in the future there will be a presumption against building in our few remaining large gardens and remaining large gardens		
Mr Albert le Blond	942	Turley Associates	86	Wish to see North Road area as a new housing growth area, believe that development of the North Road site will be of a strategic scale that can complement the Hetton Downs housing renewal initiative and provide wider community benefits for Hetton-le-Hole. It is envisaged that the site could provide 560 units. The site is considered to be close to Hetton le Hole centre and transport connections and thereby engender a proportionately lesser need to travel to get to higher-order facilities that are not typically found in Hetton -le Hole and Easington Lane local centres. The site is considered to bear many similarities with the allocated Easington Lane sites not least in its spatial relationship to Hetton-le-Hole		North Road, Hetton le Hole	
Riverside Developments UK Ltd	574	Ward Hadaway	89	Not clear the extent of boundaries of the Roker/Seaburn/Fulwell area. Support the high growth option (4). This is considered to be the only appropriate strategy for the area			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Believe that the former Dagmar Public House site is included in this area			
				Again it is not clear what the parameters of the defined growth areas are. Support growth in North Sunderland in particular the Southwick area - it is well served by public transport, excellent access to local services and should be targeted as a growth area in view of the benefits this will bring for the regeneration of the area			
						Former Dagmar Public House	
					Support option 1 that greenfield land should be allowed to come forward in exceptional circumstances. It should be recognised that with the introduction of PPS3 the importance of sustainability of sites and particular deliverability have been raised from previous national guidance on housing in PPS3. Whilst previously developed land and buildings are still the priority for new housing in PPS3, sustainable and deliverable greenfield sites for new housing are also to be allowed to come forward, particularly where previously developed land is not delivering the necessary housing required. It is considered in view of net additions in the city over the first three years of the RSS period being significantly below those set out in RSS and in view of sites such as former Groves Cole Cranes site and the former Vaux Brewery site unlikely to be delivered in the next 5 years and possibly beyond, that therefore the council needs to consider the		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					allocation of some 'deliverable' greenfield sites to meet 5 year housing land supply. Reference is made to the former Dagmar Public House site		
					and how the allocation of this site in the period 2004-2011 will help to achieve the 5 year deliverable housing land supply and provide wider benefits i.e. regeneration of the Southwick area, support local services etc		
BDW Trading Ltd (formerly Barratt Homes Newcastle)	846	Wardhadaway	89		Housing Numbers: Support the Council's proposed allocation of land for 15,150 net additions		
				Support the high growth strategy option 2. Believe that the Central Sunderland area represents the most sustainable location for new housing and offers the highest levels of previously developed land and buildings. Support Central Sunderland as an identified housing growth area			
						Land at Sheepfolds Road, Central Sunderland as a housing led mixed use allocation	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Support the medium growth option for Washington (3). The medium growth option matches the Core Strategy preferred option policy CS4 allocation. Support identification of Washington as a housing growth area			
						Three sites at Pattinson Industrial Estate	
				The document does not make specific reference to Houghton le Spring/Hetton le Hole and Easington Lane as growth areas. Recognition of these areas should be made. Suggest that Houghton le Spring/Hetton le Hole and Easington Lane are included as specific growth areas at preferred options stage			
						Land at Houghton Road, Rainton Bridge and Land at Hetton Moor House, Easington Lane	
					Support option 1 that greenfield land should be allowed to come forward in exceptional circumstances. It should be recognised that with the introduction of PPS3 the importance of sustainability of sites and particular deliverability have been raised from previous national guidance on housing in PPS3. Whilst previously developed land and buildings are still the priority for new housing in PPS3, sustainable and deliverable greenfield sites for new housing are also to be allowed to come forward, particularly where previously developed land is not delivering the necessary housing required. It is considered in view of net additions in the city over the first three years of the RSS period being significantly below those set out in RSS and in view of sites such as former Groves Cole Cranes site and the former Vaux Brewery site unlikely to be delivered in the next 5 years and possibly beyond, that therefore the council needs to consider the allocation of some 'deliverable' greenfield sites to meet 5 year housing land supply. Submit that allowing a number of sustainable		
					greenfield sites to come forward particularly where they would deliver regeneration benefits would assist the Council in achieving its housing aspirations and reduce out-migration from the City		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes agree to the use of a sustainability assessment and would also support the position where a greenfield site should be released where it performs better than a previously developed site. However, consider that the scoring system requires considerable amendment as set out in response to question 42		
					Support option 2 for different levels of density based on distances from city/town/local centres and transport interchanges		
					Yes support a strategy for low density housing for executive housing sites.		
					Washington is considered an appropriate location for executive housing		
					No. Would not support a policy that sets out maximum density		
					Would support option 1 i.e. retain the existing 50 dwelling threshold for affordable housing requirement		
					Support option 2 i.e. the defined threshold for affordable housing should be based on the number of dwellings proposed		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support option 1 i.e. continued negotiation with developers over the provision of affordable housing rather than set percentages to take account of individual site circumstances		
							Q6 - contamination. Strongly object to the scoring system for contaminated sites. There is no reasonable justification for penalising sites that are contaminated. Many previously developed land sites are likely to be contaminated. Therefore to obtain a negative score if contamination is present is likely to reduce the chances of a site coming forward. In the current system greenfield sites would gain points ahead of previously developed sites going against national, regional and local planning policy. The proposed scoring system is contrary to policy CS19 of the core strategy which is seeking to encourage the de-contamination of sites via new development. The current scoring would hinder such sites coming forward for development leaving them un- decontaminated. Suggest that Q6 is removed from the survey or the potential remediation of a site be recognised with a positive score
							Q7 - The stability of a site should not be penalised with a negative score acknowledging that many previously developed sites are likely to also have stability issues. The bringing forward of a site with stability issues is likely to rectify the problems and have positive, rather than negative impact on the City. We would suggest amendment to the scoring system on stability
							Q8 - Would suggest that sites in Flood Zone 2 (where housing can be appropriate subject to an FRA) should score 2 points rather than 0

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							Q10 - Suggest that there should be a positive score (+points) for sites that will save, or bring back to use, listed buildings, preserve archaeological sites or 'preserve/enhance' a conservation area. Such an approach would be more in line with the rest of the scoring system (which rewards positive outcomes) and with Policy SC13 of the Core Strategy
							Q11 - Question how the surveyor of a site would know whether there would be impact upon wildlife habitats without having seen or undertaken an ecological survey? This is likely to lead to assumptions being made inaccurate scoring of sites
Hellens Development Ltd	555	Wardhadaway	89		Housing Numbers: Support the Council's proposed allocation of land for 15,150 net additions		
				Support the high growth strategy option 2 for Central Sunderland of 3,800 dwellings post 2012 acknowledging that this area represents the most sustainable location for new housing in the City and offers the highest levels of previously developed land			
				Would put forward land at All Saints House, Portobello Lane. Monkwearmouth as a suitable housing allocation		All Saint House, Portobello Lane Monkwearmouth	
				Support the medium growth option for Washington (3). The medium growth option matches the Core Strategy preferred option policy CS4 allocation. Support identification of Washington as a housing growth area			
						Following sites put forward for housing allocation - three sites at Pattinson Industrial Estate (South), 1 site at Pattinson Road and a further site at Stirling Close (Pattinson Industrial Estate - south)	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Support the high growth strategy (3) for Fencehouses of approximately 1,000 new dwellings as it represents a major urban area within the Coalfield Regeneration Area. Only with high growth in all the Coalfield Areas will regeneration benefits be seen. Core Strategy policy CS4 proposes 4242 net additions in the Coalfield Area and therefore housing growth in areas such as Easington Lane and Fencehouses needs to be High Growth to achieve these housing aspirations			
				Would like to put forward Lambton Lane, Fencehouses as a mixed-use development site including residential dwellings		Land at Lambton Lane, Fencehouses as a mixed use development site including residential dwellings	
				The document does not make specific reference to Houghton le Spring/Hetton le Hole as a growth area. However, it considered that it should be recognised as such as it is clearly an area that is significant to the regeneration of the Coalfield Area			
					Would like site at land north of Eppleton Colliery County School, Hetton Downs to be a proposed housing allocation in the DPD. It is identified as a proposed housing site in the Hetton Downs Area Action Plan Preferred Options Document.	Land north of Eppleton Colliery County School, Hetton Downs	
					Support option 1 that greenfield land should be allowed to come forward in exceptional circumstances. It should be recognised that with the introduction of PPS3 the importance of sustainability of sites and particular deliverability have been raised fro previous national guidance on housing in PPS3. Whilst previously developed land and buildings are still the priority for new housing in PPS3, sustainable and deliverable greenfield sites for new housing are also to be allowed to come forward, particularly where previously developed land is not delivering the necessary housing		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					required. It is considered in view of net additions in the city over the first three years of the RSS period being significantly below those set out in RSS and in view of sites such as former Groves Cole Cranes site and the former Vaux Brewery site unlikely to be delivered in the next 5 years and possibly beyond, that therefore the council needs to consider the allocation of some 'deliverable' greenfield sites to meet 5 year housing land supply. Submit that allowing a number of sustainable		
					greenfield sites to come forward particularly where they would deliver regeneration benefits would assist the Council in achieving its housing aspirations and reduce out-migration from the City		
					Yes agree to the use of a sustainability assessment and would also support the position where a greenfield site should be released where it performs better than a previously developed site. However, consider that the scoring system requires considerable amendment as set out in response to question 42		
					Support option 2 i.e. the defined threshold for affordable housing should be based on the number of dwellings proposed		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes support a strategy for low density housing for executive housing sites.		
					Washington is considered an appropriate location for executive housing		
					No. Would not support a policy that sets out maximum density		
					Would support option 1 i.e. retain the existing 50 dwelling threshold for affordable housing requirement		
					Support option 2 i.e. the defined threshold for affordable housing should be based on the number of dwellings proposed		
					Support option 1 i.e. continued negotiation with developers over the provision of affordable housing rather than set percentages to take account of individual site circumstances		
							Q6 - contamination. Strongly object to the scoring system for contaminated sites. There is no reasonable justification for penalising sites that are contaminated. Many previously developed land sites are likely to be contaminated. Therefore to obtain a negative score if contamination is present is likely to reduce the chances of a site coming forward. In the current system greenfield sites would gain points ahead of previously developed sites going against national, regional and local planning policy. The proposed scoring system is contrary to policy CS19 of the core strategy which is seeking to encourage the de-contamination of sites via new development. The current scoring would hinder such sites coming forward for development leaving them un- decontaminated. Suggest that Q6 is removed from the survey or the potential remediation of a site be recognised with a positive score
							Q7 - The stability of a site should not be penalised with a negative score acknowledging that many previously developed sites are likely to also have stability issues. The bringing forward of a site with stability issues is likely to rectify the problems and have positive, rather than negative impact on the City. We would suggest amendment to the scoring system on stability

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							Q8 - Would suggest that sites in Flood Zone 2 (where housing can be appropriate subject to an FRA) should score 2 points rather than 0
							Q10 - Suggest that there should be a positive score (+points) for sites that will save, or bring back to use, listed buildings, preserve archaeological sites or 'preserve/enhance' a conservation area. Such an approach would be more in line with the rest of the scoring system (which rewards positive outcomes) and with Policy SC13 of the Core Strategy
							Q11 - Question how the surveyor of a site would know whether there would be impact upon wildlife habitats without having seen or undertaken an ecological survey? This is likely to lead to assumptions being made inaccurate scoring of sites
Owner of Woodbine Terrace/Ditchburn Terrace, Pallion		Wardhadaway	89		Sub Areas/Growth Area Approach: The distinction between the four Sub Areas and the eight growth areas is critical and upon first reading is not easy to understand. In effect what is being consulted in the HADPD is just the allocation between the eight identified Growth Areas as core strategy policy CS4 has already broken down the proposed % for each sub area.		
					Sub Areas/Growth Area Approach: Not clear where the exact boundaries of the Growth Areas are- too diagrammatic. There could be questions in the future as to whether a particular site falls into or outside one of these areas, with possible implications for its chances of success if proposed for allocation.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Housing Numbers: Support the Council's position in respect of the 15,150 allocation. It is suggested that the RSS Proposed Changes figure (if that is maintained through the second consultation stage) should not be regarded as a ceiling if development levels exceed those allocations, especially if sites some forward ins sustainable brownfield locations i.e. that accord with RSS Policy 3. PPS3 Para. 64 on flexibility is also noted.		
					Clearance and Replacement: The way the document deals with clearance and replacement is a little confusing. The net reduction figure of 300 dwellings for private sector renewal stock should be discounted from the net additional dwellings figure.		
					Definition of Committed dwellings: Wish to make comment on the way in which committed dwellings appears to have been calculated. In the case of the Central Area South Growth Area it seems that the committed figure of nearly 3000 dwellings stated must include a) the Vaux site and the Groves site. Whilst not objecting against these sites for residential, it could arguably be at odds with advice contained at Para. 58 of PPS3, in terms of deliverability, to include them as commitments at the present time. Not convinced that the Groves and Vaux site should be treated as 'committed' on the basis of their current planning status. As a general point, the HADPD could perhaps be clearer one exactly what is meant by the term 'committed site', perhaps as an additional footnote to table 2		
				Central Area should be the preferred area, due to the need to achieve the critical mass to deliver comprehensive improvement and an acceptable living environment			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Sites should include a mix of uses providing they are of sufficient size to accommodate a scale of development where multiple uses are appropriate. There may also be a need to look comprehensively at an area and the range of uses that can be accommodated on more than one site, rather than dogmatically requiring mixed use on every site, regardless of size and context.		
						land at North End of Woodbine Terrace/Ditchburn Terrace	
					Principle of using such a methodology is supported. Only comments are that there may not be enough weight given to the benefit that developing a site could bring in the scoring proposed. For example, if a site is contaminated but development will facilitate remediation, or will bring a Listed Building at risk back into use, then such positive factors should be reflected in the scoring		
Hellens Development Ltd	555	Ward Hadaway	89	Central Sunderland:- High Growth, approximately 3,800 dwellings			
				We would put forward the land at All Saints House, Portobello Lane, Monkwearmouth, as a suitable housing allocation.		We would put forward the land at All Saints House, Portobello Lane, Monkwearmouth, as a suitable housing allocation.	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Washington:- Medium Growth, approximately 1,000 dwellings			
				We would put forward the following sites, as identified on the attached plans and above as housing allocations within the Housing Allocations DPD. · Site 22/5 (Area B), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area E), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area G), Pattinson Industrial Estate (South), Washington · Site 22/6, Pattinson Road, Washington · Site at Stirling Close, Pattinson Industrial Estate (South), Washington		We would put forward the following sites, as identified on the attached plans and above as housing allocations within the Housing Allocations DPD. · Site 22/5 (Area B), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area E), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area G), Pattinson Industrial Estate (South), Washington · Site 22/6, Pattinson Road, Washington · Site at Stirling Close, Pattinson Industrial Estate (South), Washington	
				Fence Houses:- High Growth, approximately 1,000 dwellings			
				We would put forward the land at Lambton Lane, Fencehouses, as outlined in red on the attached plan and as referred to above as a mixed-use development site including residential dwellings.		We would put forward the land at Lambton Lane, Fencehouses, as outlined in red on the attached plan and as referred to above as a mixed-use development site including residential dwellings.	
				The Housing Allocations DPD does not make specific reference to Houghton le Spring/Hetton le Hole as a growth area. However, we would submit that it should be recognised as such in the housing allocations DPD as it is clearly an area that is significant to the regeneration of the Coalfield Area			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
						<p>We would specifically identify to the Council the land north of Eppleton Colliery County School, Hetton Downs as suitable as a housing allocation to be included in the Housing Allocations DPD. The site, outlined in red on the attached plan and as referred to above, is a proposed housing site in the Hetton Downs Area Action Plan Preferred Options Document (May 2007). The housing, public transport corridor and green wedge benefits that the site would bring forward should be recognised through allocation in the Housing Allocations DPD. .</p>	
						<p>The site is deliverable in accordance with paragraph 54 of PPS3 and would therefore come forward and deliver housing within the next five years</p>	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Yes - in exceptional circumstances We would support option (1) that Greenfield land should be allowed to come forward in exception circumstances. It should be recognised that with the introduction of PPS3 the importance of sustainability of sites and particularly deliverability have been raised. Whilst previously developed land and buildings are still the priority for new housing, sustainable and deliverable greenfield sites for new housing should also be allowed to come forward, particularly where previously developed land is not delivering the necessary housing required. In Sunderland, net additions over the first three years of the RSS period have been significantly below those set out in the RSS. The Council is also relying heavily in its Housing Land Availability Register on sites such as the Vaux Brewery and Groves Cranes delivering new housing. The reality is that these sites (equating to an estimate 2,000 dwellings) are highly unlikely to be delivered in the next five years and possibly beyond.</p>		
					<p>We would submit that allowing a number of sustainable Greenfield sites to come forward, particularly where they would deliver regeneration benefits would assist the Council in achieving its housing aspirations and reduce out- migration from the City.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Yes sustainability assessments should be used to determine at what point a greenfield site should be released. We would agree to the use of a sustainability assessment and would also support the position where a Greenfield site should be released where it performs better than a previously developed site. However, we consider that the scoring system proposed by the Council requires considerable amendment as set out in our responses to question 42 below.</p>		
					<p>Option 2. Set different levels of density in different locations We would support Option 2 for different levels of density based on distances from city/town/local centres and transport interchanges.</p>		
					<p>Yes should have exceptions in place for densities lower than 30dph We would support a strategy for low density housing for executive housing sites.</p>		
					<p>We would suggest that Washington would be an appropriate area of the City for executive housing.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No. No need for a maximum density policy as design standards should control this. We would not support the use of maximum densities for new housing sites.		
					No keep the existing threshold for affordable housing We would support retaining the existing threshold of 50 dwellings before a site requires affordable housing.		
					Dwellings proposed be used for defining thresholds We would support the use of the number of units to determine the requirement for the number of affordable houses on a site.		
					Continue with negotiation for amount of affordable housing provided We would support continued negotiation with developers over the provision of affordable housing rather than set percentages to take account of individual site circumstances.		
							We comment on each of the Questions of the Draft Strategic Housing Land Availability Assessment in turn below: Q6 – Contamination We strongly object to the scoring system for contaminated sites. We would suggest that there is no reasonable justification for penalising sites that are contaminated. If the Council are seeking to encourage the use of previously developed land, the likelihood is that such land will be contaminated. Therefore to obtain a negative score if contamination is present is likely to reduce the chances of a site coming forward. In the current scoring system, Greenfield sites would gain points ahead of a previously developed site. This goes against National, Regional and Local Planning Policy. We would submit that the proposed scoring system is contrary to proposed Core Strategy Policy CS19, which is seeking to encourage the de-contamination of sites via new development. It should also be recognised that without new development, de-contamination of sites is unlikely to occur due to financial constraints.
							Therefore contaminated sites should be supported to come forward for re-development. The current scoring system would hinder such sites to come forward We would suggest that either Q6 be removed from the survey or the potential remediation of a site be recognised with a positive score. Q7 – Stability As with contamination above, the stability of a site should not be penalised with a negative score acknowledging that many previously developed sites are likely to also have stability issues. The bringing forward of a site with stability issues is likely to rectify the problems and have positive, rather than negative impact on the City. We would suggest amendment to the scoring system on stability. Q8 – Flood Risk We would suggest that sites in Flood Zone 2 (where housing can be appropriate subject to an FRA) should score 2 points rather than 0. Q10 – Listed Buildings/Archaeology/Conservation Areas

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							<p>We would suggest that there should be a positive score (+5 points) for sites that will save, or bring back into use, listed buildings, preserve archaeological sites or 'preserve/enhance' a conservation area. Such an approach would be more in line with the rest of the scoring system (which rewards positive outcomes) and with Policy SC13 of the Core Strategy. Q11 Wildlife habitats We would question how the surveyor of a site would know whether there would be impact upon wildlife habitats without first having seen or undertaken an ecological survey? This is likely to lead to assumptions being made inaccurate scoring of sites.</p>
Ward Hadaway	89			Central Sunderland:- High Growth, approximately 3,800 dwellings			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Yes, land at North end of Woodbine Terrace/Ditchburn Terrace, Pallion, 1.76 ha			
				Central Area should be preferred area, due to the need to achieve the critical mass to deliver comprehensive improvement and an acceptable living environment. There is potential to further uplift the image of the City. Development here would be sustainable, involving reuse of PDL and with good transportation links including the Metro.			
					Broadly speaking site should include a mix of uses providing they are of sufficient size to accommodate a scale of development where multiple uses are appropriate. There may also be a need to look comprehensively at an area and the range of uses that can be accommodated on more than one site, rather than dogmatically requiring mixed use on every site, regardless of size and context.		
						Land at North End of Woodbine Terrace/Ditchburn Terrace – 1.76 hectares.	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes should have exceptions should in place for developing affordable housing sites below 30dph		
					No. No need for a maximum density policy as design standards should control this.		
					Particular areas/sites within the city for maximum density policy		
					No keep the existing threshold for affordable housing		
					both defined threshold be based on the size of the site and the number of dwellings		
					Continue with negotiation for amount of affordable housing provided		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to reserving sites for special needs housing		
					Yes encourage home zones		
					Yes encourage variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city.		
					Yes agree with the range of D.C issues		
							Yes agree with the use of an agreed scoring system
Ward Hadaway	89			Seaburn/Fulwell/Roker :High Growth, approximately 1,000 dwellings			
				Yes. Land north of the former Dagmar Public House, Whitchurch Road, (Housing allocation NA7 (5) of the adopted Unitary Development Plan 1998.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
						Yes. Land north of former Dagmar Public House, Whitchurch Road, (Housing allocation NA7(5) of the adopted City of Sunderland UDP 1998)	
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Negotiate with developer for tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock by identifying and planning for particular shortfalls and possibly particular areas		
					Yes - in exceptional circumstances Where sites are allocated for housing and where sites would bring forward regeneratative benefits in areas requiring regeneration. Where land is not afforded any landscape protection designation in accordance with Policy 3 of emerging RSS. Where sites would complete the development of a site proposed for development as part of an existing housing allocation. To meet the housing requirements for the City set out in RSS. Where sites are deliverable in accordance with PPS3 and are required to meet the City's requirement for a 5 year supply of housing sites.		
					Yes sustainability assessments should be used to determine when greenfield sites should be released		
					Option 2. Set different levels of density in different locations		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes should have exceptions in place for densities lower than 30dph		
					No. No need for a maximum density policy as design standards should control this.		
					No keep the existing threshold for affordable housing		
					Dwellings proposed be used for defining thresholds		
					Continue with negotiation for amount of affordable housing provided		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to special needs housing.		
					No home zones should not be encouraged		
					No a variety of architectural styles should not be encouraged		
					No specific architectural styles should not be restricted to certain areas of the city.		
					Yes agree with range of D.C issues		
							We agree with a scoring system however the one proposed needs to be significantly amended. We would submit that potential sites should not be penalised for being contaminated (Q6) particularly when Policy CS19 of the Sunderland Core Strategy encourages de-contamination of sites. The same applies to stability (Q7) Why should a site loose points because of stability when a site can be made stable by development? In respect to Q8 we would suggest that a site in flood zone 2 should score 2 points and not 0 given that PPS25 would allow housing one flood zone 2 site (subject to an FRA) In respect to Q10, there should be a positive score for sites that have a positive impact on listed buildings/conservation areas i.e. bringing buildings at risk back into use. Such an approach would comply with Policy CS13 of the Sunderland Core Strategy. With respect to Q11, we would question how the surveyor will know what the impact will be on wildlife without an ecological assessment having been undertaken?
							In respect to Q13, how will the surveyor know if the site has utilities? Also, we consider that a site should not be penalised for not having utilities as these can be provided by the developer and can be a positive result of development rather than a negative.

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
BDW Trading Ltd	555	Ward Hadaway	89	Central Sunderland:- High Growth, approximately 3,800 dwellings			
				We would put forward the land at Sheepfolds Road, Central Sunderland, as outline in red on the attached plan as a suitable housing led mixed-use allocation.		We would put forward the land at Sheepfolds Road, Central Sunderland, as outline in red on the attached plan as a suitable housing led mixed-use allocation	
				Washington:- Medium Growth, approximately 1,000 dwellings			
				We would put forward the following sites, as identified on the attached plans and above as housing allocations within the Housing Allocations DPD. · Site 22/5 (Area B), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area E), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area G), Pattinson Industrial Estate (South), Washington		We would put forward the following sites, as identified on the attached plans and above as housing allocations within the Housing Allocations DPD. · Site 22/5 (Area B), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area E), Pattinson Industrial Estate (South), Washington · Site 22/5 (Area G), Pattinson Industrial Estate (South), Washington	
				The Housing Allocations DPD does not make specific reference to Houghton le Spring/Hetton le Hole and Easington Lane as growth areas. However, we would submit that it should be recognised as such in the housing			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>allocations DPD as they are clearly areas that are significant to the regeneration of the Coalfield Area. We would suggest that Houghton le Spring/Hetton le Hole and Easington Lane should be included as specific growth areas in the preferred options Housing Allocations DPD.</p>			
						<p>We would specifically identify to the Council the land at Houghton Road, Rainton Bridge as suitable as a housing allocation to be included in the Housing Allocations DPD. We would also submit the land at Hetton Moor House, Easington lane as a suitable housing allocation.</p>	
					<p>Yes - in exceptional circumstances We would support option (1) that Greenfield land should be allowed to come forward in exception circumstances. It should be recognised that with the introduction of PPS3 the importance of sustainability of sites and particularly deliverability have been raised from previous national guidance on housing in PPG3. Whilst previously developed land and buildings are still the priority for new housing in PPS3, sustainable and deliverable greenfield sites for new housing are also to be allowed to come forward, particularly where previously developed land is not delivering the necessary housing required. In Sunderland, net additions over the first three years of the RSS period have been significantly below those set out in the RSS. This is clear from the Council's own publication 'Changes to the Dwellings Stock (Financial Years) in the City of Sunderland' which demonstrates that only 123, 245 and 370 net additions to the housing stock were constructed in the financial years 04/04 to 03/07.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>The Council is also relying heavily in its Housing Land Availability Register on sites such as the Vaux Brewery and Groves Cranes delivering new housing. The reality is that these sites (equating to an estimate 2,000 dwellings) are highly unlikely to be delivered in the next five years and possibly beyond. The Council therefore needs to consider allocating some Greenfield sites that can be 'deliverable' in the next five years. We would submit that allowing a number of sustainable Greenfield sites to come forward, particularly where they would deliver regeneration benefits would assist the Council in achieving its housing aspirations and reduce out- migration from the City.</p>		
					<p>Yes sustainability assessments should be used to determine at what point a greenfield site should be released We would agree to the use of a sustainability assessment and would also support the position where a Greenfield site should be released where it performs better than a previously developed site. However, we consider that the scoring system proposed by the Council requires considerable amendment as set out in our responses to question 42 below.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Option 2. Set different levels of density in different locations We would support Option 2 for different levels of density based on distances from city/town/local centres and transport interchanges.		
					Yes should have exceptions in place for densities lower than 30dph We would support a strategy for low density housing for executive housing sites.		
					We would suggest that Washington would be an appropriate area of the City for executive housing.		
					No. No need for a maximum density policy as design standards should control this. We would not support the use of maximum densities for new housing sites.		
					No keep the existing threshold for affordable housing We would support retaining the existing threshold of 50 dwellings before a site requires affordable housing.		
					Dwellings proposed be used for defining thresholds We would support the use of the number of units to determine the requirement for the number of affordable houses on a site.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Continue with negotiation for amount of affordable housing provided We would support continued negotiation with developers over the provision of affordable housing rather than set percentages to take account of individual site circumstances.		
							We comment on each of the Questions of the Draft Strategic Housing Land Availability Assessment in turn below: Q6 – Contamination We strongly object to the scoring system for contaminated sites. We would suggest that there is no reasonable justification for penalising sites that are contaminated. If the Council are seeking to encourage the use of previously developed land, the likelihood is that such land will be contaminated. Therefore to obtain a negative score if contamination is present is likely to reduce the chances of a site coming forward. In the current scoring system, Greenfield sites would gain points ahead of a previously developed site. This goes against National, Regional and Local Planning Policy. We would submit that the proposed scoring system is contrary to proposed Core Strategy Policy CS19, which is seeking to encourage the de-contamination of sites via new development.
							It should also be recognised that without new development, de-contamination of sites is unlikely to occur due to financial constraints. Therefore contaminated sites should be supported to come forward for re-development. The current scoring system would hinder such sites to come forward We would suggest that either Q6 be removed from the survey or the potential remediation of a site be recognised with a positive score. Q7 – Stability As with contamination above, the stability of a site should not be penalised with a negative score acknowledging that many previously developed sites are likely to also have stability issues. The bringing forward of a site with stability issues is likely to rectify the problems and have positive, rather than negative impact on the City.

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							<p>We would suggest amendment to the scoring system on stability. Q8 – Flood Risk We would suggest that sites in Flood Zone 2 (where housing can be appropriate subject to an FRA) should score 2 points rather than 0. Q10 – Listed Buildings/Archaeology/Conservation Areas We would suggest that there should be a positive score (+5 points) for sites that will save, or bring back into use, listed buildings, preserve archaeological sites or 'preserve/enhance' a conservation area. Such an approach would be more in line with the rest of the scoring system (which rewards positive outcomes) and with Policy SC13 of the Core Strategy. Q11 Wildlife habitats We would question how the surveyor of a site would know whether there would be impact upon wildlife habitats without first having seen or undertaken an ecological survey? This is likely to lead to assumptions being made inaccurate scoring of sites.</p>
Gentoo	119				<p>Housing Numbers: Welcome the City Council's request for a higher allocation of new housing during the latest round of Regional Spatial Strategy consultation. The proposed new allocation involving a reduction in the 2004-2011 targets and a major increase in allocation for 2011-2016 and 2016-2021, will potentially avoid overexposure during the current market slowdown. However, the targets which have been adjusted upwards in the subsequent periods will prove challenging to meet</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Affordability issue: Re-iterate confirmation from their own research that there is anecdotal evidence to suggest a growing affordability issue in the City		
				Chapelgarth should contain significant affordable provision to meet the specific housing needs of Sunderland's population			
				Ryhope should contain significant affordable provision to meet the specific housing needs of Sunderland's population			
					Support the Core Strategy objective to provide a range and choice of housing types and tenures for all, which are affordable, energy efficient and designed and built to high standards		
					Support option 2 i.e. retain flexibility in policy to address any imbalance in the housing stock, by identifying and planning for particular shortfalls of housing types and particular areas		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support option1 i.e. their is a policy in place that encourages the mix of housing tenure. This should be a clear policy to avoid negotiation removing significant affordable elements from schemes		
					Support a combination of both options i.e. ensure a mix of housing tenures on all sites and retain a degree of flexibility to identify particular shortfalls in particular areas		
					Support a combination of options 1 and 3 i.e. yes greenfield land should be released in exceptional circumstances to aid the regeneration and economic development of the city as a whole; however such cases would need to be carefully considered. Exceptions could include the exhaustion of viable brownfield sites, or a very clear shortage of a specific house type in an area that is restricting the city reaching its economic potential, such as executive housing. However, the key principle should still be the objective of maximising the re-use of previously developed land for a range of development uses, so as to minimise urban development of greenfield land		
					Support option 2 - i.e. set different levels of density in differently locations, rather than setting a minimum density of dwellings per hectare on all sites, this would provide the flexibility required to fully take advantage of the local circumstances to provide the most suitable house type, rather than being restrained by pre set levels		
					Yes agree that densities lower than 30 dwellings per hectare should be allowed in certain circumstances such as executive housing. The level of executive housing available in the city is at a very low level compared to the North East and national averages. Greater provision in this sector, in suitable areas, would provide an enhanced ability to attract and retain high earning residents to the city and stimulate economic growth		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes support option 1, would like to see consideration given to allowing lower densities for the provision of affordable housing. The key demographic, which such a measure would be beneficial to, is the growing elderly population in our areas who demand bungalow accommodation		
					No, support option 29 as the City Council is not required to set a maximum density for housing developments; it would be an unnecessary constraint to set such a limit. Design standards should control this.		
					Support option 2 i.e. lower the threshold for affordable housing, to meet the needs of the growing number of residents who are unable to gain a foothold on the property ladder and provide sustainable mixed communities. Moves to lower the threshold would of course have to take into account whether smaller sites would still be viable to developers		
					Yes support looking to consider encouraging house builders to incorporate Home Zones within new residential layout, as highlighted as good practice within the Government's Manual for Streets Guidance		
					Yes support encouraging a variety of architectural styles that reflect the positive characteristics of the various areas of the City		
					No, do not believe that specific architectural styles should be restricted to certain areas of the city, so that flexibility and choice in future decision making can be retained		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Yuill Homes	121			Fence Houses: -High Growth, approximately 1,000 dwellings			
					Land at Black Boy Road, Chilton Moor (as previously submitted). The area west of Front Street Chilton Moor, between the working men's club and the railway line and incorporating the allotments, would benefit enormously from revitalisation and environmental improvements, and this could be achieved without public subsidy through a housing development on the site at Black Boy Road.		
					No - each site should be considered on its merits in a particular locality. Insistence on mixed use through general criteria as suggested is inflexible and may threaten delivery of housing, for example if viability is an issue. This is particularly important in the development of brownfield sites. Sites within City and Local Centres tend to be located in mixed use areas anyway, so the value of an additional policy requiring their development to be mixed use is questionable. It may be more appropriate to prepare design briefs for some of the larger sites, should mixed use be deemed more sustainable.		
						Land at Black Boy Road, Chilton Moor, as previously submitted (a wider area than the recent planning application).	
					Neither the above options are appropriate. It is agreed that the Council should aim to achieve an appropriate mix to the market overall, and that imbalances or shortfalls should be addressed. These should be identified in the Strategic Housing Market Assessment, prepared with the full input of the house building industry. In practical terms, a policy or policies specifying mix in certain areas is unwieldy and not easily updated/replaced. The best approach would be to word the policy to refer to shortfalls identified in the Strategic Housing Market Assessment, and to assess planning applications in relation to the evidence base therein.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Negotiate with developer for housing tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock by identifying and planning for particular shortfalls and possibly particular areas. It is useful to have policy guidance in place when assessing viability of site development; however this comes with the strong recommendation that the policy be worded such that the tenure mix specified is a guide (based on firm evidence of need in that particular locality), and may be subject to negotiation if the tenure mix is not viable on a particular site. A policy to ensure a rigid mix of tenures on all sites is too inflexible and may threaten housing delivery.		
					Yes - in exceptional circumstances. Greenfield land should be released where there is insufficient brownfield land to meet the area's housing needs, where, other than its greenfield status it is sustainable (e.g. close to existing built up area, services and employment), and also where it may provide the opportunity for development-led regeneration and local improvements.		
					Yes sustainability assessments should be used to determine at what point greenfield land should be released.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Both options are blunt tools. Each could undermine: a. regeneration efforts aimed at revitalising e.g. an existing higher-density area; b. meeting the needs identified in the SHMA and c. design principles based on the particular physical attributes of a location. Each site should be considered on its merits. The land market generally sees to it that land is used efficiently, so, unless a site is specifically developed for executive housing (and such sites can be identified), development will be at a density of at least 30/Ha anyway. Design/development briefs for larger sites and the guidance given in the SHMA will provide the appropriate density sought through the two options above.</p>		
					<p>Yes should have exceptions in place for densities lower than 30dph Please see answer to previous question.</p>		
					<p>No exceptions should be in place for developing affordable housing sites below 30dph Scheme Design Standards can be achieved for affordable housing at above 30/Ha. Prices achieved for affordable housing would not enable development at less than 30/Ha to occur (unless the landowners were giving the land away for free).</p>		
					<p>No. No need for a maximum density policy as design standards should control this.</p>		
					<p>Only lower the threshold if the SHMA identifies a level of affordable housing shortage that cannot be delivered through the current threshold.</p>		
					<p>both defined threshold be based on the size of the site and the number of dwellings</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Set percentages based on the findings or the HMA and need. The HMA should be regularly updated as an evidence base. The percentages set from it should form a target, not an inflexible requirement in the policy. The policy should clearly allow for developers to negotiate a lower level of provision, where it can be clearly demonstrated that it is not viable to provide the target amount.		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site. This provides for flexibility in provision of affordable housing, and may also result in more affordable housing in appropriate locations.		
					Criteria based approach to special needs housing. Criteria based approach could provide for more flexibility for providers, whereas reserving specific sites provides a risk that the landowner will not release the site for anything other than general housing.		
					Yes home zones should be encouraged Where viable.		
					Yes should encourage a variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city. Each site should be considered on its merits, particularly with something as subjective as design.		
					No do not agree with the range of D.C issues. A policy dealing with Past Permissions is superfluous. The status of such sites is clear - they do not benefit from planning permission - and a renewal application should be determined on precisely the same basis as any new application. Assessment of their suitability for renewal could be undertaken as part of the Strategic Housing Land Availability Assessment - in particular why they		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					have not thus far been delivered and allowed to expire.		
					Yes The Council should consider the regeneration benefits that may be facilitated by housing development - in particular where no public funding is needed. The example of land at Black Boy Road Chilton Moor shows that it is possible to provide improvements to an area, and this should surely be one of the key aims of the new spatial planning system. Where a site is in a sustainable location and offers key community benefits, there should be some scope for the system to allow development.		
							We agree with the system of scoring. Use of numbers rather than +/- is appropriate. Allotment should be included where there is potential for rationalisation (e.g. where there is or may be a resolution to dispose). An additional assessment of 'positive benefits' could be added to decide between two equal sites.
O & H Properties	539	David Lock Associates	181	Very difficult to comment on the specific scenarios offered, given the uncertainty of the overall housing provision to be made in the Core Strategy and the need to make additional housing provision in strategic locations - particularly where this involves greenfield land. Consider that a sequential approach should be adopted to the identification of sites where the capacity of locations within Central Sunderland is prioritised ahead of the utilisation of other particularly peripheral or greenfield options			
				Support the high growth scenario, subject to following comments. O & H Properties will be seeking to bring forward phased proposals for the development of Groves Cranes site. There are no constraints, whether physical or in ownership terms to the delivery of houses on the site in the short term. In total the capacity of the site is considered to be at least 1,000 dwellings. The actual capacity will be determined through the detailed master planning process and the HADPD should be flexible enough to accommodate the outcome of that process by referring to " at least 1,000"			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The High growth option appears to do no more than include the estimates of potential total capacity for the sites allocated in the adopted UDP Alteration although this needs to be confirmed as the capacity of those UDP sites is some 4,100 dwellings (as set out in the Alteration) as opposed to the 3,850 in the Issues and Options Report. It is assumed that the difference is accounted for by completions such as of the Echo Building. The current planning consents/commitments scenario (2,931 dwellings) is wholly unacceptable and must not be progressed - limiting the capacity of key strategic sites to that set out in the UDP as that to be delivered by 2012 only</p>			
				<p>Principle location to be prioritised is Central Sunderland. The approach taken must as a minimum seek to ensure the delivery of the capacity identified within the adopted Alteration No 2, albeit in an appropriately phased manner. Flexibility should be included in the DPD to allow appropriate master planning to determine the capacity of Central Area sites over and above that identified in the DPD</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Residential uses should be supported within commercially focused schemes and within accessible commercial centres			
					Support the need for balanced communities and a mix of house types on most sites. Suggest that a generic policy is established that supports a mix of house types on all housing sites (above a small threshold). This would not seek to prescribe a particular mix to be applied to all sites or to particular sites. Rather the approach taken should be to ensure that the portfolio of sites as a whole offers the variety of site opportunities to sustain a range of house type opportunities and to provide the opportunity for master planning to establish the precise nature of the generic requirement for a housing mix on each site		
					Any policy in respect of tenures other than owner-occupied housing should only be considered in the light of a demonstrable evidence base to support such a policy. A mix of tenures per se is not considered to be a valuable planning objective in its own right since this takes no account of the mix of dwellings in the immediate area		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Government advice is that the provision of affordable housing or other tenures must always be a matter for negotiation with prospective developers. Any policy that might be introduced must reflect the need for negotiation and the need to take account of site specific circumstances. Any such policy must be explicit that negotiations will be required and that due account must be taken of the costs of development, the availability of public subsidy, the risks to delivery and the wider planning considerations relating to that particular location and development		
					Support combination of both option 1 and 3 i.e. general priority should be given in the allocation and delivery of sites to brownfield sustainable locations. In particular this will mean the strategic development opportunities within Central Sunderland should be prioritised in meeting the ultimate requirement of the RSS. However, O & H properties considers that there may be circumstances where it may be appropriate to bring forward greenfield developments as part of the overall strategy for delivering housing in Sunderland.		
					Yes, sustainability assessments should be used in the development plan process. Careful consideration needs to be given in the assessments undertaken and the weighting to be attached to specific factors. The ability to use previously developed land should be given substantial weight. In particular, the Core Strategy should set out key strategic locations within the Central Area that form a key part of the LDF Strategy - Vaux site, Groves Cranes site and Sunnyside. Such locations will always take precedence over any greenfield locations that may come forward through the LDF		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Support for all sites having a minimum density of 30 d.p.h, this does not preclude densities below 30dph within each site. Higher densities should be promoted and secured in central locations, existing centres and close to public transport. The actual density of development should come forward through detailed master planning exercises to be conducted in relation to individual sites. The policy wording of the DPD should not therefore prejudge a particular density in a particular location or on a particular site. The policy should simply promote higher densities in generic locations. In non-central locations it is suggested that higher densities should be accommodated within strategic developments to facilitate the delivery of local services and facilities.</p>		
					<p>Support option 2 i.e. no exceptions should be in place for developing sites below 30dph</p>		
					<p>Support option 2 i.e. no need for a maximum density policy as design standards should control this</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Government advice is that the provision of affordable housing or other tenures must always be a matter for negotiation with prospective developers. Any policy that might be introduced must reflect the need for negotiation and the need to take account of site specific circumstances. Any such policy must be explicit that negotiations will be required and that due account must be taken of the costs of development, the availability of public subsidy, and the risks to delivery and the wider planning considerations relating to that particular location and development. Any policy in relation to affordable housing should apply to all but the smallest sites and hence the threshold should be lowered. Reiterate any policy should explicitly address the need for negotiation on the actual delivery of affordable housing on all sites - providing an appropriate mechanism to address viability issues</p>		
					<p>No percentages should be set out in the LDF without a clear evidence base that affordable housing is required but also that this will detract from the delivery of housing in the City. The provision of affordable housing is offset by reduced requirements for owner-occupied housing. Government advice is that the provision of affordable housing or other tenures must always be a matter for negotiation with prospective developers. Any policy that might be introduced must reflect the need for negotiation and the need to take account of site specific circumstances. Any such policy must be explicit that negotiations will be required and that due account must be taken of the costs of development, the availability of public subsidy, and the risks to delivery and the wider planning considerations relating to that particular location and development. Equally any such policy should be couched District wide and indicate that expectations across the City will not be secured through identified sites alone but also through other means of delivery, including by Gentoos</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support for considering circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contribution from developers for construction on another site, where the requirement cannot be met on a site submitted for planning permission		
					Support option 2 i.e. Home Zones should not be required within new developments. Although many of the principles of home zones are supported and ought to be embraced in the master planning process, home zones, strictly applied, raise a number of technical and design issues. Instead would support reference to developments providing accessible and permeable layouts and encourage the value of multi-use streets		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support option 2 i.e. do not believe it is appropriate for the LDF to address specific architectural styles in a prescriptive manner in any location. It is sufficient for the LDF to indicate the need to secure high quality design in new developments. Such design will be secured in negotiation with developers and be based around the careful analysis and development of design responses that will be necessary in applications as a result of the requirement for the submission of Design and Access Statements with planning applications		
							Whilst the need for a clear assessment framework is understood, considerable care needs to be afforded to the assessments made and to the interpretation of the results
							Priority afforded to previously developed land is clearly supported
							Do not believe that 5 points awarded for good access to cycle routes is proportionate given the ability to earn just 10 points for a wholly brownfield development. The differential should be greater. Moreover the scoring system undermines the priority afforded to brownfield sites for instances penalising such sites of their propensity to have contamination - even though that may be readily addressed
							Care should be taken in assessing the impact of constraints within large sites where this might be readily mitigated. For instance the presence of floodplain in a small part of a much larger site is no constraint to development but an opportunity. As such it should not be negatively scored

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							Factors that also relate to accessibility also need careful assessment. It is not appropriate to score a site that is located within 500 metres of a single corner shop in the same manner as one located within 500 metres of an existing centre or the City centre
							Should be recognition in the assessment process of the value that strategic key sites such as Groves will give to the regeneration of the city
Barratt Homes Ltd Gladedale (Newcastle & Northern) Ltd	846 103	Signet Planning	184		Approach taken is supported in principle		
				Fencehouses growth area is supported. The high growth scenario of 1000 is supported in respect of the housing land to be brought forward in the growth area of Fencehouses. The high growth scenario would offer a significant opportunity to bring forward a strategic site at land south of Woodland Grange. In respect of the two alternative scenarios for Fencehouses it is considered that none of the strategic objectives for the Fencehouses area will be met through the first scenario and the second scenario would not be sufficient to enable the step change and critical mass required to provide a suitable urban extension which would meet the regeneration objectives. It is important that a coherent and consistent approach to housing provision in Fencehouses taking into account its cross boundary relationship with Chester-le-		Land south of Woodland Grange, Fencehouses	
				Street District Council is achieved in recognition of the Fencehouses HMA- this is to ensure test 4 and 6 of the tests of soundness are satisfied			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Any policies in relation to housing types must reflect the findings of the HMA, in which the industry must be engaged, and that a City wide approach would not address the requirements of the individual sub-areas		
					Support option 2- negotiation with developers in securing a mix of housing tenure. Having a prescriptive policy in place would result in the DPD being unsound as being insufficiently flexible. Negotiations should be based on the most up-to-date evidence base which will need to be updated continuously. The DPD would not have sufficient flexibility to address changes in respect of the market place if a prescriptive policy was in place and required reviewing regularly		
					Do not believe that there should be a policy in place for tenure ownership		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support the release of greenfield sites to meet the development objectives for wider regeneration and also to meet housing targets. In respect of Fencehouses, there are minimal previously developed land opportunities; consequently the release of an urban extension should be supported. In relation to the timing of release of greenfield sites, whilst the priority for previously developed land is acknowledged, it is necessary to consider the availability of previously developed land on a sub-area basis as opposed to across the City as a whole which could prohibit the release of greenfield sites in a sub-area that has a shortfall of previously developed land thus delaying the delivery of housing to meet regeneration objectives		
					Support option 1 i.e. sustainability assessments should be used to determine the point at which greenfield land should be released		
					Support option 2 i.e. set different levels of density in different locations, this would enable the circumstances of each site to be considered in relation to the site surroundings		
					Support a policy for having exceptions to the 30dph standard i.e. for executive type housing or to reflect the local character of the area. This accords with policy set out in PPS3.		
					No specific comments to make		
					No there is no need for a maximum density policy as design standards should control this		
					No comments to make		
					Not possible in advance of the HMA to determine whether lower thresholds should be provided and whether it should be based on the size of the site or number of dwellings proposed. The robust evidence base of the HMA is required to inform progression		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					of affordable housing policy and to comment in advance of this would be premature		
					Negotiation should be the policy for securing affordable housing i.e. option 1. (see representations to the core strategy)		
					It is envisaged that there may be circumstances where the need for off site provision of extra care homes, affordable housing and special needs housing is required. In this regard the City Council should ensure some flexibility where possible in the policy to enable such negotiations to take place		
					No comments to make		
					Not appropriate to comment on the approach to identifying potential sites for gypsy and travellers until the findings of the HMA have been published and scrutinised. The HMA may not identify needs on the areas identified within the question and as such it is considered premature in the absence of the HMA		
					No prescriptive policy that all developments should incorporate home zone, however agree with option 1 that the home zone concept and its principles should receive a sympathetic consideration by the council		
					Design and architectural styles of development should draw upon positive characteristics of areas with each site being considered on its merits		
					No additional generic issues are considered necessary to be included in DC policies		
							No issue in respect of a scoring system for site selection, however, significant concerns in respect of paragraph 26.18 estimating housing potential of each site. It is not clear where the thresholds used in table 1 have come from. They look to constrain yield from sites significantly. It must be evidenced how the authority are approaching potential yield from site. Therefore this approach is objected to.

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Gladedale (Newcastle & Northern) Ltd	103	Signet Planning	184		Approach taken is supported in principle		
				Fencehouses growth area is supported. The high growth scenario of 1000 is supported in respect of the housing land to be brought forward in the growth area of Fencehouses. The high growth scenario would offer a significant opportunity to bring forward a strategic site at land south of Woodland Grange. In respect of the two alternative scenarios for Fencehouses it is considered that none of the strategic objectives for the Fencehouses area will be met through the first scenario and the second scenario would not be sufficient to enable the step change and critical mass required to provide a suitable urban extension which would meet the regeneration objectives. It is important that a coherent and consistent approach to housing provision in Fencehouses taking into account its cross boundary relationship with Chester-le-		Land south of Woodland Grange, Fencehouses	
				Street District Council is achieved in recognition of the Fencehouses HMA- this is to ensure test 4 and 6 of the tests of soundness are satisfied			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Any policies in relation to housing types must reflect the findings of the HMA, in which the industry must be engaged, and that a City wide approach would not address the requirements of the individual sub-areas		
					Support option 2- negotiation with developers in securing a mix of housing tenure. Having a prescriptive policy in place would result in the DPD being unsound as being insufficiently flexible. Negotiations should be based on the most up-to-date evidence base which will need to be updated continuously. The DPD would not have sufficient flexibility to address changes in respect of the market place if a prescriptive policy was in place and required reviewing regularly		
					Do not believe that there should be a policy in place for tenure ownership		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Support the release of greenfield sites to meet the development objectives for wider regeneration and also to meet housing targets. In respect of Fencehouses, there are minimal previously developed land opportunities; consequently the release of an urban extension should be supported. In relation to the timing of release of greenfield sites, whilst the priority for previously developed land is acknowledged, it is necessary to consider the availability of previously developed land on a sub-area basis as opposed to across the City as a whole which could prohibit the release of greenfield sites in a sub-area that has a shortfall of previously developed land thus delaying the delivery of housing to meet regeneration objectives		
					Support option 1 i.e. sustainability assessments should be used to determine the point at which greenfield land should be released		
					Support option 2 i.e. set different levels of density in different locations, this would enable the circumstances of each site to be considered in relation to the site surroundings		
					Support a policy for having exceptions to the 30dph standard i.e. for executive type housing or to reflect the local character of the area. This accords with policy set out in PPS3.		
					No specific comments to make		
					No there is no need for a maximum density policy as design standards should control this		
					No comments to make		
					Not possible in advance of the HMA to determine whether lower thresholds should be provided and whether it should be based on the size of the site or number of dwellings proposed. The robust evidence base of the HMA is required to inform progression		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					of affordable housing policy and to comment in advance of this would be premature		
					Negotiation should be the policy for securing affordable housing i.e. option 1. (see representations to the core strategy)		
					It is envisaged that there may be circumstances where the need for off site provision of extra care homes, affordable housing and special needs housing is required. In this regard the City Council should ensure some flexibility where possible in the policy to enable such negotiations to take place		
					No comments to make		
					Not appropriate to comment on the approach to identifying potential sites for gypsy and travellers until the findings of the HMA have been published and scrutinised. The HMA may not identify needs on the areas identified within the question and as such it is considered premature in the absence of the HMA		
					No prescriptive policy that all developments should incorporate home zone, however agree with option 1 that the home zone concept and its principles should receive a sympathetic consideration by the council		
					Design and architectural styles of development should draw upon positive characteristics of areas with each site being considered on its merits		
					No additional generic issues are considered necessary to be included in DC policies		
							No issue in respect of a scoring system for site selection, however, significant concerns in respect of paragraph 26.18 estimating housing potential of each site. It is not clear where the thresholds used in table 1 have come from. They look to constrain yield from sites significantly. It must be evidenced how the authority are approaching potential yield from site. Therefore this approach is objected to.

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Gladedale (Sunderland) Ltd	105	Signet Planning	184			Land at Neil Street, Easington Lane	
						Land at Glebe Village House, Washington	
Mr J Sanderson		Signet Planning	184		Put forward for consideration in the DPD an appropriate allocation for their client's site which permits housing. Believe that the site should be subject to a formal housing allocation solely or as part of a mixed use site. Suggest that the following proposed wording to any policy in the DPD is included - 'land at High Street East is allocated for residential development either as a whole or as part of a mixed use scheme comprising other key town centre uses, which could include leisure and entertainment, offices, hotels/tourist accommodation and student accommodation. This would be in accord with PPS6 and Policy CS1 of the core strategy	Land off High Street East, Sunderland	
Storeys: ssp	189			Support the high growth scenario for Fencehouses noting the opportunities for improved accessibility at this location			
				Identified the SIG combibloc land at Blackthorn Way as a mixed use residential and commercial option on 4.86 hectares as part of the SHLAA and would advocate consideration of the site in the Housing Allocations DPD as it progresses.		Land at SIG combibloc Blackthorn Way, Fencehouses	
Disability Rights Commission	209				No comments to make		

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Hazardous Installations Directorate	219				No comments to make. However, wish to remind of Major Accident Hazard sites when allocation land for development		
English Heritage	265				Chapter 1 (part 4) bullet point 3, reference should also be made to 'reuse of existing buildings for existing or new housing sites'. This is in line with government guidance and emerging Regional Spatial Strategy. Strongly support the emerging key objective of the need for housing and its environs to be built to high urban design standards		
					Chapter 2 (city's housing capacity). The first two objectives of the ISHL as indicated should include reference to making more efficient use of existing buildings and reusing existing buildings, in addition to developing on cleared sites.		
				The unnumbered map on page 27 identifies proposed housing growth areas fairly evenly distributed throughout the authority area. There is an inherent danger in this approach that housing activity may be spread too thinly and that insufficient consideration is given to strengthening the role of Sunderland City itself as the hierarchical focus			
				Mixed use development on some employment sites is consistent with government policy and is therefore is broadly supported.			
					Table 3 page 28 - note that housing renewal areas are not included in the figures for additions to the housing stock		
				Each scenario for growth appears to factor in the use of vacant buildings and the curtilages of existing buildings. Much harm can be caused to the character of an area, especially if a conservation area, when curtilages are given over to additional development. It is important that the housing industry is			

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				not given over-optimistic understanding of the number of additional new units that may be provided in this way. In all cases the acceptability or otherwise of such a scheme should be design-led and based on a clear understanding of the character and context of the locality			
				Development of Chapelgarth involves developing in the countryside exclusively. It is important for any development in this location to be the subject of appropriate archaeological assessment and investigation and, where necessary, appropriate mitigation			
				The allocated use of the site of Ryhope Hospitals in each of the growth scenarios is noted			
				The use of surplus school sites in order to achieve the present scenario and any alternative growth scenarios is noted. Though unaware of the precise nature of the schools involved, where they are possessed of some historic value this should be taken into consideration and the approach adopted should be consistent with English Heritage Guidance on <i>The Future of Historic School Buildings</i>			
				It is important that, whichever growth scenario is adopted, that great care should be exercised to ensure that important heritage assets and their settings are adequately safeguarded. In this regard English Heritage has recently had cause to express concerns regarding the scale and nature of development in the vicinity of the Candidate World Heritage Site of St Peters, Monkwearmouth Station, and Monkwearmouth Bridge			

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				No comments			
				Development in a location such as this should be restricted to whatever is necessary to provide the settlement with an element of self-sufficiency. The use of greenfield land should be avoided			
				Development in a location such as this should be restricted to whatever is necessary to provide the settlement with an element of self-sufficiency. The use of greenfield land should be avoided			
					Note in Para. 20.11 that consultation on the Core Strategy indicates priority should be given to family housing, with apartment living being lowest priority. Also noted are the strong views that were expressed about housing need and affordability. Para 2.8 expresses the view that there is lessening demand for terraced housing and flats		
					No comments on chapter 5		

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					In relation to Para 22.3 CABE criteria, this is endorsed but would add that the heritage status and value of any given location should be a determining factor in arriving not only at design and layout, but the principle of housing too. The contribution made by large villas and semi-villas in spacious, well-treed, suburban and inner-urban areas should not be dismissed lightly in meeting the need for better quality executive housing. An area such as the Cedars is a case in point.		
					Issue 5 Affordable housing/housing needs - Nothing inherently or fundamentally wrong with the concept of terraced housing. Older housing should not be confused with redundancy or failure per se. Were this to be the case they would be universally unpopular - this is patently not the case. Older terraced housing where it is situated in a sustainable location can be transformed and updated to meet the needs of 21st century living, and provide accommodation for families and first time buyers at an affordable cost. This type of housing should be regarded by the city as a valuable asset and should be maximised. Indeed the Panel Report following the Examination in Public of the RSS recommended in Policy 2 is amended to refer to the prudent use of <i>existing built fabricas</i> well as the prudent use of natural resources. The secretary of state in her response to the Panel Report, appears set to endorse this amendment		
					Issue 6 Housing Environments: Fully endorse the implied intention to ensure that the environment of new and existing housing areas is well used, welcoming and efficient. Developers should be required to have regard to the principles of <i>By Design</i> , produced by CABE and promoted through PPS1		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Issue 7 Development control policies: Para. 25.5 deals with development within back gardens. It is assumed that the issue is not solely confined to development within back gardens but includes any development within the curtilage of an existing building. This should also be taken to include the demolition of existing buildings and the intensified use of the cleared site. Para 25.6 relates to design. The intention to produce a Residential Design Guide SPD is welcomed, it is hoped that this will also address matters of heritage status and value</p>		
							<p>Para 26.14 relates to land excluded from the assessment. It is noted that the list does not include reference to sites containing heritage assets and also scheduled monuments</p>
							<p>Para 26.15- would expect there to be strong resistance to development which was not compatible with the character and appearance of any entry on the English Heritage Register of Historic Parks and Gardens</p>
							<p>General - Would acknowledge that there is no blanket impediment to housing development in connection with listed buildings, conservation areas or other unlisted buildings of heritage value. In each of these cases, however, it would be expected that the design should fully acknowledge character and context, and the status of the heritage asset. In each case, where the principle</p>

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							of development may be acceptable, it is important that site capacity is not duly inflated and that site owners and developers do not harbour unrealistic expectations as to possible returns on investment
							Para 26.5 - Q1 - making best use of existing housing should be pre-eminent. Would object to any strategy whereby the seeking of high previously developed land targets results in increase in demolition. A 3 part test should be used to determine the appropriateness of demolition i.e. is the housing in the right location, is it the right mix, type and size and whether it is structurally fit. If it is not structurally fit, could some form of intervention be exercised i.e. adaptation, redevelopment or repair or a mix of all three. The principle of re-use supports the sustainability agenda
							Q10- Welcome inclusion of reference to conversation areas and such commentary, but refer to observations made above in order that certain misunderstandings may be corrected. Heritage conservation is not the same as heritage avoidance. There are likely to be very many instances where heritage assets can benefit from reuse or new uses which secure their future or which may additionally, through Section 106 Agreements for example, receive funding towards repair where they are closely associated with nearby development. The question makes no distinction between conservation areas and, for example, historic parks and gardens. The former may very well be able to accommodate new housing development if it is appropriately designed, but it is unlikely to be acceptable within an historic park or garden. The scoring carries no weighting with regard to the status of the listed building. It is to be expected that opportunities in respect of grade I listed buildings or scheduled monuments will be restricted, but development in respect, for example, grade II listed buildings or other sites of archaeological
							value may be accommodated with appropriate mitigation

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							Chapter 11, Appendix I and 2, no comments to make
							Appendix 3 - A series of notes prepared by English Heritage which are work in progress have been provided for guidance
Natural England	266				Throughout the document the potential use of previously developed land needs to take into account the requirements of PPS9 paragraph 13 with respect to the need to protect and incorporate biodiversity and geodiversity interests in developing previously developed land		
					Issue 1 - general location of housing: In determining the general location of housing land allocations consideration should be given to landscape character assessment, the Great North Forest Plan objectives for the area (if appropriate), and biodiversity and geodiversity designations and Biodiversity Action Plan priority habitat and species. Adverse impacts particularly on protected sites should be avoided through the provision of alternative land allocations, or mitigation measures to overcome any adverse impact		
				The site allocations must be considered regarding impacts, both direct and indirect, on designated sites in both the SEA/SA and the Appropriate Assessment under the Habitats Regulations as amended. Provisions should be made through modified allocations or appropriate policies to protect and enhance the integrity of designated sites and other environmental interests/assets as appropriate. Significant adverse impacts could result in the DPD being			

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				considered unsound with regard to PPS9 and elsewhere			
					Issue 6 - Housing Environments: Paragraph 24.4 the final sentence should also include species conservation		
					Issue 7 - Development Control Policies: Paragraph 25.6- the council should be encouraging sustainable design and construction methods, and consider whether to set renewable energy targets for new development. Integration of biodiversity and geodiversity as part of good design principles should also be encouraged - should refer to 'Biodiversity by Design' TCPA 2004		
							Paragraph 26.14 - Should address direct and indirect impacts on all SSSI and all European Nature conservation sites, not only the Northumbria Coast SPA

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							Paragraph 26.16 - Should also address maintaining the integrity of habitat networks (see PPS9 paragraph 12)
							Paragraph 26.43 should also refer to 'likely adverse' rather than negative effect
							Q1- Must recognise the need to integrate any significant nature conservation into development on brownfield land in line with PPS9 paragraph 13
							Q3 - To ensure sustainable development consideration should be given to proximity to the public rights of way network, as well as the cycling network to provide appropriate travel and access opportunities contributing to social health and environmental benefit
							Q9 - Opportunities for Integration of biodiversity and geodiversity as part of good design principles should also be sought and encouraged in line with PPS9 - refer to 'Biodiversity by Design' TCPA 2004
							Q11 - the section about mitigation is misleading. Weighting may not be an appropriate way forward, opportunities should be sought to integrate nature conservation interests with development, and this can be achieved through a variety of ways. Reference is made to the amendment to the Habitats Regulations 2007. The Regulations should be used to inform where statutory provisions regarding protected sites must be met. Reference to the Natural England website is also made in respect to guidance on Natural Area profiles and also the Durham BAP to inform nature conservation issues and steer opportunities. Further advice can be obtained in relation to the wider biodiversity duty for Local Authorities through DEFRA guidance
							Q12- consideration should also be given to Great North Forest objectives when considering options for specific land allocations where appropriate. It should be noted that Natural England is not a statutory consultee with regard to hedgerow/ancient woodlands and tree issues, which should be considered as an aspect of Biodiversity including as part of habitat networks. The council should also recognise these features may also support protected species and the relevant provisions indicated against Q11 should be considered

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Environment Agency	267			The proposed locations are generally acceptable due to the low risk of fluvial or tidal flooding to large areas of the district			
				The vast majority of the area lies in Flood Zone 1. A small stretch of Cut Throat Dene floods at the coast			
				Flood zones follow the course of Cherry Knock Dene and Ryhope Dene but appear not to break out of bank			
				The vast majority of Chapelgarth lies in Flood Zone 1. Only slight flood zones north of Silksworth			
				Almost entirely lies in flood zone 1, there is very little tidal risk			
				A low risk of fluvial and tidal flooding. South of the Wear, flood zones follow the course of Hendon Burn			
				Again mostly flood zone 1, Fatfield lies in flood zone 3			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Majority lies in flood zone 1, however, Lumley Park Burn floods from west of, across the north of, to east of Fencehouses. The Bournmoor/Fencehouses areas which drain to Sedgeleth STW are an area of concern with regard to impact on sewage systems. The Sedgeleth STW whilst significantly upgraded still has a significant impact on the Lumley Park burn and any further increase in flow to it would only increase the problem. Northumbrian water is looking at option for this discharge but changes are unlikely in the short term. MWL should be contacted to discuss the proposed level of development in this area.</p>			
				<p>All flood zone 1. Flood zones follow Coldwell Burn well to the south</p>			
				<p>Most of the broad allocation areas are within areas served by new or significantly upgraded sewage systems and as such do not give rise to concern.</p>			
					<p>It should be noted that PPS25 requires all allocations to be tested sequentially with regards to flood risk in accordance with your SFRA, and documentation of these process being carried out must be provided. Risk from all sources of flooding should be considered. Should the process not be adequately demonstrated at preferred options stage, the plan would be challenged?</p>		
							<p>Q5 - this appears to be missing</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							<p>Q6- The text refers to 'contaminated land' - this is a legal definition applied to land that has gone through a formal assessment process which has identified, based on the sites current use, that there are risks which are considered unacceptable. The intention is that ideally the process of determining sites as contaminated land is used where they are unlikely to be developed through the planning regime. In this case the risks associated with site should be addressed as part of the development proposals. Contaminated land therefore effectively represents a very small sub-set of land affected by contamination and no sites have been designated within Sunderland. In the context of the site allocation document it would be better to refer to land affected by contamination, which will include contaminated land, that may have arisen due to a sites previous use (this could be linked to the table which follows that identifies potentially contaminative uses) or can be 'naturally' occurring for example, mine gas or as a consequence of the sites geological setting. In relation to the table listing potentially contaminative uses it is unclear where this is taken from. Such lists are available in published guidance for example, PPS23.</p>
							<p>Q8 - suggest several amendments as follows: - functional floodplain is zone 3b not 3c, no housing allocations should be made in 3b, as outlined in PPS25 and should therefore not be included in the scoring process and in line with the above scoring points attributed to sites lying in flood zone 2 and 3a should be revised. The amount of points designated for flood zone 3a should be weighted accordingly given the high risk of flooding risk, -5 at the minimum. A strong argument exists for such a negative score to be allocated to a site in flood zone 3a as opposed to whether it is located adjacent to a cycle route. Concerns are raised whether the scoring method to be used is justification of the flood risk sequential test being undertaken. If the case, can a discussion with Environment Agency be made.</p>
							<p>Q14- This section needs to be reworded as the way it is currently written is unclear. Reference to Source Protection Zones does not sit comfortably under this title and consideration should be given to including it under a separate heading, for example, Water Resources. Groundwater is important in Sunderland as the Magnesium Limestone lies under parts of the area and this is classed as a major aquifer that is used for public water supply. The definition of Source Protection Zones given in the document is confusing and</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							<p>consideration should be given to the following wording: Parts of the district are underlain by Magnesium Limestone - a major aquifer. Groundwater within this is used for public water supply and represents a significant resource which needs to be protected. Within the aquifer, Source Protection Zones (SPZ) have been identified by the Environment Agency which show the areas of groundwater within which there is particular sensitivity to pollution risks due to the proximity of a drinking water source and the way the groundwater flows. Development within these areas should take into</p>
							<p>account the potentially sensitivity of the groundwater</p>

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Government Office for the North East	269				The document raises issues which should be addressed in the context of the Core Strategy. Chapters 2 to 7 all concern strategic matters, such as the overall amount of housing to be provided, alternative options for distribution between different sub areas; the nature and range of housing types and tenures for the City as a whole and the overall brownfield target. Paragraphs 5.1 and 5.2 of the LDF's: Lessons Learnt Examining DPDs (PINS 2007) states local planning authorities should be clear that the Core Strategy is where real and probably tough decisions have to be made		
					The Core Strategy should drive the allocation of sites, not the other way round around. The Core Strategy must not leave the question of the general allocations or the level of housing to particular sub areas open on the grounds that this can be done once housing sites have been identified in a housing DPD.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					The scenarios and questions put forward in the Housing Allocations DPD are therefore inappropriate. They concern issues, which should have been settled in the preferred options draft of the Core Strategy. The HADPD should be taking the strategic picture as read, and should be concerned with matters of site-specific detail, such as the merits of individual sites.		
					Following issue is considered unsuitable for consideration in the Housing Allocations DPD : Chapter 3 table 2 - housing supply, this detailed assessment of the housing supply should be considered as part of the formulation of the Core Strategy		
					Following issue is considered unsuitable for consideration in the Housing Allocations DPD: Paragraphs 11.8-11.9 relates to identification of strategic renewal schemes. These renewal schemes should be addressed within a strategic policy within the Core Strategy, not the HADPD. Once identified in the Core Strategy, the Allocations DPD would be able to identify the precise areas.		
				Following issue is considered unsuitable for consideration in the Housing Allocations DPD: The consideration of options for growth could result in additional dwellings being identified within specific sub-areas, which could exceed the housing figures in the Core Strategy. The housing figures for the sub-areas should be established through the preparation of the Core Strategy, having considered growth options within them.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Chapter 4 questions 20-22, options for providing a range and mix of house types in the City should be addressed within the Core Strategy DPD.		
					Q25-30 contain a range of options relating to housing density, this duplicates and elaborates upon Policy CS4 of the Preferred Options version of the Core Strategy. This issue should be addressed within the Core Strategy rather than the HADPD. If it is necessary to depart from the density policy in the Core Strategy, this could be addressed in specific housing allocations.		
					Q31-34 - affordable housing is a strategic issue and ought to be addressed within the Core Strategy rather than the HADPD.		
					In several instances the HADPD is inconsistent with the Core Strategy (conflict with test of soundness vi). For example, the proposed dwelling numbers for the sub-areas shown in chapter 3 differ from those contained within Policy CS4 of the Preferred Options version of the Core Strategy. Q31-34 of the HADPD contain a number of alternative thresholds for the provision of affordable housing, whereas the Core Strategy fails to contain an explicit figure.		
					Overall there are a number of fundamental issues concerning the relationship between the Housing Allocations Document and the Core Strategy. These need to be resolved before both DPD's proceed. Failure to resolve these issues could result in one or both of these DPDs being declared unsound by the inspector following the examination.		

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Highways Agency	270				Housing provision: Would prefer the LDF to conform to the policies set out in the RSS and would be particularly concerned if there were to be an overprovision in housing allocations		
				Generally supportive of the council's proposal to identify sustainable locations that bring forward well located major previously developed land particularly with regards to locating housing development at the most accessible locations and major public transport corridors (e.g. Metro) reducing the need to travel, especially by private car. The impact of any future proposed sites, identified in the HADPD, on the Strategic road network (for Sunderland this includes the A1 (T), A19 (T) and A194 (M)) is the main issue of concern both in isolation and cumulatively			
				Generally supportive of mixed use developments with easy access to the urban area main transport corridors and interchanges as these would reduce the need to travel by private car. Any development that could potentially have a detrimental impact upon the Strategic Road network would require further assessment in accordance with the provisions of Circular 02/2007. The Agency will be able to provide a more detailed assessment of individual potential housing development sites when this information becomes available at the preferred options stage.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The Agency welcomes the sequential approach to site allocation adopted by the DPD. Site suitability and eventual formal proposal should be assessed against its suitability in transport terms, seeking to reduce the need to travel and developing sites that can safely and efficiently accessed by sustainable modes of transport</p>			
				<p>The Agency would like to be consulted when the potential sites are proposed, particularly with regard to proposed developments that could impact on the A19 (T) and the A1 (M) or the strategic road network at the earliest opportunity in order to assess the impact on safety. Transport Assessments should be prepared for each site. Circular 02/07 should be accorded with in respect to impact on the SRN.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Wish to be consulted on any development which may impact upon the SRN, and will be able to provide a more detailed assessment further along in the process once the councils preferred approach has been decided. Sites should be located where it is accessible by a variety of modes of transport, particularly those that reduce the need to travel by car.			
				Generally support locating new development in sustainable locations on previously developed land within existing centres, close to a variety of services, facilities, employment opportunities and existing public transport links and interchanges.			
				Wish to be consulted on any further development taking place in this location; it is adjacent to the A19 SRN which is experiencing capacity problems and will continue to do so in the future			
				Considers that development should be targeted to the most sustainable locations which tend to be within existing centres on previously developed land where there is safe and convenient access to a range of services, facilities and employment opportunities, particularly via more sustainable transport modes.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Wish to be consulted on any development which may impact upon the SRN, and considers that sites should be located where it is accessible to a variety of modes of transport, particularly those that reduce the need to travel by private car. It is likely that the urban extension of Sunderland would have a possible significant impact on the safe and efficient operation of the strategic road network. It should be noted that this is purely an assumption and that a more evidence based impact assessment will be made when a proposal is put forward.</p>			
				<p>Expects that development should be targeted to the most sustainable locations which tend to be within existing centres on previously developed land where there is safe and convenient access to a range of services, facilities and employment opportunities, particularly via more sustainable transport modes.</p>			
				<p>Supports locating new development in areas where it can reduce the need to travel by private car. As this area benefits from the metro system the Agency would consider this to be a more sustainable location. However, the Agency would still wish to be consulted on any development that could impact on the SRN particularly due to the close proximity of this site to the already congested A19.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				It is suggested that to achieve future growth the council will have to rely on green field land namely playing fields and public open space. The Agency again reiterates that development should take place in the most sustainable locations especially those that are accessible by a variety of transport modes			
				Supports development targeted to the most sustainable locations which tend to be within existing centres on previously developed land where there is safe and convenient access to a range of services, facilities and employment and retail opportunities, particularly via more sustainable transport modes.			
				No comment			
				Wish to be consulted on any development that could impact on the SRN. Washington lies between the A1 and A19 SRNs both of which are currently experiencing congestion. The agency will be able to provide a more detailed assessment, further along in the process, once the council has decided its preferred approach			
				Supports locating of new developments in sustainable locations on previously developed land, close to existing public transport links and interchanges			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Supports locating new development in areas that can reduce the need to travel by private car and recognises that there are planned infrastructure improvements for this area; however the Agency would wish to be consulted on any development that may impact on the SRN and cannot rely on planned infrastructure improvements until they are committed			
				Supports locating of new developments in sustainable locations on previously developed land, close to existing public transport links and interchanges			
				Wish to be consulted on any development which may impact upon the SRN, and considers that sites should be located where it is accessible to a variety of modes of transport, particularly those that reduce the need to travel by private car. Easington is located close to the A19 which suffers currently from congestion. Any further development in this area would need to be sustainable			
				No further comment			
				Support locating new development in areas that can reduce the need to travel by private car. Support a sequential approach when identifying areas for development, these areas should be sustainable			
				Generally supportive of mixed use developments with easy access to the urban area main transport corridors and			

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				interchanges as these would reduce the need to travel by private car. Any development that could potentially have a detrimental impact upon the SRN would require further assessment in accordance with the provisions of Circular 02/2007			
					House Types and Housing Tenure - no comment		
					Preferred option would be option 3 i.e. greenfield land should only be released as last resort having given priority to other sustainable brownfield (land that has been previously developed) options. Where there is no option other than Greenfield development the Agency would require to be consulted on any development that could have an impact on the SRN		
					New development should be focused on the most sustainable sites which tend to be on previously developed land within existing urban areas. However, it is considered that previously developed land can not always be considered more sustainable than green field sites, particularly in terms of accessibility		
					No comment regarding density, but generally considers that the most sustainable locations for new development are within existing main urban areas on previously developed land, where there is safe and convenient access to a variety of sustainable transport modes, services, facilities and employment opportunities, and where the need to travel, particularly by the private car.		
					No particular preference provided that the site is sustainably located, where there is access to public transport, services, facilities and employment opportunities and where there will be no detrimental impact upon the safe and efficient operation of the SRN.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No comment		
							Generally supportive of the council's approach, particularly with regard to assessing potential sites using key sustainability criteria
Home Builders Federation	271				The HBF believe that the public sector should not dictate housing sizes, mix or specification on private sector sites. The state has no place restricting the availability of certain types of housing, which in practice amounts to telling households what they should or should not buy. By imposing size standards or housing mix on private housing sites, LA's reduce the supply of housing, exclude some households from decent housing and worsen the affordability crisis. History shows that the more flexible housing is the more likely it is to last. Over-designing houses today must not limit the flexibility of houses to meet tomorrow's needs. A flexible approach should be applied.		
					Preferred option 2- i.e. negotiate with the developer with regard to mix of housing tenure		
					On the matter of additional housing development, it is clear there will be a need for both greenfield and brownfield development. There should be some in built flexibility in assumptions made now about future housing requirements for the long term in order to allow the strategy to deal with changing circumstances (PPS12 test ix). Any sites identified for development in the long term can be controlled by a "Plan, Monitor, Manage" mechanism in order to ensure that broader sustainability policy objectives are met - this must be in the context of a core strategy focussed on delivery of housing targets. The focus must be on meeting housing requirements rather than arbitrarily prioritising brownfield land at the expense of greenfield. Such priority may only be possible at the expense of the achievement of other LDF objectives. For example, it may not be possible to deliver new housing in communities where their is limited PDL supply. Also, it may affect the delivery of the overall housing requirement of the choice of locations was limited, or sites were not sufficiently attractive to the market. It could put pressure on sites within town and district centres that are required for retailing or other community facilities.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>Support for option 2 i.e. set different levels of density in different locations. The density of a site should be set on a site-by-site basis. The document should recognise that in some cases it is appropriate for densities below the minimum of 30dph where justified (supported in paragraph 47 of PPS3). Some development must be allowed at lower densities to enable the provision of a full range of housing. Higher densities can be achieved in town centres but this must be approached sensitively in recognition of the need to preserve the existing character of these towns and existing residential amenity</p>		
					<p>Yes, support having exceptions in place for densities lower than 30dph</p>		
					<p>Support option 1 i.e. keep the existing threshold for affordable housing. If supply remains constrained by existing targets, increasing the target percentage for affordable housing and/or lowering site size thresholds actually exacerbates the under-provision of market housing. Regard an increase in housing supply as by far the most long term solution to housing under-supply and poor affordability thereby meeting the needs of all sectors of the community. Should more affordable housing be required, the selling price of the market housing will theoretically need to be increased in order to cover the costs of providing more as the developer gets the least returns from this affordable housing product. However, the sales price of new housing must also echo/reflect the second hand market price. The only alternative is for a developer to try and reduce the land price (i.e. "the residual land price") which requires a landowner to accept a lower land price. Past experience shows that this will reduce the supply of suitable land onto the market (as evidenced when Development Land Tax was imposed) and hence reduce housing supply. This will ultimately widen the affordability gap. It is</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					essential that an appropriate balance be struck in order to balance needs.		
					Support option 1 i.e. continue with negotiation with developers on a site by site basis, using the Strategic Housing Market Assessment as guidance		
					If the evidence base proves that there is a need for affordable, special needs and extra care homes for the elderly, then there should be flexibility about whether they are provided by ways of financial contributions for developers for construction on another site or provided on site. National policy is that housing developments should be provided on site in most cases, but where it can be robustly justified, a financial contribution for off-site provision may be accepted as long as it contributes to the		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					creation of mixed communities (PPS3 paragraph 29)		
					Support option 2 - i.e. a criteria based approach to the provision of special needs housing. The principle of special needs housing is supported. However, the council should not allocate specific sites for such type of housing as this goes against national or regional policy which seeks to build mixed communities in a range of geographical locations.		
					If appropriate the Council could encourage house builders to incorporate Home Zones within new residential layouts. However, the Council should not set an inflexible policy requiring this in all circumstances.		
					Would be concerned if overly prescriptive and locally defined design standards obstructed housing delivery. The HBF will continue to ensure that Building for Life standards, developed by HBF and CABE are promoted and utilised, in order to capitalise on a common basis of assessment criteria		
					Support option 2 - i.e. no the Council should not seek to restrict specific architectural styles such as contemporary designs to certain areas of the City. Inflexible design policies should not be imposed. House builders should be able to respond to the demands of the market, and tailor their designs accordingly.		
ONENortheast	276				Housing numbers: Recognise that the overall surplus/shortfalls cannot be fixed at the time of preparing the DPD and the document can only provide an indication of possible housing requirements and capacity. Support the Council pro-actively planning for housing growth in the later periods up to 2021. This pro-active approach is set in the context of the Council's emerging Core Strategy Preferred Options document and is important to enable the Local Authority to fulfil the RSS housing allocation requirements as part of the city's core role within Tyne and Wear City Region. The benefit of this approach is underlined by the shortfall in provision shown in Table 2 - Potential housing supply within the city 2004-2021 (page 22).		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Clearly the evidence provided by continued updating of the Interim Strategy for Housing Land is an important component which will help to inform the Council on the city's housing requirements and to identify sustainable sites to accommodate those requirements		
				<p>The Agency notes the city's four sub-areas proposed by the Council's Core Strategy and that this Draft Housing Allocations DPD defines further draft growth areas within those sub-areas.</p> <p>One NorthEast would encourage the investigation of the higher growth scenarios proposed for each of the sub-areas. Clearly such investigation will be influenced by issues relating to Green Belt, greenfield sites and loss of employment land.</p> <p>As you are aware the Agency is a shareholder in the URC and supports the aims of Sunderland arc to address the problems of achieving economic, environmental and social regeneration within the River Wear corridor and Sunderland City Centre. In the context of the aims of the RES, the Agency would support consideration of increases of growth in areas related to such regeneration schemes, housing restructuring areas or on strategic transport links to employment areas.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>With regard to type and mix of housing, the Agency suggests that these should be considered across the local neighbourhood or local housing market as a whole and not just within a site. The Agency believes that better aligning supply and demand can have a positive effect on the economy and allow the region to contribute to the achievement of the Regional Economic Strategy objectives, the Northern Way and government targets. Recognise that the quality and mix of the region's housing offer needs to be improved</p>		
					<p>Housing Density - The Agency considers that the Council should ensure that policies relating to density are driven by and a product of the type and mix of housing shown to be required on a site. Whatever the density the focus should be on quality neighbourhoods</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Development Control policies - Pleased to note the document's statement that the City Council is committed to achieving the highest possible standard of design and layout in all new residential development and will judge the design of proposed residential developments against the criteria set out in the emerging Residential Design Guide SPD. Agency urges the Council to encourage developers to pursue best practice in areas of accessibility, sustainability, whole life costing and general urban design standards. This should involve achieving standards relating to BRE EcoHomes, Building for Life and Secured by Design and, in line with Government objectives to generate 10% of electricity from renewable energy sources by 2010.		
Theatres Trust	394				Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and as this DPD is not directly relevant to the Trust's work no comments are made.		
Sunderland arc Ltd	414	Richard Arkell, Integer Consulting	616	Central Sunderland:- High Growth, approximately 3,800 dwellings There is a need to (i) take account of the housing proposals emerging from the East Sunniside Master Plan and revised Planning Framework for Sunniside (ii) give consideration to the housing potential of emerging regeneration sites Deptford/Pallion, Monkwearmouth and Low Southwick.			
					Brownfield mixed use regeneration sites in Central Sunderland should be prioritised		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					There should be a strong presumption in favour of mixed use in such locations		
						There is a need to (i) take account of the additional housing proposals emerging from the East Sunnyside Master Plan and revised Planning Framework for Sunnyside (ii) give consideration to the housing potential of emerging regeneration sites in Deptford/Pallion, Monkwearmouth and Low Southwick.	
					Consider a policy which seeks to address any imbalance in the housing stock. Policies need to provide for a balanced and diversified choice of housing across the city as a whole, as well as addressing imbalances and shortfalls in particular areas. It is envisaged that the forthcoming SHMA will incorporate an element of spatial differentiation and will that this will inform the latter. Housing markets are dynamic and there is therefore also a requirement for an appropriate level of flexibility in the application of policy at a more detailed local level.		
					Negotiate with developer for tenure Policy should provide general encouragement for a mix of housing tenures on large sites, in accordance with Government policy, but at a site level this should be considered on its merits and in the light of prevailing information (e.g. from the latest SHMA which may be subject to annual change) and should therefore be negotiated with developers accordingly.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock by identifying and planning for particular shortfalls and possibly particular areas. Policy needs to be framed to incorporate an appropriate measure of flexibility.		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield (land that has been previously developed) options. Option 4 is the most compatible with the sequential approach in RSS and with Sunderland's demanding target for the reuse of brownfield land. Use of term 'executive' housing is considered unhelpful as it is not capable of being adequately defined. There is no reason in principle why high quality and higher priced housing cannot be developed on brownfield sites.		
					Yes sustainability assessments should be used to determine when greenfield sites should be released. Subject to the comments entered in relation to Q. 23 (q.v.)		
					Option 2. Set different levels of density in different locations.		
					Yes should have exceptions in place for densities lower than 30dph. The above exceptions are agreed.		
					The City Centre and its immediate environs should be the locations for the highest densities, in view of the proximity of rapid transit, offices, retail, and		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					leisure etc facilities and to support a vibrant and attractive city centre.		
					No exceptions should be in place for developing affordable housing sites below 30dph Subject to previous responses re the possibility of densities lower than 30dph for high value housing.		
					Yes. Provide a policy setting out maximum density.		
					Particular areas/sites within the city for a policy on maximum densities		
					No keep the existing threshold for affordable housing both defined threshold be based on the size of the site and the number of dwellings Further detailed consideration needs to be given to this matter, in the light of the SHMA recommendations, when available.		
					Set percentages based on the findings or the HMA and need Policy should avoid an overly prescriptive application of percentages to specific sites, as the position needs to be looked at in relation to local housing market areas as a whole		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to special needs housing.		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers		
					Yes encourage home zones		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes encourage a variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city. The city centre and other major brownfield sites offer important opportunities for contemporary and innovative design approaches, but these should not be restricted to such sites.		
					Yes agree with range of D.C issues		
							Agreed in principle; however the precise definition of "urban area" is key and this needs to be agreed at a regional level. It is understood that NEA are developing a common methodology for SLA assessments and Sunderland arc considers such an agreed approach to be of critical importance.
God T.V	925	G.L Hearn	631	Central Sunderland:- High growth scenario			
					Whilst mixed-use development will likely be appropriate in a large number of central area schemes the City Council should not necessarily insist on mixed use development. There may be a presumption in favour of mixed use development in certain locations but to insist on introducing other uses may not always be viable.		
						Angel House, Borough Road	
					It would be inappropriate to require all house types on all sites. In most high density mixed use central area schemes the only appropriate type of dwelling will be apartments.		
					Providing a specific policy would give guidance to developers and may mean greater consistency. The level of tenure mix should be informed by a robust housing needs assessment. The policy would need to be flexible with reference to relevant national and regional guidance and in particular recognise that the provision of affordable housing in certain sites will not be viable because of costs/difficulties.		
					Any policy on tenure should only apply above certain thresholds. The overall target for providing affordable housing in the city should take account of affordable housing provided in purely affordable schemes. Seeking higher levels in certain areas could act as a deterrent to investment and should only be progressed if supported by a thorough assessment and understanding of the development		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					economics and viability in these areas.		
					The policy should confirm minimum density standards but in central area schemes particularly mixed use development in tall buildings, the application of density standards is considered inappropriate. These schemes will by their very nature be high density and the planning assessment should be about the quality of design and quality of residential accommodation provided.		
					A maximum density standard is not thought to be necessary for mixed use central area schemes.		
					Both negotiation and percentage should be used. A target percentage in the policy would confirm the strategy and provide guidance to developers, but it will be essential that the council then use any policy as a starting point for discussions and take a pragmatic approach. Not every site will be capable of meeting the policy aspiration and the council will need to take account of relevant considerations on a case by case basis.		
					The policy should seek to require a high quality design rather than seek to impose particular architectural styles.		
					No specific architectural styles should not be restricted to certain areas of the city , see response to Q.38		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
City of Sunderland College	317	G.L Hearn	631	The HADPD should not seek to deliver all the required housing allocations purely within the draft growth areas. Sites which come forward outside the growth areas should be properly considered through the LDF process and not discounted because they do not fall within a growth area. To rely solely on the growth areas would place substantial demands on infrastructure and could prevent sustainable alternative locations coming forward.			
						The Shiney Row centre, Success Road, Philadelphia	
						The Bede Centre and surrounding land, Durham road	
					It would be inappropriate and impractical to require a mix of house types on all sites. Certain sites will have characteristics that lend themselves to certain house types and make the provision of other house types unsuitable. It is questionable whether it is appropriate for a generic planning policy to seek control over housing type in this sense. The policy aspiration should be to maximise the potential of the site. Policy would need to be supported by robust needs assessment.		
					A policy on tenure would provide greater guidance to developers and have the potential to ensure greater consistency. Would need to be supported by robust needs assessment. Policy would need to be flexible with reference to relevant national and regional guidance and in particular recognise that the provision of affordable housing in certain sites will not be viable.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Any policy relating to tenure should only apply above certain thresholds. The overall target should include affordable housing provided in purely affordable schemes. Seeking higher levels in certain areas could act as a deterrent to investment and would need to be supported by sophisticated assessment and understanding of the development economics and viability in these areas.		
					There is considered to be adequate land within the urban area to provide for required housing rather than requiring development outside the urban area. The potential of sites within the urban area should be maximised and where sites do not realise their potential they should be considered for development in a sustainable way.		
					Neither option on density is preferred. Any policy should confirm minimum density standards. The policy should then seek to maximise the potential of the site having reference to matters such as context/character of the area, housing need, and accessibility, access to services, open space, the types proposed and whether it is mixed use. The existing density of an area should not necessarily prevent a development coming forward at a different density if appropriate in other ways.		
					Density is a somewhat 'blunt tool' in judging acceptability or otherwise of housing. In reality a whole host of issues will need to be considered that could mean certain parts of city achieve higher/lower densities than the standard. These issues could include schemes that propose a conversion of an existing building or where open space is retained that lowers the overall density.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					In most accessible locations densities should be maximised and should be judged through the quality of design and living accommodation provided.		
					A target percentage should be provided in the policy for affordable housing to confirm the strategy and provide guidance to developers. However, it is essential that the council then use any policy as a starting point and adopt a pragmatic approach in discussions and negotiations. Not all sites will be capable of meeting the policy aspiration and the council will need to consider the effect on viability together with other relevant considerations on a case by case basis.		
					Yes, encourage the provision of home zones where appropriate but do not seek to apply this approach to every scheme. In larger schemes there will be a need to deal with vehicular movements through a more traditional approach. Any policy would need to be carefully worded to ensure the approach did not apply to all developments, it may be better to deal with in a relevant SPD.		
					The policy should require high quality design. It is considered inappropriate to be specific about the type of architectural styles that the council would like to see, this is a matter that is better judged on a case by case basis following an architect or designers interpretation of a site and its context.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No specific architectural styles should not be restricted to certain areas of the city , see response to Q.38		
					The list does not appear to be exhaustive. We do not suggest other issues that may be considered other than the need for the policy to recognise potential regeneration benefits of new housing. Regeneration should not be considered as just site specific to the site but also to the wider regeneration aspect such as where an existing occupier is relocating in order to provide a better service. As a general point we would suggest that standards/requirements be addressed in a separate but associated SPD. Detailed standards/requirements are unlikely to be achievable in all schemes so are better placed as SPD than DPP.		
							Whilst an agreed scoring system could be used as a broad indicator of a site's suitability and to highlight any potential issues, we could not support the methodology as being the only system for judging a sites; suitability. In reality there are likely to be considerations that are not covered in the methodology that will be relevant, the methodology leaves little scope for a rounded and considered view of any particular site and could be skewed by high/low scores for certain criteria.
							The methodology is overly prescriptive. For instance a score for accessibility to a centre can vary by 3 points on the basis of being 1 minute closer or further away from the centre. The accessibility section is considered overly prescriptive and does not allow for potential changes to accessibility. Whether access to some of the services listed makes a site sustainable is subjective. In terms of the constraints, the assessment would do better to identify potential constraints but then score on the scope for those constraints to be overcome -the fact that a site has constraints now does not mean it should be discounted if that constraint can reasonably be overcome.

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Councillor Bohill	662				If we need 15,000 extra homes in Sunderland why are Gentoos knocking down hundreds. Ford Estate homes are selling at tens of thousands of pounds, Pennywell houses are being knocked down when these were expensive homes at the time they were built. Houses built before 1800 are still very desirable homes. We need to understand quite clearly what is causing the destruction of good houses and put it right before going onto future plans.		
				Fulwell: - The site of Fulwell Junior school - before developing this site we need to build a new school along with a new community centre. This is planned to go into the site off Ebdon Lane. This site already has a medical centre; some sheltered accommodation Peter Stracy house and the infant's school, as well as the library. The road is not very wide and has difficulty dealing with present traffic levels. Improved access is needed now, so before the junior school site is developed better access to Ebdon lane has to be provided.			
				The land behind the Methodist church - this has also been looked at before and it was impossible to get adequate access. Through the church car park was not wide enough and access of Dovedale road was turned down by the planners because it was too close to the junction of Dykelands and Dovedale roads.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The area behind the bents might be developed but again access will be a problem unless a new road is built south of Cleveland view from the development to the coast road. The bents has two exits at the movement but the way traffic is growing along the coast road these two exits create traffic hazards already.</p>			
				<p>The area between Seafields and the coast would mean the destruction of the leisure centre, the children's' facilities in the area and the loss of the car park needed by visitors to the coast. If such an area is developed and as there is already a lack of leisure facilities in the area for visitors (albeit mainly Sunderland estates like redhouse, Southwick and town end farm) it would be a sacrificial price for the lungs of these areas.</p>			
				<p>High density housing is in conflict with the need for executive housing.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				There is always the question of a hidden agenda involving the destruction of the worm park, the demolition of the house just north of Morrison's and the difficulties put in place for those that want to use the leisure centre as well as difficulties placed in the path of the allotments on shields road (greenbelt at present)			
				To the north we are hard up against south Tyneside, to the south we are fairly built up to the boundary. For any real development we will probably have to 'go west'.			
Taylor Wimpey UK - limited	853	Sanderson Weatherall	730	Ryhope- option 2 high growth is preferable given the governments increased housing targets.			
				With regards priority of growth areas, all growth areas should be judged on their merits assessing whether the site is available, suitable or viable.			
						Land between Burdon Road and Burdon Lane	
					Yes greenfield land should be released in exceptional circumstances. The land identified is greenfield but can be developed in the next 5 years. Ryhope has been identified as a potential growth area and the release of this site will therefore aid the council in achieving this.		
					Yes sustainability assessments should be used to determine at what point in the DPD process greenfield land should be released. Sustainability is a key government objective and therefore should be used as a key factor in determining site allocations. When the supply of brownfield land is limited in order to meet increased housing figures, the council should consider sustainable greenfield sites.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Every site should be judged on its individual merits, The LPA must also be realistic when setting thresholds and understand that the market demands fluctuate for housing type, which ultimately affects density and as a flexible approach should be installed. The developer would therefore make his case to the LPA on what housing density would be suited to a specific area.		
					See response to Q25		
					Yes, consideration should be given to lower densities for affordable housing. This is a valid operational argument that should be given due consideration by the LPA.		
					See response to Q25		
					The existing threshold for affordable housing should be retained. Although residential developers are aware of the importance of providing affordable housing in pleasant areas the council must also consider that this provision affects the economics of the scheme. When the threshold is lowered it becomes more difficult for house builders to balance the economics of the development taking into account consideration of developer contributions, clean up initiatives and development costs.		
					Option 1 Continue with negotiation for affordable housing provision. Councils must adopt a realistic and flexible approach to affordable housing. Certain areas of the city are already considered affordable which questions the need for more such stock. It is also important to consider that certain sites are more difficult to develop because of associated clean up costs and so the developer should be given the opportunity to present their argument. Setting percentages would undermine this flexibility and make it extremely difficult for developers to justify financially developing certain sites.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Developer contributions must be considered in light of the economics of any proposed development.		
					The indicative and final layouts and schemes must be determined on a site by site basis considering all appropriate design/layout criteria, i.e. parking arrangements and the need for open space, etc.		
Kans and Kandy (Property) Ltd		Sanderson Weatherall	730			Land at North Hylton between north bound carriageway of A19 and the A1290	
Mr Brian Potts		CBRE	751			Land at North Farm, Warden Law (3 parcels of land)	
University of Sunderland	581	CBRE	751		We, not the DPD makes no reference to higher education institution halls of residence. Halls of residence are an important consideration in relation to housing needs in an area where there is a student population. Whilst the housing strategy considers in detail the demand for new private housing, it does not specifically consider student housing needs or demands, where these arise and how these should be met. The University of Sunderland is concerned that there is an assumption that planning for student housing can be considered separately 'on its merits' where local housing strategies and subsequent planning policy give no guidance. It is important to maintain an overview of the need for student residential accommodation and to consider how that should be met. Two specific issues arise. Firstly, residential institutions under C2 are a very specific form of land use and are not generally flexible for alternative		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					use.		
					<p>If such accommodation is provided it requires substantial investment and as is the case with the university, it is an important part of the financial commitments made by the institution. Student residences should not be subject to speculative development pressure because such development pressure could undermine the overall strategy of the university, which is identified in the RSS as an important part of the north-east economy. Accordingly, if the university which to put forward a case that student residence development should be subject to a specific planning policy which states that an applicant must demonstrate need for the facility and that need will be judged on the basis of whether the applicant, if it is not itself a higher education institution, has an education institution signed up to use the development. This approach has been adopted elsewhere, notably in the London Borough of Hackney.</p>		
					<p>In addition, the university is also concerned that under use class C3 a dwelling house allows for up to 6 unrelated residents to live as a single household. The city council should consider extending its overall policies on the amount, type and location of residential development to make clear that all student residences will be considered under the use class C2 and that such development will be subject to the demonstration of need referred to above. Provision of student residences is a strategic matter. In other areas of housing policy strategic development is subject to clearly specified parameters with regards to the amount and location of development. The same consideration should apply to student residences in the forthcoming development plan review. We recommend that the development plan review identifies locations for halls of residence development which should comprise the existing campuses of the university. Proposals for halls of residences would then need to be justified on the basis of whether they are in accordance with the development plan.</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Such proposals would be those situated on the university of Sunderland's two city campuses or other locations where there is an existing use as a hall of residence. All other locations should be viewed as contrary to the development plan.		
					These are important strategic considerations that risk being omitted from the housing issues and options consultation as currently drafted.		

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University of Sunderland	581	CBRE	751			Backhouse Park and Ashburne House (Art College) Ryhope Road	
						South Bents Avenue, Seaburn	
						Rear of existing Wearmouth Hall site, Chester road	
						Precinct, Chester Road	
						Bonnorsfield, Palmers Hill Road	
						Clanny House, Peacock Street	
						Forster Building, Chester Road	
						Technology Park, Chester Road	
						Priestman Building, Green Terrace	
						Manor Quay and Wearbank House, Charles Street	
National Offender Management Service	786	Atkins global	913		In recent years there has been a significant increase in the prison population in England and Wales. The prison estate is experiencing serious overcrowding. Capacity needs to be maximised by bringing buildings back into use through refurbishment, new house blocks, temporary units and 'ready to use' units. However, many prisons are already operating at capacity and there is limited potential to significantly increase the number of places at existing prisons. Whilst there are no specific proposals for new prison development in your district at present more specific sites identified, in line with government guidance NOMS request that you consider the inclusion of criteria based policy to deal with a firm prison proposal should it arise during the plan period?		
Northumbria Police	787				Planning out crime circular 5/94 states that crime prevention is a material consideration. General advice on Secure By Design certification for new developments and request for early involvement of the force Architectural and Planning Liaison Officer of any development.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Joan Cuthbertson	870			Chapelgarth: -Thinks neither of the options given would be for the best.			
				Chapelgarth -There will be widespread loss of wildlife and more risk of flooding of nearby wear. In the connection please refer to the report broadcast today 26 January on BBC Radio 4 regarding greenfield sites of gardens to be changed to so called "brownfield sites" and the dangers resulting from this.			
				Ryhope:-Maybe suitably landscaped area with apartment blocks would be a better option. This would avoid a substantial loss of amenity and loss of wildlife and attractive countryside. Look what a success the Byker Wall in Newcastle has been.			
				South Hylton:- The low growth option of approx 500 dwellings would be the best option for South Hylton			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Central Sunderland: - As mentioned before, attractively landscaped blocks, tastefully constructed and with plenty of trees would allow for a high density of housing growth. Newcastle City Centre is an excellent example of dense residential housing.			
				General locations:- The Vaux site and coastal areas of Hendon which are eyesores at present should be prioritised for housing development			
					Mixed uses are an excellent idea especially if you create apartment blocks. Look how successful it is in London, Paris and other European cities.		
					There should be more emphasis placed on attractive apartment blocks with surrounding green areas and public amenities. This is successful in London, Paris and Italian cities and elsewhere in Europe. If you have lived abroad this is very noticeable. We use up too much space on boring, unattractive new estates with bungalows, showbox type detached houses etc		
					Greenfield land should not be released in exceptional areas. We are already losing a lot of our flora and fauna. The loss of green land and trees will result in flooding (already there is global warming) and the loss of wildlife will have serious repercussions for us all		
					Different levels of density should be set in different locations depending on their individual circumstances		
					Yes, the council could have exceptions in place for densities lower than 30dph if it really does improve environment and quality of life for existing residents - usually it does not. No additional housing around Tunstall Hill or allotment area should be built. This is our most important SSSI and asset. Sunderland is already an eyesore		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					The riverside is a good place to develop at higher densities - look at Newcastle. This would improve the safety of the area. At present people are afraid to walk along the river alone. Have some upmarket blocks of flats with plots of shrubbery and a few good restaurants/continental cafes. Looks at what they've done in London at Shad Thames which used to be an eyesore.		
					Yes, we should allow lower densities for the provision of affordable housing.		
					There is no need for a maximum density policy		
					Renewal sites should be built at lower density to provide better environments		
					The threshold for requiring affordable housing on sites should be lowered so that affordable housing is also required on smaller sites.		
					Sites should be identified on a city wide basis for gypsies and travellers. There should be provision for gypsies within cities. They should have equal opportunities for education and work		
					Yes - if it would mean that pedestrians and children could move around without danger of being run over		
					Yes the council should encourage a variety of architectural styles		
					There is a lot of jargon which most people will either not understand or not need so unfortunately most people will not bother to return the questionnaire		
Pat Murray Marine Activities Centre	871					Beacon Drive, Roker	
Clinton Mysleyko Fitz Architects	872					Scotia Quay, Low Street, Sunderland	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Corning Incorporated		DTZ	873			Former Cornings Factory	
Mr D Ridley	874					North side of Office Place (formerly 7-8 Office Place, Hetton le Hole	
Martin Tibbo	876			Opposed to any development in the Seaburn/Fulwell/Roker area - no option listed is suitable			
				No sites suitable in this area as it is already densely populated and adding to this would overpopulate the areas, putting a strain on local facilities and resources. Seaburn, Fulwell and Roker are an attractive leisure location not just to the residents but too many thousands of others, and as such the leisure facilities in the area should be expanded and improved, not destroyed to make room for houses. The greenfield sites in the area are again an attraction to many and as such should be maintained and improved. It also goes against government policy. Traffic is already heavy in the area. Adding to this is asking for trouble and increases the risk of a traffic accident. Parking is also at a premium.			
Claire Veitch	877			Opposed to any development in the Seaburn/Fulwell/Roker area. Area is a wasted opportunity for a beautiful resource. Sympathetic integrated development like there is at South Shields would be great. Appropriate leisure facilities at the sea front could enhance the area for residents and tourists. Looks down at heel at the moment. Would strongly object to housing. Open space should be kept. Fulwell already highly populated and developed.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Steve Breeds	878			<p>Opposed to any development in the Seaburn/Fulwell/Roker area. Seafront has been neglected for many years. Is astonished that this could potentially mean the loss of the Seaburn Centre. Is concerned about maintaining the value of his property and the safety of his family. Would like to see evidence that any developer puts in place measures to overcome traffic congestion, waste water drainage, flooding due to rising water tables and other environmental side effects. Would like an explanation of how the council is going against Government policy regarding greenbelt protection</p>			
R Hughes	879			<p>Opposed to any development in the Seaburn/Fulwell/Roker area. Area is a wasted opportunity for a beautiful resource. Sympathetic integrated development like there is at South Shields would be great. Appropriate leisure facilities at the sea front could enhance the area for residents and tourists. Looks down at heel at the moment. Would strongly object to housing. Open space should be kept. Fulwell already highly populated and developed.</p>			

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Terry Sandison	880			Opposed to any development in the Seaburn/Fulwell/Roker area. Strongly objects to any development which would intrude on the view of his property. Under the impression that the area directly behind Seafields was a leisure/amenities area.			
David Dorner	881			Opposed to any development in the Seaburn/Fulwell/Roker area. No effort has been made to make local residents aware of what will directly affect them. The fields are a leisure area that should be developed so that all citizens of Sunderland can make use of it. We thought Government policy was to encourage the preservation of playing fields for the benefit of all, rather than concrete them over for developer profits. Traffic management is already an issue in the area. The addition of more homes will massively add to this congestion problem.			
Bert Miles	882			Seaburn/Fulwell/Roker: Council should have informed us of residents meeting, we had no notification. The seafront should be kept as a leisure area and developed accordingly. The car parking areas are critical for attracting people to the seafront, if these were housing areas it would result in drastic parking problems. Large increase in housing in the vicinity would automatically increase the volume of traffic in and out of south bents. Seaburn/Roker, added to the cars bringing in day trippers and Morrison's.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				The council car parks are vital as overflow for shoppers, various attractions throughout the year and seafront visitors.			
				Strongly object to the possibility of housing on the greenbelt and car parks but would welcome any leisure developments to enhance the seafront for the use of all Sunderland's residents.			
				We wish to draw your attention to popular and far superior seafront and facilities at south shields in comparison to Seaburn and Roker. We should be promoting the beautiful beach and improving the open aspect of the seafront with more attractions for residents and visitors. The opportunity must not be lost to improve the wonderful natural facilities we have here on the coast in Sunderland.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Volker Stevin Ltd	883					Land at Springwell Road, Springwell	
Mr and Mrs Blakie	885			Seaburn/Roker/Fulwell: concerned with the lack of notification and secrecy surrounding this consultation exercise. It seems apparent that certain actions have already been taken to ease the way for future developments.			
				The area has had little investment or thought over many years with regards developing it tastefully as a recreational area. It has a good mix of open areas that are not built up or on and these should be used to best effect to add to the attraction for visitors.			
				It does not need new housing development to add to the already difficult traffic problems. We find it difficult to understand that when leisure activities are on the increase that you would even contemplate closing the Seaburn Centre or allowing anything to impact on the playing fields.			
				We would suggest that a close look is taken as to what we can do to make what we already have more attractive.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				We are fundamentally against the use of any greenfield or greenbelt land, the latter being designated to prevent urban sprawl and add to the quality of life.			
				Why do we want the population of Sunderland to grow? Where does it stop? When there isn't a single piece of land left without building on?			
				Maximising the use of the metro system is mentioned, this seems odd when closest stations are (No Suggestions) and Seaburn, which are a good distance away and Seaburn station has no parking and you can walk to the town centre just as quick.			
				We do not agree with the need for additional housing in this area and trust the consultation process will continue with the full involvement of the people who live in these areas.			
Julia Robinson	886			Firstly, although I appreciate there is a need for extra housing in the Sunderland area as a whole, why choose a greenbelt area such as this? Sunderland has so many few grassed areas left, why not choose old quarries to build upon? Building in this particular area is detrimental to its reputation as an area of leisure. Is it also true that you are planning on closing the Seaburn centre? The government are promoting a fitter and healthier nation, what can you hope to achieve by closing the Seaburn centre?			
				Instead of concentrating on housing why aren't you focusing on what is really important, maintaining the facilities that are already in place yet have been left to deteriorate? The Lambton Worm play park is an eyesore, as is the skateboard park. The fairground is pitiful; surely your priority is making Seaburn a tourist attraction that not people from out of the area enjoy visiting (aside from the annual Air Show) but also making it a safe and attractive environment for its existing residents.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>With regards to safety issues, there aren't many places in Sunderland where children can actually play outside, indeed. If you build up to a 1000 houses in our vicinity, can you imagine the amount of traffic this will generate, people cutting through our estate. It can take us 10 minutes to actually get out of our estate when turning off onto the sea front, imagine how the sheer volume of traffic along the sea front will be volumised by building more housing.</p>			
Nicola Flood	887			<p>I was unaware of the residents meeting as the publicity for it was in my opinion was inadequate. I would have expected that given the nature of the topic to be discussed a 'flyer' through residents letterboxes would have been the very least I would have expected.</p>			
				<p>The seafront in North Sunderland is a very big attraction to people at anytime of the year and especially during air show weekend and other cultural activities. Not to mention the use of 'Open Space' for recreational activities used by local people. However, the state of some areas of the seafront is a waste of opportunity for the city e.g. Seaburn Fair which seems to be used more as a repair centre and is an eyesore, the rundown Lambton Worm & Pirate play park, which I have never seen in my time here open, all located around Morrison's. If it is the Councils future proposals to remove recreational facilities and replace it by housing please explain how you would intend to promote the Seafront?</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>I believe that the Seafront is in need of Regeneration and that the correct strategy would see a vast improvement in the facilities, recreational resources and activities for all ages.</p> <p>I would like the council to hold a further meeting to which all the relevant residents of the Fulwell, Roker & Seaburn areas are properly invited so that the Council can put forward and openly discuss its plans for the future of the area.</p>			
Chris Irwin LCS Ltd	890					Mount Lodge, Mount Land, Springwell	
						Blue House Fields, Springwell Village	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Chris Irwin Ramsgrove Ltd/Cameron's Ltd	891/892					Albany Park, Spout Lane	
Bob Price	894			Seaburn/Roker/Fulwell:- Low Growth, approximately 300 dwellings			
				Consideration should be given to those areas closest to the employment centres. In doing so this would encourage people to use public transport or foot rather than cars.			
					Where possible I believe that mixed use would help create stronger communities, but public transport hubs and facilities should also be developed in areas that through their own development or expansion would benefit in providing an improved and sustainable public transport network.		
					Consider a policy which seeks to address any imbalance in the housing stock		
					Negotiate with developer for mix of house tenure Times and situations change and having a more flexible policy could help us meet changing needs quicker		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock Times and situations change and having a more flexible policy could help us meet changing needs quicker.		
					No - greenfield land should not be released in exceptional areas We must protect greenfield land as a barrier against overdevelopment.		
					No sustainability assessments should not be used to determine at what point a greenfield site should be released. We must protect greenfield land as a barrier against overdevelopment.		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph		
					The Fulwell area should be developed at lower densities to retain the overall character of the area,		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					retain leisure facilities on the seafront and not to put an undue strain on the current transport/road/services infrastructure		
					Yes should have exceptions should in place for developing affordable housing sites below 30dph Each case must however be carefully considered and conditions put in place to protect it against any future relaxing or changes in spacing standards		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need for affordable housing		
					No. Provision must always be made on the application site for special needs/extra care		
					Criteria based approach to special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers		
					Yes encourage home zones		
					Yes encourage a variety of architectural styles should always complement the surrounding properties in the area		
					Yes specific architectural styles should be restricted to certain areas of the city. We must avoid spoiling the character of an area by allowing designs or styles that does not compliment the area or part of.		
					No do not agree with range of D.C policy issues		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Large private gardens should not be cannibalised to provide residential development land. Well run and popular allotment sites must also be protected for future generations in the light that many newer builds have smaller green areas.		
Bob Price	894			I must strongly object to the area that includes the Seaburn Centre, Worm Park & Fun Fair Site being used for housing. I feel that we have already lost prime leisure land on the seafront to housing (The Bay Hotel Site) and to retail (The Morrison's Supermarket).			
				I can see major problems if this site was redeveloped for housing during the Sunderland International Air show, with more complaints being lodged about noise, litter and the inconvenience of access over this weekend. The additional problem of parking over this weekend for the disabled and VIPs would be compounded with the removal of the car park behind the Seaburn Centre.			
				The removal of the Seaburn Centre itself, if this development was agreed, would mean the removal of its "Wellness Centre" from the area. If we were to use this marked site for housing we would be reducing the seafront area to a narrow strip of land that would only include the beach, a couple of amusement arcades, a handful of restaurants/cafes, a pub and two hotels at the Seaburn. Any further reduction in the leisure facilities within this marked area would make it very hard for these businesses to retain or attract customers. We need to increase the leisure facilities that are more family orientated and enhance the natural beauty of the seafront, rather than replace it with housing, so as to attract more visitors to the resort. We should be increasing the facilities for people and encouraging them to improve their health, not removing it.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Church Commissioners for England	201	Smiths Gore	895			Land at Tunstall Vale, Rushford, Ryhope (SA9.17)	
						Land at South Ryhope (SA4.2)	
						Land west and east of Ryhope Road, Ryhope	
				Philadelphia area should be considered as an area for housing growth due to its existing commitments, regeneration initiatives, identified potential housing sites which maximise the use of PDL and exploit transport links, along with popular market locations.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No, no particular growth area should be prioritised.		
					No the council should not insist on mixed-use for locations within the city and local centres.		
						Land at Raglan Row (HA4.5)	
						Land at Philadelphia junction (HA4.6)	
						Voltage Terrace Allotments, Philadelphia	
					Option 1; - Have a city wide policy which aims to achieve a mix of house types on all sites.		
					Housing tenure should be negotiated with developer rather than having a policy in place.		
					Option 1 - greenfield land should be released in exceptional circumstances. The council must acknowledge that green field sites will need to be released in order to meet the housing figures in the final version of RSS. Any targets for PDL must retain flexibility to enable greenfield sites to be provided.		
					Greenfield sites need to be provided for the following reasons:- - In order to provide a mix of land for housing in different locations and to meet specific needs such as the need for executive housing. - In some cases greenfield sites are in sustainable locations and their development for housing can compliment regeneration and the re-developing of adjoining PDL. - Not all PDL sites are suitable for housing. In many cases existing industrial/business are redeveloped for housing with the loss of an important local source of employment which is then transferred to a less sustainable peripheral location or is lost altogether. The city council needs to carefully assess PDL sites as to their suitability for housing.		
					The council's ISHL objectives (quoted in Para 8.3 of HADPD) retain sufficient flexibility to satisfy the housing stock requirements through a mix of PDL and greenfield sites.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Option 2 :- set different levels of density in different locations based on distances from city/town/centres, etc.		
					Yes, agree with exceptions for lower densities.		
					No, exception should not be in place fro developing affordable housing at lower densities.		
					No, maximum density policy not required.		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					Any defined threshold should be based on both site size and dwellings proposed.		
					Continue with negotiation for the amount of affordable housing to be provided.		
					Circumstances for off-site provision for affordable/special needs homes should not be considered. Provision must always be made on the application site		
					A criteria based approach should be given to sites for special needs.		
					1. sites should be identified within the Washington/Hetton and fence houses area		
					No, homezones should not be encouraged.		
					Yes a variety of architectural styles should be encouraged.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No, Specific architectural styles should not be restricted to certain areas of the city.		
					yes, agree with range of D.C policies		
							Yes, agree with the use of an agreed system of scoring sites.
Ian McConnell	896			Seaburn/Roker/Fulwell: - I cannot support the provision of additional housing in this area. I would fully support the provision of superior leisure facilities.			
				There is a need for leisure facilities; high density is already in place. The traffic management and parking infrastructure is totally inadequate now.			
				It is very important for quality of life to retain areas of greenbelt encompassing leisure facilities.			
				The city council need to issue a statement to confirm that no dwellings are planned /will be tolerated in the general area between Dykelands Road and South Bents and inland up to the boundaries of the Academy of light. And confirm that long term plans to regenerate the whole sea front as I am concerned with the state of the seafront.			
Alison McConnell	896			Seaburn/Roker/Fulwell: There is a need for leisure facilities; high density is already in place. The traffic management and parking infrastructure is totally inadequate now.			
				It is very important for quality of life to retain areas of greenbelt encompassing leisure facilities.			
				The city council need to issue a statement to confirm that no dwellings are planned /will be tolerated in the general area between Dykelands Road and South Bents and inland up to the boundaries of the Academy of light. And confirm that long term plans to regenerate the whole sea front as I am concerned with the state of the seafront.			

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R Bell	897			Roker/Seaburn/Fulwell: - The proposals for housing would be seen at variance with the understood planning intention for this part of the city and being undertaken with little publicity. Full public discussion and involvement are required.			
B.J.Rowell	898			Roker/Seaburn/Fulwell: - If proposals for development of land in the area of Seaburn are definite I am surprised that have not been given greater publicity. Traffic problems which already exist will be exacerbated. Seaburn is a leisure area for the family surely it is more important to develop the area with this aspect in mind.			
Mrs M. Ashcroft	899			Roker/Seaburn/Fulwell: Concerned didn't know about the meeting. Speculation about closures of Seaburn centre and clearing of fun fair area for housing development. What proposals are in place for this land? Is the council proposing housing development in this area? Seaburn is Sunderland's jewel in the crown and major housing development and consequent effects of this would have a negative impact on the area. Traffic management is already an issue and our playing fields and open spaces need to be protected for future generations.			
Mrs O.A Swaine	900			Roker/Seaburn/Fulwell: Strongly oppose development of 1,000 houses from the east side of Seafields to Morrison's car park.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>I am not against executive housing being put on the seafront, but a concrete jungle is another matter. Leisure facilities are lacking and hence tourists go to south shields. The government is trying to encourage people to get more active but not Sunderland council, they want to get rid of play parks. Should provide play park for children and are for elderly. Arcades should go Seaburn centre should be replaced with better facilities. I should like to know why the people around the area were not told of this meeting, it seems very secretive and underhand.</p>			
Peter Ramsey	901			<p>Roker/Seaburn/Fulwell: Register objection to proposed residential development in this area. Area used as safe area for recreational activities. Fields adjoining south bents were bequeathed by Sir Hedworth Williamson to the Sunderland technical college and should remain as such.</p>			
				<p>Seaburn is being downgraded as a leisure area, traffic problems. Parking and access would deteriorate even further with proposals to build extra houses. Need to reject housing and put thoughts into retaining greenbelt and develop whole area with leisure and recreation facilities.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Mr F J Veitch	902			Roker/Seaburn/Fulwell: - Register objection to proposed residential development in this area. This is one of the few open spaces in an already highly developed area. It is well used and is an important buffer between residential areas and the sea. Council seem to have abandoned any idea of developing tourism and leisure here. Once open space is built on the greenfields will be lost forever. Surely there are numerous brownfield sites which would be more appropriate for housing.			
				There are already traffic problems and any further residential development would make congestion much worse. Serious implications for schools in the area.			
Gordon Gardner	903			Roker/Seaburn/Fulwell: - Very concerned concerning your intentions regarding the recreation areas to the sides and rear of Morrison's supermarket. I have noticed how the playing fields have been run down and now wonder if this is to discourage the public from using it.			
				It also appears that the demolition of the Seaburn centre is now planned. I would suggest that South Shields sea front should be observed in order to learn how these areas can be used for public recreation. Concerns with how the local roads will handle the traffic. From April to October each year the sea front is impossible during fine days, concerns over more carbon emissions.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				I strongly support sport and I strongly object to any future plans to take away our playing fields. The deeds of the land need checking as they are restrictive covenants regarding the use of the land in question.			
N.W	904			Seaburn: - Strongly object to residential development in the Seaburn camp area. This area is open of the few remaining greenbelt areas within the city boundaries, well used for social and recreation purposes and a safe area for children to play. Provides the opportunity to participate in healthy outdoor activities as well as being encouraged to do so by the government.			
				Seaburn continues to be run down as a leisure area, it has not been maintained or updated to any where near its potential as a leisure and tourist area. The playing fields are not being maintained, with litter, graffiti, etc.			
				Already major problems with traffic management in the area, any further residential development in this area will further add to these traffic problems and local parking problems. I would strongly urge the council to reject any proposals for further residential development in this area, it is not required and the council would be better served to maintain the greenbelt and making Seaburn into a leisure and recreational area.			
David A. Ross	905			Seaburn/Fulwell/Roker: Concerned that when initially enquired with the planning department they stated that no indication that building was to take place on this land. Enquired again November 2007 and told the same again. I now find this may not be true			

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				I firmly believe that this area is in need of some investment and redevelopment, but leisure area rather than high density housing. The beach and playing fields attract many people and to loose the open space would have a negative effect on the area. Also the loss of valuable parking facilities, especially for the air show will result in increased congestion and problems with traffic management.			
				Environment agency mapping shows that some of this area is likely to flood in the vent of raised sea levels, surely that should prevent any developer from considering this as a suitable site for housing. I do not believe that developing this area for housing falls in line with government policies on protection of greenbelts and playing fields.			
Mr C Butler	906			Seaburn: - Strongly object to residential development in the Seaburn camp area. This area is open of the few remaining greenbelt areas within the city boundaries, well used for social and recreation purposes and a safe area for children to play. Provides the opportunity to participate in healthy outdoor activities as well as being encouraged to do so by the government.			
				Seaburn continues to be run down as a leisure area, it has not been maintained or updated to any where near its potential as a leisure and tourist area. The playing fields are not being maintained, with litter, graffiti, etc.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Already major problems with traffic management in the area, any further residential development in this area will further add to these traffic problems and local parking problems. I would strongly urge the council to reject any proposals for further residential development in this area, it is not required and the council would be better served to maintain the greenbelt and making Seaburn into a leisure and recreational area.</p>			
J R Fraser	907			<p>South Hylton:-I do not think sufficient regard is being given to the unique situation to the village. We have an interface of river, countryside and urban housing that does not exist to anything like the same degree in the city. The consequences of building large numbers of additional housing in the village will seriously affect this charming quality of South Hylton.</p>			
				<p>I do not think that any more large scale development of additional housing should go ahead. Permission for future building of some houses in small or infill sites may well be desirable and judged on their respective merits.</p>			
Donald and Linda Miles	908			<p>Seaburn/Roker/Fulwell: - Annoyed to learn about public meeting, no notice was given to ourselves or to other residents in these areas. The impact of building up to 1,000 new homes will have a devastating effect on the area; they will become one massive estate and loose their identity.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Traffic will also be an issue; car parks are not able to accommodate current levels. The coast should be an area to be proud of, not destroyed. The area should be kept as a recreational area.			
John Adamson	914			Seaburn/Fulwell/Roker:-I was somewhat perturbed by the lack of notification for the consultation carried out on the 4th and even more disturbed by the incredibly short amount of time allowed for representations to be made on issues arising. A period of only 6 days (two of which are Saturday and Sunday), why is this period so short? Why were householders in each of the development scenarios not informed individually by letter? Why were householders not invited to the public consultation?			
				Scenario 1 Where are the existing consents and allocation? And what types of development are planned on each? Why will these developments not take full advantage of metro system? Is the suggestion that more properties should be built with easy access to the metro system?			
				Scenario 2 What is the definition of an underused site? What areas of Seaburn/Fulwell/Roker fall into your definition of underused sites? What type and density of housing is to be considered? How will further development increase current difficulties with parking and traffic management? In areas of Seaburn/Fulwell/Roker there are already issues with litter, graffiti, youth conduct and disorder. What additional problems will an expansion of existing households bring?			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Scenario 3</p> <p>What is the definition of an underused site?</p> <p>What areas of Seaburn/Fulwell/Roker fall into your definition of underused sites?</p> <p>What type and density of housing is to be considered?</p> <p>How will further development increase current difficulties with parking and traffic management?</p> <p>In areas of Seaburn/Fulwell/Roker there are already issues with litter, graffiti, youth conduct and disorder. What additional problems will an expansion of existing households bring?</p> <p>You refer to minimal use of greenfield land. What areas of greenfield land are being considered for the use of housing development?</p> <p>How can the negative impact upon green and open spaces be offset? At a time when we are trying to encourage healthier lifestyles why are we considering the reduction of the green and open spaces that will be needed to meet the increasing demands of a population trying to live healthier lifestyles?</p>			
				<p>What provision will be for leisure and recreational facilities?</p> <p>In particular how will the exiting infrastructure be improved to accommodate any increase in households? And what impact will additional housing have upon road safety and traffic congestion?</p> <p>As we face many issues brought about by increasing environmental changes that will increase the risk of flooding, what impact will development on greenfield sites have and how will this be assessed and taken into account?</p> <p>Surface water drainage and the need for increased sewage and waste water management will massively increase with more development - what guarantees will be given to existing householders that their properties will not be adversely affected? If they are what compensation will be made available?</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Scenario 4</p> <p>What is the definition of an underused site?</p> <p>What areas of Seaburn/Fulwell/Roker fall into your definition of underused sites?</p> <p>What type and density of housing is to be considered?</p> <p>How will further development increase current difficulties with parking and traffic management?</p> <p>In areas of Seaburn/Fulwell/Roker there are already issues with litter, graffiti, youth conduct and disorder. What additional problems will an expansion of existing households bring?</p> <p>You refer to minimal use of greenfield land. What areas of greenfield land are being considered for the use of housing development?</p> <p>How can the negative impact upon green and open spaces be offset? At a time when we are trying to encourage healthier lifestyles why are we considering the reduction of the green and open spaces that will be needed to meet the increasing demands of a population trying to live healthier lifestyles?</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>What provision will be for leisure and recreational facilities? In particular how will the exiting infrastructure be improved to accommodate any increase in households? And what impact will additional housing have upon road safety and traffic congestion? As we face many issues brought about by increasing environmental changes that will increase the risk of flooding, what impact will development on greenfield sites have and how will this be assessed and taken into account? Surface water drainage and the need for increased sewage and waste water management will massively increase with more developments - what guarantees will be given to existing householders that their properties will not be adversely affected? If they are what compensation will be made available?</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The impact of an additional 1,000 homes will require the building of additional roads, what is the environmental impact of this? As well as building new roads improvements to junctions and existing roads will be required. How can householders be assured that this will not increase the likelihood of death or injury on the roads? How will it be ensured that existing householders are not subject to traffic problems, delays and bottlenecks due to inadequate traffic capacity? If each of 1,000 new homes has at least one car what will be the impact upon existing traffic management and parking issues in Seaburn/Fulwell/Roker areas? How will this be managed? If each household has two or more vehicles then the issue will be even greater and the problems will be increased massively.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>You list questions to consider....it is difficult to answer these questions when you give so little information. I am of course concerned about the sudden and unexplained demolition of the Caretakers house at the entrance to Seaburn Camp. Why if houses are in short supply did you allow the demolition of a perfectly good family home? Is this because of plans to build an access road to develop the playing fields? I would object to the destruction of this important green space which is essential for leisure and sports activities in the Seaburn/Fulwell/South Bents area.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Val Derbyshire	915			<p>Seaburn/Roker/Fulwell: -The proposals under scenarios 1& 2 seem very interesting particularly if it was possible to develop some of the badly neglected sites in the Seaburn, Roker and Fulwell areas. However, further development than this would seem highly undesirable. It is particularly worrying that the council seem to be considering the use of greenfield sites for housing. There are so many other under used and neglected sites in the city to the north of the river that it would be a shame to continue to neglect them whilst at the same time allowing developers to build on new sites.</p>			
				<p>In the meantime, the Seaburn, Roker and Fulwell areas seem to have many properties for sale and they have been for sale for a considerable time. This is particularly true near to the sea front. I wonder therefore about the information that the council have that would lead it to conclude that the city requires another 1000 new houses. Schools such as Monkwearmouth have indicated an expected decline in numbers over the coming years and this does not really suggest a need for new housing.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>It is very difficult to maintain confidence in a council that would consider building houses on greenbelt land whilst at the same time allowing sites such as the old Vaux site, or the open spaces in the middle of Southwick to continue undeveloped. I would like to know what evidence and information were used in order to produce the sets of proposals and which of the proposals is favoured by the council.</p>			
Michael Hartnack	916			<p>Seaburn/Fulwell/Roker: - On another point however, as a result of the possible housing proposals for the north area of the city, especially with regard to development around Seaburn, South Bents, and Roker - this recent so called consultation exercise has created a tremendous amount of distrust as far as the council planning authorities are concerned. For example, the methods of feeding back views to the core strategy have been mixed with confusion; I know of at least three people who have contacted your office and been told that they can only feedback on the web - one of those people is 70+ years old and has never used a computer in their life. Further, did you know that the website was not accessible for much of the weekend?</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>I have come across nobody at all who was aware of the consultation meeting and the assertion that adverts were placed at various shops and public buildings in the community are very questionable indeed. Your method of notifying the public on such an important issue show a very old fashioned and underhanded way in which to get the beaurocratic tick in the box for consultation - has it not struck you that to be open and engaging with the public, you have to be far more sophisticated than putting notices in a small selection of public buildings and shops to get the message heard and you have to be far more open as to what the content of the meeting is about. Failure on two counts, then to hold the meeting at a school on a dark winter night, inaccessible to people without transport is simply not on.</p>			
				<p>These are desperate steps to alleviate what has become a serious breakdown of trust between this council and local residents who believe that the council planners are working on hidden agendas for the area, running the place down purposely and significantly in order to justify much of the criteria for housing development contained within the relevant core strategy documentation.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Michael Simmons	917			<p>Seaburn/Roker/Fulwell: - I was appalled to hear that consideration has been given to demolish the Seaburn centre to make way for further development to this and the entire area from Seafields estate to Morrison's. An interest has also been shown in the football fields adjacent to south's bents, this would be an outrage and blatant breach of government policy who's objective it is to retain recreation fields and the UDP for the seafront zone includes pursue recreation opportunities and protect and enhance the environment.</p>			
				<p>I look forward to seeing the justification for even considering housing in this area, not to mention the wider scale problems associated with the area. Traffic congestion would become even more of a problem and an increased ganger for pedestrians. The seafront zone if for leisure and entertainment and not a saturated housing development. We want the council to look after its existing residents.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Simon Burdis	918			<p>Seaburn/Roker/Fulwell:-I felt it necessary to write to you in order to make my objections known in reference to the proposed developments along the Sea Front in Seaburn. I also wish to register my disapproval at the way in which the meeting at Redby School was advertised when a change of this magnitude will obviously be of interest to all residents in our local area. At the time of my writing, the pages on the website in reference to the development are temporarily unavailable, and when the date for objections to be registered ends tomorrow, I feel this is highly unprofessional.</p>			
				<p>Putting this to one side, I discover this week that the intention of the council is to build houses on Cliff Park, the Lambton Worm play park, the Seaburn Centre, Seaburn Camp and the playing fields by South Bents. I really question the councils thinking behind this development. Seaburn has been crying out for an injection of money to develop it as a location people wish to come and visit. Building houses in my opinion is short term money grabbing exercise that will first of all destroy what community is in place as well as destroying any potential the area has to develop as a commercial area.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The Seaburn Centre acts as a building that unites the community that is used by a very high percentage of the local populace. The fair has acted as a white elephant for the last couple of years with it opening on a very ad hoc basis. However with a bit of investment this fair is in a prime location to rival that of South Shields. I don't understand the council's mentality in deciding to remove even more of the green belt when the exact opposite aim is plastered all over your own website. The new skater park in my opinion was put in the wrong area as it is just offering kids a chance to hide from their parents. It needs to be a lot better lit but in theory is a good initiative. With houses built, where is there for kids to play; the cemetery? You will take away all areas of entertainment for miles. People will have to travel either Sunderland or South Shields centre for entertainment.</p>			
Martin Wilkes	919			<p>Seaburn/Roker/Fulwell:-I understand that there was a consultation exercise on Monday 4 February at Redby School re: Sunderland's Core Strategy and the future housing needs for the City of Sunderland. Unfortunately, as the Council chose not to inform the affected residents DIRECTLY and only advertised the consultation exercise in an extremely low-key manner, I was not aware of this meeting and so did not attend.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>I feel that current neglect shown to the whole of this area is typical of wasted opportunities for the town. Seaburn and Roker's seafront it a really beautiful natural resource and with real drive, initiative and genuine commitment, Sunderland could better the excellent efforts made by a, forward thinking Local Authority like South Tyneside, with their sympathetic, integrated development of South Shields sea front and immediate surroundings.</p> <p>Surely, by investing in appropriate tourism and leisure facilities' the sea front area from South Bents, through Seaburn to Roker could be significantly developed to enhance the environment for all of Sunderland's residents and increase income from tourist visitors. Instead the seafront has been developed in an ad hoc manner; facilities such as the Seaburn Centre are rapidly becoming run down through lack of investment and the play areas are limited and poorly maintained and in the case of the Lambton Worm, shut.</p>			
				<p>If what I've heard on the grapevine is true, that most of the area is being seriously considered for a major housing development then I would strongly oppose any such decision. It is already a highly populated residential area from Fulwell to South Bents and the 'open space' between Seaburn and South Bents enhances the natural environment and is used recreationally for team sports, individual sports, leisure activities and important events, such as the Airshow. If housing developments are planned I would like to receive information about infrastructure to support additional population such as traffic, access, parking, litter and pollution control, noise and roads and school places for the increased population. Traffic in the area is already heavy and access to and from South Bents can be difficult (especially at certain times of day and year such as the Sunderland Air Show).</p>	Fred Miller		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Fred Miller	920			<p>Seaburn/Roker/Fulwell:-Firstly, we would like to object to the fact that we had no information about the consultation exercise at Redby School on February 4th and were only aware of the meeting after the event. Secondly, the tight timescale by which our representation must be made. Most of the people with whom the development will be an issue are unable to make their opinions known as they are still unaware of the facts.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>As to the possible scenarios, we must remember that the seafront is one of Sunderland's greatest assets and we want it to be a place for all inhabitants to enjoy its recreational facilities and not become one massive housing estate, losing our precious green belt. We need places for children to play and families to picnic etc. Give a thought to how South Shields has developed its seafront.</p>			
				<p>The type of housing we feel is right for the area is a mixed development with mainly houses. Surely we do not need any more "luxury 2 bedrooomed apartments". To this end we could only agree to Scenarios 1 or 2 and those after much more detailed information which we hope will be forthcoming.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
John Adamson	921			<p>I am deeply concerned that future development in the Seaburn/South Bents area that may target greenbelt land and land currently used for leisure purposes. As we try and shape the communities of tomorrow access to leisure facilities are essential to encourage healthier lifestyles and social inclusion and harmony.</p> <p>The removal of playing fields cannot be supported as it will destroy the very places that are needed more than ever to allow young people to engage in sports and leisure. Why are the facilities provided not used? Why does the council not open the council owned play parks at the rear of the Seaburn Centre?</p>			
				<p>How can the council conceivably consider developing the land on the University playing fields for housing when there is a shortage of recreational space for children to play? Why are changing facilities, caretakers and park keepers been systematically removed? We must defend these open and green spaces for the future of Sunderland and should target development on brown field and housing which is currently poor or substandard.</p>			
				<p>What percentage of properties in Sunderland are currently empty? How many properties are currently neglected and run down? How many communities are not been fully supported by the council? Why not target development on bringing existing housing stock up to an acceptable standard? If all the property in Sunderland was brought up to standard we would have enough desirable homes for all.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Mr R Nichol	924	Nicholson and Weston	923			Elstob House Farm, Silksworth	
Frank Hunter	926			Seaburn/Fulwell/Roker:-I believe that a number of scenarios relating to housing development were outlined at this meeting, some of which involved the construction of dwellings on land between Seafields Estate and Morrison's Supermarket, and also on the green belt between Seaburn and South Bents. I wish to register my objection to these proposals as I believe that this land should be reserved for leisure use.			
				I only know of these proposals second hand as I was unaware that the meeting was taking place. The council seems to have once again adopted its legendary low key approach to consultation and the publicising of such events. The fact that comments have to be in by 10 February, thus allowing only 6 days for views to be expressed, proves beyond all doubt that this council has no interest in the opinions of local people. We on Seafields Estate have not received the council's own newspaper for many years, but I would have thought that an issue of this importance would have at least warranted a leaflet drop.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>The leaflet distributed at the public meeting refers to planning over the next 15 years, but my immediate concern is for what is intended in the medium and short term, the future of Seaburn Centre being a case in point. Seaburn is blighted with bright ideas from the council that don't seem to have worked out, for example Lambton Worm Playpark.</p>			
Graeme Wilkie	927			<p>Seaburn/Fulwell/Roker:-Logged an objection to the development scenarios in this area.</p>			
David Staward	928			<p>Seaburn/Fulwell/Roker:-I have grave concerns about the potential scale and inappropriateness of these scenarios which I have only just been made aware of and would like to make the following key points:</p> <ul style="list-style-type: none"> • The open spaces of the sports fields are essential, both for sport and for the environment. We must leave space for the young and not so young to exercise and enjoy. • The fields also act on occasions as a 'flood plain'. • With the danger of loss of facilities from Crowtree and Newcastle Road Swimming Baths it is more essential than ever that we look to retain and 			

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				develop facilities around the Seaburn Centre for: a) indoor sports; b) leisure swimming; c) ice skating; d) RSC; e) antiques fairs etc.			
				Some level of new house-building is inevitable but we are a long walk from the Metro and Seaburn Metro has very limited facilities. The sea front at Seaburn is a valuable amenity which must principally be for leisure otherwise the whole character of the area and its advantages to the wider population of Sunderland is wasted.			
Freda and David Fleming	929			Seaburn/Fulwell/Roker:- We deplore the possible loss of such a valuable green buffer for what can only be short term financial gain from the developers, even taking into account the removal of the cost of upkeep of current "facilities" (which must be negligible anyway as the Council does hardly anything to keep on top of problems).			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Everyone needs spaces such as these away from the noise and pollution of traffic and the area in question is used regularly by a wide range of people from all over the City from pet owners to sports people including horse riders, wind surfers, children practising football, kite flyers and even the occasional caravan rally. Indeed, development of this area would fly in the face of Government policy which is to create playing areas to encourage our young people to keep fit and healthy.</p>			
				<p>There is currently valuable parking space for visitors to the beach area not to mention one of this council's few real success stories - the Sunderland Air Show. Any other large scale events that could, and should, be developed, such as the illuminations if resurrected, would also be affected if these areas were no longer available for overspill parking and fairground use and instead full of additional residences. The Air Show in particular would have much less appeal to visitors if parking was not available and the Show would be a much greater logistical nightmare to organise.</p>			
				<p>Creating huge residential areas at Seaburn is not the way forward and we wish to register most strongly our objection to the likelihood of this happening and ask that the Council look instead at developing further leisure facilities.</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Colin Colborn	930			<p>Seaburn/Roker/Fulwell: - I would like to oppose any construction of new housing developments in the Seaburn, Roker and Fulwell areas for the following reasons:</p> <p>1. CONGESTION To further develop the area with new properties would mean building on currently undeveloped land. Namely the fields at Seaburn, the play park areas close to Morrison's and where the Seaburn centre is located. This will cause even greater congestion problems to the area. The coast road is already very busy due to people coming to the area to use the open fields, the beach and the local restaurants and pubs. Further development will only add to this congestion. If current parking is also reduced it will mean more parking problems at current residents' houses. Also when events like the airs-how are being held there will be no-where for the cars to park.</p>			
				<p>2. THE AREA People come to the area to go to the beach, use the playing fields and the Seaburn centre. The area is unique and special due to its facilities, open fields and beach. That is what makes it a desirable place to live. Once the open fields are taken away and housing developments added to the area. This uniqueness' will be gone. And once it's gone it can't be brought back</p> <p>3. I purchased my property because of the open views I have along the sea front. I do not want that to be blighted by further developments. The council should look at areas that have previously had developments</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Charles Coombs	931			<p>Seaburn/Roker/Fulwell: - I wish to register my concerns regarding the development of the Seaburn area. There has been very little investment in what should be the jewel in the crown of Sunderland. This is the only area many visitors get to see namely on Airshow day.</p>			
				<p>You need to think again we need facilities for the present residents without making the present shortcomings worse. We all complain about the youths of today hanging around the streets and yet our answer is to Knock down the few places they have to go and replace them with more streets.</p>			

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Capt. J.K.Allison	932			<p>Seaburn/Fulwell/Roker: -Due to insufficient information being promulgated I was unable to attend the public meeting held on the 4th February at Redby Community Centre.</p> <p>Due to technical problems with the council website this weekend I have been unable to access the pdf file concerning the above matter. The Council does not seem to have an alternative way to view documents, such as by html to look at the material available for public access. Other government departments do have this facility.</p>			
				<p>With regard to Scenario 4.</p> <p>I am not in favour the proposal on the following grounds.</p> <p>Loss of the green belt.</p> <p>Loss of fields which could be used for recreational purposes with minimal investment required.</p> <p>Overcrowding of local roads at peak periods, and resulting air/noise pollution.</p> <p>Over extending existing service provision at all levels.</p> <p>Basically using a flood plan for housing with no consideration of future global warming</p> <p>Effects on local wild life.</p> <p>Loss of green space and the public health implications of this (communities should be developed in accordance with national obesity and mental health guidelines). You are supposed to be planning for health.</p> <p>Have you had a health impact assessment done regarding the proposed use of the area?</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
C.M.Goodfellow	933			Seaburn/Roker/Fulwell:- Low growth			
				Greenbelt land to be protected.			
				Chapelgarth: - Current planning consents -option 1, but measures to be taken to protect amenity and wildlife habitat value.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Ryhope: - Option 1, current planning consents, but greenfield land use to be limited to as small as area as possible. Settlement breaks to be protected to prevent loss of separation between communities.			
				South Hylton:- Option 1, current planning consents			
				Central Sunderland:- Current Planning consents			
				Central Sunderland: -Mix of housing types required, family housing needed not just apartments			
				Washington :- Option 2, Low growth			
				Fence Houses:- Option1 : current planning consents			
					Yes the council should insist on mixed use sites for locations within the city and local centres.		
					Option 1:- Have a city wide policy for all sites in relation to house types.		
					Option1:- Have a policy in place for encouraging mix of house tenure		
					Option 1, Have a policy for tenure on all sites		
					No, greenfield land should not be released in exceptional circumstances. Settlement breaks should be protected.		
					Yes, home zones should be encouraged.		
					The council should not allow development in large private gardens as this has a detrimental effect on the character of a locality, especially when it is in a conservation area.		
Norah Scrafton	934			South Hylton: - The publicity for this meeting was a complete disgrace. Concerned about the prospect of more houses being built in area. I would like to assume that possibility the idea would be to go further out than South Hylton. Where in the village could additional housing go? The village could not take all the extra traffic this would cause, if necessary, where would a new road come in?			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Sheltered housing for elderly is needed and recreation areas for young people. This area is unique with a beautiful riverside and still a rural atmosphere, this needs to be nurtured.			
Mr and Mrs Fletcher	935			Seaburn/Roker/Fulwell: - We oppose the recent proposals of the development of the Seaburn area on our door step. There is more need to develop the area as a leisure location as opposed to housing development. The Seaburn centre would be an ideal location for a swimming pool. The proposal involves council owned car parks, that means there will be limited car parking for visitors to Seaburn and chaos on the weekend of the air show.			
M Nichol & Co.	936					Land at Silksworth, Tunstall Hope Lodge (High Newport)	
Mr T D Seymour	937			Seaburn/Fulwell/Roker:-I am concerned and disappointed at the lack of publicity and forward intelligence afforded by the city council. While low density development is inevitable I strongly oppose to any encroachment of the greenbelt.			
Mr and Mrs T A Royal	938			Seaburn/Fulwell/Roker: - No notification was given to the residents about public meeting. The development of houses on the land is a no no. The taking away of greenbelt and playing fields is abysmal and illegal not to mention all the wild life, birds nesting. No thought has gone into developing the sea front as a leisure site. Poor accessibility to the metro and lack of parking. 'The mound' can not be taken into consideration, as bluebells a protected specie grow there. Additional cars adds to the carbon footprint, not to mention poor school facilities, car parking.			

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				General Infrastructure not able to take all these houses. There aren't enough jobs in the Sunderland area to warrant building any more houses and if needed, brownfield sites should be made use of.			
Christine Alder	939			Seaburn/Fulwell/Roker: - Feel very disturbed and annoyed that my council does not have sufficient faith in itself or respect for its rate payers that it made so little an effort to talk to the people who would be interested in future plans for this part of the city.			
				Whilst acknowledging that is some areas there is a need for new housing I do not agree that housing is the single most important use in our city or region. Better management of existing housing stock would go a long way to remedying any need.			
				The council has a stated aim of developing Seaburn by improving leisure facilities, not by building large housing estates. Government policy is the retention and maintenance of existing playing fields in order to encourage health and well being of people. Building on existing car parks would create more traffic management problems. The underused of the existing leisure facilities is solely the responsibility of the council. The implications of increasing what is already high density housing has many implications. To take away the leisure			

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				facilities and increase the population would be an unacceptable strain on the greenspace left. Seaburn metro station is at least 20mins away with no cycle or car parking facilities.			
Mrs Valerie Hamilton	940			Seaburn/Roker/Fulwell: - We do not need more housing in this area, what we need is well maintained leisure development. Should look at south shields seafront and develop the area as a good seaside resort. Traffic congestion is currently a major problem.			
Lambton Estates	941					Various sites throughout Houghton-le-Spring	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Mr A J Le Blond	942				Support guideline figure of 15,150 net additional dwellings to Sunderland to 2021 and support the sub-area approach to the broad distribution.		
				Object to Fencehouses and Easington Lane as growth areas.			
				Hetton-le-hole should be identified as a growth area. It is more sustainable to direct larger growth settlements in the growth areas as these have a better range of shops and services and public transport links. Hetton, unlike Fence houses and Easington Lane is a denied district centre and is sequentially preferable. It should be given priority.			
						Land at North Road, Hetton	
						Land at Hazard lane, Hetton	
Mrs Wigham-Mclaren	943			South Hylton: - Village can not cope with any new developments, the village side streets are too marrow with mainly on-street parking. Cambria Street can not cope now with traffic, never mind any more. The traffic on Hylton Bank is only heavy between schools dropping off times. If no stopping regulations were in place at these times, the traffic problems would stop. If a new road was put into the village from St Luke's Road traffic problems would occur in the centre of the village.			
				I see no need for a through road, it would encourage people to cut off the corner and bring enormous problems to the centre of the village. If a new road was to be built, it should be limited to users and not for through traffic into the main village. Schools and local facilities are at maximum capacity.			

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Washington east residents action group	945			Seaburn/Roker/Fulwell:-Current planning consents/known ISHL sites approximately 125 dwellings meaningful consultation with local residents should precede any developments so as not to destroy the local character of the coastal belt			
				Chapelgarth:-Current planning consents/known ISHL sites approximately 650 dwellings not familiar with this area - a locator map should have been provided to enable location			
				Ryhope:-Current planning consents/known ISHL sites approximately 1111 dwellings. All brownfield sites possible should be developed and areas of open space, forested and the natural environment should be preserved at all costs. we are losing too much open space all over the city but especially at the periphery			
				South Hylton :-High Growth, approximately 800 dwellings Get the derelict houses demolished and the whole area redeveloped with local consultation immediately - it is a disgrace that this and other brownfield sites have not been redeveloped before now - no wonder people are not attracted to the city when they see derelict sites like this along the main arteries going into the city			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				<p>Central Sunderland:-Current planning consents/known ISHL sites approximately 2,931 dwellings the city centre has had enough money spent on it to the detriment of the periphery the high rise at the old Echo offices has not been taken up so why build more of these ultra modern monstrosities that are not being sold. Give the buildings character to fit in with the other buildings</p>			
				<p>Washington:-Current planning consents/known ISHL sites approximately 400 dwellings the majority of the open spaces planned for Washington new town are gradually being built on yet there are large numbers of dwellings in the town that unoccupied. Leave the natural environment alone for the use of ALL of the community; trees, ponds etc are needed for public health BOTH PHYSICAL AND MENTAL. Demolish the old infrastructure and housing as replacement dictates and use only brownfield areas. We need our trees, ponds etc preserve them at all costs or the consequences will be felt in the ballot box as is already evident from recent elections in the area People feel that they are being ignored</p>			
				<p>Fence Houses:-Current planning consents/identified sites approximately 180 dwellings The road and transport infrastructure does not support a high population density preserve the green belt at the periphery at all costs. think of the condemnation of future generations if there is any more environmental vandalism as is happening at the moment</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings again an area on the urban fringe preserve the natural environment and keep to brownfield sites Sunderland has plenty of these to redevelop without tearing down trees etc we need these 'green lungs' to survive			
					All of the areas that have at present been boarded up for years and left as eyesores. Why have they not been rebuilt long before now? there are places in Sunderland I would be ashamed to take visitors they are so derelict		
					Insist is too emotive a description. Work to the needs of each community with meaningful consultation. Be adaptable and actually take notice of what the communities need instead of imposing projects on local communities who then feel as if they get unsustainable projects that they dislike		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Have a city wide policy which aims to achieve a mix of house types on all sites with an aging population there should be plenty of provision for single storey commotion		
					Negotiate with developer for tenure only after meaningful local consultation		
					None: - consult, consult, consult listen to the local people this should ALWAYS be the starting point. both of these suggestions dictate to the community this should not happen neither of these statements is acceptable they are too inflexible		
					No - greenfield land should not be released in exceptional areas preserve the natural environment for community use at all costs there has been far too much land that should have been preserved built on. there are plenty of brownfield sites available still use only them		
					No sustainability assessments should not be used to determine when greenfield sites should be released. absolutely NEVER we need these green areas to be sacrosanct - UNTOUCHED, UNDEVELOPED, LEFT ALONE, IMPOSSIBLE TO BE BUILT ON untouchable		
					Option 2. Set different levels of density in different locations BUT DEPENDS ALWAYS ON LOCAL ASPIRATIONS AND NEEDS AFTER CONSULTATION WITH THE LOCAL COMMUNITY IT SHOULD NEVER BE THE PLANNERS OR THE PLANNING DEPARTMENT TO DECIDE WHAT THEY WILL IMPOSE A NUMBER OF OPTIONS/SCHEMES SHOULD BE OFFERED FIRST FOR LOCAL CONSULTATION		
					Yes should have exceptions in place for densities lower than 30dph yes because there are already some such dwellings e.g. some of the old manor houses and farmhouses they add to the character of the area		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					not if it involves using green belt area but there may be some need in future for the older population to live quietly in a low level development most developments that would satisfy older peoples needs are currently multi-storey apartments there is a distinct absence of low maintenance low level housing except very old stock in the Southwick area		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					No. No need for a maximum density policy as design standards should control this. this is to prescriptive a question neither of these options finds my favour it should always be as local needs require		
					Particular areas/sites within the city for a policy on maximum densities bearing in mind my previous comments		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need only after local consultation too many decisions are being made by the planners before meaningful initial local consultation this should always come first in a democratic society there has been far too many imposed decisions without consultation		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site. note previous comments - they are not for everyone but some older people may perhaps welcome them		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					depends upon what the criteria are this is an impossible question to answer as the criteria have not been stated		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers I wonder why Washington ,Hetton and fence houses are the only suggested locations for Sunderland I find this question patronising and abhorrent I would include the civic Centre central forecourt and west Sunnyside and wonder what the reaction to that would be.		
					What is a home zone I cannot answer this question as it lacks explanation and clarity		
					Yes should encourage a variety of architectural styles definitely. Some of these ultra modern buildings are an eyesore and totally out of character with other buildings surrounding them ... as Prince Charles once said. They are monstrous carbuncles!		
					not even there they are more suitable to low level high tech offices and factories on well landscaped sites		
					No do not agree with range of D.C policy issues		
					If people are to be attracted into the city then for a truly 21st century policy as in the intro to Sunderland's web site that it will be environmentally friendly - this looks good on paper but in practice it is non existent. There is no meaningful local consultation, you go through the sham of the exercise then continue to do as YOU want not the local people want. People input and recognition of it must be central to the planning process if it is to be successful and then people will be happy to come and live in the city		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Dianne Snowdon Resident of Sunderland	948			Seaburn/Roker/Fulwell:-Low Growth, approximately 300 dwellings But consider looking for a site for travellers in this area, close to the boarder with south Tyneside			
				Chapelgarth:-High Growth, approximately 1,000 dwellings			
				Ryhope:-Current planning consents/known ISHL sites approximately 1111 dwellings			
				South Hylton:-High Growth, approximately 800 dwellings encourage links with public transport/metro and car free areas.			
				Central Sunderland :-Current planning consents/known ISHL sites approximately 2,931 dwellings			
				Washington:-High Growth, approximately 1,400 dwellings Encourage use of brownfield sites, re open Leamside line to give added much needed public transport links to Sunderland but also consider where the schools, shops etc are			
				Fence Houses:-Current planning consents/identified sites approximately 180 dwellings			
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings			
					Keep mixed -use		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
						Glebe village centre	
					Consider a policy which seeks to address any imbalance in the housing stock needs should be community lead		
					Negotiate with developer for housing tenure keep this as flexible as possible, but encourage building of affordable homes		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock affordable homes strategies		
					Yes - in exceptional circumstances We need to encourage money to the city, this type of housing may be the answer		
					Yes sustainability assessments should be used to determine when greenfield sites should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph		
					Yes should have exceptions should in place for developing affordable housing sites below 30dph		
					No. No need for a maximum density policy as design standards should control this.		
					Lower the threshold so that affordable housing is also required on smaller sites. Affordable housing on all sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Continue with negotiation for amount of affordable housing provided		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to special need housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers consider Fulwell		
					Yes home zone should be considered Similarly to Gateshead Staiths		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes encourage a variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city.		
					Yes agree with the range of D.C issues		
O&H Properties	539	RPS	952			Land at Houghton Road, Newbottle	
G L Hearn	953					Land to the east of St Benet's Church, Causeway, North Church Road, Monkwearmouth	
Andrea Scollen resident of Sunderland	954			Seaburn/Roker/Fulwell:- Current planning consents/known ISHL sites approximately 125 dwellings			
				Roker, old railway line areas. Fulwell, allotments to the back of The Square (that was the abattoir) Roker retail park, and Newcastle road including the baths which are to be replaced along with what was the car show room on Newcastle Road.		Roker, old railway line areas. Fulwell, allotments to the back of The Square (that was the abattoir) Roker retail park, and Newcastle road including the baths which are to be replaced along with what was the car show room on Newcastle Road.	
				Ryhope:- High Growth, approximately 1,400 dwellings			
				Ryhope hospital land		Ryhope hospital land	
				Prioritise land at Pennywell and Ford Estate - it looks so run down.			
					Yes, transport, shops and schools are essential to any new sites.		
					Consider a policy which seeks to address any imbalance in the housing stock		
					Have a policy in place for mix of tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes - in exceptional circumstances - there is an excessively high demand and the land is no longer used by the general public		
					Yes sustainability assessments should be used to determine at what point a greenfield site should be released		
					Option 2. Set different levels of density in different locations		
					Yes exceptions should be in place for densities lower than 30dph		
					No exceptions should be in place for developing affordable housing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages for affordable based on the findings or the HMA and need		
					Yes consider exceptions for densities lower than 30dph for affordable housing		
					Criteria based approach to reserving sites for special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers		
					Yes home zones should be encouraged		
					Yes encourage a variety of architectural styles		
					Yes specific architectural styles should be restricted to certain areas of the city - Contemporary builds are great at the time - but how soon have they become and do become outdated etc - Washington, path layout - design of flats with hanging tiles that have now been demolished, flat roof -		
					Yes agree with range of D.C issues		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							Yes agree with use of agreed scoring system
Jacky Owen resident of Sunderland	955			Seaburn/Roker/Fulwell:-Current planning consents/known ISHL sites approximately 125 dwellings			
				Chapelgarth:-High Growth, approximately 1,000 dwellings			
				Ryhope:-High Growth, approximately 1,400 dwellings			
				South Hylton :-High Growth, approximately 800 dwellings			
				Central Sunderland :-High Growth, approximately 3,800 dwellings			
				Washington:-High Growth, approximately 1,400 dwellings			
				Fence Houses:-Medium Growth, approximately 500 dwellings			
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings			
					Yes insist on mixed-use sites		
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Negotiate with developer for housing tenure		
					No - greenfield land should not be released in exceptional areas - Green field land should be saved before we forget that we have ever had it!		
					No sustainability assessments should not be used to determine at what point a greenfield site should be released.		
					Option 2. Set different levels of density in different locations		
					No exceptions should not be in place for densities lower than 30dph		
					No exceptions should be in place for developing affordable housing sites below 30dph.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					No keep the existing threshold for affordable housing		
					Site size used for defining thresholds		
					Continue with negotiation for amount of affordable housing to be provided		
					Yes consider exceptions for densities lower than 30dph for affordable housing		
					Criteria based approach to reserving sites for special needs housing		
					Identify potential site/s within the Washington, Hetton and Fence Houses area for gypsies and travellers		
					Yes encourage home zones		
					Yes encourage a variety of architectural styles		
					no specific architectural styles should not be restricted to certain areas of the city		
					no do not agree with range of D.C issues		
					avoid greenfield land at all costs		
Lesley Etherington Resident of Sunderland	956			South Hylton:- Current planning consents/known ISHL sites approximately 370 dwellings			
				No. There needs to be a realistic consideration taken of the village (and other areas of the city) in terms of community and values rather than how much land can be earmarked to put houses on. Qualitative rather than quantitative development.			
				I do not consider that I currently have enough information nor can I, in the short space of time made available for consultation, suitably inform myself to make suggestions about other areas of the city apart from where I live. However, I do care about my city and the people who live in it and would like to see a more cooperative and coordinated response to the housing issues that have been raised so that the people of Sunderland are truly consulted rather than directed by suits from the civic.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					This sounds like theory into practice rather than a consideration of the views of the people who live here. Residents need to be educated about issues and involved in the planning process rather than left feeling powerless and at the mercy of planners who "know what's best". I accept that resources are limited and compromises will have to be made but where people are treated as equal partners they are more positive to change.		
					Consider a policy which seeks to address any imbalance in the housing stock. There are particular issues around certain locations in the city e.g. the university where there is a need for a certain type of accommodation. There are also issues to do with housing for ethnic minority groups who arrive in the city to ensure that we integrate and include all residents throughout the city.		
					Have a policy in place for mix of tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield - However there are considerations of prior use of brownfield sites. For example there is a		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>site in South Hylton where planning permission has been given for the building of 5 x 4 bedroomed houses on a site where there is a chapel. The site is on a busy narrow road with a pavement only possible on one side and limited space for parking. Access to the site as a chapel was not a problem as it was used, in the main, by people in the village who walked there. The potential for increased traffic generation will not only affect the safety of pedestrians but also contribute to street parking problems which already exist and increase the risk to cyclists and drivers who use the road to get to the riverside and a local public house. Consideration here appears to have been more to building houses rather than taking a holistic approach to the development of the site in terms of quality of living space.</p>		
					<p>Surely depends on some sort of aesthetic appreciation of the brownfield site. What sort of environment are we trying to create?</p>		
					<p>What about distribution of facilities? I assume that consideration of housing would encourage some consideration of development of facilities which sustain communities. Surely the 2 options are the same - both about distance from the city centre</p>		
					<p>Yes consider exceptions for densities lower than 30dph - Local character, the environment and quality of life would be priorities for me. As we move further into the 21st century the impact of technology on lifestyle is increasing. More people shop on line and have greater opportunity to work from home, for example. Will we want/need to travel into the city centre in the future?</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					South Hylton because I live here and think it is a unique area of the city, undervalued as an example of community with potential to become as exciting a part of the city as others which seem to be developed in a more coordinated and sympathetic way.		
					Yes. Provide a policy setting out maximum density - With developers crawling over any available land there needs to be some overview as financial gain is bound to influence decisions to release land. Otherwise, who cares?		
					Citywide Policy for maximum densities		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need		
					Yes consider exceptions for densities lower than 30dph for affordable housing		
					Criteria based approach to reserving sites for special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsy and travellers		
					Yes encourage a variety of architectural styles - But there needs to be an "eye" for the environment. Let's not end up with a hotchpotch of housing. The city has history which we should be proud of but we need to reflect the century we are just at the beginning of.		
					To be fair I have not had time to consider all the documentation available. I work full time in a job which is demanding and has long hours. I also give up some of my time to be involved in community activities. I wish I had further time to spend on the issues. It concerns me that consultation does not		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>always reflect the true views of the people. Certainly I object to people who claim to represent me when their only criteria is that they have the time to go to meetings during the day which I don't. Why not go into schools community buildings and hospitals and ask the people there what they think. Why not have a day's) when the issues can be presented and questions answered so that there can be real consensus about the way forward. I think this questionnaire should have had links to other documents so that I could have had sight of things I wanted more information about as I was actually completing it. It's actually taken me a long time on a Saturday when I have loads of other things to do (like washing and shopping) before I go back to work on Monday. How about a response from ethnic minority groups in the city, like the Bangladeshi community, about their city views?</p>		
					<p>Yes -Distribution of ethnic groups in the city - impact on social/community cohesion and schools 'admissions. Let's get this right and learn from others. Safety. Are we going to have a city that is safe for young and old? Are we encouraging communities (reflecting what we know to be good) or pandering to a presumed "life style" that does not take into account the views of the people who will live here in the future - our young people? Has their creative contribution been considered?</p>		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							Don't know enough.
Mary Todner Resident of Sunderland	957			Seaburn/Roker/Fulwell:-Medium Growth, approximately 500 dwellings along the sea front as long as they are of good design			
				Chapelgarth:-High Growth, approximately 1,000 dwellings good area to surround Doxford International	a		
				Ryhope:-Current planning consents/known ISHL sites approximately 1111 dwellings			
				South Hylton :-Current planning consents/known ISHL sites approximately 370 dwellings			
				Central Sunderland :-Current planning consents/known ISHL sites approximately 2,931 dwellings			
				Washington:-Medium Growth, approximately 1,000 dwellings			
				Fence Houses:-Medium Growth, approximately 500 dwellings			
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings			
				Seaburn and along the coast. It could create its own identity			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes, but this will only be sustained if you get the mix right by listening to what people want. You didn't ask us in the city centre about needing a viable supermarket. What a shame		
					Have a city wide policy which aims to achieve a mix of house types on all sites Why build a ghetto?		
					Negotiate with developer for housing tenure		
					Have a policy to ensure a mix of house tenures on all sites		
					Yes - in exceptional circumstances There should not be a rigid rule. People's expectations and lifestyles change and the council should be sensitive and responsive to this. BUT they need to consult and listen because they certainly do not always know best.		
					Yes sustainability assessments should be used to determine at what point a greenfield site should be released Yes, but only after consultation and bearing in mind how brief the span of decision-makers powers		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph		
					No exceptions should be in place for developing affordable housing sites below 30dph.		
					No. No need for a maximum density policy as design standards should control this.		
					No keep the existing threshold for affordable housing		
					both defined threshold be based on the size of the site and the number of dwellings		
					Continue with negotiation for affordable housing provision		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					construction on another site.		
					Criteria based approach to sites for special needs housing		
					Identify potential site/s within the Washington, Hetton and Fence Houses area for gypsies and travellers		
					Yes encourage home zones		
					Yes encourage variety of architectural styles We should be concentrating on superior modern design. After all, the council demolished most of our grand old buildings in favour of concrete mausoleums		
					No specific architectural styles should not be restricted to certain areas of the city		
					Yes agree with the range of D.C issues		
Mrs Rutherford Resident of Sunderland	958			Seaburn/Fulwell/Roker:- Medium Growth, approximately 500 dwellings			
				I think the sea front area should be prioritised for housing development, particularly the area currently covered by the amusements, Seaburn centre etc.			
					I think the City Council should look at each area separately and see what already exists and considering the impact on retail establishments etc		
						As I said previously the land on the sea front at Seaburn, plus the space behind the amusements etc.	
					Consider a policy which seeks to address any imbalance in the housing stock		
					Negotiate with developer for housing tenure Rather than a blanket policy I think it would be better to consider individual applications and the needs of that location		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield I think we should consider using greenfield land very carefully as it is very important to have some open spaces for sport, walking and the general look and feel of areas - it doesn't make people feel happy if areas are over developed and they feel hemmed in.		
					Yes sustainability assessments should be used to determine at what point a greenfield site should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph		
					I think the sea front area should be developed at lower density to enable us to maintain the area as a popular attraction for people to visit		
					Yes should have exceptions should in place for developing affordable housing sites below 30dph		
					No. No need for a maximum density policy as design standards should control this. As I said previously I think different areas/sites will have different needs.		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both		
					Continue with negotiation for the amount of affordable housing provided		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to reserving sites for special needs housing		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Identify potential site/s within the Washington, Hetton and Fence Houses area for gypsy's and travellers		
					Yes encourage home zones		
					yes encourage variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city		
					Yes agree with range of D.C issues		
Normington (Resident of Sunderland)	959			South Hylton is above capacity now. The only land available soon is Quarry View School land, which is not in South Hylton. How a figure of 800 dwellings or 38 football pitches comes from? This is the total size of South Hylton			
				Vaux site. This is proof of zero planning in Sunderland. What has Sunderland got-- A bomb site!!!!			
					Not greenfield sites. For years it has been impossible to build on a green site. Why change now!		
					Everybody has moved away from this. The super markets have been allowed to put the butcher the baker and the candlestick maker out of business		
						Vaux site	
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Have a policy in place for tenure		
					Have a policy to ensure a mix of house tenures on all sites		
					No - greenfield land should not be released in exceptional areas		
					No sustainability assessments should not be used to determine when greenfield sites should be released greenfield means green field		
					Option 2. Set different levels of density in different locations		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes should have exceptions in place for densities lower than 30dph		
					Vaux site		
					No exceptions should be in place for developing sites below 30dph for affordable housing		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					No keep the existing threshold for affordable housing		
					Dwellings proposed be used for defining thresholds		
					Set percentages based on the findings or the HMA and need for affordable housing		
					No. Provision must always be made on the application site for special needs/extra care		
					Criteria based approach to special needs housing.		
					Only cater for rate payers		
					Yes home zones should be encouraged		
					No specific architectural styles should not be restricted to certain areas of the city. The new swimming pool is an eyesore Only traditional styles work		
					Yes agree with the range of D.C issues		
A White Amenity Group	960				Vital that there is no loss of green areas such as parks, playing fields, SSI's, LNR's		
					No - greenfield land should not be released in exceptional areas. Once lost greenfield land can never be regained. Its existence is vital to quality-of-life for the residents of the city.		
					Greenfield sites should be viewed as inviolable.		
					Option 2. Set different levels of density in different locations. A case-by-case approach is preferable to a formulaic approach.		
					No should not have exceptions in place for densities lower than 30dph In exceptional circumstances. Not if the exceptions allow development of executive housing on greenfield sites.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Yes should encourage a variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city. A case-by-case approach would make more sense.		
Paul Bennett (Trees & Wildlife Action Group)	961			Seaburn/Fulwell/Roker: - Low Growth, approximately 300 dwellings It should be for individual communities to decide how their communities should develop. Maintaining Open Green Space is vital.			
				Chapelgarth:-Current planning consents/known ISHL sites approximately 650 dwellings it should be for individual communities to decide how their communities should develop. Maintaining Open Green Space and settlement breaks is vital.			
				Ryhope;- Current planning consents/known ISHL sites approximately 1111 dwellings It should be for individual communities to decide how their communities should develop. Maintaining Open Green Space is vital.			
				South Hylton: - Medium Growth, approximately 650 dwellings taking advantage of the metro link is sensible. Public transport links must be improved. A PPG17 assessment is urgently required and none has been completed.			
				Central Sunderland:-Current planning consents/known ISHL sites approximately 2,931 dwellings. How are all these people going to travel on a road network that is rapidly becoming saturated? Vast improvements are required to public transport.			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Washington:-Current planning consents/known ISHL sites approximately 400 dwellings It should be for individual communities to decide how their communities should develop. Maintaining Green Open Space is vital.			
				Fence Houses:-Current planning consents/identified sites approximately 180 dwellings Maintaining settlement breaks is vital for communities. Preserve the Great North Forest. Remove the white land classification between the east of Fence Houses and the west of Newbottle. Complete a PPG17 assessment.			
				Easington lane: - Current planning consents/identified sites additional 780 dwellings Protect Green Open Space.			
					The metro route is an obvious priority but future housing must be sustainable. Open greenspace should be retained and enhanced. Brownfield sites must be consumed first.		
					Yes the City Council insist on mixed-use for locations within the City and Local Centres		
						Please do not construct on open green space or in woodland.	
					Have a city wide policy which aims to achieve a mix of house types on all sites. Create communities not divides.		
					Have a policy in place for tenure Developers are driven by profit, nothing more. Policy required.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Have a policy to ensure a mix of house tenures on all sites do not divide society further.		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield Remove the convenient tag 'white land', these are green open spaces which act as settlement breaks. Leave them as green open space.		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances. Construct a totally sustainable eco community village.		
					Develop at high densities on rail and metro links.		
					No exceptions should be in place for developing sites below 30dph. Question the reasoning causing 'more rigid spacing standards'.		
					No. No need for a maximum density policy as design standards should control this. Market demand.		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need		
					No. Provision must always be made on the application site for special needs/extra care		
					Criteria based approach to special needs housing.		
					Identify potential sites on a city –wide basis for gypsies and travellers I have always lived within 1/2 mile of a showman's guild site. There is no problem with how people choose to live their lives. Let them have the choice.		
					Yes home zones should be encouraged Places are for people not just traffic. Build a tram network rather than an incinerator.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes variety of architectural styles encouraged. As long as sustainable.		
					No specific architectural styles should not be restricted to certain areas of the city.		
					No do not agree with range of D.C issues Your policy for trees will not work. Sunderland Council cannot opt out of statute. The Trees Regulations (1999) places a duty of care to protect trees in the environment. BS5387 provides an excellent standard for trees in Construction. There are many species of trees all of which provide a useful function to people and the environment.		
					Yes Trees and 'White land' need to be considered		
							The scoring system can never be perfect. More logic is required. You could provide a dwelling sited 8 minutes from an employment centre and that householder may choose to travel further afield.
Paul Wilson	962			Seaburn/Roker/Fulwell:- Current planning consents/known ISHL sites approximately 125 dwellings (6 football pitches)			
				Current planning Chapelgarth: - consents/known ISHL sites approximately 650 dwellings. (31 football pitches)			
				Ryhope: - Current planning consents/known ISHL sites approximately 1111 dwellings. (53 football pitches)			
				Current planning South Hylton:- consents/known ISHL sites approximately 370 dwellings (17 football pitches) Poor access to South Hylton should prohibit large scale development			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Central Sunderland:- High Growth, approximately 3,800 dwellings (180 football pitches)			
				Washington:- Medium Growth, approximately 1,000 dwellings (48 football pitches)			
				Fence Houses:- Current planning consents/identified sites approximately 180 dwellings (9 football pitches)			
				Easington Lane:- Current planning consents/identified sites additional 780 dwellings (37 football pitches)			
				Central Sunderland. Seems pointless developing edge of town greenfield sites while leaving brownfield inner city sites in their current state.			
					Yes. the City Council insist on mixed-use for locations within the City and Local Centres		
					Consider a policy which seeks to address any imbalance in the housing stock. There is a dearth of bungalows in the city. I did plan to move from my current 4 bedroom house to a smaller bungalow when I retire. I have researched this and found that bungalows are few and far between, and ones that were on the market were more expensive than the house I currently own, caused in part by shortage of this type of accommodation. The last thing I want as I head into retirement is to be weighed down with another mortgage.		
					Have a policy in place for tenure		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					No - greenfield land should not be released in exceptional areas. Sunderland has plenty of brownfield sites to develop.		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Particular areas/sites within the city		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Continue with negotiation for the amount of affordable housing to be provided.		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site		
					Criteria based approach to sites for special needs housing		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers		
					Yes home zones should be encouraged.		
					Yes variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city		
					Yes		
Bert Huntley	967				No more growth. Feel very strongly against the use of playing fields to develop housing. It is the only piece of greenbelt land and sports area the village has left due to private developers taking up land over the last 30 years. I believe the population of the village is at a maximum at present. The one thing I would like to see happen sooner rather than later is another road in and out with safety being the main concern. There is only one pathway running down the side of Hylton Bank. Children are stepping onto the road going to and from school as people push prams up and down from the Metro Station. If there was a fatality on Hylton Bank the road would have to shut off this giving no emergency cover to all of the residents living down in the village. This situation has been going on for years now so I suppose it will take something to seriously happen before anything is done to stop the problem.		
Mark Mann	968					Fulwell Reservoir	

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
						Fulwell Reservoir	
Pam Tate	969				I was informed by a councillor that there was a meeting in my area (Roker) to allow discussion about proposals for increased housing. I am amazed at the poor attempt to engage the public in the meeting - there were possible 6 people maximum at the meeting in Redby Primary School and some like myself had just been informed about it that day. I get the feeling that the council employees are happy to pay 'lip service' to the requirement of involving the public in policy development - as that meeting cannot by any means be viewed as canvassing local views.		
					Is there a specialist employed who has an ability to reach the public at a local level? The graphics presentation seemed to have produced by people who were not presenting the presentation as questions asked about what was shown (or covered geographically) by the few who attended were not always given an answer as the info could not be shown/seen on the screens. The meeting was held on Tuesday 5th Feb and replies had to be in by Sunday 10th - not long to allow consideration of various issues. Maybe a retired person with a boring life might have time to do it - but a 6pm meeting is not user friendly for families or employed		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					<p>My limited comment (cause I already had another meeting booked in for 7pm so had to leave at 6.30pm and the meeting started late in the hope I presume that a few more people might show up. Whey is no consideration being given to the area formerly railway line from Newcastle Road down to the North Dock. The area behind St Bedes Terrace is particularly ugly as when it was built the back wall were never intended to be in full view as they are at present. It may be considered an 'open space' but its use is mostly as a 'dogs toilet'</p>		
Chris Parks	970				<p>Could you please advise how advances any plans are for housing development in the Seaburn, Fulwell, Roker area of Sunderland? I am interested to know what the outcome was of the public meeting held 4th Feb 2008. As a local resident I would like to be informed of any background to any proposed large scale development (residential or otherwise). I would also be grateful if you could let me know of any local framework or Regional Spatial Strategy policies which may be relevant</p>		
No details provided.				<p>Ryhope:- Current planning consents/known ISHL sites approximately 1111 dwellings</p>			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
No details given				Seaburn/Roker/Fulwell:-Current planning consents/known ISHL sites approximately 125 dwellings			
				Chapelgarth:-Current planning consents/known ISHL sites approximately 650 dwellings			
				Ryhope:-Current planning consents/known ISHL sites approximately 1111 dwellings			
				South Hylton :-Low Growth, approximately 500 dwellings			
				Central Sunderland :-High Growth, approximately 3,800 dwellings			
				Washington:-Medium Growth, approximately 1,000 dwellings			
				Fence Houses:-Current planning consents/identified sites approximately 180 dwellings			
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings			
No details provided				Seaburn/Roker /Fulwell High Growth, approximately 1,000 dwellings			
				Chapelgarth:-High Growth, approximately 1,000 dwellings			
						Hendon next to Lindsay close	
No details provided					Have a city wide policy which aims to achieve a mix of house types on all sites		
No details provided				Seaburn/Roker/Fulwell:-Current planning consents/known ISHL sites approximately 125 dwellings			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
No details provided				Seaburn/Roker/Fulwell: High Growth, approximately 1,000 dwellings			
Resident of Sunderland no further details given				Seaburn/Roker/Fulwell:-High Growth, approximately 1,000 dwellings			
				Chapelgarth:-High Growth, approximately 1,000 dwellings			
				Ryhope:-High Growth, approximately 1,400 dwellings			
				South Hylton :-High Growth, approximately 800 dwellings			
				Central Sunderland :-High Growth, approximately 3,800 dwellings			
				Washington:-High Growth, approximately 1,400 dwellings			
				Fence Houses:-High Growth, approximately 1,000 dwellings			
				Easington Lane:-High Growth, approximately 1,400 dwellings			
				The entire city should be considered for housing growth.			
					There should be a combination of retail/housing and where possible the creation of art studios work shops in one or two areas of the city.		
					Consider a policy which seeks to address any imbalance in the housing stock		
					Negotiate with developer for mix of house tenure - there should only be social housing		
					social housing only		
					Yes - in exceptional circumstances		
					Yes sustainability assessments should be used to determine at what point a greenfield site should be released		
					Option 2. Set different levels of density in different locations - extend the metro from Sunderland to Washington to allow for the desired density		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No exceptions should not be in place for densities lower than 30dph		
					Yes exceptions should not be in place for developing affordable housing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					Lower the threshold so that affordable housing is also required on smaller sites. Unviable for whom? Sunderland city should build social housing		
					Site size used for defining site thresholds		
					Set percentages for affordable housing based on the findings or the HMA and need the questions consider only private housing what about Sunderland council building homes for people?		
					No. Provision must always be made on the application site for special needs/extra care		
					Criteria based approach to reserving sites for special needs housing		
					Identify potential sites on a city –wide basis for gypsy's and travellers		
					What are home zones?		
					Yes encourage a variety of architectural styles		
					No specific architectural styles should not be restricted to certain areas of the city		
					No do not agree with the range of D.C issues		
Planning Agent (no further details given)				Seaburn/Roker/Fulwell:-Medium Growth, approximately 500 dwellings			
				Chapelgarth:-Current planning consents/known ISHL sites approximately 650 dwellings			
				Ryhope:-Current planning consents/known ISHL sites approximately 1111 dwellings			
				South Hylton :-Current planning consents/known ISHL sites approximately 370 dwelling			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Central Sunderland :-High Growth, approximately 3,800 dwellings			
				Fence Houses:-Current planning consents/identified sites approximately 180 dwellings			
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings			
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Negotiate with developer for tenure		
					Consider a policy which seeks to address any imbalance in the tenure		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield (land that has been previously developed) options		
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		
					Option 1. Should any site have a minimum density of 30 dwellings per hectare		
					No should not have exceptions in place for densities lower than 30dph In exceptional circumstances.		
					No. No need for a maximum density policy as design standards should control this.		
					Lower the threshold so that affordable housing is also required on smaller sites		
					Should define thresholds on Dwellings proposed		
					Continue with negotiation for amount of affordable housing provided		
					Criteria based approach to special needs housing.		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers		
					No home zones should not be encouraged		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No variety of architectural styles should not be considered.		
					No specific architectural styles should not be restricted to certain areas of the city.		
					Yes agree with the range of D.C issues		
(No details)				Seaburn/Fulwell Current planning consents/known ISHL sites approximately 125 dwellings			
(No details)				Seaburn/Fulwell/Roker:- Medium Growth, approximately 500 dwellings			
				Chapelgarth:- High Growth, approximately 1,000 dwellings			
				Ryhope:- High Growth, approximately 1,400 dwellings			
				South Hylton:- Current planning consents/known ISHL sites approximately 370 dwellings			
				Central Sunderland:-High Growth, approximately 3,800 dwellings			
				Washington:- Current planning consents/known ISHL sites approximately 400 dwellings			
				Fence Houses;- High Growth, approximately 1,000 dwellings			
				Easington Lane:- Current planning consents/identified sites additional 780 dwellings			
					less houses should be demolished instead do they up and pass them on to people who will look after their house		
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Have a policy in place for tenure		
					Have a policy to ensure a mix of house tenures on all sites		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield		
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
Resident of Sunderland - no details given				Seaburn/Fulwell/Roker Medium Growth, approximately 500 dwellings			
				Chapelgarth:- Current planning consents/known ISHL sites approximately 650 dwellings			
				Ryhope:- Current planning consents/known ISHL sites approximately 1111 dwellings			
				South Hylton:-Medium Growth, approximately 650 dwellings			
				Central Sunderland:- Current planning consents/known ISHL sites approximately 2,931 dwellings			
				Washington:-Medium Growth, approximately 1,000 dwellings			
				Fence Houses:-Medium Growth, approximately 500 dwellings			
				Easington Lane:-Current planning consents/identified sites additional 780 dwellings			
					Developments should reflect the needs of the communities & reduce the need for travel to meet basic needs e.g. shops, schools, medical services etc, should all be within easy reach without the need for private or public transport.		
					Consider a policy which seeks to address any imbalance in the housing stock. Private housing stock needs to take into account rising costs & needs to be affordable for 1st time buyers.		
					Negotiate with developer for tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					No - greenfield land should not be released in exceptional areas		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released The Greenbelt needs to be maintained to prevent the		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					urban sprawl that has had a negative impact on so many other cities.		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances.		
					The character of certain areas of the city must be maintained in order to preserve the city's heritage etc.		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities		
					Yes home zones should be encouraged.		
					Yes variety of architectural styles encouraged.		
					Yes specific architectural styles should be restricted to certain areas of the city. Ultra modern / contemporary designs should be limited to central areas of the city as they tend not to fit into existing / established residential areas.		
					Yes agree with range of D.C issues		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
No details given				Seaburn/Fulwell/Roker:- Current planning consents/known ISHL sites approximately 125 dwellings			
				Chapelgarth:- Current planning consents/known ISHL sites approximately 650 dwellings			
				Ryhope:- Current planning consents/known ISHL sites approximately 1111 dwellings			
				South Hylton:- Current planning consents/known ISHL sites approximately 370 dwellings			
				Central Sunderland:- Current planning consents/known ISHL sites approximately 2,931 dwellings			
				Washington:- Current planning consents/known ISHL sites approximately 400 dwellings			
				Fence Houses :-Current planning consents/identified sites approximately 180 dwellings			
				Easington Lane:- Current planning consents/identified sites additional 780 dwellings			
					Yes the City Council insist on mixed-use for locations within the City and Local Centres		
					Consider a policy which seeks to address any imbalance in the housing stock		
					Have a policy in place for tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances.		
No details given					No - greenfield land should not be released in exceptional areas		
No details given				Seaburn/Fulwell/Roker High Growth, approximately 1,000 dwellings			
				Chapelgarth:- Current planning consents/known ISHL sites approximately 650 dwellings			
				Ryhope: - Current planning consents/known ISHL sites approximately 1111 dwellings.			
				South Hylton:- Medium Growth, approximately 650 dwellings			
				Central Sunderland: -Current planning consents/known ISHL sites approximately 2,931 dwellings			
				Washington:- Low Growth, approximately 800 dwellings			
				Fence Houses:- Medium Growth, approximately 500 dwellings			
				Easington Lane:- High Growth, approximately 1,400 dwellings			
					Mixed-use sites :- this should be a consideration within the decision making process		
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Negotiate with developer for tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					No - greenfield land should not be released in exceptional areas		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					No keep the existing threshold for affordable housing		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need for affordable housing		
					No. Provision must always be made on the application site for special needs/extra care		
					Criteria based approach to special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers		
					Yes home zones should be encouraged.		
					Yes variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city.		
					No do not agree with range of D.C issues		
							No do not agree with use of agreed scoring system
No details given				Seaburn/Roker/Fulwell Current planning consents/known ISHL sites approximately 125 dwellings (6 football pitches)			
				Chapelgarth: - Current planning consents/known ISHL sites approximately 650 dwellings. (31 football pitches)			
No details given				Seaburn/Roker/Fulwell:- Low Growth, approximately 300 dwellings (just over 14 Football Pitches)			
				Chapelgarth: - Current planning consents/known ISHL sites approximately 650 dwellings. (31 football pitches)			
				Ryhope: -Current planning consents/known ISHL sites approximately 1111 dwellings. (53 football pitches)			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				South Hylton:- Low Growth, approximately 500 dwellings (24 football pitches)			
				Current planning consents/known ISHL sites approximately 2,931 dwellings (140 football pitches)			
				Medium Growth, approximately 1,000 dwellings (48 football pitches)			
				Medium Growth, approximately 500 dwellings (24 football pitches)			
				Current planning consents/identified sites additional 780 dwellings (37 football pitches)			
					yes, the City Council insist on mixed-use for locations within the City and Local Centres		
					Option 1:- a city wide policy which aims to achieve a mix of house types on all sites		
					Have a policy in place for tenure		
					Have a policy to ensure a mix of house tenures on all sites		
					Yes - greenfield land should be released in exceptional circumstances in exceptional circumstances		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
					Option 1. All sites should have a minimum density of 30 dwellings per hectare		
					Yes should have exceptions in place for densities lower than 30dph		
					2. No exceptions should be in place for developing sites below 30dph.Excetions should be considered, but not necessarily for affordable housing		
					No. No need for a maximum density policy as design standards should control this.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Citywide Policy for maximum densities		
					2. Lower the threshold so that affordable housing is also required on smaller sites.		
					both - defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site		
					Criteria based approach to sites for special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsy and travellers		
					Yes home zones should be encouraged.		
					Yes, variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city		
					Yes, agree with range of D.C issues		
							yes, agree with use of agreed scoring system
Sunderland Resident (no details given)				Seaburn/Roker/Fulwell Low Growth, approximately 300 dwellings (just over 14 Football Pitches)			
				Chapelgarth: - Current planning consents/known ISHL sites approximately 650 dwellings. (31 football pitches) Greenfield site in an unsustainable location shouldn't be developed until later in plan period			
				Ryhope: -High Growth, approximately 1,400 dwellings (66 football pitches)			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				South Hylton:- Low Growth, approximately 500 dwellings (24 football pitches)			
				Central Sunderland:- Current planning consents/known ISHL sites approximately 2,931 dwellings (140 football pitches)			
				Washington:- Medium Growth, approximately 1,000 dwellings (48 football pitches)			
				There is no housing sites in Washington, should use some of the greenfield industrial areas at Pattinson to accommodate growth			
				Fence Houses:- High Growth, approximately 1,000 dwellings (48 football pitches)			
				Assist in the regeneration of the area together with Chilton Moor			
				Easington Lane:- High Growth, approximately 1,400 dwellings (67 football pitches)			
				Assist in Regeneration of the area			
				Silksworth particularly around High Newport This would help to make some sites more sustainable			
					Consider a policy which seeks to address any imbalance in the housing stock		
					Have a policy in place for tenure Need for affordable housing, enabled by increase in rented social housing, particularly using council owned land		
					Have a policy to ensure a mix of house tenures on all sites in accordance with the governments mixed sustainable communities agenda		
					3. Greenfield land should only be released as a last resort having given priority to other sustainable brownfield		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph		
					Chilton Moor, High Newport, Silksworth		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Particular areas/sites within the city		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both, defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need Developers never agree to numbers nor keep to them		
					Yes. the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site		
					Criteria based approach to sites for special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsy and travellers. No known gypsy or traveller site in Sunderland, but could be accommodated in Durham or Gateshead		
					Yes home zones should be encouraged.		
					Yes variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city		
					Yes		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
							weighting allows policy to reflect the situation of a site
No details given				Seaburn/Roker/Fulwell:- Current planning consents/known ISHL sites approximately 125 dwellings (6 football pitches)			
				Chapelgarth:- High Growth, approximately 1,000 dwellings (47 football pitches)			
				Ryhope: - Current planning consents/known ISHL sites approximately 1111 dwellings. (53 football pitches)			
				South Hylton:- High Growth, approximately 800 dwellings (38 football pitches)			
				Central Sunderland:- Current planning consents/known ISHL sites approximately 2,931 dwellings (140 football pitches)			
				Washington:- High Growth, approximately 1,400 dwellings (667 football pitches)			
				Fence Houses:- High Growth, approximately 1,000 dwellings (48 football pitches)			
				Easington Lane:- High Growth, approximately 1,400 dwellings (67 football pitches)			
				The Port area.			
					Yes, mixed use essential.		
						The Port area.	
					Consider a policy which seeks to address any imbalance in the housing stock. Move away from apartments. They end up vacant and that does not help the economy. Have a policy in place for tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances.		
					City centre could be higher density, but only where there is a policy in place that prevents cramming in bedsits and small apartments that have no real benefit to the economy.		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density. You have only to look at the proposals for Bonnersfield/next to St Peter's Campus.		
					Particular areas/sites within the city Everything has a context.		
					Lower the threshold so that affordable housing is also required on smaller sites.		
					both defined threshold be based on the size of the site and the number of dwellings		
					Continue with negotiation for the amount of affordable housing to be provided. Should be done on a site by site basis.		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site		
					Criteria based approach to sites for special needs housing		
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsies and travellers.		
					Yes home zones should be encouraged.		
					Yes variety of architectural styles encouraged. Yes to variety of styles, but stay away from mimicking old building styles.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					No specific architectural styles should not be restricted to certain areas of the city. Contemporary designs, if well done, can fit in anywhere.		
					No, don't agree with range of D.C policies. Leaves us open to testing by the more clever developers. Could be disastrous.		
					Yes Design quality and standards, bedsit provision.		
							No scoring - this is a flawed system! Each site must be assessed properly by experts from all planning and transport departments.
No details given				Seaburn/Fulwell/Roker:- Medium Growth, approximately 500 dwellings (24 football pitches)			
				Central Sunderland:-High Growth, approximately 3,800 dwellings (180 football pitches)			
				Washington:- Medium Growth, approximately 1,000 dwellings (48 football pitches)			
				Washington, there are no houses which are affordable for first time buyers, I don't want to move away from Washington but the house prices in descent areas are just to high. Yes, more houses should be built in the city centre, but at affordable prices, there is no point in building house which cost a fortune where the people of Sunderland can't buy them.			
					Have a city wide policy which aims to achieve a mix of house types on all sites Maybe the council should build more houses, where do all the people go when you knock down a council estate and build private houses?		
					Negotiate with developer for tenure		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Consider a policy which seeks to address any imbalance in the tenure		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield yes, knock down all the disused factories and stop building new ones on grass land.		
					No sustainability assessments should not be used to determine at what point in the development plan process, green field land should be released		
No details given				Seaburn/Roker/Fulwell:- Medium Growth, approximately 500 dwellings (24 football pitches)			
				Chapelgarth:- High Growth, approximately 1,000 dwellings (47 football pitches)			
				Ryhope:- High Growth, approximately 1,400 dwellings (667 football pitches)			
				South Hylton:- Medium Growth, approximately 650 dwellings (31 football pitches)			
				Central Sunderland:- High Growth, approximately 3,800 dwellings (180 football pitches)			
				Fence Houses:- Medium Growth, approximately 500 dwellings (24 football pitches)			
				Easington Lane:- Current planning consents/identified sites additional 780 dwellings (37 football pitches)			
				Central Sunderland area should be a priority as to enhance the City centre.			
					yes, the City Council insist on mixed-use for locations within the City and Local Centres		
					Consider a policy which seeks to address any imbalance in the housing stock. We need to look at each area and determine the best way forward based upon local circumstances - not a blanket cover all policy		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Have a policy in place for tenure. We should have a policy that is open to local determination on different areas/site developments where the City can negotiate with the developer		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock We can not have a blanket policy as we need to ensure local circumstances are dictated too, but an overall policy with this in mind would be preferable		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield		
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations matched to local housing need.		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances.		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					No. No need for a maximum density policy as design standards should control this.		
					Lower the threshold so that affordable housing is also required on smaller sites. This should be determined through the results of the HMA		
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need some negotiation should still take place with developers as the City should not have a blanket policy but one that is open to local negotiation based upon local circumstances		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site. All affordable housing supported housing and extra care housing.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Criteria based approach to sites for special needs housing. Criteria set upon local circumstances as to ensure that the proposed development matches all the requirements e.g. transport links, health centres etc		
					Identify potential site/s within the Washington, Hetton and Fence Houses area for gypsies and travellers. The site should be a semi-permanent transit site available from Spring to Autumn with services provided such as a water browser, refuse collection and port-a-loo. The authority should also employ a Gypsy and Traveller Liaison Officer.		
					Yes home zones should be encouraged.		
					Yes variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city. Contemporary designs, if well done, can fit in anywhere.		
					Yes agree with range of D.C issues		
							Yes agree with use of agreed scoring system
A Hunt no further details given				Seaburn/Fulwell/Roker:- Low Growth, approximately 300 dwellings (just over 14 Football Pitches)			
				Chapelgarth: - Current planning consents/known ISHL sites approximately 650 dwellings. (31 football pitches)			
				Ryhope: - Current planning consents/known ISHL sites approximately 1111 dwellings. (53 football pitches)			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				South Hylton:- Current planning consents/known ISHL sites approximately 370 dwellings (17 football pitches)			
				Current planning Central Sunderland:- consents/known ISHL sites approximately 2,931 dwellings (140 football pitches)			
				Washington:- Current planning consents/known ISHL sites approximately 400 dwellings (19 football pitches)			
				Fence Houses:- Current planning consents/identified sites approximately 180 dwellings (9 football pitches)			
				Easington Lane: -Current planning consents/identified sites additional 780 dwellings (37 football pitches)			
					No the City Council should not insist on mixed-use for locations within the City and Local Centres		
					Consider a policy which seeks to address any imbalance in the housing stock		
					Negotiate with developer for tenure		
					Consider a policy which seeks to address any imbalance in the tenure of the housing stock		
					Greenfield land should only be released as a last resort having given priority to other sustainable brownfield		
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					No. No need for a maximum density policy as design standards should control this.		
					Lower the threshold so that affordable housing is also required on smaller sites.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					both defined threshold be based on the size of the site and the number of dwellings		
					Set percentages based on the findings or the HMA and need		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to sites for special needs housing.		
					Identify potential site/s within the Washington, Hetton and Fence Houses area for gypsies and travellers.		
					No home zones should not be encouraged		
					Yes variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city.		
Emma (Children's services)				Seaburn/Roker/Fulwell:- Low Growth, approximately 300 dwellings (just over 14 Football Pitches)			
				Chapelgarth: - Current planning consents/known ISHL sites approximately 650 dwellings. (31 football pitches)			
				Ryhope: - Current planning consents/known ISHL sites approximately 1111 dwellings. (53 football pitches)			
				South Hylton:- Current planning consents/known ISHL sites approximately 370 dwellings (17 football pitches)			
				Central Sunderland:- Current planning consents/known ISHL sites approximately 2,931 dwellings (140 football pitches)			
				Washington:- Low Growth, approximately 800 dwellings (38 football pitches)			

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
				Fence Houses:- Current planning consents/identified sites approximately 180 dwellings			
				Easington Lane:- Current planning consents/identified sites additional 780 dwellings			
					Yes agree with mixed use but do not crowd the City Centre with to many buildings		
						No and I think that some land should be left for scenic areas	
					Have a city wide policy which aims to achieve a mix of house types on all sites		
					Negotiate with developer for tenure		
					No - greenfield land should not be released in exceptional areas		
					Yes sustainability assessments should be used to determine at what point in the development plan process, green field land should be released		
					Option 2. Set different levels of density in different locations		
					Yes should have exceptions in place for densities lower than 30dph In exceptional circumstances.		
					Yes exceptions should be in place for affordable housing developing sites below 30dph.		
					Yes. Provide a policy setting out maximum density.		
					Citywide Policy for maximum densities		
					No keep the existing threshold		
					both defined threshold be based on the size of the site and the number of dwellings		
					Continue with negotiation for the amount of affordable housing to be provided.		
					Yes the City Council should consider circumstances where affordable, special needs and extra care homes for the elderly can be provided by way of financial contributions from developers for construction on another site.		
					Criteria based approach to sites for special needs housing.		

Name of respondent	Respondent Ref	Agent	Agent Ref	Growth Area comments	Other Comments	Potential housing site	Draft SHLAA methodology
					Consider opportunities for 'sub-regional sites', particularly with our neighbouring authorities for gypsy's and travellers		
					No home zones should not be encouraged		
					Yes variety of architectural styles encouraged.		
					No specific architectural styles should not be restricted to certain areas of the city.		
					Yes agree with range of D.C issues		

REPORT OF DIRECTOR OF COMMUNITY & CULTURAL SERVICES

FOOD LAW SERVICE PLAN 2008/09

1. PURPOSE OF THE REPORT

- 1.1 To advise Cabinet of the Service's Food Law Service Plan for 2008/09 and seek approval of the plan.

2.0 RECOMMENDATION

- 2.1 Cabinet is recommended to refer the matter to Council with the recommendation that the Food Law Service Plan for 2008/09 be approved, and to refer it to the Regeneration and Community Review Committee for further advice and consideration.

3.0 INTRODUCTION/BACKGROUND

- 3.1 The Food Standards Agency is an independent food safety watchdog set up by an Act of Parliament in 2000 to protect the public's health and consumer interests in relation to food.
- 3.2 The White Paper "The Food Standards Agency – A Force for Change" identified the Food Standards Agency as having a key role overseeing local authority enforcement activities. The Agency therefore is proactive in setting and monitoring standards and auditing local authorities enforcement activities to ensure that they are effective and undertaken on a more consistent basis.
- 3.3 Food Service Plans are seen to be an important part of the process to ensure national priorities and standards are addressed and delivered locally. It was recognised by both central and local government that central guidance on the contents of local service plans for food enforcement work would be helpful to local authorities.
- 3.4 The Food Standards Agency Framework Agreement (under review) has been developed in close partnership with the Local Authorities Co-ordinators of Regulatory Services (LACORS) and the Local Government Association. They have recommended a format for food enforcement service plans and given detailed guidance on the content of the plan. They have also requested that the plan produced should be submitted to the relevant member forum for approval to ensure local transparency and accountability.

4.0 CURRENT POSITION

- 4.1 The Food Standards Agency require that the Food Law Service Plan 2008/09 (attached) is formulated on an annual basis to comply with the current recommendations of the Food Standards Agency Framework Agreement.

5.0 REASONS FOR THE DECISION

- 5.1 The Foods Standards Agency which monitors and audits Local Authority activities requires Food Law Service Plans to be approved by Members to ensure local transparency and accountability. The plan forms part of the Council's policy and budgetary framework as defined in the Constitution.

6.0 ALTERNATIVE OPTIONS

- 6.1 There are no alternative options available.

7.0 BACKGROUND PAPERS USED

Framework Agreement on Local Authority Food Law Enforcement

Sunderland City Council

Community & Cultural Services

Environmental Health and Trading Standards

Food Law Enforcement Service Plan
2008/9

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FOOD LAW ENFORCEMENT SERVICE PLAN 2008/9

1. SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

The Department's aim is to protect the health of all persons within the City in relation to food safety matters.

Our objectives are to proactively interact with food businesses within the City on a risk-based programme. A variety of interventions are under consideration by the Food Standards Agency guidance which will influence the actions. Alternative strategies for enforcing standards in lower-risk premises will be adopted in accordance with the anticipated new code of practice from the Food Standards Agency. We will undertake a programme of food sampling, both microbiological and compositional and respond appropriately to all food complaints, food alerts and food poisoning incidents. We will also undertake to educate and advise the public and the food trade in matters of food hygiene and safety. The inspection of ships visiting the Port will be undertaken by officers from the Food team in accordance with current guidance.

1.2 Links to Corporate Objectives and Plans

The Sunderland Strategy for the years 2008-2025 sets out the framework for the work of everyone in the council. The full document can be viewed on the council's website. The Environmental Health section, in relation to Food, can impact on all of the five strategic aims to a greater or lesser extent.

They are;

1. To create a strong and diverse local economy that will provide jobs and careers for people in the city now and in the future.
2. To create a city that provides excellent health and social care services, where residents are supported to make healthy life and lifestyle choices.
3. To make Sunderland a place where everyone feels welcome and can be part of a safe and inclusive community.
4. To create a thriving learning culture where everyone can be involved in learning.
5. To ensure that Sunderland becomes a clean, green city with a strong culture of sustainability.

Of the five priorities set to achieve the goals, the Food section will be involved with – Prosperous city, Healthy city, Safe city and Learning city.

The Corporate Improvement Plan

The Food teams are likely to be included in the following Corporate Improvement Objectives whilst undertaking their statutory and advisory roles;

- Delivering Customer Focused Services
- Being One Council
- Efficient and Effective Council
- Improving Partnership Working to deliver One City.

2. BACKGROUND

2.1 Profile of the Local Authority

Sunderland City Council covers an area of 138 sq. kilometres and contains a population of about 284,000. It is the largest City between Leeds and Edinburgh. The area is largely urban ("metropolitan") but contains a great diversity of settlements including the City Centre, Washington and former coalmining communities such as Houghton le Spring and Hetton le Hole.

2.2 Organisational Structure

The Council through a Leader, Cabinet and a total of 75 Councillors covering 25 wards, has an annual estimated budget of approximately £243 million for 2008/9. The Council employs 13,918 different individuals working full and part time across the City in a wide variety of jobs. The most recent estimate of the number of Council staff (Full Time Equivalents) currently employed is 10,722.95.

Current Structure;

Chief Executive + 5 Major Directorates; Community and Cultural Services, Corporate Services, Development and Regeneration, Children's Services, and Housing, Health and Adult Services.

Structure of Community and Cultural Services;

Community and Cultural Services have three main service areas, Environmental Services, Culture and Tourism and Community Services.

Environmental Services includes the Environmental Health, Licensing and the Trading Standards division as well as Cemeteries and Crematorium, Building Maintenance (Education and Civic Buildings), Drainage, Grounds Maintenance, Highways and Winter Maintenance, Refuse Collection and Street Cleaning, and Transport.

Within the Environmental Health division, the Commercial Food and Area Office team are involved in food related matters and Trading Standards are involved in primary production and feedingstuffs control.

With regard to the line of Management for food matters, the Director of Community and Cultural Services is the Chief Officer and the Assistant Head of Environmental Services heads the Environmental Health, Licensing and Trading Standards division. There is an Environmental Health Manager for Commercial sections and Area Office, and a Principal Environmental Health Officer responsible for food matters. The Assistant Head of Environmental Services is also line manager to the City Trading Standards Officer.

2.3 Scope of the Food Service

The activities relating to food in the City are undertaken between the Commercial Food team, Area Office staff, Health Promotion team and Trading Standards staff.

The Commercial Food team carry out a programme of food hygiene and food standards inspection duties as well as responding to requests for service and infectious disease notifications. Sampling of foodstuffs, both microbiological and compositional, is also undertaken. Health and Safety at Work in most food premises is enforced by the team. Officers also respond to Port Health requests and food hygiene inspections are part of the Ship Sanitation Certificates required under International Health Regulations.

Trading Standards Officers within the Department specialise in the primary production and animal feedingstuffs response.

The services of Health Protection Agency laboratories and the County Analyst, Durham complement the work of the two teams.

The Health Promotion team provide Level 2 (Basic) and Level 3 (Intermediate) Food Hygiene Training Courses. Advanced Food Hygiene training can be made available on request. Officers organise campaigns and undertake visits to educational establishments in connection with food hygiene. The Heartbeat award and Healthy Home Award schemes are promoted and managed by the team.

Up to April 2008 the Department, with other Tyne and Wear Authorities, has been involved with a programme of training for small food businesses in "Safer Food, Better Business", a food safety management system promoted by the Food Standards Agency (FSA). The programme was successfully completed with £250,000 funding from the FSA. The Joint Authorities are considering how the training for new businesses may be extended in a partnership arrangement between the Authorities and funded by the participants.

The food service operates from the Civic Centre and currently the Houghton Offices, which are open to the public in normal working hours throughout the week, 8.30am to 5.15pm (4.45pm Friday), although officers work in a flexi-time scheme. There is an evening and weekend service arrangement for contacting management for out-of-hours emergencies. There are no formal planned "out of hours" arrangements for field Officers, however visits are conducted at events or as necessary outside normal working hours.

In the past year there have been numerous requests for information including Freedom of Information and Environmental Information requests regarding food premises. We planned during the year to make certain information regarding food premises, e.g. "scores on the doors" available on-line from the council website. "Scores on the Doors" is the publication of a star rating for food premises in the City based on standards of hygiene ratings and confidence in management scores assessed during programmed inspections. Although the design was undertaken, practical arrangements were held back and the Food Standards Agency have expressed that a national scheme should ultimately be

adopted. The scheme proposed is fundamentally different to schemes run by most Authorities and concern has been expressed regarding the changes. Following inspections, written communications to business owners advise them that the information may be released on the website in the future and in response to third party requests as required by Freedom of Information legislation.

The Council website www.sunderland.gov.uk encourages the public to communicate with the Department by email and makes information constantly available. Letters from the Department to customers / companies encourage the use of email. The facility to contact the Department and individual Officers by direct telephone lines is also promoted.

The Authority has a very limited rural community, principally arable with a very limited number of livestock holdings. The Trading Standards Division carries out the enforcement of primary production and feedingstuffs legislation and advice to farmers/retailers.

2.4 Demands on the food service

- There are 2095 food premises currently operating and recorded on the premises database.

Food Premises in the City of which;	No.	Food Hygiene High Risk (a)	Food Hygiene Medium Risk (b-d)	Food Hygiene Low risk (e-f)	Unrated / to be classified/ unclassified
Primary producers / manufacturers / processors	40	1	39	0	
Packers / Importers / Exporters / distributors, etc	32	1	23	8	
Retailers	630	2	578	50	
Restaurant / Other Caterers	1264	0	1216	48	
Contact Materials and articles	0	0	0	0	
Total Food Premises	2095 (including unrated premises)	4 (0.2%)	1856 (88.5%)	106 (5.1%)	129 (6.2%)

- The majority are classified in the Restaurant / catering outlet group (1264) whilst there are 630 food retailers.
- Approximately 0.2% of food businesses are rated Risk Category A and 9.5% are rated Risk Category B. The greater number of food premises, 1199 (57.2%) come within the category C Risk Category.

- The Stadium of Light can accommodate over 40,000 spectators, with significant catering from the outlets within the Stadium. International events are also hosted at the site.
- There are a significant number of outdoor events held regularly each year (e.g. Air Show, Kite Festival) which are attended by up to 1.5 million visitors, with various mobile caterers and food businesses from around the region and beyond visiting the Authority to cater at the events.
- The additional element of work due to FSA / Government policy regarding port health inspections which requires increased administration and inspections of food hygiene and standards on board vessels coming into the port was minimised due to the number, type and previous destinations of vessels arriving in the Port. The request for Ship Sanitation Certificates has increased and two members of staff received specific training in Edinburgh in April on applying the new International Health Regulations.
- Increased vigilance continues to be expected regarding the inland enforcement of imported food legislation in an effort to prevent the spread of disease in food animals.
- The Freedom of Information Act continues to impact significantly on the workload of the teams due to the administration of requests and time spent recovering the information. Press and other enquiries to Local Authorities in the region continue to request specific information regarding comparative businesses in each Local Authority. Whilst there is a legal duty to respond, this can place a burden on resources which would otherwise be productively used in providing the service.
- The transfer of licensing to the Local Authority from the Magistrates three years ago continues to impact on the workload as many of the premises are inspected for health and safety by officers in conjunction with their food hygiene and food standards visits.

There is some potential for any large outbreak of food poisoning or illness, or a serious accident at a food premises, to impact significantly on the routine service operated by the Authority. There were no major outbreaks within the City attributable to a specific food premises, although the Norovirus ("Winter Vomiting disease") continued to affect many residential establishments in the City and regionally. Officers work closely with the Health Protection Agency to limit the spread of this infection environmentally and ensure an appropriate response is made commensurate with the necessity to identify the infection and limit the impact.

One suspected outbreak of food poisoning at a function in the region was possibly linked to a caterer whose business is in the City. Officers have assisted in the investigation. The absence of food samples or bacteriological samples from cases following the event limited a conclusive judgement.

There are no other likely major impacts e.g. significant food imports, seasonal variations or high numbers of food manufacturing businesses other than local catering businesses. Where food alerts necessitate a significant response, this can impact on other areas of the service.

Food alerts have continued to impact on the work of the section. During 2007 there were a total of 49 alerts plus 5 updates. In the first three months of 2008 a further 14 alerts were received with 4 updates. They have included hazards associated with possible metal contamination in ready meals, salmonella contamination of seeds, glass in nan breads, rice and rice products with undeclared irradiated ingredients, tainted fish, rubber contamination of crisps, and glass in ready to eat meals. Details of all the food alerts are available on the Food Standards Agency (FSA) website, www.food.gov.uk. The FSA system of allergy alerts, separate from food alerts, have continued with many instances of food labelling errors or contamination of specific ingredients. Whilst not critical to the general public health they can have disastrous effects on persons prone to allergic reactions.

2.5 Enforcement Policy

The Department has a documented Enforcement Policy, which has due regard to the Tyne and Wear Food Enforcement Policy. The Authority works in accordance with the principles of the Regulators' Compliance Code, and future review will take into consideration guidance from the Better Regulation Office.

The Code of Practice requires that any breaches of food law that may be detected in premises where the Authority is itself the proprietor of a food business should be brought to the attention of the Chief Executive, without undue delay.

3. SERVICE DELIVERY

3.1 Food Control

3.1.1 Food Premises Inspections

There is to be more emphasis on targeting non-compliant businesses. A National Performance Indicator has been set for the percentage of food businesses that are broadly compliant. It is envisaged that those premises which are found not to be complying as indicated by poor structures, poor hygiene standards or where there is low confidence in management, will fall into a scheme to require improvements. There will still be risk rating for all premises inspected and the Food Standards Agency still anticipate the frequency of inspections being governed by the rating. The lowest rated category may be subject to alternative enforcement strategies. Premises formerly requiring specific approval will be subject to a frequency of inspection determined by the risk rating rather than the previous separate standard.

It has been the Department's ongoing annual target to inspect all food premises at a risk rated frequency in accordance with guidance from the Code of Practice, which is currently under revision. The FSA are encouraging Authorities to spend more time at targeted businesses rather than spread over the whole range in future and alternative strategies for the lower risk premises will be considered.

Highest risk premises which require specific approval will not continue receive as many interventions as required in previous years. They will be subjected to risk rating and intervention frequency will be determined individually.

Due to the special project funded by the FSA, and with their approval, not all premises due for routine inspection during the last 12 month period received programmed inspections as previously required. There was a significant emphasis and workload involved in assisting businesses to implement the "Safer Food, Better Business" system. The Department however has also again achieved high rates on inspection of food premises and in 2007/8 visited 1454 different food premises and undertook 1504 inspections. A total of 1797 visits were made including inspections, response to complaints, revisits and sampling. As a consequence of the Safer Food, Better Business project 166 businesses from this Authority received free training and / or coaching in the use of the FSA food safety management system. All businesses have been or will in due course be assessed for compliance with this requirement, an on-going process commenced in 2007.

The estimated number of inspections programmed for the year 2008/9 at the time of preparation of this report is 1406 plus any new businesses commencing within the year. These inspections have been strictly programmed using the current risk based system published by the Food Standards Agency. We aim to inspect the premises within one month of the due date for inspection, the only exceptions being those businesses that operate seasonally and those who may be subject to alternative enforcement strategies, a principle anticipated to be encouraged by the FSA.

Secondary inspections (including revisits) to premises are carried out as necessary in order to ensure that material defects are rectified. Those premises which are not broadly compliant will be followed up with a view to enforcing compliant standards.

There are no immediate plans to change to the commercial database software preferred corporately, and the in-house software continues to operate in a more advanced manner, which enables effective management of the service. There are modifications required, currently being worked upon, to accommodate the changes necessary for the change in FSA requirements.

Participation with neighbouring Authorities in sampling and other food related matters ensures that the Authority works in a co-ordinated and compatible way.

The Department has maintained close links with the Health Protection Agency as a partner in tackling ill health. Regular meetings to discuss various matters relating to food poisoning cases and sampling programmes take place. The County Analyst and Health Protection Agency (ex-Public Health Laboratory Service) are contracted to assist with expertise where any additional problems arise. Networks exist within the region, nationally and with the Chartered Institute of Environmental Health and the Local Authorities Coordinators of Regulatory Services (LACORS).

3.1.2 Food Complaints

The Authority is committed to investigating all food complaints, the extent of the investigation depending on the merits of the complaint. This can range from re-assuring the complainant to the more formal process, including reference to home or originating Authorities in accordance with the Local Authorities Coordinators of Regulatory Services (LACORS) guidance and the Code of Practice.

In 2007/8, 283 requests for service requiring a response from Officers were made, including 82 food complaints and 15 requests relating to suspected food poisoning. The staff resources required to deal with these requests are drawn from existing Commercial Food and Area Office teams. It is estimated that the time expended on food complaints in 2008/9 will be equivalent to 0.25 officers (full time equivalent).

3.2 Primary Producers and Feedingstuffs Control

3.2.1 Premises Inspection

The Trading Standards Section of the Department have the delegated duty to enforce legislation in relation to primary production and feedingstuffs control. Inspection and sampling of products at farms, manufacturers, wholesalers and retailers will be undertaken on a risk assessed basis.

Further contact with primary producers under Food Hygiene legislation and a survey has been undertaken. An inspection programme is in the process of development.

As part of the animal health visits, feedingstuffs inspections are undertaken.

3.2.2 Feedingstuffs Complaints

Due to the relatively few number of feedingstuffs establishments, it is not anticipated that there will be a significant number of complaints received by the Authority. Any complaints will be investigated in line with Departmental procedures. The Authority last year received no complaints, which previously have related to pet food and not feedingstuffs for animals intended for human consumption. Sampling as necessary will be undertaken where circumstances warrant or intelligence indicates a problem.

3.3 Home Authority Principle

There are anticipated changes to this principle which will be dictated by the Code of Practice awaited from the FSA.

3.4 Advice to Business

The Authority seeks to assist local businesses as part of the City / Community Strategy. The Authority is committed to promote the Food Standards Agency (FSA) project "Safer Food, Better Business", (SFBB) which is aligned to supporting certain food businesses in complying with the food safety management principles. Over 2006-8, the five Tyne and Wear Authorities

worked in partnership with an FSA grant of £250,000 to employ a specialist contractor to train, advise and coach food businesses to implement the SFBB system. The Local Authorities had a substantial role in monitoring the effectiveness of the contractor's work which impacted on staffing resources. Part way through the project the Authorities elected to take on the role of targeting businesses due to the poor response by businesses following contact by the contractor. There will continue to be great efforts to educate businesses in complying with the requirement for them to implement a suitable food safety management system.

In correspondence to food businesses, a standard invitation is given to them to seek advice from the Department.

Larger manufacturing businesses and small-medium enterprises have both expressed their approval of the department's dealings with their business and readiness to assist with advice, a policy of the Department for many years.

In routine inspections and visits to businesses, Officers pay special attention to advising and explaining matters appropriate to the situation.

Close links have been made with many business organisations in the City and informal agreement reached to cooperate more fully with businesses through these contacts.

3.5 Food Inspection and Sampling

3.5.1 Food Inspection and Sampling

The Department is committed to sampling foods for compositional standards, bacteriological standards and food standards compliance. Sampling is undertaken proactively involving imported and locally produced foods, as well as participating in national and regional surveys with Local Authorities Coordinators of Regulatory Services (LACORS) and Health Protection Agency Laboratory Service.

The Department undertakes local sampling surveys from its own intelligence and from liaison with the Health Protection Agency.

As a consequence of "demand" i.e. complaints, food alerts, food poisoning outbreaks, etc. further samples will be taken.

An estimated 700 samples will be taken for bacteriological examination / compositional analysis in the year 2008/9, including 30 water samples.

Formal agreements with the Durham County Analyst exist, although the service is likely to break away into a private business but still hold the classification of a Public Analyst. We also use the Health Protection Agency Laboratory Service in Newcastle for Bacteriological sampling. This Laboratory is also likely to move site this year but will remain within the Health Protection Agency. Close liaison exists with the laboratories management and neighbouring Authorities to ensure the most effective and coordinated programme with flexibility for local peculiarities.

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Department, with the Health Protection Agency, operates under the updated “Guidelines – Preventing person-to-person spread following gastrointestinal infections”

A local Consultant for Communicable Disease Control is employed by the Health Protection Agency. Dr Kirsty Foster is available to the Department for any advice regarding specific problems relating to infectious disease.

The Department has the power to exclude persons from work in accordance with Health Protection Agency and agreed local policy based on national guidelines. On the rare occasion where such exclusion is necessary the Department will undertake such measures.

Advice on food poisoning is available on the Sunderland.gov.uk website by inserting “food poisoning” in the search box on the home page (top right) and following the links.

The number of reported cases of food poisoning depend on persons suffering attending their GP or hospital, where, if samples are taken, and found to be positive, the medical practitioner has a legal duty to inform the Authority. There are close liaisons between the laboratories, Health Protection Agency and the Department to follow up all positive cases.

Statistics of cases investigated over recent years

Year to March 31 st	Campylobacter	Salmonella	Cryptosporidia	Food poisoning & suspected FP	Shigella	Esch. Coli	Other miscellaneous organism	Totals
2008	292	53	28	13	1	3	6	396
2007	282	69	69	21	3	7	1	452
2006	346	86	25	35	1	3	1	497
2005	287	100	9	30	1	7	6	440
2004	253	109	47	28	4	2	4	447

Year to March 31 st	April	May	June	July	August	September	October	November	December	January	February	March	Totals
2008	19	33	42	46	58	44	39	40	19	13	18	25	396
2007	23	20	60	51	51	73	49	44	32	13	12	24	452
2006	42	35	46	54	53	69	49	38	30	18	33	30	497
2005	20	38	47	48	70	41	47	32	22	27	30	18	440
2004	18	8	75	42	49	96	41	24	16	33	23	22	447

The Authority is committed to the investigation of all cases and outbreaks notified. The scale of the investigation and response will be measured and as appropriate to the causative organism and potential for further spread. Many cases appear to be the result of foreign travel or home acquired, and some infections e.g. Cryptosporidiosis may be acquired from the environment rather than from a food source within the City.

Another illness commonly called Winter Vomiting Disease still continues to impact on residents both locally and nationally. This is an illness of rapid onset but short duration caused by Norovirus and is commonly spread environmentally from person to person rather than being food-borne.

3.7 Food Safety Incidents

The Authority is committed to responding appropriately to all Food Alerts issued by the Food Standards Agency in accordance with the Code of Practice on this subject. The level of response is determined by the category of response required and individual circumstances of the incident / local impact. Information is available to the public through Press releases and a link on the Council website to the Food Standards Agency. The cooperation of the Council's media team is again acknowledged.

3.8 Liasing with other organisations

The Authority joins with the four other Authorities in the Tyne & Wear Food Liaison Group and the Tyne and Wear Sampling Group and Health Protection Agency / Local Authority Liaison group, which includes representatives from the relevant analytical and bacteriological laboratories and Communicable disease specialists. The Authority continues to be represented on the User Group for the National Food Sampling database.

Trading Standards Officers meet frequently at North East Trading Standards Association (NETSA) meetings when any topical subjects can be considered. In the course of a year, the attendance at such meetings is equivalent to seven full working days.

Relevant Building Control and Planning Applications are referred to the Department for consideration and comment.

There is frequent liaison with other Departments and sections in connection with food matters, including Facilities Management (City Catering), School Meals, Procurement, Housing, Health and Adult Services and regarding premises licences. Potential conflicts of interest are being considered and the enforcement policy will be amended appropriately at the next review in accordance with the anticipated Code of Practice.

The section has positive liaison with the local office of the Health Protection Agency, Sunderland Teaching Primary Care Trust, City Hospitals Sunderland, local food federations and guilds. Last year there was particularly effective co-operation with ethnic communities, as well as with the voluntary sector and schools and colleges.

3.9 Food Safety and Standards Promotion

Whilst Officers in the course of inspections and other visits give advice and information, the Health Promotion Team offer training for the Level 2 Award Food Hygiene, the Level 3 Intermediate Certificate in Food Safety and Level 1 Foundation Certificate in Nutrition. The Team also undertake campaigns during the year on food related topics. In 2007/8, 63 training events were provided.

The Heartbeat Award has been running in Sunderland since 1990 and the Healthy Home award commenced in this Authority in 1997. Each of these award schemes have food hygiene related elements. A total of 156 Heartbeat awards and 15 Healthy Home awards were given in 2007/8.

During 2007/8:-

- 25 delegates attended at one of three Food Hygiene Awareness Training Sessions held,
- 7 Food Hygiene Refresher Training Courses were held for 81 delegates
- 24 courses were held in Level 2 Award Food Hygiene attended by 341 delegates
- 14 delegates attended Level 3 Intermediate Certificate training

The Health Promotion team also respond to requests from schools and other educational and community organisations for information and talks on subjects pertaining to food. Talks and presentations were given to 28 schools on food safety and the importance of washing hands properly.

Basic food hygiene information for consumers is available on the Council Website. Similarly advice is also available on food poisoning organisms and what to do in the event of suspecting that you are ill from consuming contaminated food.

4. RESOURCES

4.1 Financial Allocation

For 2008-9 the budget for food control (CC2090) is £414,566. (This includes a proportion of env health support charges, budget otherwise £313,313)
The sampling budget is £14,671 and Health Promotion has a general budget of £111,859 including anticipated income of £24,162 partly from food hygiene training.

It is estimated that about £485,000 of the Department's total budget will be available for use in relation to food safety.

4.2 Staffing Allocation

Staffing resources allocated to Food work currently are as follows;

Food Team

- 1 Principal Environmental Health Officer / Team Leader (Full Time)
- 2 Environmental Health Officers (Full time)

- 1 Environmental Health Officer (Part time, Agency)
- 2 Environmental Health Officers (Job share / part time) – both posts vacant
- 1 Technical Officer (Full time – working towards Higher Certificate)
- Clerical Support

Area Office

- 1 Principal Environmental Health Officer / Team Leader retired during 2004, post under review.
- 2 Environmental Health Officers (Part time food)
- 1 Technical Officer (Part time food - Ordinary Certificate)
- Clerical Support

Health Promotion

- 1 Principal Environmental Health Officer / Team Leader (Part time on food matters)
- 1 Health Promotion Assistant (Part time on food matters)

All of the full-time Environmental Health Officers currently employed have over 2 years experience in food matters.

Trading Standards

- 1 Trading Standards Officer (Part time fertiliser and feedingstuffs)
- 1 Trading Standards Officer (Part time Primary Producers)

Estimated Total Full-time equivalent = 8.2 Officers on the establishment.

4.3 Staff Development Plan

Staff Appraisals are undertaken annually and the findings form the basis of individual staff development and training plans.

Individuals are sent to specific training where appropriate and all Environmental Health Officers are required to maintain a training log in order to comply with Continuing Professional Development.

Training days and training sessions on subjects are programmed as necessary.

Any members of staff "new" to food hygiene are supervised and receive training commensurate with the Code of Practice. (During the last year one Senior E.H.O. from Health and Safety Team was successfully seconded for a period into the food team to cover for an officer on long term career break.)

Environmental Health Officers in other sections also receive update training in food matters.

5. QUALITY ASSESSMENT

Charter Mark status was reviewed in May 2006 and was awarded to a high standard, the department is now applying for Customer Excellence status.

The recording of monitored inspections within the food premises database will be undertaken during this year.

The new annual return of statistics for 2008/9 (LAEMS – Local Authority Enforcement Monitoring System) will be provided to the Food Standards Agency by the required internet method as required in 2009.

6. REVIEW / PERFORMANCE MANAGEMENT

6.1 Review against Service Plan

A formal review against the service plan is undertaken mid-year with submission of achievements against targets submitted via the Director to the Chief Executive.

In the interim periods, line management monitors progress, including utilising the excellent in-house database software.

Monthly targets are set and teams of officers are expected to achieve the required inspection rate to reach annual service level targets.

The Corporate Improvement Plan and an Annual Report is produced to define achievements made during the previous year.

6.2 Identification of any variance from the Service Plan

The food control teams performed extremely well against the Service Plan for 2007 / 2008 in all areas of Service Delivery.

The comprehensive review of procedure and policy documents is an on-going task.

As a consequence of the success of the Safer Food Better Business project bid, and resulting work undertaken between the Tyne & Wear Authorities, some other inter Authority elements of the service plan were necessarily postponed until the SFBB project is complete in 2008.

6.3 Areas for Improvement

- Continue to promote the use of Safer Food Better Business (SFBB) to appropriate food businesses in the City via visits by Officers.
- Devise and implement as appropriate an alternative enforcement strategy for low risk businesses
- Undertake the necessary adaptations to databases to be able to report to the FSA using their Local Authority Enforcement Monitoring System (LAEMS) from March 2009. This will be necessary to report on the new National Indicator.
- Support peer review, Inter Authority Audit and / or internal monitoring exercise between Tyne & Wear LAs.

- Consider the implementation of “Scores on the Doors” in the format expected to be finalised by the FSA during 2008/9.
- The Regulatory Enforcement and Sanctions Bill due to become an Act in 2008 will primarily implement the key recommendations in the;
Hampton Review - reducing administrative burdens
Macrory Review - regulatory justice making sanctions effective
Government paper - Next Steps on Regulatory Reform
The Act will influence how Food law enforcement functions are carried out.

END