
Report to Sunderland City Council

by Mark Dakeyne BA (Hons) MRTPI
an Inspector appointed by the Secretary of State
Date: 7 January 2020

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Sunderland Core Strategy and Development Plan 2015-2033

The Plan was submitted for examination on 21 December 2018

The examination hearings were held between 21 May 2019 and 13 June 2019

File Ref: PINS/J4525/429/8

Abbreviations used in this report

AAP	Area Action Plan
AM	Additional Modification
A&DP	Allocations and Designations Plan
DtC	Duty to Co-operate
Dpa	Dwellings per annum
ELR	Employment Land Review
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
Ha	Hectares
HGA	Housing Growth Area(s)
HIS	Housing Implementation Strategy
HMA	Housing Market Area
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
IAMP	International Advanced Manufacturing Park
IDP	Infrastructure Delivery Plan
KEA	Key Employment Areas
LCA	Landscape Character Assessment
LEP	Local Enterprise Partnership
LP	Local Plan
LPA	Local Planning Authority
MM	Main Modification
NDSS	Nationally Described Space Standards
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PEA	Primary Employment Areas
PPG	Planning Practice Guidance
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAMM	Strategic Access Monitoring and Management
SANG	Suitable Alternative Natural Greenspace
SCC	Sunderland City Council
SCI	Statement of Community Involvement
SD	Submission Document
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SP	Supporting Document
SPA	Special Protection Area
SPD	Supplementary Planning Document
Sq m	Square metres
SSGA	South Sunderland Growth Area
SSTC	Sunderland Strategic Transport Corridor
UDP	Unitary Development Plan
UEP	Unauthorised Encampment Policy
WPVA	Whole Plan Viability Assessment

Non-Technical Summary

This report concludes that the Sunderland Core Strategy and Development Plan 2015-2033 [LP or the Plan] provides an appropriate basis for the planning of the City, provided that a number of main modifications [MMs] are made to it. Sunderland City Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Many of the MMs concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared a Schedule of the proposed MMs and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. My recommendations on the MMs take into account all the representations made in response to consultation on them. In some cases, I have amended their detailed wording or made consequential modifications where necessary.

The MMs can be summarised as follows:

- Clarifying and adjusting the distribution of housing and employment land and supply figures to reflect up-to-date information
- Articulating the exceptional circumstances for the release of Green Belt land
- Clarifying and updating the components of housing land supply, the assumptions that will be relied upon to calculate the five-year supply and the role of a Housing Implementation Strategy
- Ensuring that policies and proposals for gypsies and travellers are positively prepared, effective and consistent with national policy
- Clarifying the components of employment land supply and ensuring employment policies are effective
- Ensuring that the strategic and generic policies, including those relating to the Green Belt, valued landscapes, housing, and minerals and waste, are positively prepared, justified, effective, consistent with national policy, and clear to the decision-maker
- Deleting Green Belt Housing Growth Areas [HGA] and Safeguarded Land at East Springwell, Rickleton and North Hylton so that land release is positively prepared, justified and consistent with national policy
- Avoiding the protection of the part of the Hendon Key Employment Area where there is no reasonable prospect of the land being used for that purpose
- Ensuring that the extent of Settlement Breaks is positively prepared and justified
- Modifying the development criteria for HGA and the South Sunderland Growth Area so that they are positively prepared, justified and effective
- Ensuring that key triggers that would lead to a review and the Implementation and Monitoring Framework are embedded in the LP

Introduction

1. This report contains my assessment of the Sunderland Core Strategy and Development Plan 2015-2033 [LP or the Plan] in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework 2012 [NPPF or the Framework] makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised Framework was published in July 2018 and further revised in February 2019. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this Plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance [PPG] has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority [LPA] has submitted what it considers to be a sound plan. The Sunderland Core Strategy and Development Plan 2015-2033 submitted in December 2018 is the basis for my examination (Submission Document [SD] SD.1). It is the same document as was published for consultation in June and July 2018. A Schedule of Minor Modifications (SD.3) was also submitted alongside the Publication Draft but, as this was not subject to consultation, I am not treating it as a formal addendum to the Plan. I have included some of the modifications as Main Modifications [MMs] as appropriate. The remainder have been included as Additional Modifications [AMs]. I have been provided with the representations on the Publication Draft and have taken them into account in my examination of the Plan and this report.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any MMs necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, many of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal [SA] of them. The MM schedule was subject to public consultation for six weeks during September and October 2019. I have taken into account the consultation responses in coming to my conclusions in this report. In the light of the consultation responses I have made some amendments to the MMs and made consequential amendments to others as necessary for consistency or clarity. None of the amendments significantly alters the content of the MMs as published for consultation or undermines the participatory processes and SA

that have been undertaken. Where necessary, I have highlighted these amendments in the report.

6. The Council has also proposed some AMs which have also been publicised. But as these do not go to soundness, I do not need to address them in this report.

Policies Map

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Publication Draft Core Strategy and Development Plan 2015-2033 Policies Map (SD.2).
8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. I have referred to these changes to the policies map within this report.
9. These further changes to the policies map were published for consultation alongside the MMs (EX19.007 – Proposed Policies Map Amendments).
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in SD.2 and the further changes published alongside the MMs in EX19.007.

Assessment of Duty to Co-operate (DtC)

11. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
12. I have had regard to the DtC Statement (SD.11) in considering whether the DtC has been met. The Statement describes the consultation that has taken place with prescribed bodies, regional working with other LPAs and cross-boundary co-operation on strategic priorities.
13. Sunderland is one of the seven local authorities comprising the North East Local Enterprise Partnership [LEP]. My assessment of whether the DtC has been met focuses on the relationship of Sunderland with other authorities and prescribed bodies within the LEP area and in particular with adjoining LPAs. Areas beyond the LEP, such as the Tees Valley, which has its own LEP, do not share any significant DtC issues. The seven authorities and the Northumberland National Park Authority entered into a Memorandum of Understanding setting out how they would comply with the DtC. The creation

of the new North of Tyne Combined Authority (Newcastle, North Tyneside and Northumberland) should not detract from effective working across the Sub-Region and should have positive effects.

14. The nearby authorities of Gateshead, Newcastle, Durham and South Tyneside are at different stages of LP preparation. A joint Gateshead and Newcastle Core Strategy was adopted in 2015 and allocation plans for the authorities are currently being examined. Durham's LP is also currently under examination. South Tyneside is preparing a new LP and has recently consulted on a pre-publication draft version. However, notwithstanding the different stages that LPs have reached, the approach to evidence gathering has been reasonably consistent and, in some cases, such as the earlier Gypsy and Traveller Accommodation Assessment [GTAA] 2014 with South Tyneside, derived from a joint study.
15. Notwithstanding the synergies within the LEP, the Strategic Housing Market Assessment Update [SHMA – SD.23] concludes that Sunderland has a largely self-contained Housing Market Area [HMA]. Similarly, the Employment Land Review [ELR – SD.37] identifies Sunderland as demonstrating a reasonably high level of self-containment with regard to its Functional Economic Market Area with 67% of Sunderland's working residents being employed within the City's boundaries. That said there are strong commuting flows to Durham, Gateshead and South Tyneside and vice-versa.
16. In this context the Council asked neighbouring authorities, Durham, Gateshead and South Tyneside, whether they could accommodate some of Sunderland's housing needs because of the extent of the Tyne and Wear Green Belt in the northern and central parts of the City. However, Gateshead and South Tyneside are also constrained by Green Belt, most land outside settlements being so designated. Durham has large areas of non-Green Belt land but those parts of the County which are adjacent to Sunderland are generally restricted by Green Belt. Durham is already proposing some Green Belt release in its emerging LP. Therefore, the neighbouring authorities have advised that they would be unable to meet additional growth from Sunderland without revising their own Green Belt boundaries.
17. Sunderland has also been approached about whether it can meet any of Durham's and South Tyneside's housing needs. However, Sunderland City Council [SCC] has said that it is unable to do so because of the encroachment into Green Belt to meet its own housing needs. The Gateshead and Newcastle Core Strategy has already set out the growth proposals for these authorities, involving some Green Belt release.
18. In terms of employment, whilst the starting point has been to assess and meet quantitative needs at LPA level, it has been under the umbrella of the LEP Strategic Economic Plan. There are certain locations and sectors that warrant a cross-boundary approach to identifying suitable sites. For the automotive and advanced manufacturing sectors, related in part to the Nissan Car Plant, this has resulted in a jointly prepared and adopted International Advanced Manufacturing Park [IAMP] Area Action Plan [AAP] which has led to the implementation of the IAMP on 150 hectares [ha] of land straddling Sunderland and South Tyneside.

19. The DtC Statement also evidences the co-operation with prescribed bodies, including infrastructure providers and technical consultees. This has influenced the policies in the Plan and the preparation of key supporting documents such as the Infrastructure Delivery Plan [IDP] (SD.59). A working group was set up to assist in the preparation of the IDP. Highways England has had ongoing involvement in ensuring that key highways infrastructure affecting the trunk road network, notably the A19, is programmed and included in the IDP. Key bodies such as Natural England and the Environment Agency have had input into the need for additional evidence to support the policies and proposals as reflected in Statements of Common Ground.
20. SCC, Gateshead and South Tyneside have produced a Joint Municipal Waste Strategy and procure waste services together. The Council works collaboratively on minerals as part of the North East Aggregates Working Party which prepares annual aggregates assessments and monitoring reports. This joint working has informed the waste and minerals policies of the Plan.
21. I am satisfied that, where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

22. This Plan deals with the overarching strategy, strategic policies and strategic allocations and designations for the City, including some limited alteration of Green Belt boundaries. It is referred to as a Part 1 Plan. The Part 2 Plan will be an Allocations and Designations Plan [A&DP] which is yet to be prepared but will set out local allocations, principally derived from the Strategic Housing Land Availability Assessment [SHLAA], and designations, under the umbrella of the Part 1 Plan. Together with the IAMP AAP, adopted in 2017, the three documents will comprise the City's development plan.
23. The LP has a plan period of 2015-2033. However, assuming it is adopted in early 2020, it will only have about a 13-year period post adoption, albeit that the whole timespan will be 18 years. The 2012 Framework refers to a 15-year time horizon being preferable but does not, unlike the revised Framework, refer to this period being post-adoption. Moreover, the period is not mandatory. Rebasing the evidence would be onerous. In any event there is now a statutory requirement to consider the need for updating of LPs every five years. The timeframe is appropriate.
24. The IAMP AAP has, and this Plan will (once adopted), supersede saved policies of the Sunderland Unitary Development Plan [UDP]. However, a number of UDP policies will remain saved policies until the A&DP is adopted. Deleted and saved policies of the UDP are set out in a revised Appendix 1 of the Plan.
25. Some of the representations on the Plan refer to the merits of sites which have not been included in the LP – omission or alternative sites. However, the purpose of the examination is to consider whether the submitted Plan is sound. Therefore, the focus of this report in relation to sites will principally be on (1) whether the process followed by the Council in selecting the Housing Growth Areas [HGA] and Strategic Sites is sound, particularly in considering

whether exceptional circumstances exist for the release of the HGAs from the Green Belt; and (2) whether these sites, along with other likely sources of supply, will meet the development requirements of the Plan.

Main Issues

26. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, I have identified nine main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy or policy criterion in the Plan.

Issue 1 – Whether the amount of housing and employment land required in the LP is appropriate to meet the needs of the City

Housing Objectively Assessed Need [OAN]

27. Due to the high degree of self-containment, the City LPA area is an appropriate HMA. The Plan identifies an OAN of 745 net additional dwellings per annum [dpa] leading to an overall requirement of 13,410 homes.
28. The SHMA Update 2017 (SD.23) and the 2018 Addendum (SD.24) have followed the methodological steps for calculating the OAN set out in the PPG, using the 2014-based household projections as a starting point. Over the Plan period the household projections suggest an increase of 9965 households which equates to 570 dpa.
29. In relation to local demographic trends, consideration has been given to whether adjustments should be made to take into account falling net out-migration and suppressed household formation for the 25-34 age group. The 2014 household projections already take into account recent changes in migration rates which leads to the 570 dpa. Nationally there have been recent changes to the way that younger people interact with the housing market. This includes choosing to rent rather than buy which is reflected in a decline in first time buyers. In Sunderland in particular, there is a greater propensity for young people to stay at home longer notwithstanding relatively low house prices. 12% of households include adult children. Therefore, no further adjustments are necessary in relation to local demographic trends.
30. In terms of employment trends, out-migration from Sunderland has been reducing. In addition, post EU-Referendum employment forecasting suggests an annual net increase of people in employment of over 400 per annum. These increases take into account the IAMP but is not over-optimistic because it is likely to take a significant period to develop the site. Economic growth suggests an uplift of around 30% on the 570 dpa which leads to a figure of 745 dpa. This would ensure that the working age population does not decline over the Plan period. There remain uncertainties over the impact of Brexit on economic growth and IAMP in particular. But such impacts are beyond the timeframe of this examination. A review of the LP would take into account any significant post-Brexit changes in growth.
31. House prices in Sunderland are low compared to national and regional levels. The House Price Ratio is 4.6. There was no appreciable increase in lower

quartile house prices between 2015-2018. The House Price Ratio is well below the level where a market signals uplift is recommended. The Rental Affordability Ratio, which is influenced by the student rental market, is higher than might be anticipated at 26.6%. This figure is marginally above the level where an uplift is recommended but has been falling. However, these levels taken together do not suggest that a further uplift in the OAN is necessary for market signals or affordability pressures.

32. In terms of affordable housing needs, although the SHMA suggests an annual imbalance of 542 dpa, this is not a target for delivery. There is a degree of overlap between the OAN and affordable housing need. In any event most housing sites would only deliver a maximum of 15% affordable housing. It would be unrealistic to increase the OAN to a level which would generate 542 affordable dpa. Moreover, the need can be met from a number of sources other than affordable dwellings provided through the application of Policy H2. This includes Council-led regeneration schemes, cheap market housing, recycled Council houses, people sharing homes and the private rented sector. No further adjustment is needed to the OAN for affordable housing delivery.
33. In September 2018 the Office for National Statistics published the 2016-based household projections. This latest data set suggests a reduction in household growth of some 4900 households in Sunderland over the Plan period compared to the 2014-based projections. However, given that household projections are a starting point, the same factors referred to above would need to be applied and would still support an uplift on the demographic forecasts. Moreover, the Government has said that the 2014 data should be used as a baseline for assessing local housing need, not the lower 2016-based projections, as the former better reflect historic under-delivery and declining affordability.
34. The 2019 Framework refers to the new standard method of assessing housing need set out in the PPG. For Sunderland this would represent 593 dpa. However, this LP is being examined under the 2012 Framework. Moreover, the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth.
35. Overall and in the context of the Council's commitment to economic growth and the Government's objective of significantly boosting the supply of homes, the OAN figure of 745 dpa, which leads to a requirement for at least 13,410 homes for the Plan period of 2015-2033, is justified and has not been countered by any alternative robust analysis.

Employment OAN

36. The ELR and ELR Post EU Referendum Forecasting Analysis (SD.38) provide the evidence base for an employment OAN of at least 95 ha of employment land. The 95 ha is at the bottom of the range of between 95 ha and 115 ha but reflects the downward pressures signalled in the Post EU Analysis. The IAMP is additional to the 95 ha as it fulfils a sub-regional need.
37. The employment and housing OAN have been calculated using the same employment forecasts (Experian September 2016). The employment and housing OAN are reasonably well aligned.
38. The employment OAN is justified.

Housing and Employment Land Requirements

39. The Framework requires that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework such as Green Belt indicate that development should be restricted. Significant parts of Sunderland outside the existing urban area are designated Green Belt.
40. The Plan makes provision for the whole of the housing and employment OANs. In terms of housing, most of the requirement will be met from sites within the existing urban area or on sites adjacent to the built-up area, many of which are already committed through the grant of planning permissions. These developments will not affect Green Belt land and will not have any significant adverse impacts.
41. The employment land OAN can be met by existing sources of supply mainly within existing primary and key employment areas. Meeting the full employment OAN will not have any significant adverse impacts.
42. Limited Green Belt release will make up the remainder of the housing requirement. Given the restrictive policies of the Framework exceptional circumstances need to be demonstrated to justify this component of the requirement. I go on to consider this matter under Issue 2 where I conclude that exceptional circumstances justify the principle of some Green Belt release in locations where there would be otherwise a shortage of housing land. In terms of the specific impacts of sites, I consider, under Issue 6, that three of the HGA are unacceptable. However, with the deletion of these sites, my overall conclusions are that exceptional circumstances exist for the limited release of Green Belt land. Therefore, there is justification for meeting the whole of the housing OAN as reflected in the Plan's housing requirement.
43. Policy SP1 sets out the housing requirement of 13,410 new homes but does not express it as a net requirement. **MM3** would rectify this omission so that the Plan is effective. A similar change is required to Policy SP8 through **MM14**.

Conclusions on Issue 1

44. I conclude that, subject to the MMs proposed, the amount of housing and employment land required in the LP will be appropriate to meet the needs of the City.

Issue 2 – Whether the development strategy and related policies are positively prepared, justified, effective and consistent with national policy

Development Strategy, Spatial Distribution and Exceptional Circumstances

45. Sunderland is recognised as having five distinct sub-areas. These are:
 - The Urban Core, which includes the city centre, the University of Sunderland Campuses, major leisure and tourism facilities and transport interchanges;

- Washington, a planned new town with its own town centre, plenty of employment land and a modern highway network;
 - North Sunderland, containing generally higher density residential areas with employment along the river corridor;
 - South Sunderland, a predominantly suburban area containing around 40% of the City's population; and,
 - The Coalfield, comprising former mining towns and villages across the largest sub-area.
46. Washington and North Sunderland are constrained by Green Belt in that all greenfield land outside the existing urban areas is so designated. South Sunderland and the Coalfield are also affected to an extent by Green Belt, although some greenfield land, particularly in the Coalfield, is open countryside rather than Green Belt. As a reflection of the Green Belt constraints much of the land supply in recent times has been in the urban area, South Sunderland and the Coalfield and continues to be so. The South Sunderland Growth Area [SSGA] has been brought forward in that context to provide an urban extension of some 3000 homes.
47. The Plan does not diverge significantly away from the above distribution as explained in paragraph 40. However, there are viability issues with many sites in the built-up area, particularly those on brownfield land. As a result, the Plan indicates that some 40% of new housing will be on brownfield land going forward. This is a significant shift from the historic split in that between 1995 and 2019 around 82% of new housing was built on previously-developed land. **MM1** brings the commentary and Figure 8 within Chapter 2 up-to-date in terms of the split so that the Plan is effective. However, the brownfield land that remains is challenging in terms of viability. Some sites are to be brought forward under the accelerated construction programme supported by Homes England. However, many sites that are suitable for housing are not included in the supply figures as they are not deliverable or developable due to viability.
48. In considering whether additional brownfield land could be brought forward, the Council has assessed whether employment sites could be released for housing. The ELR has identified a number of employment sites that are no longer required for such purposes and these are included within the SHLAA. Some of these are now commitments. However, to release significant further employment land would prejudice the Council's ability to maintain an adequate supply of employment land over the Plan period against the requirement for at least 95 ha to be developed.
49. That said, there are a limited number of instances where it is suggested that there is no reasonable prospect of land which is safeguarded for employment being used for such a purpose. This applies in particular to the South Sunderland Sub-Area where the amount of land (about 37% of total supply) does not balance with the demand. I return to this matter under issue 4 below.
50. Consideration has also been given to increasing densities on non-Green Belt sites within and adjacent to the urban area to maximise development. The

SHLAA process has scrutinised the density assumptions used to forecast future development capacity and found them to be realistic.

51. In addition, there is an imbalance between the location of much of the employment land, about 40% of which is in Washington, and housing sites. For example, without the proposals in this Plan, only 7% of housing would be in the Washington Sub-Area according to the SHLAA.
52. A significant component of the housing requirement is to support economic growth in the city. An important driver for the growth is the IAMP and nearby Primary Employment Areas [PEA]. Some of the housing required in connection with the IAMP will be outside the city's boundaries. However, this Plan should seek to achieve some correlation between these main areas for employment development and the provision of housing so that commuting distances are reduced, and housing is of the right type and in the right place to be attractive to the new workforce. Providing such housing is important for achieving economic growth. Tying in with the above, the SHMA indicates that one of the main shortages in house types are larger detached family homes. Building to higher densities on urban sites would not meet these particular needs.
53. In order to bring forward sites which are in locations close to employment growth, are attractive to the market, and can provide larger family homes, the Plan identifies some HGA on Green Belt land in Washington and North Sunderland, the nearest sub-areas to the IAMP.
54. The Plan also proposes some land release in that part of the Coalfield affected by Green Belt. Notwithstanding the availability of land in the Coalfield as a whole, the settlements of Penshaw, New Herrington and Philadelphia have not had much development in recent times which has led to a spatial imbalance in housing provision and supply in the Sub-Area. The proposed Coalfield HGA would provide sites in sustainable locations and assist in wider regeneration. Significant further development on non-Green Belt land in the Coalfield and South Sunderland, additional to that already committed, would lead to the loss of the identity of settlements by further eroding settlement breaks and putting additional burdens on infrastructure, such as the highway network and schools.
55. The Plan also proposes altering Green Belt boundaries in the Washington Sub-Area to identify 'safeguarded land' to meet longer-term development needs. Taking into account the imbalance in the location of housing land and the economic drivers outlined above, which are still likely to be relevant beyond the current Plan period, the principle of the identification of such land as part of this LP is justified and consistent with national policy. However, as the identification of safeguarded land is a key part of the strategy it should be referred to within the strategy section of the Plan. This would be achieved by **MM3** and **MM6** so that the Plan is positively prepared.
56. Putting to one side the particular effects of each of the HGA and the safeguarded land on the Green Belt which I deal with under Issue 6, the need to promote sustainable patterns of development demonstrates, at a strategic level, the exceptional circumstances for the alteration of Green Belt boundaries in Washington, North Sunderland and the Coalfield. However, the

Plan does not clearly articulate this for these Sub-Areas. **MM4**, **MM7** and **MM11** would provide concise explanations so that the Plan is positively prepared, justified and consistent with national policy.

57. The Plan is not clear how this strategy is reflected in development in the Sub Areas in that there are no figures showing how employment and housing land would be broadly distributed. Therefore, to be effective Chapters 2 and 4 are amended through **MM1** and **MM3** to show how housing and employment will be distributed, the amount of development on brownfield land and to reflect housing and employment land supply figures updated to 31 March 2019.
58. Policy SP1 sets out the Plan's overarching requirements in terms of new homes, employment land and retail floorspace and the broad means by which these requirements will be met. The policy is referred to as a 'Spatial Strategy' whereas in effect it represents a 'Development Strategy'. The policy does not refer to the significant proposals at the SSGA and in the Urban Core at The Vaux. **MM3** includes these changes to the policy so that it is effective.

Green Belt Policy

59. Policy NE6 is generally clear in setting out the purposes of the Green Belt in Sunderland and cross-referencing with national policy. However, there is some ambiguity in Section 3 which would be rectified by **MM29** so that Policy NE6 is consistent with the Framework.
60. Whether specific development proposals in the Green Belt would satisfy the exceptions within national policy is not a matter for this examination. They would be considered on a case by case basis by the Council.

Settlement Breaks

61. Settlement breaks are a longstanding policy within Sunderland to protect the identity of separate built-up areas beyond the Green Belt to prevent them from merging. The breaks have also served to provide Green Infrastructure [GI] corridors close to settlements.
62. The settlement breaks have been eroded to an extent by recent development which has been allowed in the absence of an up-to-date LP. However, in my view, they are still an important tool in preventing the merging of settlements in the Coalfield and retaining a valuable open break between Grangetown and Ryhope around Tunstall Hills, South Sunderland. They also continue to serve as a green lung.
63. The Settlement Break Review (SD.48) has considered not only the principle of the designation but also the detailed boundaries. In general, the extent of the proposed settlement breaks is justified. I return to some specific locations under Issue 6.
64. Policy NE7 sets out the purposes of settlement breaks and the restrictions on development. The policy refers to essential development taking place but does not clarify what this is likely to equate to. **MM30** provides clarity in this respect so that the policy is effective. I have made further changes to the MM following consultation for the same reason, cross-referencing with Policy NE8.

Countryside and Valued Landscapes

65. Although much of the open countryside in Sunderland is protected as Green Belt or Settlement Breaks, there are areas within the South Coalfield which are just 'ordinary' countryside. Policy NE8 seeks to protect and enhance the open countryside. This is reasonably consistent with the Framework's objective of recognising the intrinsic character and beauty of the countryside in that recognition implies a level of protection. Moreover, the areas of countryside remaining within Sunderland are limited in their extent compared to many authorities and vulnerable to development pressures because of their proximity to the urban area. The extensive urban area provides the opportunities for development to meet most of the area's needs. In this context there is justification for Policy NE8 offering more protection for the countryside than national policy.
66. In setting out the forms of development that will be supported in the open countryside, Section 7 confuses extensions to buildings with changes to residential curtilages. In order to ensure that the policy is effective and clear to the decision-maker **MM31** is necessary.
67. The LP at paragraph 10.43 refers to valued landscapes but does not indicate which areas of the city comprise such areas. The Sunderland Landscape Character Assessment [LCA] (Supporting Document [SP] 47) identifies areas for 'landscape protection' including the Magnesian Limestone Plateau, a feature which extends north and south into South Tyneside and Durham respectively; the River Wear valley; and stretches of undeveloped limestone coast. These equate to areas of higher landscape value.
68. Although the LCA was carried out some four years ago, landscape character has not materially changed in Sunderland in the meantime. The LCA is an appropriate but proportionate basis for defining valued landscapes. Taking into account this evidence, the identification of these areas as valued landscapes through **MM32** and **MM39** would ensure that the Plan is positively prepared, effective and consistent with national policy. I have made further changes to MM32 following consultation for clarity.

Conclusions on Issue 2

69. I conclude that, subject to the MMs proposed, the development strategy and related policies are positively prepared, justified, effective and consistent with national policy.

Issue 3 - Whether the policies of the Plan address the needs for all types of housing, including affordable housing and those of different groups in the community such as gypsies and travellers

Generally

70. The Whole Plan Viability Assessment [WPVA] (SD.60) makes assumptions about land values, sales values, profit and development costs, including build costs. The assumptions and the findings of the WPVA, together with the Viability Note of June 2018 (SD.61), support the policies of the Plan, including those relating to affordable housing and housing standards that I deal with below. The approach of the WPVA is in line with the Framework and PPG.

Build costs are shown as being lower than some nearby authorities, for example South Tyneside, but the figures are based on robust analysis of local information. The assumptions are realistic.

Affordable Housing

71. Policy H2 proposes that on developments of more than 10 dwellings or on sites of 0.5 ha or more, 15% affordable housing should be provided. The level of affordable housing is supported by the WPVA which indicates that for most greenfield site typologies 15% is achievable. Whilst the assessment concluded that brownfield sites are not viable for affordable housing, in reality such provision has been secured in the last few years. Therefore, the 15% requirement within Policy H2 is justified taking into account the objective of delivering as much affordable housing as possible.
72. The explanation to Policy H2 accepts that in some instances it may not be possible to deliver the full amount of affordable housing or indeed any at all. However, such a caveat and the requirement to support such a stance with a viability assessment should form part of the policy. **MM16** would achieve this change so that the Plan is justified and effective. I have amended the wording of the MM following consultation for clarity.
73. In referring to developments of more than 10 dwellings contributing to affordable housing, Policy H2 aligns with earlier versions of the PPG which set a threshold of 11. However, the revised Framework now states that affordable housing should not be sought for residential developments that are not major developments. Therefore, notwithstanding the transitional arrangements set out in paragraph 2 of this report, the policy should align with the revised Framework. **MM16** secures this change so that Policy H2 is consistent with national policy going forward and is not effectively out-of-date upon adoption.
74. The current SHMA supports a tenure split of 80% affordable rent and 20% intermediate tenure and this mix is referred to in the explanation to Policy H2. However, the SHMA will be regularly updated and there may be other sources of evidence for a particular area or site. In order to ensure that it is justified and effective the policy should recognise that the tenure split should be based on the latest available evidence (**MM16**).
75. There are other issues with Policy H2. Firstly, off-site provision or a financial contribution are not expressed as an exception which would be at odds with paragraph 50 of the Framework. This could undermine the provision of affordable housing in the right place at the right time. Secondly, there is no reference to rural exception sites. Thirdly, the policy does not take into account the 10% requirement for affordable housing that has already been set for the SSGA. Finally, the requirement to have affordable housing in clusters of 3 or 4 dwellings is too prescriptive. These flaws would be rectified by **MM16**, ensuring that Policy H2 is positively prepared, effective and consistent with national policy.

Housing Mix and Types

76. The Framework requires that LPAs provide for a mix of housing based on future and demographic trends, market trends and the needs of different groups in the community. Policy H1 refers to developments providing an

appropriate mix of housing in terms of size, type and tenure taking into account the SHMA or other evidence. This approach is consistent with the Framework's objectives. As referred to under Issue 2, there is a need to rebalance the housing stock by providing more larger detached dwellings which is provided for by Policy H1.

77. Policy H1 seeks to encourage densities that reflect the character of an area. However, densities should also have regard to the accessibility of a location. **MM15** would ensure that the policy recognises this factor so that it is consistent with national policy.
78. The needs of older people are recognised in Policy H1. However, the circumstances where provision of accommodation for older people would be justified are not clear. **MM15** would ensure a link to evidence of need and a preference for highly accessible locations.
79. The Council holds a register for those with an interest in self-build and custom-built housing. Although the demand is low, Policy H1 includes reference to the inclusion of such plots and is consistent with national policy.

Housing Standards

80. Policy H1 requires that 10% of dwellings on developments of 10 or more meet the Building Regulations M4(2) Category 2 standard for accessible and adaptable dwellings. The SHMA Addendum (2018), WPVA and Technical Paper on Optional Standards (SP.16) provide the justification for the requirement based on need and viability. The 10% figure takes into account that some of the 2143 additional adapted properties needed over the Plan period will be met from improvements to the existing housing stock. However, there is no reference to the timing of the introduction of the requirement. Moreover, the policy does not recognise that in some circumstances development may be unviable if it needs to meet the requirement. **MM15** allows developers to plan for the technical standard by including a transitional period up to 1 April 2021 and includes explanation relating to viability to make sure that the policy is effective.
81. Design Policy BH1 refers to the national space standards. The Internal Space Standards Report (SD.25) shows that a significant proportion of the 2-bed and 3-bed homes built or permitted recently in Sunderland do not meet the Nationally Described Space Standards [NDSS]. Although the NDSS requirement was introduced into the Plan after the WPVA was undertaken, the WPVA modelled the viability of schemes consistent with the use of the NDSS. Therefore, need and viability have been taken into account. However, the policy does not have regard to timing as referred to in the PPG. **MM21** introduces a transitional period up to 1 April 2021 so that Policy BH1 is consistent with national policy.
82. Although the Plan is being examined under the transitional arrangements, it is noteworthy that the revised Framework sets out an expectation that planning policies for housing should make use of the optional standards for accessible and adaptable housing. There is also now explicit reference to the NDSS in the Framework.

Gypsies, Travellers and Travelling Showpeople

83. The need for accommodation for gypsies, travellers and travelling showpeople has been considered through the GTAA 2017 (SD.26) and the GTAA Addendum 2018 (SD.27). The GTAA did not identify any need for permanent pitches for gypsies and travellers but a need for some form of stop-over provision.
84. The Council sought to identify a site for stop-over pitches but has been unable to do so. Instead the Council has been operating an Unauthorised Encampment Policy [UEP] (SP.17) whereby encampments are tolerated subject the location being suitable and those staying on the site complying with a code of conduct. A similar procedure has been in place since 2008.
85. In Durham the number of unauthorised encampments is significantly greater than Sunderland due to the county's size and the existence of cross Pennine routes, some of which gravitate towards Appleby. Durham operates a procedure similar to the UEP.
86. Experience from both Sunderland and Durham suggests that using an UEP would be more effective than providing a small stop-over site for those travellers in transit.
87. The Monitoring Framework to the LP indicates that the number of encampments will be monitored. The success of the UEP will also be kept under review. If necessary, any review of the LP could consider whether the allocation of a stop-over site would be more effective. In the circumstances the approach is justified.
88. The GTAA also showed a need for 33 plots for travelling showpeople with 15 of those required in the short-term (by 2022/23) and 18 plots longer-term. Policy H4 allocates two sites in Hetton-le-Hole and Houghton-le-Spring which would provide 15 plots between them. The former is adjacent to existing showpeople plots and the latter on the site of a Council depot which is due to close soon. Both are deliverable and would ensure 5 years' worth of supply. The policy also identifies broad locations for further plots in the same localities which would meet the longer-term needs. Both the allocations and the broad locations are justified.
89. The above allocations do not include any criteria to guide the sites' development or figures to define the extent of the allocations. In this respect they contrast with the HGA which include detailed site requirements and plans. In order to ensure that Policy H4 is positively prepared and effective **MM17** introduces criteria relating to the number of plots to be provided, vehicular access, the living environment for future occupiers and neighbouring residents, and the location of fairground equipment storage and maintenance as well as plans of the two sites.

Other Types of Housing

90. The University of Sunderland has campuses in the Urban Core. Policy H3 requires student accommodation to be in the same sub-area to ensure that it is well-related to, and accessible from, the university and does not significantly impact on areas of family housing. This approach is justified.

91. Policy H6 deals with Homes in Multiple Occupation [HMOs]. The explanation to the policy refers to the need for HMOs to provide a good standard of accommodation but the policy itself does not include a criterion which requires the same. This would be rectified by **MM18** so that Policy H6 is positively prepared.

Conclusions on Issue 3

92. I conclude that, subject to the MMs proposed, the policies of the Plan address the needs for all types of housing, including affordable housing and those of different groups in the community such as gypsies and travellers.

Issue 4 – Whether the Plan meets the development needs of business through its policies

Employment Land Supply

93. The Plan's requirement for at least 95 ha of employment land will be met principally from available sites within the PEA and Key Employment Areas [KEA]. Together these areas will provide some 75 ha of land. Other sites, including at the Port of Sunderland, have about 9 ha of available land. There has also been some 13 ha of completions since the base date of the Plan. Therefore, sufficient supply exists (97 ha). The A&DP can allocate additional sites if flexibility is required. The Plan is not explicit on these components of employment land supply. **MM19** inserts explanation into Chapter 7 of the Plan and tables setting out the overall supply position and details showing available sites in the PEA and KEA so that the Plan is effective.

Protection of Employment Land and New Employment Development

94. Policies EG1 and EG2 of the Plan allocate employment sites as PEA or KEA respectively. The former are areas which are considered essential to the long-term success of Sunderland. The latter are older employment areas, but which are still required to ensure sufficient employment land is available.
95. Policy EG1 bestows a higher level of protection than Policy EG2 to reflect the status of the sites. Protection of the sites listed under EG1 is justified. There is only one change necessary which affects PEA8 (Nissan). The Hylton Plantation Local Wildlife Site is not excluded from the PEA. The Policies Map should be amended so that it does not wash over the Wildlife Site and Policy NE2 is effective.
96. In terms of the KEA, taking into account the evidence and what I saw of them, most of the sites are appropriate for protection for employment use. Vacant plots on traditional industrial estates such as Leechmere (KEA2), Pennywell (KEA3) and Pallion (KEA4) still provide a useful source of employment land. Policy EG2 refers to the current ELR being the key document that would recommend a KEA from release from employment use. However, other evidence may also be available to support non-employment use. **MM19** would ensure that Policy EG2 is positively prepared and effective in this regard.
97. Six ha of land forming part of KEA6 at Deptford is subject to an application for a mixed-use development, including residential, which was submitted in 2011 and upon which there was a resolution to grant planning permission in 2013.

However, the application has not been progressed as a planning obligation has not been completed. Because of its planning status, the site was not considered to be available for employment in the 2016 ELR. It was also suggested in the ELR Update that other land within KEA6 should be considered for a mixed-use allocation, due to viability issues and the oversupply of employment land in South Sunderland.

98. However, KEA6 will become a more attractive proposition for development with the implementation of the next phase of the Sunderland Strategic Transport Corridor [SSTC] which had commenced at the time of the hearings and is due for completion in 2021. It will, along with other vacant sites on the south side of the river, be more likely to be developed for employment purposes and should be retained as part of the supply. The protection of KEA6, along with KEA5, through Policy EG2 is justified. If circumstances change, the designations could be reviewed in the A&DP.
99. The site of the former paper mill, Hendon, lies at the southern extremity of KEA1. The employment use ceased some time ago. Planning permission was granted in 2011 for housing but this was not taken up because of market conditions at the time. However, probably because of the permission, the 2016 ELR did not include the site in its calculation of available supply. The site is not well-located in relation to the existing and proposed strategic transport network, including the line of the SSTC. There is no realistic prospect of the site being used for employment.
100. The site could make a positive contribution to regeneration and renewal through development for other uses, including housing in accordance with Policy SP5. The imbalance within the Sub-Area between the supply of, and demand for, employment land (paragraph 49 refers) would be rectified to an extent by removal of the 10 ha site from the protection afforded by Policy EG2. As a result, South Sunderland would have 25% of the city's supply. The site is not needed to ensure that the Plan's employment land requirement is met. The site should be shown as 'white land' until such time the A&DP decides upon its future. **MM19** and related changes to the overall and Sub-Area Key Diagrams (**MM2** and **MM9**) would be necessary so that the LP is justified and effective. The Policies Map would require a corresponding modification.
101. Other employment areas not protected as PEA or KEA would be subject to Policy EG3 which balances protection with the opportunity for redevelopment where regeneration benefits would ensue. Policy EG4 offers encouragement for new employment uses, where they cannot be accommodated within designated areas. Policy EG5 steers office development to The Vaux, PEA at Doxford International, Hylton Riverside and Rainton Bridge South, and designated centres. These policies are justified.

Port of Sunderland

102. The Port of Sunderland is protected for port related activities through Policy SS5. The criteria within the policy recognise the need to provide improved transport links and take into account flood risk. Further regeneration at the port would be assisted by later phases of the SSTC.

Main Town Centre Uses

103. The retail evidence indicates that there is a need for some 45,400 square metres [sq m] of comparison floorspace after 2020. Policy SP9 sets out a broad spatial distribution to accord with the retail hierarchy set out within Policy VC1. Most comparison goods floorspace would be directed towards the City Centre and Washington Town Centre which is consistent with national policy. No specific allocations are proposed within this LP, but the A&DP will include them, probably taking forward some from the UDP.
104. The retail studies (SD.39-42) do not indicate a quantitative need for convenience goods floorspace in the City as a whole. But, taking into account expenditure leakage, a new foodstore in the Coalfield would have qualitative benefits. The A&DP is likely to bring forward such an allocation. The town centre boundary of Houghton-le-Spring is drawn wide enough to accommodate such a development.
105. Main town centre uses are steered towards the defined centres by Policy VC1 in accordance with national policy. The policy also addresses the sequential test. Policy VC2 introduces a range of thresholds for retail impact tests most of which are lower than the default threshold of 2500 sq m within the Framework. The thresholds are based on an analysis of various factors such as the scale of the town centres, their vitality and viability and their sensitivity to change and are justified.
106. Primary and Secondary Frontages are defined on the Policies Map for the City Centre and Washington and Houghton Town Centres and are subject to Policy VC3. The policy seeks to control the composition of Primary Frontages through reference to thresholds of non-A1 uses not being exceeded and by the inclusion of a marketing requirement. However, the wording lacks clarity by implying that marketing would be required even where the thresholds are not exceeded. **MM20** would modify Policy VC3 so that marketing is only necessary in cases where the thresholds are exceeded to ensure that the policy is effective and clear to the decision-maker.
107. Policy VC4 seeks, amongst other things, to prevent the development of hot food takeaways within 400m of primary and secondary schools and in wards where obesity levels among primary school aged children are high. The policy is linked to Policy SP7 which includes a range of measures aimed at improving health and well-being.
108. The justification for these restrictions is set out in the Public Health Evidence Report (SD.18) which points to lower than average life expectancy in Sunderland as a whole and the significant gap between the most and least deprived wards in the City. Deaths from cardiovascular disease for those under 75 and from cancer are significantly higher in Sunderland than in England as a whole. Obesity levels for both children and adults are also higher than the national average with some wards being well above the average.
109. Although some hot food takeaways may sell healthy meals, many contain a high calorie count and significant proportions of fat, saturated fat, sugar and salt. It is difficult to prove a direct causal link between the number of takeaways and child obesity, but analysis shows sufficient correlation. Reducing access to hot food takeaways is one component of an overall

approach that can help to combat poor health and childhood obesity in particular. But it is an important one. Section 2 of Policy VC4 and Section 5 of Policy SP7 are justified.

Conclusions on Issue 4

110. I conclude that, subject to the MMs proposed, the Plan meets the development needs of business through its policies.

Issue 5 – Whether generic policies of the Plan not dealt with elsewhere are positively prepared, justified, effective, consistent with national policy and clear to the decision-maker

Healthy and Safe Communities

111. The Health Impact Assessment Report which supported the LP (SD.19) justifies the requirement within Policy SP7 for large scale developments to submit a health impact assessment. The provision will ensure that developments, including significant housing and student accommodation schemes, consider a range of measures that could have a positive impact on peoples' health, such as availability of supporting services and access to healthy modes of travel and GI.

112. Policy HS1 addresses the quality of life and living environment of local communities. The policy would be more effective and clearer to the decision-maker if Section 2 referred to 'unacceptable adverse' rather than 'significant adverse' in relation to the cumulative impacts of sources of environmental nuisance. This change would be secured by **MM13**.

Design

113. Design quality is dealt with by Policy BH1 of the LP. Section 8 implies that all development would seek enhancement and upgrading of the public realm and existing GI whereas such measures would not always be appropriate. In requiring that all development does not detract from established views, Section 10 establishes a high bar. Finally, in relation to masterplans, although reflective of a positively prepared and effective LP, clarity is required as to the definition of large-scale developments. **MM21** would ensure a positively prepared and effective policy in these respects.

114. Policy BH2, in dealing with sustainable design and construction, sets out some desirable outcomes for major development. However, some of the requirements may not be deliverable. **MM22** ensures that references to the type of materials and scheme orientation are realistic so that the policy is effective. In response to representations on the MMs I have removed reference to the requirement to provide details of the source of materials.

Historic Environment

115. Policies BH7, BH8 and BH9 deal with the historic environment and are generally consistent with national policy. However, Section 8 of Policy BH8, in dealing with non-designated heritage assets, is more onerous than paragraph 135 of the Framework. Furthermore, Policy BH9 in relation to assets of archaeological interest, needs to recognise that some non-designated assets of

this type can have equivalent significance to scheduled monuments. **MM23** and **MM24** would secure these modifications so that the provisions of Policies BH8 and BH9 are consistent with national policy.

Natural Environment

116. The protection, enhancement and creation of GI is dealt with by Policy NE1. However, the policy should also recognise more explicitly the significance of rivers, lakes and the sea in providing recreational and other benefits. **MM25** would achieve this change to ensure a positively prepared Plan. The policy would not prevent development provided that GI corridors are not significantly reduced or severed. The A&DP will consider the GI network in more detail, including the ability of allocations to enhance corridors. In this respect **MM25** also clarifies, for effectiveness, that the GI corridors shown on Figure 40 are indicative.
117. Policy NE2 does not include sufficient distinction between the hierarchy of wildlife sites as required by paragraph 113 of the Framework. **MM26** would ensure that the protection afforded to international, national and locally designated sites is commensurate with their status so that the policy is positively prepared and consistent with national policy.
118. There is a disconnect between the requirement within Policy NE3 that development should only be permitted where it can be demonstrated that it cannot be located elsewhere, and the objectives of the policy to conserve trees woodlands and hedgerows. **MM27** would make sure that the policy is effective and clear to the decision-maker.

Water

119. Policies WWE2 and WWE3 deal with flood risk in a manner which is consistent with national policy, including the requirement to satisfy the sequential and exception tests.
120. In dealing with foul water, Policy WWE5 does not include sufficient safeguards in circumstances where trade effluent would be discharged in connection with a development. **MM33** would ensure that a Foul Water Management Plan would be required so that the policy is positively prepared and effective.

Waste and Minerals

121. It is important that existing waste facilities are for the most part retained so that the Council and partners can ensure sufficient capacity. Policy WWE8 would achieve this to an extent by safeguarding such sites. The explanation to the policy also refers to the impact that other development proposed nearby could have on the future of waste sites by introducing uses such as housing that would not be compatible. However, this aspect is not referred to in the policy itself. **MM34** would give this element policy weight so that WWE8 is positively prepared and effective.
122. Policies SP11 and M1-M4 deal with a range of minerals issues, including extraction, safeguarding, instability and restoration and are generally sound. However, the objectives of Policy SP11 in ensuring that mineral extraction does not have any significant environmental and social effects, are

undermined by Section 2 of the policy. In order to ensure that the policy is positively prepared, **MM36** deletes Section 2.

Conclusions on Issue 5

123. I conclude that, subject to the MMs proposed, generic policies of the Plan not dealt with elsewhere are positively prepared, justified, effective, consistent with national policy and clear to the decision-maker.

Issue 6 – Whether the policies and land identified for development within the Sub-Areas of the City are consistent with the Plan's strategy and national policy, including protecting Green Belt land, and whether the housing identified will be delivered

Generally

124. The SHLAA follows the methodology set out in the PPG. It identifies land that will meet the majority of Sunderland's housing requirement. The land comprises commitments and other sites that are likely to be suitable for development and are either deliverable or developable. This Plan allocates those sites beyond the Green Belt which are strategic either in terms of their scale (SSGA) or regeneration benefits (The Vaux).

125. However, additionally, I have already found under Issue 2 that, in order to deliver the overall spatial development strategy and achieve sustainable patterns of development, it is necessary to release land from the Green Belt around Washington and North Sunderland and in the Coalfield. I consider below site specific issues including the effect on Green Belt purposes in order to determine whether there are exceptional circumstances.

126. Policy NE6 (Green Belt) refines the Green Belt purposes set out within paragraph 80 of the Framework so that they reflect the characteristics of the settlements within Sunderland which lie within or adjacent to the Green Belt. In particular reference is made to the setting and special character of Springwell and Newbottle Villages and preventing the merging of the main built-up area of Sunderland with the nearby urban areas of Tyneside, Washington, Houghton-le-Spring and Seaham. I find that this local interpretation of Green Belt purposes to be justified.

127. Green Belt assessments have been undertaken to consider land against the Green Belt purposes set out in the Framework and Policy NE6 (SD.29-34). The SA has assessed the HGA, the proposals for safeguarded land and reasonable alternatives against fifteen sustainability objectives. In the light of this evidence, this Plan, as a strategic document, proposes the alteration of Green Belt boundaries through the allocation of eleven HGA and two areas of safeguarded land. The Sunderland Development Frameworks document (SD.35) carries out more detailed analysis of the HGA which has assisted in drawing up the specific criteria intended to guide development of the HGA.

128. All HGA and the safeguarded land, other than HGA10, will affect Green Belt purposes to an extent by leading to encroachment into the countryside. However, the other effects on Green Belt purposes vary depending on the particular characteristics of the HGA.

129. Policies SS2, SS4 and SS7 provide some higher-level criteria for all the HGA. There is reference to a focus on family homes, but such a description can apply to a wide range of dwelling types. The evidence base justifies a higher proportion of larger family homes. The requirements to enhance education and healthcare provision and access to local services are desirable but will not necessarily be required for each HGA depending on existing capacity and local infrastructure. **MM5**, **MM8** and **MM12** would ensure that Policies SS2, SS4 and SS7 are justified and effective in these regards.
130. The HGA are not included in the five-year housing land supply on the basis that none of them have the benefit of planning permission and pre-application studies are not likely to be undertaken until HGA are confirmed within the adopted plan. Delivery is anticipated to be within the 6-10-year or 11-15-year periods depending on the particular site constraints and capacity. Delivery assumptions from the HGA are in general terms realistic. If the sites come forward earlier then all well and good.
131. I now deal with the specific allocations by sub-area having regard to the evidence base, representations and my own assessment of the sites based on a number of visits to the area.

Urban Core

132. Policy SP2 is the strategic policy for the Urban Core, emphasising the city centre functions of the sub-area, including its role as the home of the two university campuses. Areas of Change identified in the policy will be the focus of the Council's city centre regeneration initiatives.
133. The Vaux is allocated for a mixed-use development of offices, residential and leisure through Policy SS1. The policy reflects the planning permission for the site. The first phase, comprising office development, was completed in the summer of 2019. Significant new investment for the Vaux has recently been announced.
134. The attractiveness of The Vaux and other sites around the Urban Core will be enhanced by the completion of the next phase of the SSTC. Land at the Vaux has been prepared for development with contamination dealt with. Part of the Sheepfolds site, Stadium Village, will benefit from the accelerated construction programme supported by Homes England. However, a cautious approach has been taken to the delivery of many of the brownfield sites in the sub-area. The assumptions about delivery of the housing sites in the Urban Core identified in the housing trajectory at Figure 34 of the Plan are realistic.

Washington

135. The Washington Sub-Area includes Springwell Village, the IAMP and large PEAs to the south of the latter, as well as Washington itself. Countryside around the built-up area is currently designated as Green Belt, wrapping around Springwell Village, lying to the north of Usworth up to the boundary with Gateshead and running along the north-western banks of the River Wear.

HGA1 – South West Springwell

136. The site lies on a plateau to the immediate south of existing housing. The Green Belt assessments recognise that an important purpose of the Green Belts hereabouts is providing strategic separation from Gateshead. The development would not materially erode the gap between the village and Wrekenton in Gateshead as it would not encroach any nearer than existing development on the western edge of Springwell Village. The topography reduces the site's landscape impact despite it being within the area shown for 'Landscape Protection and Enhancement' in the LCA which surrounds and washes over the village.
137. Therefore, the effect on the Green Belt purposes of checking urban sprawl, preventing the merging of settlements, safeguarding the countryside from encroachment, and preserving the setting of the village would be moderate. The landscape impacts would also be moderate. These conclusions would not be affected should permission be granted for a reservoir on land to the south.
138. Exceptional circumstances are justified for the alteration of Green Belt boundaries, but the Plan does not clearly articulate it for HGA1 by reference to Green Belt purposes. **MM4** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
139. The site would be sufficient distance from the Bowes Railway Scheduled Ancient Monument to the north-west so as not to harm the significance of the heritage asset by affecting its setting. The site is relatively close to the centre of the village with its primary school, shops and other facilities. It is understood that the village school is close to capacity with little space for expansion. However, pupil spaces may become available in the next few years. There are also schools in North Washington. Development would assist in sustaining village services.
140. There is scope to provide pedestrian and cycle routes to the village centre through connections to the north. Bus routes from the village centre go to Gateshead, Newcastle and Sunderland. Footways could be provided along the north side of Mount Lane to tie in with existing pavements. The vehicular access via Mount Lane and nearby junctions including that at Mount Lane/Springwell Road may require some improvement, the details of which would be determined at planning application stage. The wider highway network has the capacity to accommodate additional vehicle movements arising from the development.
141. Criterion v. relating to HGA1 is confusing as it seeks to protect long distance views to the south by referring to high architectural quality. Moreover, criterion vi. seeks a design to reflect housing to the north and east of the site but this adjacent development is not locally distinctive. **MM5** would ensure that Policy HGA1 is effective, clear to the decision-maker and consistent with national policy in these respects.

HGA2 and SS3 – East Springwell

142. The open land comprising HGA2 East Springwell and the safeguarded land to the south-west separates the south-eastern parts of the built-up area of the

village from the north-western edge of Washington comprising the suburb of Donwell. Although the A194(M) also forms a barrier between the two settlements and lies in a cutting hereabouts, as a major transport artery it does not assist in preserving the setting of Springwell Village. Nor is the motorway perceived as land which contributes significantly to Green Belt purposes. The landscaped belt to the east of the A194 and west of Donvale Road contributes to an extent to the separation but is not protected as Green Belt.

143. The larger parcel of land to the south-west is described as effectively closing the gap between Springwell Village and Washington in the Green Belt Assessment of 2017 (SP16 in SD.30). I would attribute the same characteristics to HGA2 and the safeguarded land. Indeed, the gap narrows considerably at its northern point where it meets Peareth Hall Road.
144. The Green Belt reports tend to focus on the role of the Green Belt around Springwell Village in providing strategic separation between Washington and Gateshead, underplaying the role of the Green Belt in preserving the setting and special character of Springwell Village despite this purpose being expressly set out within Policy NE6. For example, the Green Belt reports refer to retaining the distinctive identity of the village but then only ascribe a zero or minor impact to this purpose for all parcels of land around the village. Springwell Village or parts of it are not designated as a conservation area. However, the triangular core of the village was developed in connection with Springwell Colliery and the Bowes Railway in the 1800's. The eastern point of the core is close to the land to be removed from the Green Belt. Despite considerable 20th century expansion, the village has a character which is distinct from the new town to the south-east.
145. The combined site of HGA2 and the safeguarded land to the south-west, in combination with land at Peareth Hall Farm and the Gospel Hall, forms a fundamental part of the gap between Springwell Village and the A194(M) and the built-up area of Washington. I accept that the purpose of the land around Peareth Hall Farm and the Gospel Hall in preventing merging of settlements is weakened by the presence of buildings and other development. However, it is more open in character than the main built-up part of the village and therefore still contributes to Green Belt purposes.
146. The combined sites also form part of the landscape setting of the village. The LCA shows the sites as being within an area shown for 'Landscape Protection and Enhancement'. The assessment does not bestow the sites with the status of a 'valued landscape' but the sloping land is important in maintaining a separate identity to the village in the landscape and accentuating its relatively elevated position as part of the Coalfield Ridge Landscape Character Type.
147. A sensitive landscape framework could maintain key views through and across the site but would not resolve the fundamental harm that would be caused to Green Belt purposes and the landscape setting of the village.
148. The effect on the Green Belt purposes of checking urban sprawl, preventing the merging of settlements, safeguarding the countryside from encroachment, and preserving the setting of the village would be significantly adverse. The landscape impacts would also be significantly adverse.

149. For these reasons the proposals for HGA2 and the safeguarded land should be deleted and the land, together with that at Peareth Hall Farm and the Gospel Hall, retained as Green Belt. **MM5** would secure these changes so that the Plan is positively prepared, justified and consistent with national policy. A consequential amendment would be needed to Policy SS3 (Safeguarded Land) and Figure 22 to remove reference to land south-east of Springwell (**MM6**). The change to the extent of the Green Belt would require corresponding changes to the submitted Policies Map.

HGA3 - North of High Usworth

150. The site is well-contained by the A194(M) to the west, a hotel and residential development to the east, and by strong tree belts to three of the boundaries. The extent of enclosure and the site's juxtaposition with housing to the south means that the site does not contribute to maintaining a gap between the built-up area of Washington and Springwell Village. The allocation would not encroach any further north than the adjacent hotel. Therefore, the effect on the Green Belt purposes of checking urban sprawl, preventing the merging of towns and safeguarding the countryside from encroachment are moderate as are the landscape impacts.
151. Exceptional circumstances are justified for the alteration of Green Belt boundaries, but the Plan does not clearly articulate it for HGA3 by reference to Green Belt purposes. **MM4** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
152. The site is within walking distance of a bus route and a primary school. Vehicular access would be available by a reconfiguration of the existing car park to the east. The site is subject to some noise from the motorway. Mitigation could be incorporated within any development to reduce noise.
153. The criteria within Policy HGA3 need to reflect the characteristics of the site, including recognising the line of a heritage trail and not being unduly prescriptive in terms of layout and design. Moreover, it may not be feasible to require the retention of all trees. **MM5** would ensure that the criteria are effective, clear to the decision-maker and consistent with national policy. I have made some further changes to the criteria for these reasons following consultation on the MMs. In particular I have distinguished between screening and noise mitigation requirements.

HGA4 – North of Usworth Hall

154. The site is comparable in terms of encroachment into the Green Belt with housing to the north of Stone Cellar Road. A reasonable expanse of Green Belt would be retained between the northern edge of the site and employment development at Follingsby within Gateshead. However, extending the site further north up to the field boundary would erode the gap to an unacceptable extent. The effect on the Green Belt purposes of checking urban sprawl, preventing the merging of towns and safeguarding the countryside from encroachment are moderate as are the landscape impacts. Exceptional circumstances are justified for the alteration of Green Belt boundaries, but the Plan does not clearly articulate it for HGA4 by reference to Green Belt purposes. **MM4** would secure this change so that the policy is positively

prepared, justified and consistent with national policy.

155. The site is within walking distance of bus routes, Sunderland College and a primary school. Vehicular access would be available direct from Stephenson Road. SCC owns the access so delivery should not be materially affected. Development would be capable of incorporating mitigation so that the impacts on flood risk and the Leamside Line would be acceptable. The site should incorporate land up to the shelter belt alongside the Leamside Line so that the criterion requiring a buffer would be effective. **MM5** would achieve this change to Figure 19. Corresponding changes would be required to the submitted Policies Map.
156. The criteria within Policy HGA4 need to avoid duplication, prevent built-development within Flood Zones 2 and 3 and ensure that any off-site highway improvements are necessary. Criterion vii. is confusing as it seeks to protect long distance views to the north by referring to high architectural quality. **MM5** would ensure that the criteria are effective and consistent with national policy.

HGA5 - Fatfield

157. Fatfield forms part of St James Steel Park, comprising a small enclave of land sandwiched between the river, the A182 and local roads. As such it is distinct from the wider area of Green Belt alongside the river corridor to the north-east. A new clearly defined and permanent Green Belt boundary will be formed by the river and the A182. The effect on the Green Belt purposes of checking urban sprawl, preventing the merging of settlements and safeguarding the countryside from encroachment are moderate as are the landscape impacts. Exceptional circumstances are justified for the alteration of Green Belt boundaries, but the Plan does not clearly articulate it for HGA5 by reference to Green Belt purposes. **MM4** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
158. The site is on a bus route, adjacent to a community hall and within walking distance of a primary school. The existing vehicular access would be utilised. The number of dwellings envisaged would allow the site's recreational and GI attributes, which have been somewhat neglected, to be enhanced.
159. The criteria within Policy HGA5 need to avoid duplication and repeating the requirements of generic policies of the Plan such as BH1 (Design Quality). **MM5** would ensure that the criteria are effective and clear to the decision-maker.

HGA6 - Rickleton

160. The site is on the southern edge of Washington, adjacent to the county boundary with Durham. There is a significant area of undeveloped woodland separating the site from the built-up area of Chester-le-Street. The effect on the Green Belt purposes of checking urban sprawl, preventing the merging of settlements and safeguarding the countryside from encroachment are moderate as are the landscape impacts.

161. However, the site contains a number of well-maintained football pitches with changing rooms and is actively used by local football teams and for other recreational purposes. The Council has proposed a modification which would mean that development could only take place if the site is declared surplus to requirements following a Playing Pitch Assessment. However, based on what I have read and heard, it would be unlikely that the site would be surplus to requirements, notwithstanding the provision of the football hubs. Therefore, the site is unlikely to be developable. Moreover, development leading to the loss of the playing fields would conflict with Policy NE4 of the LP and paragraph 74 of the Framework.
162. For these reasons HGA6 should be deleted and the land retained as Green Belt. **MM5** would secure these changes so that the Plan is positively prepared, justified and consistent with national policy. The change to the extent of the Green Belt would require corresponding changes to the submitted Policies Map.

Safeguarded Land East of Washington

163. The Framework requires that LPs should consider Green Belt boundaries having regard to their permanence. Boundaries should, where necessary, be defined to identify safeguarded land between the urban area and the Green Belt in order to meet longer-term needs stretching well beyond the Plan period.
164. Policy SS3 proposes that 98 ha of land is removed from the Green Belt and becomes safeguarded land. The site lies between the IAMP to the east and the Leamside Line to the west. Beyond the old railway line are the residential and employment areas of Usworth.
165. The site would not encroach any further north than existing development in Usworth and would be contained by the IAMP to the east. The low-lying land is crossed by pylons and contains a small copse and some hedgerow field boundaries but otherwise is without significant features. The Green Belt and landscape impacts would be moderate. Although parts of the site are within Flood Zones 2 and 3, the scale of the site would allow any future built development to avoid areas of higher risk adjacent to watercourses.
166. The land is well-located in relation to the IAMP and PEAs and is reasonably close to existing services. The size of the site would allow a well-planned sustainable community to be developed. Moreover, the site has the potential to provide land for housing in the longer-term in a part of the city where supply has been constrained.
167. The housing supply position does not justify the release of the site for development at present. Moreover, upfront infrastructure and lead in times are likely to be significant. However, should the supply position change, then a review of the LP would allow the site to be considered for development without the need to further alter Green Belt boundaries. The A&DP would also provide an opportunity to review the need for release. However, this possibility is not referred to in the LP. **MM6** includes reference to the A&DP so that the Plan is positively prepared and effective.

168. The extent of the safeguarded land does not reflect the new alignment of the A1290. **MM6** would ensure that Figure 22 is accurate in this respect so that the Plan is effective. As a result of the realignment, the safeguarded land would amount to some 95 ha. Land to the south of the A1290 but outside the PEA will be shown as white land. As a relatively small parcel of land, its designation would be considered in the preparation of the A&DP. The amendments would require corresponding changes to the submitted Policies Map.
169. The provision of 95 ha of safeguarded land East of Washington, when combined with other opportunities for development beyond the Plan period on land beyond the Green Belt, would be likely to meet the longer-term development needs of the city. Therefore, exceptional circumstances to justify the removal of other land from the Green Belt have not been demonstrated, notwithstanding the deletion of the relatively small area of safeguarded land east of Springwell.

Overall

170. The deletion of two HGA from the Washington Sub-Area would to an extent undermine the intentions of the Plan to seek some redress in the spatial imbalance in the distribution of housing land supply and provide more larger detached dwellings. Some 9% of housing would now be in the sub-area whereas around 47% of available employment land would be in Washington.
171. However, HGA2 is unacceptable because of, amongst other things, its effect on Green Belt purposes. HGA6 is needed for sport and recreation. In the city as a whole sufficient land has been identified to meet housing needs. HGA1 will address the limited development opportunities that have existed in Springwell Village by allowing a proportionate expansion of the village. Land east of Washington has the potential to redress the spatial imbalance in the longer-term and is much closer to the IAMP and PEAs than HGA2 or HGA6. In these two instances the policies of the Framework in relation to Green Belt indicate that development should be restricted.
172. Policy SP3, the Strategic Policy for Washington, and the Key Diagram for Washington require amendment to reflect the deletion of HGA2, HGA6 and the safeguarded land south-east of Springwell Village. The changes to the boundary of the safeguarded land will also need to be reflected in the Key Diagram. **MM4** would achieve these changes so that the Plan is effective.
173. The housing trajectory identifies sites within the Washington Sub-Area that are deliverable within the next five years or developable over the remainder of the Plan period. No substantive evidence is before me to undermine the trajectory. The assumptions about delivery of the housing sites in Washington identified in the housing trajectory are realistic.

North Sunderland

174. The North Sunderland Sub-Area spans from the A19 in the west to the coast in the east. Countryside to the north of the built-up area up to the boundary with South Tyneside is currently designated as Green Belt as is a stretch of

land running along the north-western banks of the River Wear. The areas are contiguous with Green Belt to the north and south-west respectively.

HGA7 – North Hylton

175. The open land at North Hylton plays a key role as part of the Green Belt in maintaining a strategic green infrastructure corridor along the River Wear estuary and preventing urban sprawl. Despite what is said about the containment provided by Ferryboat Lane, the land subject to HGA7 is an important component of the Green Belt sub-area. There is not a clear defensible boundary between the site and the other land to the north of the lane which is to be retained as Green Belt (HY1, HY3 and HY4 and the lower part of HY2 in SD.30). It is not particularly distinguishable from the remainder of the sub-area forming part of the overall swathe of land running along both banks of the river. This is shown by the scoring against Green Belt purposes for the different parcels of land within the 2016 Green Belt Review (SD.29).
176. Although the later Green Belt reports suggest that the area subject to HGA7 plays a lesser role compared to the other Green Belt land I disagree. Indeed, its role is enhanced by its position higher up the valley slopes which make it more prominent from longer distance views across the valley particularly from the south-west. In this respect it is perceived as providing an open gap between South Hylton and Castletown.
177. For similar reasons the site makes a significant contribution in landscape terms to the river corridor. The landscape contribution is particularly apparent in views from Penshaw Monument, Offerton and from the A19 viaduct over the River Wear. In this respect I note that it is an area shown for 'Landscape Protection' in the LCA, thus a valued landscape by virtue of MM32 and MM39. In addition, as part of the undeveloped river valley, it contributes to the inter-district GI corridor, albeit in this respect it is not as important as the lower slopes.
178. The inclusion of mitigation such as viewing corridors to enable long distance views and landscape buffers would not disguise the fact that the proposal would lead to the development of a greenfield site with a housing estate.
179. The effect on the Green Belt purposes of checking urban sprawl, preventing the merging of settlements and safeguarding the countryside from encroachment would be significantly adverse. The landscape impacts would also be significantly adverse. For these reasons HGA7 should be deleted and retained as Green Belt. **MM8** would secure these changes so that the Plan is positively prepared, justified and consistent with national policy. Policy SP4, the Strategic Policy for North Sunderland, and the Key Diagram for North Sunderland require amendment to reflect the deletion of HGA7. **MM7** would achieve these changes so that the Plan is effective. The change to the extent of the Green Belt would require corresponding changes to the submitted Policies Map.
180. There has been criticism about the Habitats Regulations Assessment [HRA] process undertaken for HGA7. However, as I am recommending that the 'project' is not carried forward, it is not necessary for me to consider the

matter further through an appropriate assessment.

181. The deletion of HGA7 from the North Sunderland Sub-Area would to an extent undermine the intentions of the Plan to seek some redress in the spatial imbalance in the distribution of housing land supply and provide more larger detached dwellings. However, HGA7 is unacceptable because of, amongst other things, its effect on Green Belt purposes.
182. In the city as a whole sufficient land has been identified to meet housing needs. A number of sites within the sub-area are being brought forward under the accelerated construction programme supported by Homes England. This will ensure that delivery takes place, assisting with the regeneration objectives set out by Policy SP4. Land east of Washington is relatively close to the sub-area and equidistant to the IAMP and PEAs to the south. It has the potential to redress the spatial imbalance between the areas to the north and south of the river in the longer-term. In this instance the policies of the Framework in relation to Green Belt indicate that development should be restricted.

HGA8 - Fulwell

183. The site is contained to an extent by the golf driving range to the north and the existing urban area around Fulwell to the east of the A1018 which encroaches much further north. A significant expanse of Green Belt would be retained between the northern edge of the site and the settlements of Cleadon and Boldon in South Tyneside. However, extending the site further north would erode the gap to an unacceptable extent and additional housing land is not needed. The site has tree belts to the west and south which would be retained but no other landscape features. The effects on the Green Belt purposes of checking urban sprawl, preventing the merging of settlements and safeguarding the countryside from encroachment are moderate as are the landscape impacts.
184. Exceptional circumstances are justified for the alteration of Green Belt boundaries, but the Plan does not clearly articulate it for HGA8 by reference to Green Belt purposes. **MM7** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
185. The site is adjacent to a main arterial route into the city with frequent bus services. Seaburn Metro Station is about 300m from the site. A primary school, medical centre and local shops are also within walking distance. Vehicular access would be available direct from Newcastle Road.
186. The site is within the zone of influence of the Northumbria Coast Special Protection Area [SPA]. The SPA is important for nesting seabirds which can be disturbed by recreational use, particularly dog-walkers. Development of the site would be likely to have significant effects on the SPA on its own and in combination with other projects which are committed, by increasing the amount of recreational disturbance.
187. However, appropriate mitigation can be achieved by the provision of Strategic Access Monitoring and Management [SAMM] and Suitable Alternative Natural Greenspace [SANG]. With regard to the latter, Council owned land to the west of HGA8 at Fulwell Quarry can be enhanced to provide an attractive location

for informal recreation. **MM26** makes it clear that such mitigation will be required for HGA8 so that the Plan is positively prepared and effective.

188. The site was last used as a football pitch. The Council is to undertake a Playing Fields Assessment to ascertain which pitches are surplus to requirements following the development of new football hubs in the city. However, the pitch in this case has not been used since 2015 and is isolated from changing facilities and other pitches. Open space provision in the Southwick Ward is plentiful. It is unlikely that the site would be required for playing field use. In these respects, it is clearly distinguishable from HGA6 at Rickleton. That said Policy HGA8 should incorporate a criterion to reflect the need for the assessment before the site is released for housing. This would be secured by **MM8** so that the policy is positively prepared and effective.
189. Criterion vii. within Policy HGA8 should avoid repeating the requirements of Policy BH1 (Design Quality). **MM8** would ensure that the criterion is effective and clear to the decision-maker.
190. The site has been subject to landfill in the past. A preliminary site report recommends further investigation. However, there is nothing within the evidence to suggest that this or other constraints would prevent the site coming forward for development. In recognition of the need for further assessment, both in respect of playing fields and ground conditions, the site is shown as being delivered towards the end of the Plan period which is realistic.

Delivery

191. The housing trajectory identifies sites within the North Sunderland Sub-Area that are deliverable within the next five years or developable over the remainder of the Plan period. No substantive evidence is before me to undermine the trajectory. The assumptions about delivery of the housing sites in North Sunderland identified in the housing trajectory are realistic.

South Sunderland

192. The South Sunderland Sub-Area spans from the A19 in the west to the coast in the east. Countryside to the south of the built-up area beyond the SSGA up to the boundary with County Durham is designated as Green Belt as is a stretch of land running along the south-eastern banks of the River Wear. A further pocket of Green Belt abuts the built-up area around Middle Herrington. These areas are contiguous with Green Belt to the south, north and west respectively. No development, including HGA, is proposed in the Green Belt within the Sub-Area.
- SSGA*

193. The SSGA is by far the largest urban extension within the city. A significant proportion of the SSGA is already committed through the grant of planning permissions. Some phases have already commenced. Only one site is yet to secure planning permission. Despite this progress, Policy SS6 sets out a number of requirements for the SSGA as a whole to ensure a coordinated approach to infrastructure and service provision. The Council has been using the draft policy as a basis for considering proposals thus far.

194. Some of the requirements of Policy SS6 need to be revised so that they are effective and clear to the decision-maker. **MM10** would ensure that the contributions from the various phases are clear, that the components of the neighbourhood centre are clarified, that the Ryhope-Doxford Link Road is supported by contributions that meet the tests for obligations, and that other requirements are effective. In addition, the Council has prepared a draft Supplementary Planning Document [SPD] to guide development. For effectiveness the SPD should be referred to in Policy SS6 (**MM10**). The weight to be given to the SPD will increase once it is approved following consultation. I have further modified MM10 in response to representations on its detailed wording.
195. HRA has already been undertaken for the projects making up the SSGA when the planning applications were considered. There is a requirement for SANG within the SSGA because of the proximity of the coastal SPA. However, it is possible that SANG can also function as part of the public open space provision. This would be made clear by **MM10** and **MM26** so that Policies SS6 and NE2 are effective.
196. Some 75% of the 3000 homes within the SSGA are expected to be delivered in the Plan period. **MM10** provides the updated figures in the explanation to Policy SS6 so that the policy is effective. Infrastructure provision is being coordinated through an Infrastructure Delivery Strategy for the SSGA (SP.24). The missing sections of the Ryhope-Doxford Link Road are being provided by direct delivery or funded by planning obligation contributions. The assumptions about housing delivery in the SSGA appear realistic.

Green Belt

197. The general extent of the Green Belt in South Sunderland is appropriate and serves a number of purposes. Although the rectangle of open land to the north of Middle Herrington around Hastings Hill lies between the A19 and the built-up area, it prevents urban sprawl and countryside encroachment. Moreover, the parcel forms part of the valued landscape of the limestone plateau and includes an ancient monument. Its Green Belt and landscape qualities can be appreciated from the rural oasis of Foxcover Road. Land to the south of the SSGA is important in preventing the merger of the southern extremity of Sunderland with Seaham and Seaton. Moreover, there is a plentiful supply of housing land elsewhere in South Sunderland.
198. However, the triangle of land known as 'The Park' at Middle Herrington and the area of land immediately to the north used as public open space is something of an anomaly. It is hemmed in by housing and does not serve any Green Belt purposes as indicated by the 2017 Green Belt Assessment. The Green Belt Assessment Addendum (2018) (SD.32) focuses on the site's function as greenspace rather than its Green Belt role.
199. Although 'The Park' and the adjoining land has a special character, it has more appropriate designations as a Village Green and greenspace which secure protection under Policy NE4. This can be reaffirmed through the A&DP if necessary. The above factors taken together constitute exceptional circumstances to support the removal of West Park from the Green Belt. This would be secured by **MM9** which would amend the Key Diagram for South

Sunderland to ensure that the Plan is justified and consistent with national policy. The change to the extent of the Green Belt would require corresponding changes to the submitted Policies Map.

Settlement Break

200. The entirety of the settlement break proposed in South Sunderland between Grangetown and Ryhope around Tunstall Hills is justified by the Settlement Break Review (SD.48). Development in the vicinity of Tunstall Hills itself would be particularly prominent and erode the integrity of the break. In comparison the triangle of Council-owned open land to the north-west adjacent to Silksworth Lane is low-lying and does not play a fundamental role in separating the communities of High Newton and Elstob. Therefore, its exclusion from the settlement break is justified.

Delivery

201. The housing trajectory identifies sites within the South Sunderland Sub-Area that are deliverable within the next five years or developable over the remainder of the Plan period. No substantive evidence is before me to undermine the trajectory. The assumptions about delivery of the housing sites in South Sunderland identified in the trajectory are realistic.

The Coalfield

202. The Coalfield Sub-Area spans from the A19 in the east to the County Durham boundary to the west and south. Countryside to the north and east of Houghton-le-Spring is currently designated as Green Belt. The areas are contiguous with Green Belt to the north and east within the South Sunderland and Washington Sub-Areas.

HGA9 – Penshaw

203. The site is bounded by existing housing to the north-west and south-west. Development would not bring Penshaw materially closer to the urban edge of Sunderland. The sloping site is crossed by pylons but otherwise has no significant features. Views over the site towards Herrington Country Park from the surrounding area would be maintained. The Green Belt and landscape impacts would be moderate.
204. Exceptional circumstances for the alteration of Green Belt boundaries are justified but the Plan does not clearly articulate it for HGA9 by reference to Green Belt purposes. **MM11** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
205. Penshaw Monument, a Grade I listed building on Penshaw Hill to the north, towers over the site. However, the proposed housing would form a relatively small component of the wide panorama of urban areas and countryside that is visible from the monument. Housing on the site would not encroach any nearer than existing development. Therefore, the HGA would not harm the significance of the heritage asset by affecting its setting.
206. The site is adjacent to a main arterial route into the city with frequent bus services. Primary schools, a medical centre and local shops are also within

walking distance. Vehicular access would be available direct from Chislehurst Road. Herrington Country Park is on the doorstep. Links would be provided from the site.

207. The criteria within Policy HGA9 relating to a buffer to Herrington Burn, retention of trees and hedgerows, provision of open space, ecological improvements, flood risk, vehicular access and off-site highway improvements include some duplication and in some cases are too prescriptive. **MM12** would ensure that the policy is effective and clear to the decision maker.
208. Figure 30 shows a narrow strip of land between the site and Herrington Burn excluded from HGA9. It could become a no-mans land. **MM12** would include this strip within the site so that flood risk and ecological mitigation would be more effective. The change to the extent of the site would require a corresponding change to the submitted Policies Map.

HGA10 – New Herrington

209. The site is occupied by a members' club and disused park and bowling green and has housing to three sides. The New Herrington Park lies to the south. The effect on Green Belt purposes from housing development would be limited. Exceptional circumstances for the alteration of Green Belt boundaries are justified but the Plan does not clearly articulate it for HGA10 by reference to Green Belt purposes. **MM11** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
210. The site is adjacent to a main arterial route into the city with frequent bus services. Primary schools, a medical centre and local shops are also within walking distance. The loss of the potential open space is not a significant factor because of the close proximity of the well-maintained park which provides a range of recreational facilities including a bowling green.
211. The club is to be replaced but development of the site would be unlikely to be viable if a new club had to be located within its confines. There is scope to build a new club within the adjacent park where it could also provide changing accommodation. Moreover, the site contains significant tree cover. If all trees had to be retained, delivering the development would be challenging. Increasing the capacity of the site from 20 to 30 homes would also assist delivery. **MM12** would modify Policy HGA10 in these respects so that the policy is effective.

HGA11 – Philadelphia

212. The site is bounded by vacant and semi-derelict industrial complexes and former colliery land to the north and west. Development would not bring Philadelphia materially closer to the urban edge of Sunderland. The gently sloping site comprises agricultural fields with no significant landscape features. The Green Belt and landscape impacts would be moderate. Allocation of the site would assist in regeneration of the adjacent brownfield land by facilitating a comprehensive development comprising both greenfield and previously-developed land.

213. Exceptional circumstances for the alteration of Green Belt boundaries are justified but the Plan does not clearly articulate it for HGA11 by reference to Green Belt purposes. **MM11** would secure this change so that the policy is positively prepared, justified and consistent with national policy.
214. The site is close to a main bus route. Primary schools, a medical centre and local shops are within walking distance. Vehicular access would be via the highways infrastructure to be provided on land to the north. The setting of listed buildings within the wider Philadelphia complex would not be harmed by development of the site.
215. Criterion iv. of Policy HGA11 is confusing as it seeks to protect long distance views from the south by referring to high architectural quality. The significant element is protecting important views of the Newbottle Conservation Area to the south. The policy is prescriptive in terms of which junctions nearby will need improvement. However, such requirements will not be determined until a transport assessment is carried out at application stage. **MM12** would ensure that Policy HGA11 is effective and consistent with national policy in these respects.

Settlement Breaks

216. The settlement breaks in the Coalfield designated within the UDP have been eroded in places by new housing. However, the remaining areas defined in this LP are for the most part important in maintaining the separate identity of the settlements. The gap between settlements is particularly narrow to the north of Hetton Bogs. In this respect, it is important that the area free from development to the west of the A182 is protected to prevent coalescence.
217. New development off Coaley Lane to the west of Newbottle has led to the majority of the Russell Foster Football Centre being surrounded on three sides by development. This land no longer serves the settlement break purpose of preventing the merging of settlements. The site should be excluded from the settlement break so that Policy NE7 is positively prepared and justified. The Key Diagram for the Coalfield requires amendment in this respect (**MM11**). The change would require a corresponding amendment to the submitted Policies Map. The site, as existing open space, would be protected by paragraph 74 of the Framework and Policy NE4 of the LP.
218. The land to the north of that shown to be removed from the settlement break designation and which forms part of the football centre is part of a relatively narrow gap between Sunnyside and Success and should remain protected to prevent the merging of settlements.

Delivery

219. The housing trajectory identifies sites within the Coalfield Sub-Area that are deliverable within the next five years or developable over the remainder of the Plan period. No substantive evidence is before me to undermine the trajectory. The assumptions about delivery of the housing sites in the Coalfield identified in the trajectory are realistic.

Conclusions on Issue 6

220. Taken together with the strategic allocations and SHLAA sites, the eight remaining HGA will deliver sufficient sites to meet the Plan's housing requirement. A significant area of safeguarded land at East of Washington will meet longer-term needs beyond the Plan period in the right location. There is insufficient justification for the identification of other safeguarded land.
221. The Council is to prioritise work on the A&DP following adoption of this LP which will allocate suitable sites from the SHLAA and will also consider whether any of the safeguarded land needs to be released earlier than anticipated. Allocating additional sites at this stage to compensate for those to be deleted and to increase flexibility in the supply would significantly delay the adoption of the Plan and would not be necessary to make the Plan sound as demonstrated by my findings in relation to the next main issue.
222. The Key Diagram and Figure 33 require amending to reflect the MMs set out under this issue. This would be achieved by **MM2** and **MM14** to ensure an effective LP.
223. I conclude that, subject to the MMs proposed, the policies and land identified for development within the Sub-Areas of the City are consistent with the Plan's strategy and national policy, including protecting Green Belt land, and the housing identified will be delivered.

Issue 7 – Whether the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will have a five-year housing land supply upon adoption and be able to maintain it through the Plan period

Generally

224. Earlier in this report I concluded that the Plan's requirement for 13,410 homes between 2015 and 2033 is justified. Under Issue 6 I considered whether the land identified within the Sub-Areas was suitable and would be delivered. I now go on to consider the totality of the likely housing supply against the Plan's requirements and the need for a five-year housing land supply.

Components of Supply

225. Chapter 6 of the LP addresses, amongst other things, housing land supply. However, it is not explicit in setting out the components of housing supply. This would be rectified by **MM14** which includes a table setting out the position at 31 March 2019 in terms of contributions from completions, units under construction, commitments, a small-sites allowance, sites to be brought forward in this Plan (HGA, the SSGA and the Vaux) and projected allocations on SHLAA sites as part of the A&DP. Demolitions are incorporated as a minus figure. This modification ensures that the LP is effective in setting out how housing will be delivered and how the housing requirement will be met.
226. The small sites allowance comprises sites of between 1 and 4 dwellings. The figure of 50 is based on historic data which shows delivery of an average of 57 dpa from this source over the last 10 years (EX17.005). Units created through permitted development rights have not materially inflated these figures. The

SHLAA does not include such small sites. The SHLAA sites within the five-year supply calculation also exclude units on developments of 4 or less. Therefore, there is no double counting. The small sites windfall allowance is justified by compelling evidence. The Plan does not explain the justification for the allowance, but this would be rectified by **MM14**. An allowance for larger windfall sites would not be warranted as such sites are captured by the comprehensive SHLAA which is updated annually.

227. An allowance of 20 units per year for demolitions is included in the housing supply table for the period 2024-2033. Demolitions for the next five years are largely known and therefore have been accounted for in the net figures for commitments in the table. Historically demolition numbers have been higher because Gentoo, the association that manages the majority of the city's social housing, undertook significant stock clearance between 2004 and 2015. However, there are no plans to carry out further major clearance. The demolition allowance is justified.

228. The table of components of the supply shows that some 14,229 dwellings are capable of being delivered in the Plan period. This exceeds the requirement by around 6%. Therefore, there is some flexibility built into the supply. In addition, the A&DP will (1) provide the opportunity to increase the range of sites if some are stalling at that time and (2) increase flexibility in the supply. Moreover, a LP review, including the assessment of safeguarded land, will be a further opportunity to update and increase supply, should it prove necessary. I am satisfied that there will be sufficient flexibility built into the supply to ensure that the housing requirement will be met over the Plan period.

Housing Trajectory, Housing Implementation Strategy [HIS] and Five-year Housing Land Supply

229. Paragraph 47 of the Framework indicates that LPAs should illustrate the expected rate of housing delivery through a housing trajectory for the Plan period and set out a HIS describing how a five-year supply of delivery will be maintained to meet the housing target. In order to rectify omissions in the supporting evidence to the submitted Plan a HIS has now been provided. The HIS includes an updated housing trajectory to reflect the housing land supply position at 31 March 2019 and sets out how housing supply will be managed. Figure 34 within the Plan (housing trajectory) is also updated. The production of the HIS and the updated trajectory are explained by **MM14** which is required to ensure that the LP is effective.

230. The data that supports the housing trajectory and which derives from the SHLAA is based on realistic assumptions about when sites will come forward, lead-in times and build-out rates. The SHLAA itself is supported by a panel that includes representatives of the development industry. The assumptions have not been subject to significant challenge during the examination.

231. In identifying a five-year supply of deliverable housing sites, the Framework requires an additional buffer of 5% or 20% to be added, the latter to be applied where there has been a record of persistent under delivery against the housing requirement. The five-year supply position set out in the Compliance Statement and HIS is based on a 5% buffer. Figures since the base date of the Plan show that delivery was above the requirement of 745 dpa in two of

the four years. Some 200 dwellings above the requirement have been delivered between 1 April 2015 and 31 March 2019. Going back to the period 2009/10 to 2014/15 delivery was considerably less and below the then Regional Spatial Strategy [RSS] target but that was during a period when the country was coming out of recession. Moreover, the RSS target was not based on OAN but was an aspirational figure. There has not been a record of persistent under delivery. A 5% buffer is justified.

232. The LP should clearly express the key assumptions and parameters which will be relied upon to calculate the five-year housing land supply. **MM14** would ensure that reference is made to the 5% buffer and the circumstances where a 20% buffer might be applied in the future so that the LP is effective and consistent with national policy.

233. The HIS indicates that supply would be above five years on adoption of the LP using the base date of 31 March 2019. Indeed, the five-year supply is shown as 6.1 years. The Council's track record in robustly monitoring supply, the actions contained within the HIS to manage housing delivery and the flexibility in the supply give me comfort that a five-year supply can be maintained over the Plan period. This is reflected in the housing trajectory.

Conclusions on Issue 7

234. I conclude that, subject to the MMs proposed, the housing requirement will be met; the means of meeting the requirement have been justified and will be effective; and the LP will have a five-year housing land supply upon adoption and be able to maintain it through the Plan period.

Issue 8 – Whether necessary infrastructure is likely to be delivered alongside development

The IDP and Planning Obligations

235. The Plan is supported by the IDP. Policy ID1 provides a link to the IDP in requiring that development should contribute to the delivery of essential infrastructure identified in the IDP. The extent of contributions will be determined on a case-by-case basis having regard to the legal and policy tests that govern planning obligations. The policies that relate to the HGA include infrastructure requirements that are reflected in the IDP. The IDP is to be reviewed regularly so that what is defined as essential infrastructure and sources of funding will be kept up-to-date. In these respects, Policy ID1 is not too prescriptive and provides the necessary support for the delivery of essential infrastructure.

236. Policy ID2 indicates that planning obligations will be sought to deliver affordable housing and infrastructure and facilities. This would include additional school places and improvements to health-care provision. The terms of the policy are generally consistent with the legal and policy tests. However, it is important that the need for infrastructure improvements is clearly evidenced. Moreover, the seeking of fees to cover monitoring and the like is an administrative matter, not something that should be contained within a development plan policy. The place for this sort of detail would be the Planning Obligations SPD. Finally, the policy should make it clear that a viability assessment will be needed where it is proposed not to deliver policy

requirements, such as affordable housing, in full. **MM37** would ensure that Policy ID2 is positively prepared and effective in these respects.

Transport

237. The Plan sets out a number of policies which have the objective of delivering highway schemes and sustainable transport initiatives. Policy SP10 identifies specific schemes but needs to reflect the up-to-date position in relation to the key improvements that are necessary at the Wessington Way link to, and junction with, the A19. The explanation to the policy also needs to emphasise that the efficient operation of the Strategic Road Network is not only dependent on improvements to the A19 and the implementation of the SSTC. It can also be assisted by the implementation of travel planning measures and improved public transport provision. **MM35** would enable these changes so that the policy is positively prepared and effective.

Greenspace

238. Policy NE4 requires the protection of greenspace and that development contributes to the provision of new greenspace. The amount to be provided alongside new residential development as set out in Sections 3 and 4 of the policy is reflective of the existing approach within the UDP and the good supply of existing greenspace and is justified. However, the type of provision as set out in Section 3 would not necessarily result in appropriate space. Moreover, open space provision in housing developments would include space for children's and young people's outdoor play and activities as well as amenity space. **MM28** is required so that development can make provision that is reflective of local circumstances, including shortfalls in particular typologies. Through this modification the policy would be positively prepared.

Conclusions on Issue 8

239. I conclude that, subject to the MMs proposed, the necessary infrastructure is likely to be delivered alongside development.

Issue 9 – Whether the monitoring and implementation provisions of the Plan will be effective

240. The Plan includes an Implementation Table at Appendix 6 and refers to a standalone Monitoring Framework (SD.13). Paragraph 6.9 of the Plan and the HIS referred to within **MM14** are specific to housing delivery. However, there is nothing within the delivery section of the Plan which emphasises the importance of both monitoring and key review triggers or the role of the Authority Monitoring Report. **MM38** would insert a short section within Chapter 14 of the Plan to deal exclusively with monitoring and address the deficiencies referred to above. **MM40** inserts the Monitoring Framework into the Plan itself. Both modifications are required so that the Plan is effective.

241. The need to partially or fully review the Plan because key triggers are engaged does not only apply to this Plan but to the development plan as a whole, including the IAMP AAP and the A&DP. This is made clear by **MM38** so that the Plan is effective.

Conclusions on Issue 9

242. I conclude that, subject to the MMs proposed, the monitoring and implementation provisions of the Plan will be effective.

Assessment of Legal Compliance

243. My examination of the legal compliance of the Plan is summarised below.

244. The Plan has been prepared broadly in accordance with the Council's Local Development Scheme 2018-2020 (SD.15). Adoption of the Plan is likely to be early in 2020 rather than in 2019 but the difference is not significant and is due to the length of the examination.

245. The Council produced a Statement of Community Involvement [SCI] in 2015 (SD.16) and a Consultation Statement (SD.7) under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (LP Regulations). The Consultation Statement indicates that the Council has given local communities and key stakeholders the opportunity to be involved, and to make representations, at various stages of the LP preparation process in accordance with the SCI.

246. There has been some criticism of the Council's approach to consultation, including a failure to undertake effective engagement. The preparation of the Plan has been a long process starting with identification of issues and options back in 2005. The base date of the Plan was then moved forward to 2015 due to updated evidence and changes to Government policy. However, although a long and complex process, consultation has occurred at every stage.

247. In more recent times events have been held at various locations in the City. A separate event with Council Officers hosted by the Springwell Village Residents' Association was held in July 2018. These events have allowed the public and their representatives to engage with Council Officers. The events have allowed informal discussions. Moreover, these meetings have been in addition to, but not a substitute for, the formal public consultation that has taken place.

248. Although the use of digital means of communication and consultation have been the default, hard copies of the Plan and evidence documents were made available at key public buildings around the City. The local press, promotional material and leaflets sent to all residents and businesses have supplemented the use of the Council's website and social media. Paper consultation forms were provided on request and representations in writing have been accepted.

249. Some suggest that people have not been listened to. However, it appears that the Council has considered views expressed. Moreover, positive preparation of a plan does not mean that all will be satisfied with the outcome. There is a balance to be struck between the requirements of national policy, the development needs of the area and environmental constraints.

250. Consultation on the Plan and the MMs was carried out in compliance with the SCI. The Council has exceeded the consultation requirements in the LP regulations.

251. SA has been carried out and is adequate. Reasonable alternatives, including different allocations, designations and policy criteria, have been subject to SA in the same way as the proposals in the Plan. The SA has led to the inclusion of mitigation and a number of changes to policies to avoid significant adverse effects.
252. The HRA Report of December 2018 (SD.10) sets out that the plan may have some negative impact which requires mitigation. This mitigation has been secured through the plan as modified, noting the MMs that affect HGA8 and Policy NE2 in particular. HGA7 which is now proposed to be deleted was excluded from consideration within SD.10 as, at that time, potential mitigation had not been identified and agreed. Therefore, the fact that HGA7 will no longer contribute to mitigation will not undermine the findings of the HRA report. The only implication is that other projects within the SPA Zone of Influence will probably need to make a slightly greater contribution to SAMM measures.
253. The Plan's spatial vision, spatial priorities and strategic, built-environment, GI, energy and transport policies are designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Development proposed through the Plan is or will be close to services and will be served by a choice of travel modes.
254. The Local Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the LP Regulations.
255. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of policies for traveller sites and accessible and adaptable housing.

Overall Conclusion and Recommendation

256. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
257. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendix, the Sunderland Core Strategy and Development Plan 2015-2033 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the NPPF.

Mark Dakeyne

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.

Sunderland City Council
Schedule of Main Modifications
January 2020

Core Strategy and Development Plan 2015-2033
Publication Draft

The Publication Draft Core Strategy and Development Plan (CSDP) must meet the requirements of section 20(5) (a-c) of the 2004 Act, associated regulations and the requirements of the National Planning Policy Framework ('the Framework'). Under section 20(7C) of the 2004 Act, the Inspector has recommended main modifications to the plan that are deemed necessary to make the CSDP sound and legally compliant.

There are two types of modifications;

- **Main Modifications** - are those that materially affect the submitted Plan, which are required to ensure that the plan is sound and legally compliant.
- **Additional Modifications** - are those where they will not impact upon the intent or interpretation of the Plan or go to the heart of whether the plan is 'sound' or not. The minor changes outlined are changes such as typographical errors and factual updates.

The Council is proposing Main Modifications to the Publication Draft CSDP (June 2018) which are contained in this schedule. These modifications include recommendations from the appointed Inspector and are modifications that materially affect the submitted Plan and are required to ensure that the plan is sound and legally compliant. The Council has prepared a separate schedule of Additional Modifications.

The modifications are set out in plan order. Where it has not been possible to show information (such as tables, diagrams and maps) within the schedule, these are provided in Appendix 1.

The following format has been used to denote modifications:

- Additions to text or new/amended/deleted figures/tables are shown as underlined.
- Deletions of text are shown as ~~striketrough~~.

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
MM1	14-20	2. Sunderland Today	<p>2.12 Washington has an estimated 25,000 dwellings which equates to nearly 20% of the housing stock in Sunderland. The development of additional homes in this area has been constrained by Green Belt on all sides as well as the lack of available urban sites for development. During the period 2007 to 2015, only 652 homes or 93 homes per annum were built in the Washington areas. The latest Strategic Housing Land Availability Assessment (SHLAA) identifies land available to accommodate only 778 <u>951</u> homes on 13 sites during the Plan period. This equates to 7 <u>9</u>% of the total land supply in Sunderland. (p.14)</p> <p>2.15 South Sunderland is a popular residential area. The area contains the largest proportion of the city's housing stock and contains 47 <u>43</u>% of all deliverable and developable housing sites within the SHLAA, including the South Sunderland Growth Area (SSGA), which will constitute the largest urban extension in the city over the plan period. (p.15)</p> <p>2.28 However, more recent evidence demonstrates that this trend is changing and the net out-migration has been reducing significantly averaging -625 over the last 5 years <u>period</u> (2012<u>1</u>-2016).</p> <p>2.29 Projections also estimate that the population of Sunderland is ageing. The latest Population projections estimate that... (p.16)</p> <p>2.38 As identified in the SHMA, there is a shortage of 3 and 4 bedroom houses to meet families' <u>needs</u>, bungalows and <u>other</u> accommodation to meet older person's needs. (p.18)</p> <p>2.46 In terms of delivering new homes, Sunderland has recently experienced higher delivery than a decade ago as illustrated in Figure 7. This is in part due to the amount of demolitions between 2000 and 2013 and the recession. However, this trend during the past four <u>five</u> years has started to change, with an average net additional dwellings completion of 846 <u>817</u> per year. (p.19)</p> <p><u>Replace Figure 7 Housing delivery</u> (p.19) (see Appendix 1)</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>2.47 Historically, we have been very successful at developing previously developed land. In fact, between 1995 and 2016 <u>2019</u>, 90 <u>82</u>% of new housing development in Sunderland was built on previously developed land (pdl) (brownfield) (see Figure 8). (p.19)</p> <p><u>Replace Figure 8 Proportion of housing completions on previously developed land (p.19) (see Appendix 1)</u></p> <p>2.48 The council's latest SHLAA identifies only 44 <u>41</u>% of new homes will be delivered on brownfield land. This is because the supply of brownfield sites that is considered to be deliverable is considered to be relatively low. This is in part due to viability. The Council's Viability Assessment concluded that Sunderland has challenging areas and previously developed land will be difficult to deliver and therefore sites in the Urban Core should not be heavily relied upon in the housing supply. (p.19)</p> <p>2.49 The spatial distribution of housing supply in recent years varies across the city. For example, between 2008 and 2016 <u>2019</u>, 33 <u>34</u>% of housing completions in the city were in the Coalfield, sub-area compared to 14% in the Washington sub-area. Consequently, the Coalfield settlements have become particularly saturated with housing development and increasingly, infrastructure including the road network and school capacity has been put under pressure. On the other hand, other parts of city such as Washington and Sunderland North have experienced lower levels of housing growth, in part, due to the lack of available sites for development and these areas being tightly surrounded by Green Belt. (p.19)</p> <p><u>Replace Figure 9 Housing distribution (SHLAA 2018) (p.19) (see Appendix 1)</u></p>
MM2	30	Figure 12 Key Diagram	<u>Amend Figure 12 Key Diagram</u> (p.30) (see Appendix 1)

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
MM3	31-34	Policy SP1	<p>SP1 Spatial <u>Development</u> Strategy (p.31):</p> <p>1. i. deliver at least 13,410 <u>net</u> new homes and create sustainable...</p> <p>2. iii. emphasising the need to develop in sustainable locations in close proximity to transport hubs. Higher densities close to transport hubs will be encouraged...</p> <p>2. v. delivering the right homes in the right locations through the allocation of homes in the A&D Plan, <u>the allocation of South Sunderland Growth Area and The Vaux</u> and amending the Green Belt boundary to allocate Housing Growth Areas.</p> <p>4.8 In order to meet identified development needs, the spatial <u>development</u> strategy sets out the scale and distribution of new development for the Plan period up to 2033.</p> <p>4.10 The SHMA has identified the OAN for housing in Sunderland to be an average of 745 net additional dwellings per annum (dpa) each year, equating to a total housing requirement of at least 13,410 <u>net additional</u> dwellings over the Plan period. The 13,410 <u>net</u> dwellings figure should not be seen as a ceiling, but rather the level of growth which is both needed and anticipated to take place over the Plan period.</p> <p>4.14 The Government's proposed standardised methodology calculates a Local Housing Need (LHN) for Sunderland of 593 <u>573</u> dpa... (p.33)</p> <p>4.17 With regards to the objectively assessed need for employment land, the ELR identifies a need for between 95 and 115 hectares of employment land (for B Use Classes) over the Plan period. The Plan identifies a number of Primary and Key Employment Sites throughout the city to meet this requirement. <u>The distribution of available employment land is set out in the table below.</u> (p.33)</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change											
			<table><tr><td><u>Sub Area</u></td><td><u>Percentage of General Available Land Supply Distribution</u></td></tr><tr><td><u>Washington</u></td><td><u>47%</u></td></tr><tr><td><u>Coalfield</u></td><td><u>22%</u></td></tr><tr><td><u>Sunderland South</u></td><td><u>25%</u></td></tr><tr><td><u>Sunderland North</u></td><td><u>6%</u></td></tr></table>	<u>Sub Area</u>	<u>Percentage of General Available Land Supply Distribution</u>	<u>Washington</u>	<u>47%</u>	<u>Coalfield</u>	<u>22%</u>	<u>Sunderland South</u>	<u>25%</u>	<u>Sunderland North</u>	<u>6%</u>	
<u>Sub Area</u>	<u>Percentage of General Available Land Supply Distribution</u>													
<u>Washington</u>	<u>47%</u>													
<u>Coalfield</u>	<u>22%</u>													
<u>Sunderland South</u>	<u>25%</u>													
<u>Sunderland North</u>	<u>6%</u>													
			<p>4.22 The SHLAA (<u>May 2019 update</u>) has identified that approximately 13,233 <u>10,559</u> new homes (<u>which includes the Housing Growth Areas</u>) can be delivered in the Existing Urban Area on a mixture of brownfield <u>sites</u> (44%) (<u>41%</u>) and greenfield (56%) (<u>59%</u>) sites. As set out in the Housing Trajectory (Figure 34), 18% <u>24%</u> of the housing requirement (<u>based on 13,410</u>) has already been delivered, 22% <u>24%</u> has planning permission or is under construction, and a further 18% <u>19%</u> is on Strategic Sites (Vaux and SSGA, most of which also have planning permission). <u>The allocation of eight Housing Growth Areas through this plan provide around 7% of the overall housing supply.</u> To deliver the remainder of the housing requirement, the council will <u>utilise the SHLAA to</u> allocate housing sites in the Existing Urban Area through the A&D Plan. (pp.33-34)</p> <p>4.23 The <u>housing distribution is such that</u> SHLAA demonstrates that the majority of the identified housing land supply is located in South Sunderland (47%) (<u>43%</u>) and Coalfield (28%) (<u>30%</u>) sub areas. In part, this has been as a consequence of the lack of available housing sites in the northern part of the city, which can be largely attributed to the presence of the Tyne and Wear Green Belt, which places a heavy constraint on the supply of suitable development land. Subsequently, locations such as Washington and Springwell <u>Village</u> have experienced limited development over a number of years. <u>The broad distribution of housing is set out in Table 5 below.</u> (p.34)</p>											

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change												
			<table><tr><th>Sub-area</th><th>Broad Housing Distribution %</th></tr><tr><td>North Sunderland</td><td>12%</td></tr><tr><td>Urban Core</td><td>7%</td></tr><tr><td>South Sunderland</td><td>43%</td></tr><tr><td>Coalfield</td><td>30%</td></tr><tr><td>Washington</td><td>9%</td></tr></table> <p><u>Figure 13: Broad Housing Distribution*</u> <u>*Table includes HGA's and excludes small sites and demolitions (p.34)</u></p> <p>4.25 ... The Council has identified land in the Settlement Breaks and the Open Countryside which are considered to be suitable for housing development through the SHLAA. <u>However</u>, in order to meet the housing requirement there still remains a shortfall of land to deliver around 177 <u>111</u> dwellings. (p.34)</p> <p>4.29 The spatial strategy allocates 11 <u>8</u> Housing Growth Areas (HGAs) (Policies SS2, SS4 and SS7) and amends the Green Belt boundary (as defined on the Policies Map). These HGAs will be able to deliver approximately 1330 <u>930</u> new homes during the Plan period. These sites range in size from 20 <u>30</u> homes to 400 homes. These sites are considered to be the most appropriate and suitable locations for the future expansion of our Existing Urban Area. (p.34)</p> <p><u>New Paragraph following para 4.29:</u></p> <p><u>4.30 Furthermore, and in line with the NPPF, the Council has identified 'Safeguarded Land' in order to provide a degree of permanence to the Green Belt boundaries in the longer term, so that they should be capable of enduring beyond the Plan period. (p.34)</u></p>	Sub-area	Broad Housing Distribution %	North Sunderland	12%	Urban Core	7%	South Sunderland	43%	Coalfield	30%	Washington	9%
Sub-area	Broad Housing Distribution %														
North Sunderland	12%														
Urban Core	7%														
South Sunderland	43%														
Coalfield	30%														
Washington	9%														
MM4	38	Policy SP3	<p><u>Replace Figure 15 Washington key diagram (p.38) (see Appendix 1)</u></p> <p>SP3 Washington (p.38):</p>												

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>Washington will continue to thrive as a sustainable mixed community and a driver of economic growth for Sunderland.</p> <p>In order to achieve this:</p> <ol style="list-style-type: none"> 1. economic growth will be focused in identified Employment Areas (policies EG1 and EG2) and at the IAMP; 2. Washington Town Centre will be the focus for office, retail and Main Town Uses. Any development within the centre should enhance its vitality and viability; 3. South West Springwell, East Springwell, North of High Usworth, North of Usworth Hall, <u>and</u> Fatfield and Rickleton (Policy SS2) are allocated as Housing Growth Areas; 4. land will be safeguarded at East Washington and South of Springwell (Policy SS3); and 5. existing Travelling Showpeople sites will be safeguarded (Policy H4). <p>4.43 In order to help facilitate growth and provide homes where people want to live, a number of Housing Growth Areas have been identified within the Washington sub-area to support the sustainable growth of Washington. Allowing a small amount of new developments on the edges of Springwell Village will help to sustain the future of the shops, services and community facilities within the village. (p.38)</p> <p><u>New Paragraph (after 4.43) preceding Policy SS2 (p.38):</u></p> <p><u>Exceptional circumstances in Washington</u></p> <p><u>In seeking to meet the city's agreed housing need over the Plan Period, the council has demonstrated that all sustainable non-Green Belt site alternatives have been fully considered and exhausted (including full consideration of site densities).</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>Because of the configuration of the Green Belt principally to the north of the city, there is a spatial imbalance in the housing land supply, with a lack of housing sites in Washington and North Sunderland, and over-reliance of sites to the south of the city.</u></p> <p><u>The council has identified the following sites to be deleted from the Green Belt to provide Housing Growth Areas:</u></p> <p><u>HGA1 South West Springwell</u> <u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and represents a logical rounding-off of the village, with the creation of a new durable Green Belt boundary.</u></p> <p><u>HGA3 North of High Usworth</u> <u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and represents a logical rounding-off of the urban area, with the creation of a new durable Green Belt boundary.</u></p> <p><u>HGA4 North of Usworth Hall</u> <u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and will be defined by a new, durable Green Belt boundary to the north and west.</u></p> <p><u>HGA5 Fatfield</u> <u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and represents a logical rounding-off of the urban area, with the creation of a new durable Green Belt boundary along the A182.</u></p>
MM5	38-42	Policy SS2	SS2 Washington housing growth areas (p.38):

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>Development of Washington housing growth areas should:</p> <ol style="list-style-type: none"> 1. provide a mix of housing types with a focus on <u>larger detached dwellings</u> family homes; 2. address impacts and make provision or contributions towards education provision and healthcare <u>where justified and necessary</u>; 3. enhance access to local facilities and services, <u>where appropriate</u>, and <p>Policy SS2: HGA1 (p.39):</p> <p>HGA1 South West Springwell should: ...</p> <p>v. <u>retain</u> be of high architectural quality to protect long distance views to the southern edge of the development from the south <u>through good design</u>;</p> <p>vi. be designed to respect the village character and to existing residential development on the northern and eastern edges;</p> <p><u>Remove Figure 17 East Springwell</u> (p.39) (see Appendix 1)</p> <p><u>Delete Policy SS2: HGA2</u> (p.39):</p> <p>HGA2 East Springwell should:</p> <ol style="list-style-type: none"> i. deliver approximately 60 new homes; ii. create a new defensible Green Belt boundary to the south of the site; iii. maintain a wildlife and green infrastructure corridor running north-south and limit any impact on the areas landscape character through sensitive boundary treatment; iv. <u>retain</u> be of high architectural quality to protect long distance views to the southern edge of the development from the south through good design; v. be designed to respect the village character and to existing residential development on the northern and western edges;

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p> vi. include additional buffers, mitigation and/or design as necessary to address noise implications from the A194(M) directly bordering the eastern edge of the site; vii. mitigate the impacts of the natural swale and associated surface water flooding located along the southern edge of the site and provide easements for public sewers as necessary; viii. retain all healthy trees and hedgerows where possible and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality; and include vehicle access from Peareth Hall Road and improve other junctions as necessary. </p> <p>Policy SS2: HGA3 (p.40):</p> <p>HGA3 North of High Usworth should:</p> <p> iii. maintain a wildlife and green infrastructure corridor running west east and limit any impact on the area's landscape character; iii. iv. retain existing screening of the site from the north and, west and south including any additional buffers and acoustic barrier as necessary to address noise implications from the A194(M); iv. provide buffers and acoustic barriers as necessary to address noise implications from the A194(M); v. retain all healthy trees and hedgerows where possible and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality; and vi. retain as undeveloped the southern edge of the site to provide amenity space and as a potential location for SuDS; and </p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>vii. be of high architectural quality and be designed with consideration of the village character to the south;</p> <p>New bullet vi:</p> <p><u>vi. seek improvements to the permissive footpath within the site.</u></p> <p><u>Replace Figure 19 North of Usworth Hall (p.40) (see Appendix 1)</u></p> <p>Policy SS2: HGA4 (p.40):</p> <p><u>iii. provide greenspace/green infrastructure within the site, including greenspace provision along the southern edge to form a sewer easement and to protect/enhance an existing Right of Way;</u></p> <p>v. incorporate greenspace/green infrastructure to the <u>within the eastern east part</u> of the site to provide a buffer to the former Leamside line, address flooding associated with the Usworth Burn and to minimise impact on priority species and protected habitats;</p> <p>vi. provide an area of greenspaces along the southern edge to form a sewer easement and to protect/enhance an existing Right of Way;</p> <p><u>vi. retain</u> be of high architectural quality along the northern edge of the site to protect long distance views to the northern edge of the site through good design and to reflect the local vernacular;</p> <p><u>vii. viii.</u> provide improved public transport connections to the site, and provide pedestrian/cycleway connections to the west and east of the site and connect to existing public rights of way; and</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>viii. ix. include appropriate vehicle access from Stephenson Road, and <u>provide junction improvements in the locality where justified and necessary;</u> and mitigation as necessary to the road junctions at Heworth Road, Rutherford Road, the A195 and A184.</p> <p><u>ix.</u> avoid development in Flood Zones 2 and 3.</p> <p>Policy SS2: HGA5 (p.41):</p> <p><u>Replace Figure 20 Fatfield with correct map of Fatfield (p.41).</u></p> <p>v. be of high architectural quality to reflect the local vernacular, providing a unique community within a woodland setting;</p> <p><u>vi.</u> vii. include vehicle access from existing highways linking to Bonemill Lane; <u>and</u></p> <p><u>vii.</u> viii. provide pedestrian/cycleway; and ix. connections through the site, linking to neighbouring routes.</p> <p><u>Remove Figure 21 Rickleton (p.41) (see Appendix 1)</u></p> <p><u>Delete Policy SS2: HGA6 (p.41):</u></p> <p>HGA6 Rickleton should:</p> <ul style="list-style-type: none"> i. deliver approximately 200 new homes; ii. maintain wildlife and green infrastructure corridors to the south; iii. provide a greenspace buffer to minimise impact on the adjacent Grade II Lambton Castle Registered Park and Garden and priority species and protected habitat in the locality;

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>iv. retain all healthy trees and hedgerows and create a central greenspace into the site that will upgrade the existing scrub land and mature natural features;</p> <p>v. provide greenspace improvements to Rickleton Park to compensate for the greenspace loss;</p> <p>vi. be of high architectural quality and designed with consideration to the village character on the northern and eastern edges;</p> <p>vii. provide pedestrian connections from the site westwards and northwards to Bonemill Lane and to connect to the existing public Right of Way on the north eastern boundary; and</p> <p>include vehicle access from Bramhall Drive, and provide mitigation as necessary to the road junctions at Bonemill Lane, Picktree Lane, A183, A1(M) and A182.</p>
MM6	42	Policy SS3	<p>Replace Figure 22 Safeguarded Land (p.42) (see Appendix 1)</p> <p>SS3 Safeguarded land (p.42):</p> <p>Land East of Washington and land South of East Springwell has been removed from the Green Belt and designated as Safeguarded Land.</p> <p>Planning permission for the development of Safeguarded Land will not be granted except where development is temporary or would otherwise not prejudice the ability of the site to be developed in the longer term.</p> <p>Reference to the following paragraph now follows para 4.29. (p.42)</p> <p>4.44 When revising Green Belt boundaries, the NPPF indicates that the Local Plan should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. In addition, where necessary, the Local Planning Authority should identify 'Safeguarded Land' between the urban area and the Green Belt in order to meet the likely longer term development needs.</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>4.46 The Council consider that the land East of Washington, as designated on the Policies Map, could accommodate a new sustainable community in the longer term. However, the development of this site would require a comprehensive approach to ensure that the infrastructure required to make the site sustainable is delivered. Land to the south east of Springwell Village is also identified for safeguarding. The site is removed from the Green Belt in order to ensure that a strong and durable boundary can be established. It should be noted that Safeguarded Land can only be released for development through a review of the Plan, in accordance with the NPPF. <u>The council will give consideration as to whether an early release of the safeguarded land is justified through the emerging A&D Plan. (p.42)</u></p>
MM7	43	Policy SP4	<p><u>Replace Figure 23 Key diagram North Sunderland (p.43) (see Appendix 1)</u></p> <p>SP4 North Sunderland (p.43)</p> <p>North Sunderland will continue to be the focus for regeneration and renewal <u>whilst ensuring its future sustainability</u>. In order to achieve this:</p> <ol style="list-style-type: none"> 1. the Council and its partners will work to secure regeneration and renewal at Marley Potts and Carley Hill; 2. <u>a</u> Housing Growth Areas at North Hylton and Fulwell (Policy SS4) are <u>is</u> allocated to ensure there is land for the future growth of North Sunderland; and 3. economic development will be focussed on identified Employment Areas (Policies EG1 and EG2). <p>4.51 In order to support the sustainable growth of this sustainable location area, the Council have <u>has</u> identified two <u>a</u> Housing Growth Areas <u>at Fulwell</u> in North Sunderland. (p.43)</p> <p><u>New Paragraph (after 4.51) to be added preceding Policy SS4 (p.43):</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>Exceptional circumstances in North Sunderland</u></p> <p><u>In seeking to meet the city's agreed housing need over the Plan Period, the council has demonstrated that all sustainable non-Green Belt site alternatives have been fully considered and exhausted (including full consideration of site densities).</u></p> <p><u>Because of the configuration of the Green Belt principally to the north of the city, there is a spatial imbalance in the housing land supply, with a lack of housing sites in Washington and North Sunderland, and over-reliance of sites to the south of the city.</u></p> <p><u>The council has identified the following site to be deleted from the Green Belt to provide a Housing Growth Area:</u></p> <p><u>HGA8 Fulwell</u></p> <p><u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable (subject to the sports pitches being proven to be surplus to requirements – site was last used for this purpose in 2015) and provides an urban extension along the A1018, with the creation of a new durable Green Belt boundary to the west and north.</u></p>
MM8	43-45	Policy SS4	<p>SS4 North Sunderland housing growth areas (p.43)</p> <p>Development of the North Sunderland Housing Growth Areas should:</p> <ol style="list-style-type: none"> 1. provide a mix of housing types with a focus on <u>larger detached dwellings</u> family homes; 2. address impacts and make provision or contributions towards education provision and healthcare <u>where justified and necessary</u>; 3. enhance access to local facilities and services, <u>where appropriate</u>, and...

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>Remove Figure 24 North Hylton</u> (p.44) (see Appendix 1)</p> <p><u>Delete Policy SS4: HGA7</u> (p.44)</p> <p>HGA7 North Hylton should:</p> <ul style="list-style-type: none"> i. deliver approximately 110 new homes; ii. create a new defensible Green Belt boundary to the west, south and east of the site; iii. limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the area landscape character through sensitive design and boundary treatment; iv. create buffer zones to support wildlife and to address noise implications from the A19 and A1231 directly bordering the western and northern edges of the site; v. retain all healthy trees and hedgerows and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality; vi. ensure that a Habitats Regulations Assessment is undertaken and appropriate mitigation provided; vii. mitigate the impacts of the natural swale to the west of the site and associated surface water flooding, and provide easements for public sewers as necessary; viii. be of high architectural quality to protect long distance views throughout the development towards Penshaw Monument and along the River Wear corridor; ix. provide pedestrian/cycleway connections from the site to (and along) Ferryboat Lane as well as links into existing public rights of way to the south of the site; and <p>include vehicle access from Ferryboat Lane and include necessary mitigation works to A1231.</p> <p>Policy SS4: HGA8 (p.44)</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>vii. be of high architectural quality and designed to respect the local vernacular and to key views, including the setting of the WW1 Acoustic Mirror Scheduled Ancient Monument and <u>Grade II Listed Buildings</u>, <u>Grade II* Listed Fulwell Mill</u> and <u>Grade II Listed Lime Kilns</u>;</p> <p>An additional passage also to be added to the end of the policy:</p> <p><u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement in accordance with Sport England's playing field policy exception E1 or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u></p>
MM9	45	Policy SP5	<u>Replace Figure 26 Key diagram South Sunderland (p.45) (see Appendix 1)</u>
MM10	46-47	Policy SS6	<p>SS6 South Sunderland Growth Area (p.46):</p> <p>Sites within SSGA include Chapelgarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope. These sites are allocated to create a new high quality, vibrant and distinctive neighbourhood.</p> <p>Development should deliver:</p> <ol style="list-style-type: none"> 1. approximately 3000 new homes <u>to be broadly distributed across the four sites as follows:</u> <ol style="list-style-type: none"> i. <u>Chapelgarth – approximately 750 homes;</u> ii. <u>Land North of Burdon Lane – approximately 1,000 homes;</u> iii. <u>Cherry Knowle – approximately 800 homes; and</u> iv. <u>South Ryhope – approximately 450 homes;</u> 2. 10% affordable housing; 3. a new primary school and extensions to two existing schools; 4. 3. a local neighbourhood centre within Land North of Burdon Lane to provide a focal point within the SSGA and complement nearby existing centres which will comprise: <ol style="list-style-type: none"> i. a range of appropriate uses from the following use classes: A1, A3, A4, D1 and D2;

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p> <u>ii. a new 1.5 form entry primary school which will also serve as a community hub;</u> <u>iii. wheeled Sports Area;</u> <u>iv. formal play space;</u> <u>v. Multi Use Games Area;</u> <u>vi. 3G pitch;</u> <u>vii. appropriate parking facilities and served by bus service;</u> 5. community/cultural facilities <u>4. extensions to two existing primary schools in close proximity to SSGA;</u> 6. 5. large expanses of public open space; 7. 6. woodlands allotments, provided on-site or off-site via a financial contribution; <u>7. suitable ecological mitigation in line with HRA requirements;</u> <u>8. cycleways and footpaths; and</u> <u>9. new and improved public transport services and infrastructure; and the completion of the Ryhope-Doxford Link Road</u> <u>10. contributions to support the completion of the Ryhope-Doxford Link Road by either direct delivery as part of development or via a financial contribution.</u> </p> <p><u>All development should be in accordance with the SSGA SPD.</u></p> <p>4.61 Development will also protect and enhance existing heritage assets in the area and provide a network of connected greenspaces <u>(depending on the form that the Suitable Alternative Natural Greenspace (SANG) takes, it may be possible for part of this to also be used for public open space).</u> This new sustainable neighbourhood will provide for a mix of housing sizes, types and tenures, including affordable housing. The site is allocated for 3,000 homes but it is expected that approximately 2,285 <u>2,305</u> will be delivered in the Plan period. (p.47)</p>
MM11	48	Policy SP6	<p><u>Replace Figure 29 Key diagram The Coalfield (p.48) (see Appendix 1)</u></p> <p>SP6 The Coalfield (p.48):</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>The Coalfield character and settlements will be protected whilst ensuring its future sustainability. In order to achieve this:</p> <ol style="list-style-type: none"> 1. the Open Countryside and Settlement Breaks will be protected from inappropriate development; <p><u>New Paragraph (after 4.67) to be added preceding Policy SS7 (p.50):</u></p> <p><u>Exceptional circumstances in the Coalfield</u></p> <p><u>In seeking to meet the city's agreed housing need over the Plan Period, the council has demonstrated that all sustainable non-Green Belt site alternatives have been fully considered and exhausted (including full consideration of site densities).</u></p> <p><u>Because of the configuration of the Green Belt principally to the north-east of the Coalfield area, there is a spatial imbalance in the housing land supply in this area, with a concentration of sites to the south and west of this area.</u></p> <p><u>The Council has identified the following sites in the northern part of the Coalfield to be deleted from the Green Belt to provide Housing Growth Areas:</u></p> <p><u>HGA9 Penshaw</u></p> <p><u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and provides an urban extension along the A183, with the creation of a new durable Green Belt boundary to the north and east.</u></p> <p><u>HGA10 New Herrington</u></p> <p><u>The site demonstrates minor impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and represents a logical</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>rounding-off of the urban area, with the creation of a new durable Green Belt boundary to the south.</u></p> <p><u>HGA11 Philadelphia</u> <u>The site demonstrates moderate impact on Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and provides a logical extension to the existing Philadelphia Complex regeneration site, supported by the creation of a new durable Green Belt boundary to the north and east.</u></p>
MM12	49	Policy SS7	<p>SS7 The Coalfield housing growth areas (p.48)</p> <p>Development of The Coalfield Housing Growth Areas should:</p> <ol style="list-style-type: none"> 1. provide a mix of housing types with a focus on <u>larger detached dwellings</u> family homes; 2. address impacts and make provision or contributions towards education provision and healthcare <u>where justified and necessary</u>; 3. enhance access to local facilities and services, <u>where appropriate</u>, and... <p><u>Replace Figure 30 Penshaw</u> (p.49) (see Appendix 1)</p> <p>Policy SS7: HGA9 (p.49):</p> <p>HGA9 Penshaw should:</p> <ol style="list-style-type: none"> iii. provide sensitive design to minimise the impact on the wildlife and GI corridors to the north and east, providing an <u>appropriate</u> buffer to Herrington Burn and protected species in particular;

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>vi. retain all healthy trees and hedgerows <u>where possible</u> and <u>incorporate provide large areas of</u> greenspace through the <u>site for amenity purposes/minimise impact on priority species and protected habitat in the locality</u> centre of the site and in the south west corner, utilising the pylon buffer zone;</p> <p>vii. provide ecological improvements to support wildlife in these areas;</p> <p><u>vii</u> viii mitigate any surface water flooding impacts and incorporate appropriate water attenuation in relation to flood zones associated with Herrington Burn <u>and avoid development in Flood Zones 2 and 3;</u></p> <p><u>ix. x.</u> provide vehicular access via Chislehurst Road, <u>and provide junction improvements in the locality where justified and necessary.</u> Access from Chester Road will not be permitted. Various vehicular junctions in the vicinity of the site should be assessed, including Wensleydale Avenue, A183/Washington Highway and the A183/A19 junction.</p> <p>Policy SS7: HGA10 (pp49-50):</p> <p>HGA10 New Herrington should:</p> <p>i. deliver approximately <u>320</u> new homes;</p> <p>iii. incorporate the <u>provide</u> creation of a new club building and car park <u>within the locality</u> that would serve the community;</p> <p>iv. provide greenspace improvements to the adjacent park, as well as including changing facilities within the community building to support sports uses. The location of the new building and car park should be located appropriately to serve all uses;</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>vi. retain all healthy trees and hedgerows <u>where possible</u> and protect trees with Tree Preservation Orders (TPO's);</p> <p>Policy SS7: HGA11 (p.50):</p> <p>HGA11 Philadelphia should:</p> <p>iii. provide sensitive design that relates to the development of the Philadelphia Complex by providing a buffer to the west between the residential development and the proposed commercial development and incorporates design that relates to the area's historic past <u>including Listed Buildings in the locality and protecting long distance views southwards towards Newbottle Village Conservation Area;</u></p> <p>iv. be of high architectural quality to protect long distance views to the southern edge of the development from the south;</p> <p><u>iv.</u> v. provide greenspace on the northern edge of the site to provide a gas main easement and to mitigate the impacts of a natural swale and associated surface water flooding;</p> <p><u>v.</u> vi. provide greenspace buffers to the south and east of the site in order to support the adjacent wildlife and green infrastructure corridor and limit any impact on the areas landscape character;</p> <p><u>vi.</u> vii. protect the Local Wildlife Site located on the north eastern edge of the site and minimise impact on priority species and habitat in the locality;</p> <p><u>vii.</u> viii. provide pedestrian and cycle links through the site and along the southern and eastern boundaries to link to neighbouring residential areas and nearby parkland; <u>and</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>viii. ix. include vehicle access from the Philadelphia Complex redevelopment; and <u>provide junction improvements in the locality where justified and necessary.</u></p> <p>x. provide junction improvements if necessary to Coaley Lane/Houghton Road, A182/Front Street and A182/B1286 junctions.</p>
MM13	54	Policy HS1	<p>HS1 Quality of life and amenity (p.54):</p> <p>2. Development must ensure that the cumulative impact would not result in significant <u>unacceptable</u> adverse impacts on the local community...</p> <p>5.6 Where a site is affected by land stability issues <u>(including mineral legacy issues as set out in Policy M3)</u>, the responsibility for securing a safe development rests with the developer and/or landowner. Affected development must incorporate remediation and management measures. Cumulative impacts should also be considered. <u>Any new developments will be expected to follow the "agent of change" principles (i.e. person or business responsible for the change must also be responsible for managing the impact of the change).</u></p>
MM14	57	Policy SP8	<p><u>Replace Figure 33 Potential housing supply (p.57) (see Appendix 1)</u></p> <p>SP8 Housing supply and delivery (p.57):</p> <p>The Council will work with partners and landowners to seek to exceed the minimum target of 745 <u>net</u> additional dwellings per year...</p> <p>6.5 To ensure that the council maintains a continuous five-year supply of deliverable housing sites, this Plan requires a minimum of 745 new dwellings per year. <u>In terms of the five-year land supply a 5% buffer has been applied to the housing requirement once any over/undersupply has been accounted for. The application of the buffer assists to bring forward housing from later in the plan period where necessary and to increase choice in the market for housing. Should there be a record of persistent (over previous three years) under delivery of</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>housing, this buffer will be increased to 20%.</u> This Plan will be reviewed by 2024 and, where appropriate, will reassess the strategy. (p.58)</p> <p>6.6 The expected delivery rates are expressed as a trajectory for the Plan period. The red line is a minimum target. As shown in the trajectory, current commitments (planning permissions and sites under construction) play an important role in boosting supply initially until the strategic allocations in this Plan (Strategic Site and Housing Growth Areas) come forward, <u>a- As do completions since the start of the Plan period which have exceeded the minimum target. A small sites allowance has also been included based on evidence of past delivery over a 10-year period.</u></p> <p><u>Insert table following Paragraph 6.7</u> (p.58):</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change																																								
			<table><tr><th>Source</th><th colspan="2">Dwelling numbers</th></tr><tr><td></td><th>2015/16-2018/19</th><th>2019/20-2032/33</th></tr><tr><td>Completions</td><td>3,180</td><td></td></tr><tr><td>Units under construction</td><td></td><td>1,335</td></tr><tr><td>Outline planning permission</td><td></td><td>824</td></tr><tr><td>Full planning permission</td><td></td><td>1,040</td></tr><tr><td>Small sites</td><td></td><td>700</td></tr><tr><td>Demolitions</td><td></td><td>-210</td></tr><tr><td>Strategic sites to be allocated in the Local Plan (The Vaux and SSGA)</td><td></td><td>2,506</td></tr><tr><td>Housing Growth Areas to be allocated in the Local Plan</td><td></td><td>930</td></tr><tr><td>Other SHLAA sites to be allocated in the Allocations and Designations Plan</td><td></td><td>3,924</td></tr><tr><td>Dwellings</td><td>3,180</td><td>11,049</td></tr><tr><td>Total dwellings</td><td colspan="2">14,229</td></tr></table>	Source	Dwelling numbers			2015/16-2018/19	2019/20-2032/33	Completions	3,180		Units under construction		1,335	Outline planning permission		824	Full planning permission		1,040	Small sites		700	Demolitions		-210	Strategic sites to be allocated in the Local Plan (The Vaux and SSGA)		2,506	Housing Growth Areas to be allocated in the Local Plan		930	Other SHLAA sites to be allocated in the Allocations and Designations Plan		3,924	Dwellings	3,180	11,049	Total dwellings	14,229		<p>New Figure 34: Housing Supply Breakdown</p> <p><u>6.8 (New paragraph) Further details will be set out within the Council's Housing Implementation Strategy (HIS), which sets out the council's approach to facilitating and managing delivery of new housing to ensure a continuous five-year land supply is maintained and the overall OAN are met. (p.58)</u></p> <p>Replace Figure 34 Housing trajectory (p.58) (see Appendix 1)</p>
Source	Dwelling numbers																																										
	2015/16-2018/19	2019/20-2032/33																																									
Completions	3,180																																										
Units under construction		1,335																																									
Outline planning permission		824																																									
Full planning permission		1,040																																									
Small sites		700																																									
Demolitions		-210																																									
Strategic sites to be allocated in the Local Plan (The Vaux and SSGA)		2,506																																									
Housing Growth Areas to be allocated in the Local Plan		930																																									
Other SHLAA sites to be allocated in the Allocations and Designations Plan		3,924																																									
Dwellings	3,180	11,049																																									
Total dwellings	14,229																																										
MM15	59	Policy H1	<p>H1 Housing Mix (p.59):</p> <p>iii. achieving an appropriate density for its location which takes into account the character of the area <u>and the level of accessibility</u>; and...</p>																																								

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>iv. <u>from 1 April 2021</u>, requiring 10% of dwellings on developments of 10 or more to meet building regulations M4 (2) Category 2 – accessible and adaptable dwellings.</p> <p><u>Insert additional text and new paragraphs following 6.11:</u></p> <p>6.12 Policy H1 seeks to ensure that new housing supply meets the needs of an ageing population, in recognition that almost a quarter of the Sunderland's population is forecast to be aged 65 or over by the end of the Plan period. The SHMA recognises a significant preference for people to stay in their own home and homes that are designed from the outset to be flexible and accessible to avoid the need for 'special' adaptations which are often costly to install and remove for future occupiers. As such, the Council will require developers to ensure at least 10% of dwellings on sites of 10 or more, meet building regulations M4 (2) Category 2 – accessible and adaptable dwellings. However, low-rise non-lifted serviced flats will be excluded due to not being able to achieve step-free access. In order to ensure choice in the housing stock for the city's ageing population developments should consider alternative designs and layouts to provide for those older people who may want to stay within their own home. <u>The council does recognise that in some instances, it may not be possible to deliver the accessible and adaptable dwellings requirement in full. In this instance the applicant will be expected to submit a detailed viability assessment in line with the requirements of the PPG to clearly demonstrate how the requirement set out within Policy H1 (iv) would make the scheme unviable.</u></p> <p><u>6.13 In order to allow for an appropriate transitional period, the standard relating to accessible and adaptable dwellings will only be applied to outline or full applications approved after 1 April 2021. It will not be applied retrospectively to those applications for reserved matters where the outline permission was determined or is subject to a resolution to grant permission (including subject to planning obligations) before 1 April 2021.</u></p> <p><u>6.14 In order to ensure choice in the housing stock for the city's ageing population, developments should consider alternative designs and layouts to provide for those older people who may want to stay in their own home and take on board appropriate evidence to ensure</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<u>suitable accommodation for older people and those with special housing needs is provided, where a need is demonstrated, particularly in highly accessible locations. (p.59)</u>
MM16	60	Policy H2	<p>H2 Affordable Homes (p.60):</p> <p>All developments of more than 10 dwellings <u>or more</u>, or on sites of 0.5ha or more, should provide at least 15% affordable housing. This affordable housing should:</p> <ol style="list-style-type: none"> 1. be provided on-site in order to help achieve mixed and balanced communities. However, <u>exceptionally</u>, off-site provision or a financial contribution made in lieu may be considered acceptable where it can be justified; 2. be retained in affordable use in perpetuity; 3. when part of a mixed housing scheme should be grouped in small clusters throughout the site; and 4. be indistinguishable in terms of appearance from the market housing-; <u>and</u> 5. <u>reflect the latest available evidence with regards the tenure split and size of dwellings.</u> <p><u>A viability assessment should be submitted in line with the requirements of the PPG where it is not proposed to deliver the affordable housing requirement in full.</u></p> <p>6.15.....The Council's strategy is to maximise affordable housing delivery from viable sites over the Plan period alongside exploring other opportunities to maximise the delivery of affordable housing. <u>Should a need be identified for a rural exception site, consideration will be given to Policy NE8 of this plan and national policy.</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>6.16 Policy H2 sets out the Council's approach for the delivery of affordable housing when developments propose more than 10 dwellings. <u>Policy SS6 sets out the affordable housing requirements for the South Sunderland Growth Area (SSGA).</u></p> <p>6.18.....The SHMA will be updated regularly and applicants need to take this into consideration <u>consider this as the starting point with regards to tenure split and to an appropriate affordable housing mix. Other evidence, where appropriate will be considered to ensure the right tenure split and mix is delivered on sites.</u></p> <p>6.21 In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters <u>of a size proportionate to the scale of the development (3 or 4 dwellings per cluster).</u> (p.60)</p>
MM17	61-62	Policy H4	<p>H4 Travelling showpeople, gypsies and travellers (p.61):</p> <p>1. The needs of Travelling Showpeople will be met by:</p> <p>i. allocating land for new Travelling Showpeople sites at Station Road North, and Land at Market Place Industrial Estate, to accommodate 15 plots in the short term. <u>Development of allocated Travelling Showpeople Sites should:</u></p> <p><u>Station Road North</u></p> <ul style="list-style-type: none"> • <u>accommodate at least 3 plots;</u> • <u>provide a suitable vehicular access to the site from the industrial estate to the south</u> • <u>be laid out as such to avoid living accommodation on the land to the northern part of the site.</u> • <u>utilise the northern part of the site for storage.</u> • <u>provide adequate screening to the existing allotments to the west of the site.</u> • <u>not impact upon the pedestrian footpath to the north and east of the site</u>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>Market Place Industrial Estate</u></p> <ul style="list-style-type: none"> • <u>accommodate at least 12 plots</u> • <u>provide a suitable vehicular access to the site from Gravel Walks</u> • <u>give consideration to additional vehicle access from Balfour Street for cars only.</u> • <u>provide adequate screening to the east of the site to protect the amenities of residents living on the site</u> • <u>provide an adequate screening/buffer to the south of the site adjoining Gravel Walks, to reduce any noise impact on existing residents of Gravel Walks/Lake Road.</u> • <u>provide adequate screening of the site to protect the amenities of residents living on the site.</u> • <u>ensure that fairground equipment is stored and maintained to the eastern most part of the site to avoid any noise impact on residential properties to the west and south of the site; and</u> • <u>give consideration to the location of fairground equipment within individual plots, in order to protect the amenity of both residents living on the site and residents in nearby residential properties.</u> <p><u>In order to ensure adequate provision is made for Travelling Showpeople within the City the council has allocated two sites within the Coalfield sub-area. Site criteria is in place to ensure a suitable form of development can be provided and any impacts on the amenity of existing and proposed residents are mitigated.</u></p> <p><u>Insert two maps (p.62) (see Appendix 1)</u></p>
MM18	63	Policy H6	<p>H6 Homes in multiple occupation (HMOs) (p.63):</p> <p>4. adequate provision for parking, servicing, refuse, recycling arrangements and the management and maintenance of the property can be demonstrated through the submission of a management plan; and</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>5. the proposal would not result in an over concentration of HMOs within the locality-; <u>and</u></p> <p>6. <u>the accommodation provides a good standard of living space and amenity for occupiers of the HMO.</u></p>
MM19	65	7. Economic growth	<p><u>New Paragraph to be added following para 7.3 (p.65):</u></p> <p><u>7.4 Primary Employment Areas and Key Employment Areas make up the city's designated general employment land portfolio. Totalling 1,073 hectares (rounded), these designated employment sites play an important role in meeting economic growth and employment needs. Overall, 30 sites have been designated as either Primary Employment Areas (13 sites) or Key Employment Areas (17 sites). As of 31 March 2019, there is an estimated 84.07 hectares of general available employment land (*footnote). Completions between the start of the Plan period to the 31 March 2019 totalled 13.42 hectares (p.66). Table 7 identifies components of supply. Tables 8 and 9 below set out designated employment sites by overall size and available employment land on each of the 30 designated allocations.</u></p> <p>7.4 <u>7.5</u> Some small-scale ancillary uses will be supported in Primary Employment Areas where this meets the day to day needs of workers on the employment sites.</p> <p>Three tables are proposed to be inserted to illustrate designated employment sites and available employment land (p.65) (see Appendix 1)</p> <p>Policy EG2 Key employment areas (p.66)</p> <p>2. i. the council's current Employment Land Review recommends its release for another purpose, or it can be demonstrated <u>through alternative evidence</u> to the council's satisfaction that a site is no longer needed or capable of accommodating B use class employment uses;</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<u>*Footnote – Please note that general available employment land is made up of the following components, available employment land on Primary Employment Areas and Key Employment Areas plus known commitments at the Port and elsewhere (other sources).</u>
MM20	72	Policy VC3	<p>VC3 Primary shopping areas and frontages (p.72):</p> <p>3. Non-A1 uses in Primary Frontages will only be considered acceptable where it can be demonstrated that premises have been vacant and marketed unsuccessfully for A1 uses for a period of least 24 months.</p> <p>4. Where proposals for non-A1 use within primary shopping areas cannot demonstrate that they have satisfied the above, they will be normally be resisted if they would result in:</p> <p>i. more than 15% of each Primary Frontage thoroughfare in Sunderland City Centre being in non-A1 retail use; or</p> <p>ii. more than 25% of each Primary Frontage thoroughfare in Washington Town Centre being in non-A1 retail use; or</p> <p>iii. more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use.</p> <p><u>3. Proposals for non-A1 use within primary shopping areas will normally be resisted if they would result in:</u></p> <p><u>i. more than 15% of each Primary Frontage thoroughfare in Sunderland City Centre being in non-A1 retail use; or</u></p> <p><u>ii. more than 25% of each Primary Frontage thoroughfare in Washington Town Centre being in non-A1 retail use; or</u></p> <p><u>iii. more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use.</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>4. <u>Where proposals for non-A1 use within Primary Frontages will exceed the above thresholds, they will only be considered acceptable where it can be demonstrated that the premises have been vacant and marketed unsuccessfully for A1 uses for a period of least 24 months.</u></p>
MM21	77	Policy BH1	<p>BH1 Design quality (p.77):</p> <p>8. provide appropriate landscaping as an integral part of the development, including, where appropriate and viable, retaining landscape features and reflecting surrounding landscape character, and where appropriate and viable, the enhancement and upgrading of public realm and existing green infrastructure, retaining landscape features and reflecting surrounding landscape character;</p> <p>10. not detract from <u>avoid, where possible, disruption to</u> established views of important buildings, structures and landscape features;</p> <p>13. maximise <u>encourage</u> durability and adaptability throughout the lifetime of the development to accommodate a range of uses; and</p> <p>14. <u>From 1 April 2021,</u> meet national spaces standards as a minimum (for residential).</p> <p>New Paragraph to be added following 9.4:</p> <p><u>9.5 In order to allow for an appropriate transitional period, the standard relating to Nationally Described Space Standards will only be applied to outline or full applications approved after 1 April 2021. It will not be applied retrospectively to those applications for reserved matters where the outline permission was determined or is subject to a resolution to grant permission (including subject to planning obligations) before 1 April 2021. (p.78)</u></p> <p>9.56 Masterplans or development frameworks should be prepared for large scale development, in particular those which will be phased. <u>For clarity, large-scale development within the context of this policy is considered to be that which exceeds 250 dwellings for residential development</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>or 5 hectares for non-residential development. This will ensure that development creates high quality sustainable places based on sound urban design principles. Design codes should also be prepared for large-scale, phased development and accompany outline planning applications. The code should set out mandatory and non-mandatory aspects of design and include regulatory plans. The need for design codes should be identified at the pre-application stage of development. Development should take into consideration SPDs on design and which will be a material consideration in the determination of planning applications for relevant proposals. (p.78)</p>
MM22	78	Policy BH2	<p>BH2 Sustainable design and construction (p.78):</p> <p>Sustainable design and construction should be integral to development. Where possible, major development <u>(as defined in the 2019 Framework)</u> should...</p> <p>4. provide details of the type, life cycle and source of materials to be used <u>at the appropriate stage of development</u>;</p> <p>9.7 In order to ensure that the energy efficiency of properties is maximised, <u>where appropriate</u>, the layout of... (p.78)</p>
MM23	82	Policy BH8	<p>BH8 Heritage assets (p.82):</p> <p>1. Development affecting heritage assets (both designated and non-designated) or their settings should recognise and respond to their significance and demonstrate how they conserve and enhance the significance and character of the asset(s), including <u>any contribution made by</u> its setting where appropriate...</p> <p>8. Development affecting non-designated heritage assets should conserve heritage assets <u>take account of their significance</u>, their features and setting, and make a positive contribution to local character and distinctiveness.</p>
MM24	83	Policy BH9	<p>BH9 Archaeology and recording of heritage assets (p.83):</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			1. Development which adversely affects the archaeological interest or setting of a Scheduled Ancient Monument (<u>or non-designated heritage asset of equivalent significance</u>) will be refused planning permission unless wholly exceptional circumstances exist that satisfy the requirements of the NPPF.
MM25	85	Policy NE1	<p>NE1 Green <u>and Blue</u> Infrastructure (p.85):</p> <p>1. To maintain and improve the Green Infrastructure Network through enhancing, creating and managing multifunctional greenspaces and bluespaces that are well connected to each other and the wider countryside, development should:</p> <ul style="list-style-type: none"> i. incorporate existing and/or new green infrastructure features within their design and to improve accessibility to the surrounding area; ii. address corridor gaps and areas of corridor weakness where feasible; iii. support the management of existing wildlife corridors, including reconnecting vulnerable and priority habitats (see policy NE2); iv. apply climate change mitigation and adaptation measures, including flood risk and watercourse management; v. link walking and cycling routes to and through the corridors, where appropriate; vi. include and/or enhance formal and natural greenspace and bluespace provision; vii. protect and enhance landscape character; and viii. have regard to the requirements of the Green Infrastructure Delivery Plan and make contributions proportionate to their scale towards the establishment, enhancement and on-going management; <u>and</u> ix. <u>protect, enhance and restore watercourses, ponds, lakes and water dependent habitats.</u> <p>2. Development that would sever or significantly reduce green infrastructure will not normally be permitted unless the need for and benefits of the development demonstrably outweigh any adverse impacts and suitable mitigation and/or compensation is provided.</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			10.4 Six inter-district green infrastructure corridors within the city have been identified (as shown by Figure 40). These corridors will build on the existing network linking the city to the wider region and seek to broaden the range and quality of functions that green infrastructure can bring to Sunderland. The district corridor network within Sunderland will also be protected and enhanced. This network is also shown <u>indicatively</u> on Figure 40. (p.86)
MM26	86-87	Policy NE2	<p>NE2 Biodiversity and Geodiversity (p.86):</p> <ol style="list-style-type: none"> 1. Biodiversity and geodiversity will be protected, created, enhanced and managed by requiring development to <u>Where appropriate, development must</u> demonstrate how it will: <ol style="list-style-type: none"> i. provide net gains in biodiversity; and ii. avoid (through locating on an alternative site with less harmful impacts) or minimise adverse impacts on biodiversity and geodiversity in accordance with the mitigation hierarchy. 2. proposals <u>Development</u> that <u>would</u> have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are: <ol style="list-style-type: none"> i. no suitable alternatives; ii. imperative reasons of overriding public interest; iii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and iv. development will only be permitted where the council is satisfied that any necessary mitigation is included such that, in combination with other development, there will be no significant effects on the integrity of European Nature Conservation Sites.

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>3. <u>Development</u> that would adversely affect a Site of Special Scientific Interest, either directly or indirectly, will be required to demonstrate that <u>the reasons for the development, including the lack of an alternative solution, clearly outweigh the nature conservation value of the site and the national policy to safeguard the national network of such sites.</u>⁺</p> <p>i. There are no reasonable alternatives; and</p> <p>ii. The case for development clearly outweighs the nature conservation value of the site.</p> <p>4. <u>Development</u> that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that:</p> <p>i. there are no reasonable alternatives; and</p> <p>ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site.⁺</p> <p>5. <u>Development</u> that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:</p> <p>i. that there are no reasonable alternatives; and</p> <p>ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site.⁺</p> <p>6. proposals <u>Development</u> that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor.</p> <p>10.9 Any proposal that is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will need to undertake a Habitats Regulations Assessment (<u>HRA</u>). If necessary, developer contributions or conditions will be secured to implement measures to ensure avoidance or mitigation of adverse effects. Where necessary,</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>planning obligations will be secured to implement avoidance and mitigation measures for strategic site HGA8. Mitigation measures will include a combination of Strategic Access Management and Monitoring (SAMM) and the provision of Suitable Alternative Natural Greenspace (SANG). Proposals for development or land use that would adversely affect a European Site, either individually or in combination with other plans or projects, will only be permitted where the developer can demonstrate that there are imperative reasons of overriding public interest, including those of a social or economic nature, and there is no alternative solution. Compensatory measures will be secured to ensure that the overall coherence of the network of European sites is maintained. Where a SANG is proposed as mitigation for HRA impacts, depending on the use and form that the SANG takes it may be possible for this to also be utilised as useable greenspace providing the uses are compatible. (p.87)</u></p> <p>10.10 It is expected that in the majority of cases, habitats and species of principal importance will have already been identified on a site-specific basis and are protected through national and local designations - however, species will not always be confined to a designated site boundary. <u>Sites of Special Scientific Interest (SSSIs) are of national significance and receive statutory protection. Local Wildlife Sites (LWSs) are of regional or sub regional importance and are designated by a Local Wildlife Sites Partnership. They are non-statutory and rely on the planning system for their protection. Local Nature Reserves (LNRs) are designated by the council and receive statutory protection. (p.87)</u></p> <p>10.14 Wildlife corridors are strategic networks which transcend administrative boundaries and are instrumental in the movement of species within and beyond Sunderland. Wildlife corridors will be protected from intrusive developments, including certain recreational uses, <u>though development that demonstrates significant enhancement and net gain may be considered appropriate.</u> The nature conservation value of wildlife corridors should be maintained and enhanced as part of any planning approval. (p.87)</p>
MM27	88	Policy NE3	<p>NE3 Woodlands/hedgerows and trees (p.88):</p> <p>To conserve significant trees, woodlands and hedgerows, development should:</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p>1. only be permitted where it can clearly demonstrate that development cannot reasonably be located elsewhere;</p> <p><u>21.</u> follow the principles below to guide the design of development where effects to ancient woodland, veteran/aged trees and their immediate surroundings have been identified:</p> <ul style="list-style-type: none"> i. avoid harm; ii. provide unequivocal evidence of need and benefits of proposed development; iii. provide biodiversity net gain; iv. establish likelihood and type of any impacts; v. implement appropriate and adequate mitigation and compensation; vi. provide adequate buffers; and vii. provide adequate evidence to support proposals; <p>32. retain, protect and improve woodland, trees subject to Tree Preservation Orders (TPOs), trees within Conservation Areas, and 'important' hedgerows as defined by the Hedgerows Regulations 1997;</p> <p>43. give consideration to trees and hedgerows both on individual merit as well as their contribution to amenity and interaction as part of a group within the broader landscape setting; and</p> <p>54. ensure that where trees, woodlands and hedgerows are impacted negatively by proposed development, justification, mitigation, compensation and maintenance measures are provided in a detailed management plan.</p>
MM28	88-89	Policy NE4	<p>NE4 Greenspace (p.88-89):</p> <p>3. requiring all major residential development to provide:</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			i. a minimum of 0.9ha per 1000 bedspaces of amenity <u>useable</u> greenspace on site, unless...
MM29	90	Policy NE6	NE6 Green Belt <u>belt</u> (p.90-91): 3. Development in the Green Belt may <u>will</u> be permitted where the proposals are consistent with the exception list in national policy subject to all other criteria being acceptable.
MM30	91	Policy NE7	<u>Replace Figure 41 Settlement Breaks</u> (p.91) (see Appendix 1) Add additional paragraph after 10.36 10.37 <u>For clarity, essential development within the context of Policy NE7 is considered to be development which is required to be located within the Settlement Break and could not reasonably be located within another less sensitive location. It may include the types of development referred to in Policy NE8 provided the purposes of the Settlement Break are not unacceptably affected. Each proposal will be assessed on its individual merits.</u> (p.91)
MM31	92	Policy NE8	NE8 Development in the open countryside (p.91-92): 7iii. 8. With regards residential, the creation <u>and extension</u> of a residential curtilage, <u>provided that it will not have a harmful impact on the character of the countryside.</u> <u>9. limited infilling...</u> <u>10. the redevelopment of previously developed land, provided that the site is not of high environmental value or landscape quality, and if the development will contribute to local housing needs or provide new jobs.</u> <u>Replace Figure 42 Open countryside</u> (p.92) (see Appendix 1)
MM32	93	Policy NE9	10.43 National policy provides strong support towards protecting and enhancing valued landscapes. It recognises the intrinsic character and beauty of the countryside as a core planning principle. <u>Valued landscapes in Sunderland equate to those areas highlighted in the city's Landscape Character Assessment (LCA) for 'landscape protection' only, which are also</u>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<u>identified as areas of higher landscape value. These are shown on the Map in Appendix 3 as 'Landscape Protection' coloured yellow. (p.93)</u>
MM33	99	Policy WWE5	<p>WWE5 Disposal of foul water (p.99):</p> <p>Insert fourth Policy stem:</p> <p><u>4. Where the development involves the disposal of trade effluent a foul Water Management Plan/drainage assessment will be required to demonstrate how the disposal of foul water is undertaken following the disposal hierarchy. This should include a trade effluent consent if connected to the sewerage system. Trade effluent is any liquid produced in the course of any trade or industry including car washes.</u></p>
MM34	101-102	Policy WWE8	<p>WWE8 Safeguarding waste facilities (p.101):</p> <p>The council will safeguard all existing waste management sites within Sunderland from inappropriate development in order to maintain existing levels of waste management capacity and to aid delivery of the Joint Municipal Waste Strategy, including those sites identified within Table 2, as well as planned future replacement facilities for existing Household Waste Recycling Centres (HWRCs) and commercial facilities required for the management of LACW or other waste streams, unless it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. There is no longer a need for the facility; and 2. Capacity can be met elsewhere; or 3. Appropriate compensatory provision is made in appropriate locations elsewhere in the city; or 4. The site is required to facilitate the strategic objectives of the city. <p><u>Applications for non-waste development in close proximity to existing or proposed waste facilities will not normally be supported where they would adversely impact upon the use of the site for waste management operations.</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			11.43 In addition to the sites listed in Table 2 and those specified in Appendix 10 of the <u>Waste Arisings and Capacity Requirements report (2018)</u> , the following sites are also considered of importance to the management of LACW in Sunderland and for the delivery of the Joint Municipal Waste Strategy...
MM35	105	Policy SP10	<p>SP10 Connectivity and transport network (p.105):</p> <p>iv. Improvements to <u>the mainline and</u> key junctions on the A19, including providing access to the IAMP;</p> <p>12.6 A number of specific new highway schemes and initiatives have been identified to deliver this plan, including:</p> <ul style="list-style-type: none"> the Sunderland Strategic Transport Corridor (SSTC) which will provide a high-quality route between the A19 and the Port, taking in the Urban Core as well as improving accessibility to development sites along the river corridor. Both the initial section of this road (St Mary's Boulevard) and Phase 2 including the Northern Spire Bridge are complete. Further phases to follow include: <ul style="list-style-type: none"> Phase 3 (South Bridgehead to St Michael's Way); and Phase 4 and 5 Commercial Links (Wessington Way and Port Access improvements). <p><u>The delivery of SSTC4 will better manage traffic to and from the A19 and assist in managing potential queuing on the Strategic Road Network (SRN) off slip roads at the Wessington Way junction. The council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties.</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<ul style="list-style-type: none"> the council is proposing a major area of housing growth, known as the SSGA (Policy SS6). The key transport infrastructure requirement needed to support the development of SSGA is the Ryhope-Doxford link road; the Central Route in the Coalfield will link the A182 at Biddick Woods via Sedgeleth and Dubmire south to Rainton Bridge Industrial Estate. The road will support housing and employment regeneration and improve connectivity in the Coalfield. Developer contributions will be sought to fund completion of this road; and key junctions on the A19 at Downhill, Ferryboat Lane and A690 including. The IAMP AAP Infrastructure Delivery Plan contains the road improvements-works that are required to specifically support the IAMP. (p.106) <p>New paragraph following para 12.7:</p> <p><u>12.8 The efficient operation of both the local and SRN (A19 and A194(M)) is vital to support the growth and long-term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN, highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN. (p.106).</u></p>
MM36	111	Policy SP11	<p>SP11 Mineral extraction (p.111):</p> <p>Remove point 2 of the Policy:</p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			2. Where the above cannot be ensured, the benefits of mineral extraction must outweigh any likely harm and significant justification and mitigation must be provided.
MM37	118	Policy ID2	<p>ID2 Planning Obligations (p.118):</p> <p>1. Section 106 planning obligations will be sought to facilitate the delivery of:</p> <ul style="list-style-type: none"> i. affordable housing (see Policy H2); and ii. local improvements to mitigate the direct or cumulative impact of development, <u>where evidenced</u>, and/or additional facilities and requirements made necessary by the development, in accordance with the Planning Obligations SPD. <p>2. To facilitate the delivery of the mitigation measures the council will seek maintenance, management, monitoring and such related fees.</p> <p>3. Where there are site specific viability concerns, development must be accompanied by a Viability Assessment. Where it is not possible to deliver the policy requirements in full, a viability assessment should be submitted in line with the requirements of the PPG.</p>
MM38	118	Monitoring Section, following paragraph 14.16	<p><u>Implementation and Monitoring</u></p> <p><u>14.17 The successful implementation of the Local Plan relies on a coherent, robust and flexible monitoring process which will enable the Council to respond to changing circumstances. The principal mechanism for monitoring the performance of the Local Plan will be through the Authority's Monitoring Report (AMR). The Localism Act 2011 requires Local Authorities to prepare AMRs to assess the implementation of the Local Development Scheme (LDS), and the extent to which policies and proposals set out in local development documents are being successfully implemented.</u></p> <p><u>14.18 The Implementation & Monitoring Framework is set out in the CSDP Monitoring Framework (2018). The Framework is structured according to the composition of the CSDP.</u></p>

Modification Reference	Page Ref (Publication Draft 2018)	Plan Section (in publication draft)	Proposed Change
			<p><u>enabling for easy and direct comparison with the policies, proposals and overall objectives. The implementation of the Local Plan will be monitored through a schedule of Monitoring Indicators on an annual basis. These will provide an accurate indication of the performance of the Local Plan against the objectives and the Local Plan policies. Through the monitoring process, the AMR will identify any issues that need to be rectified.</u></p> <p><u>14.19 There are several key triggers identified throughout the CSDP which would lead to a partial or full review of the Local Plan*. Further set out in the CSDP Monitoring Framework (2018) are specific triggers for each Policy. This approach ensures that appropriate and proportionate triggers and actions can be set for each Policy and Monitoring Indicator due to a failure to meet key targets.</u></p> <p>* Footnote – <u>A plan review refers to any part of the Local Plan i.e. CSDP, IAMP AAP and A&D Plan.</u></p>
MM39	127	New Appendix following Appendix 2	<u>Appendix 3: Areas for Landscape Protection (Valued Landscapes)</u> (see Appendix 1)
MM40	135	New Appendix 8 – Monitoring Framework	<u>Insert Monitoring Framework Table</u> (see Appendix 1)

Appendix 1

Figure 7 Housing Delivery (MM1)

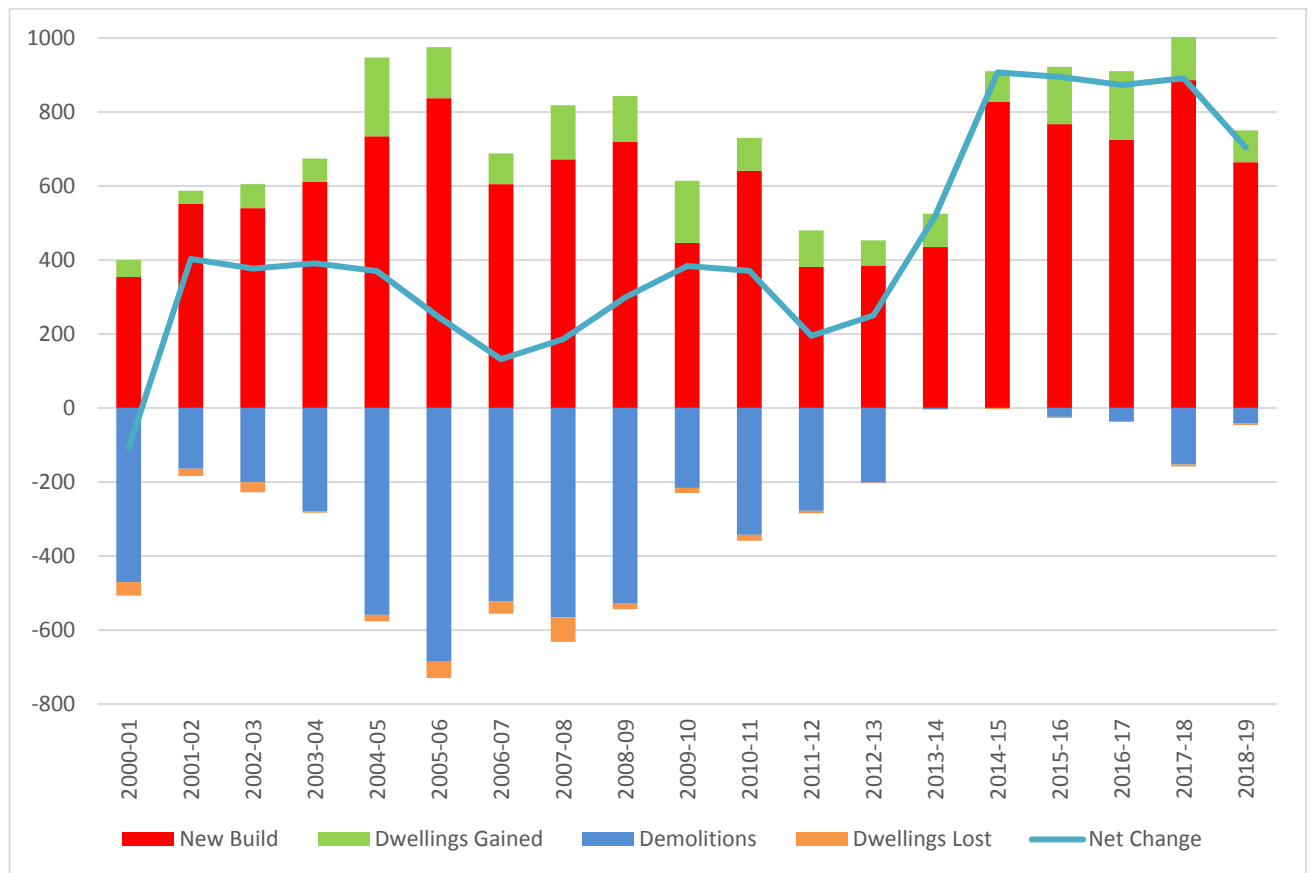


Figure 8 Proportion of housing completions on previously developed land (MM1)

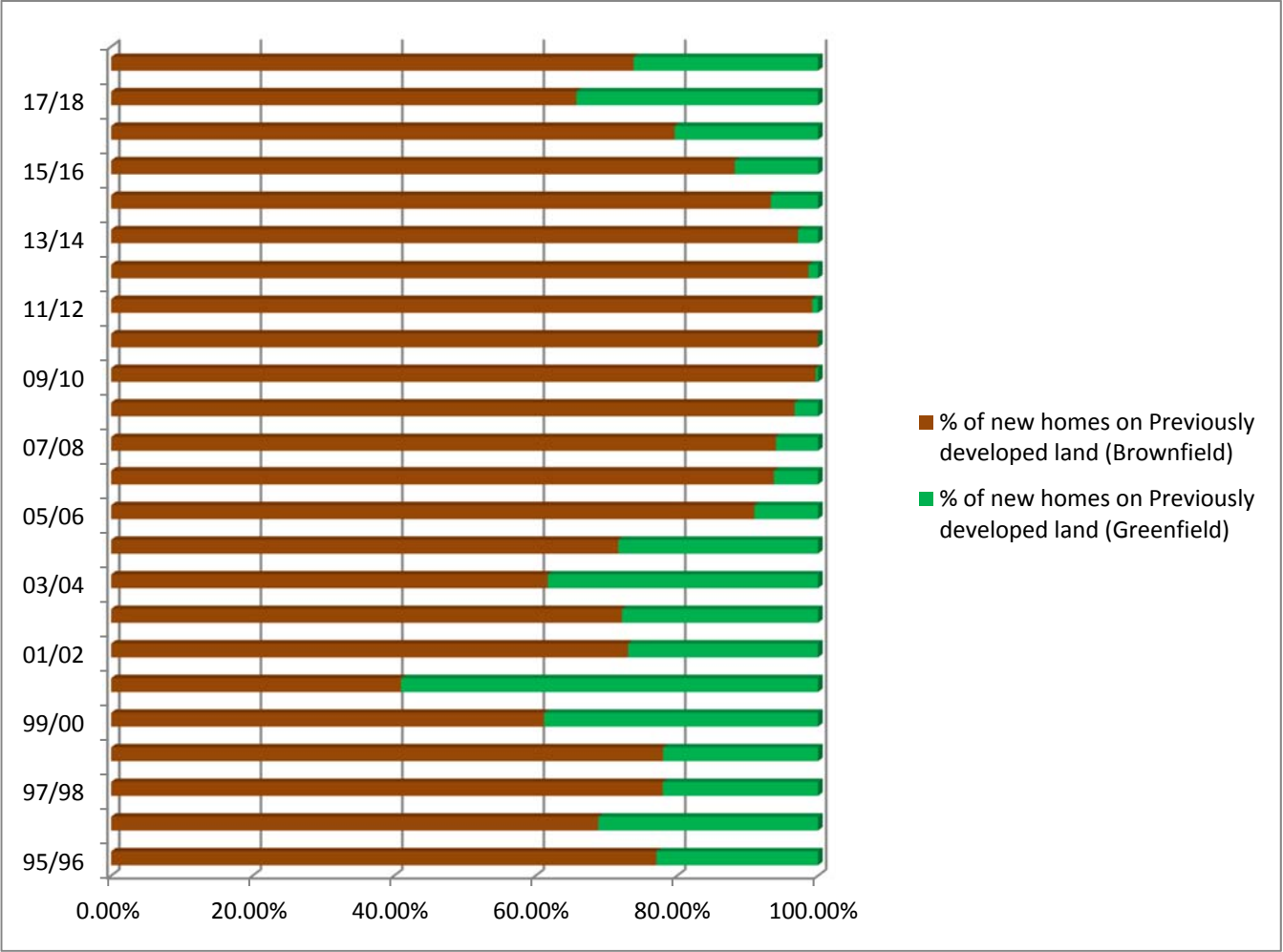


Figure 9 Housing distribution (SHLAA 2019) (MM1)

Sub-area	1 to 5 years (2018-2023)	6 to 10 years (2023-2028)	11 to 14 years (2028- 2033)	Total	%
Coalfield	1491	1107	535	3133	30%
Sunderland North	785	214	227	1226	12%
Sunderland South	1467	1702	1350	4519	43%
Urban Core	216	363	151	730	7%
Washington	353	448	150	951	9%
Total	4312	3834	2413	10559	100%

Figure 12 Key Diagram (MM2)

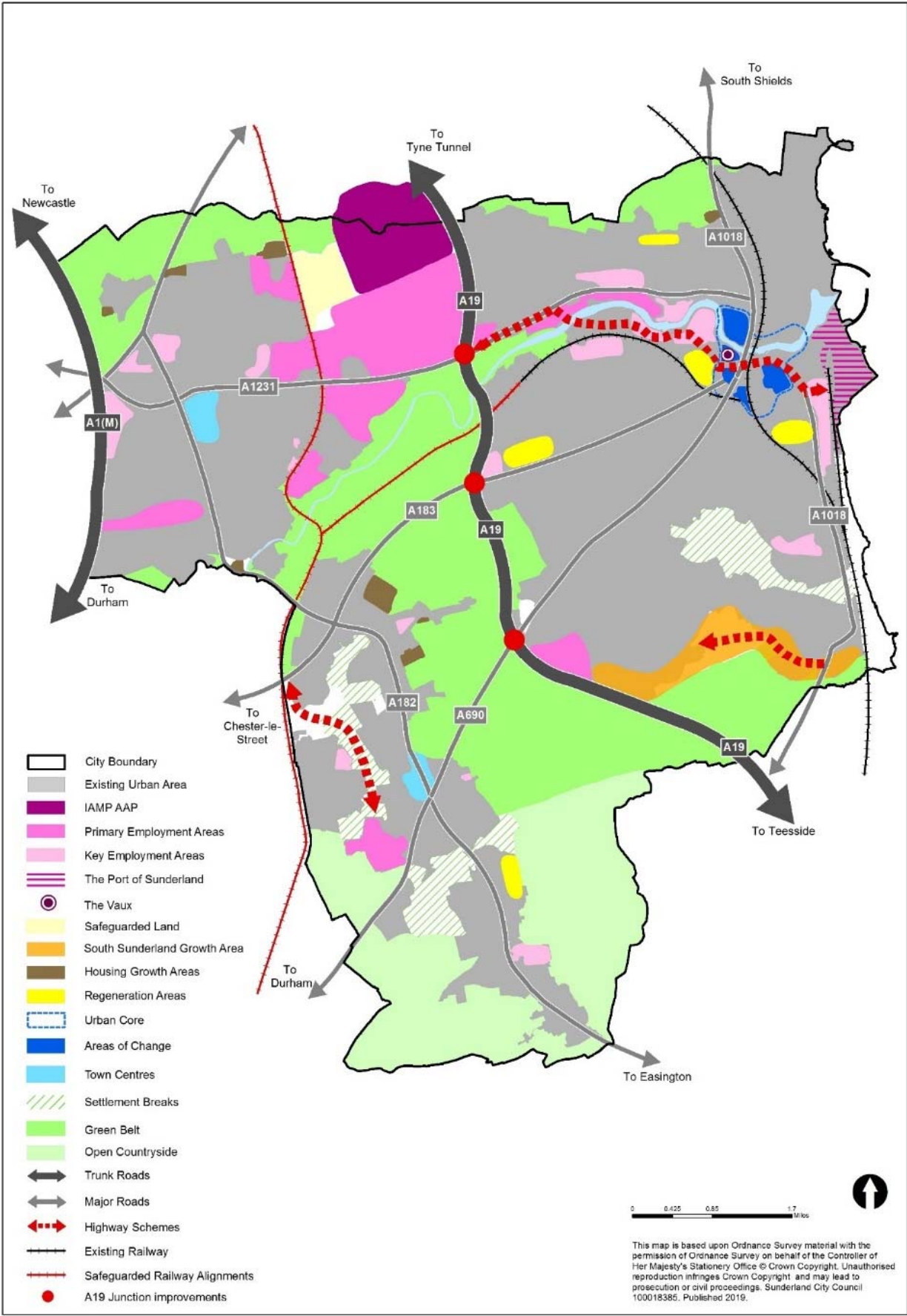


Figure 15 Washington key diagram (MM4)

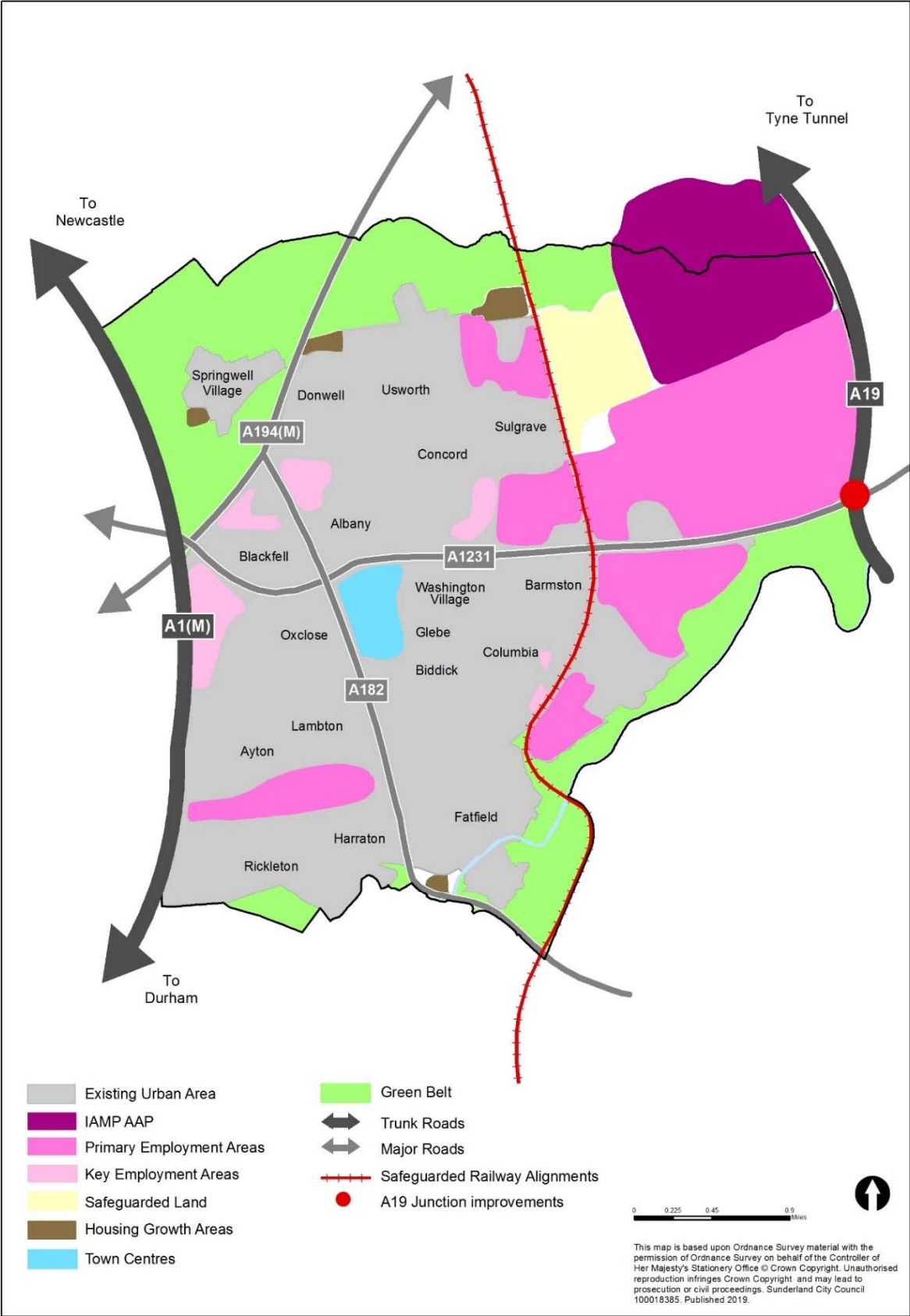


Figure 19 North of Usworth Hall (MM5)

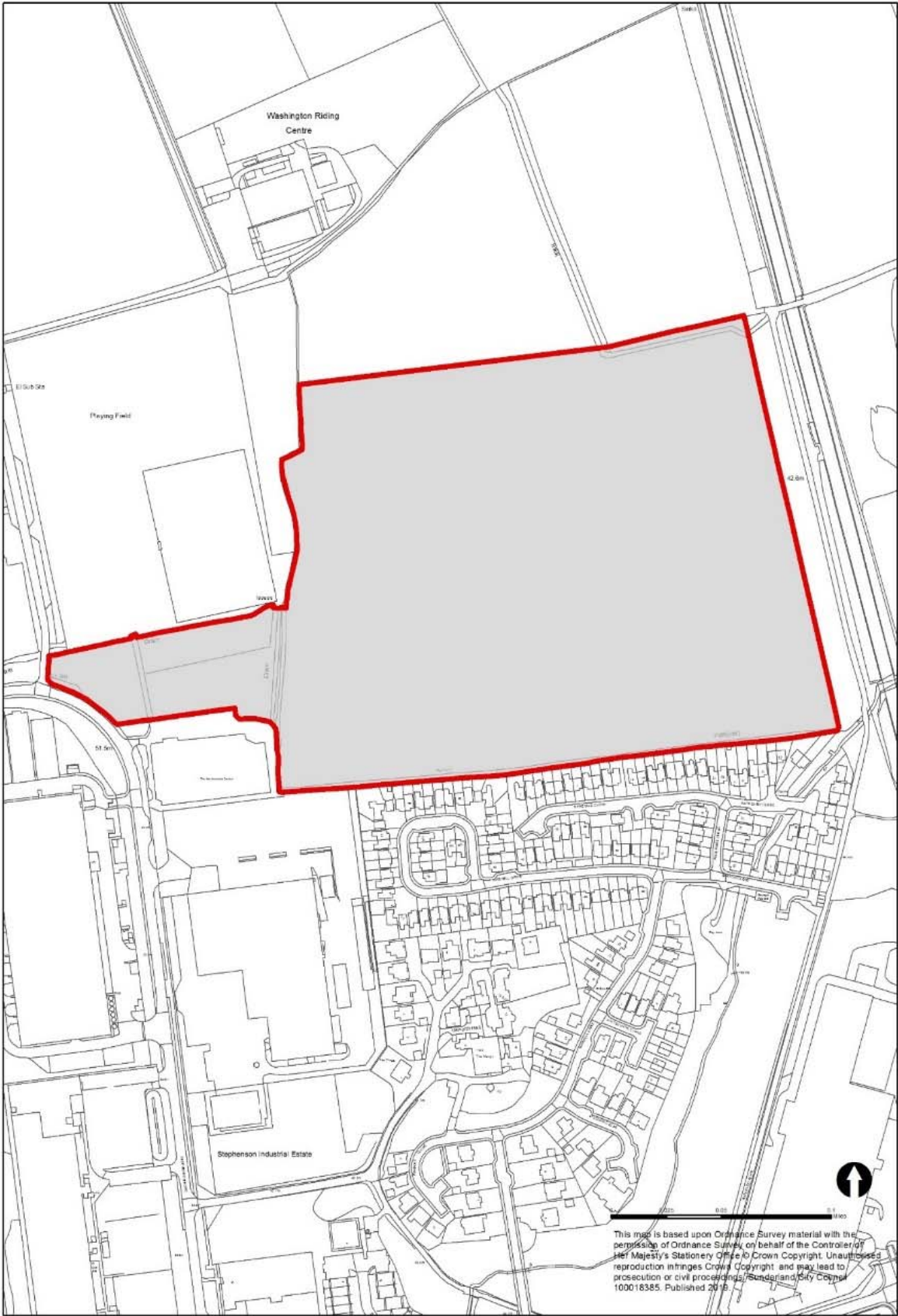


Figure 22 Safeguarded Land (MM6)

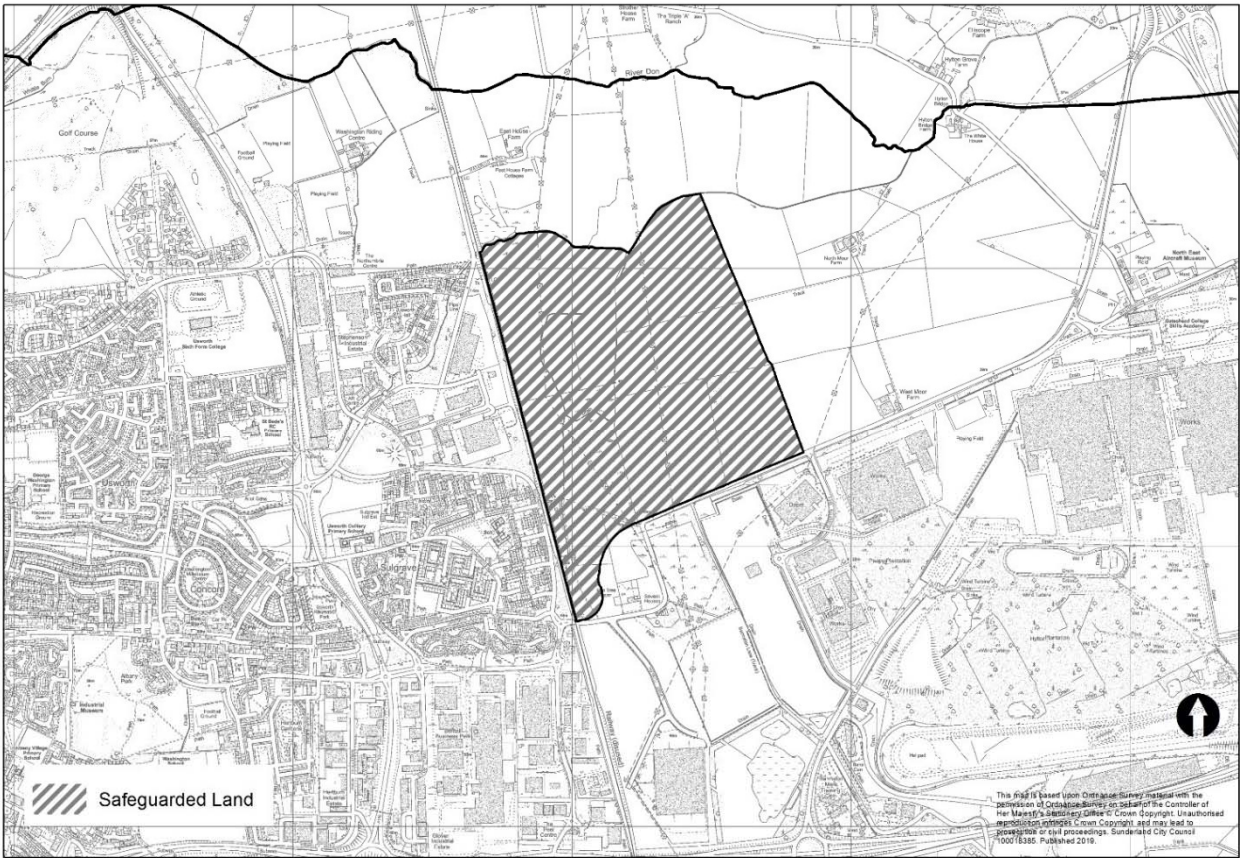


Figure 23 Key diagram North Sunderland (MM7)

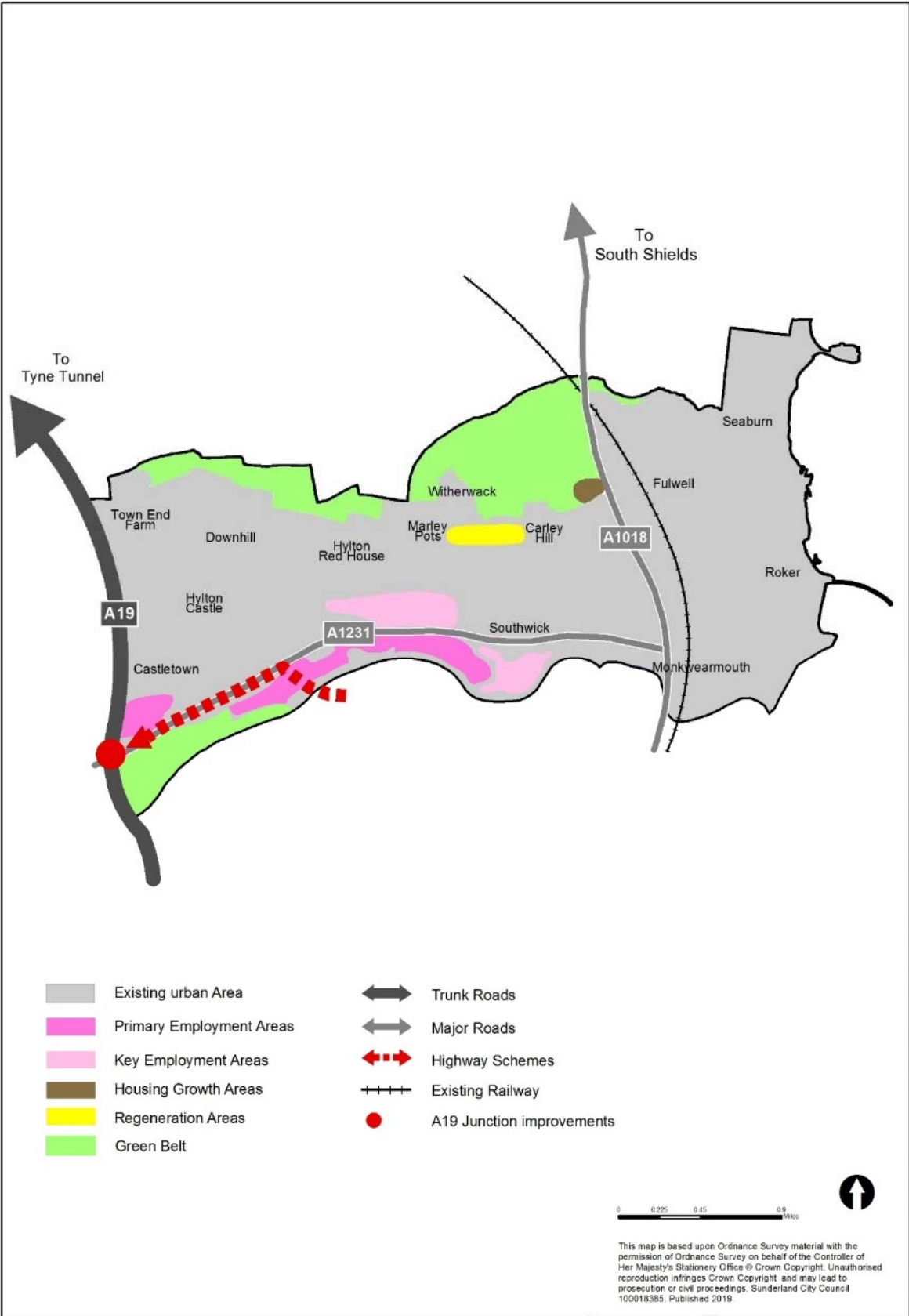


Figure 26 Key diagram South Sunderland (MM9)

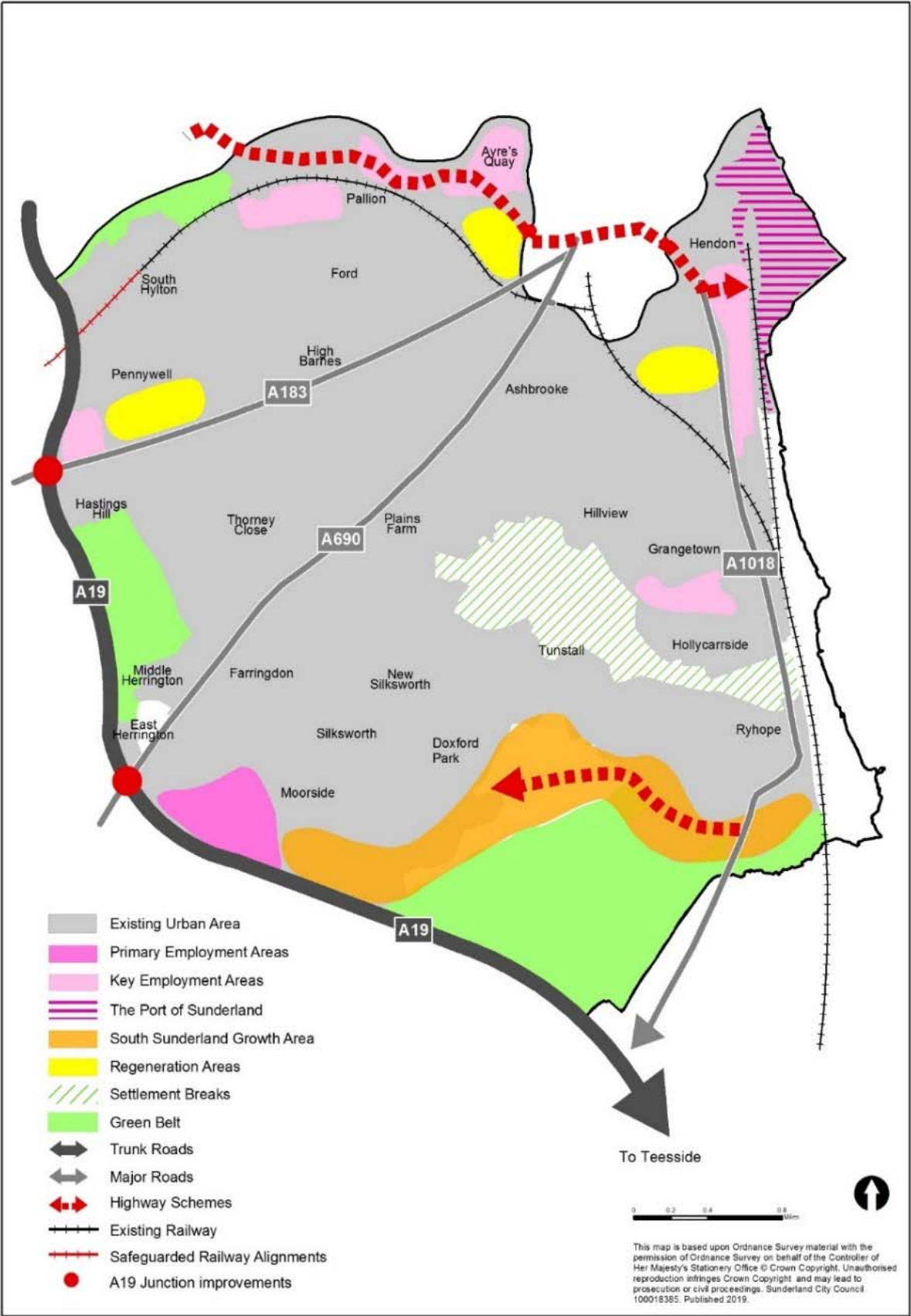


Figure 29 Key diagram The Coalfield (MM11)

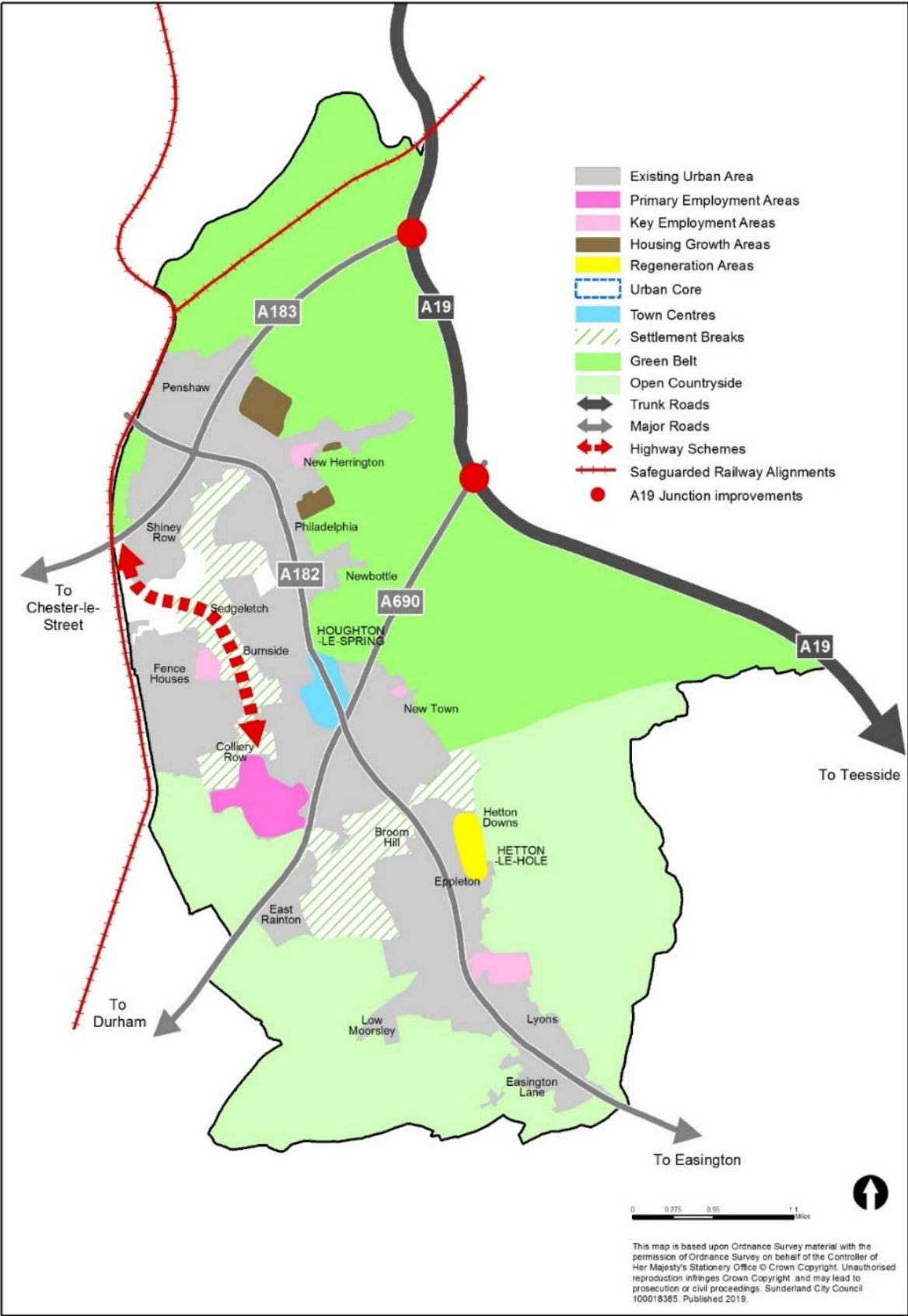


Figure 30 Penshaw (MM12)

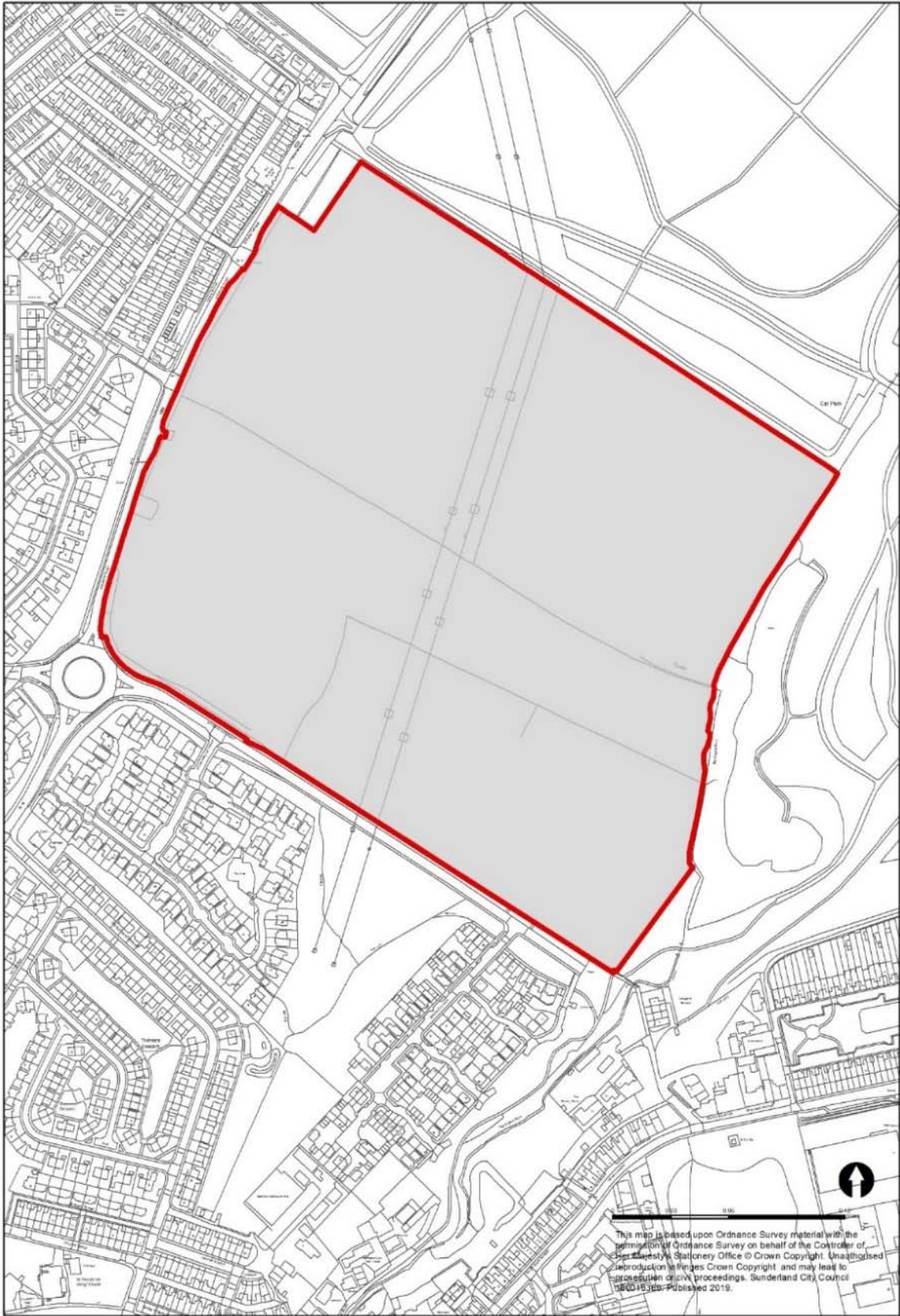


Figure 33 Potential housing supply (MM14)

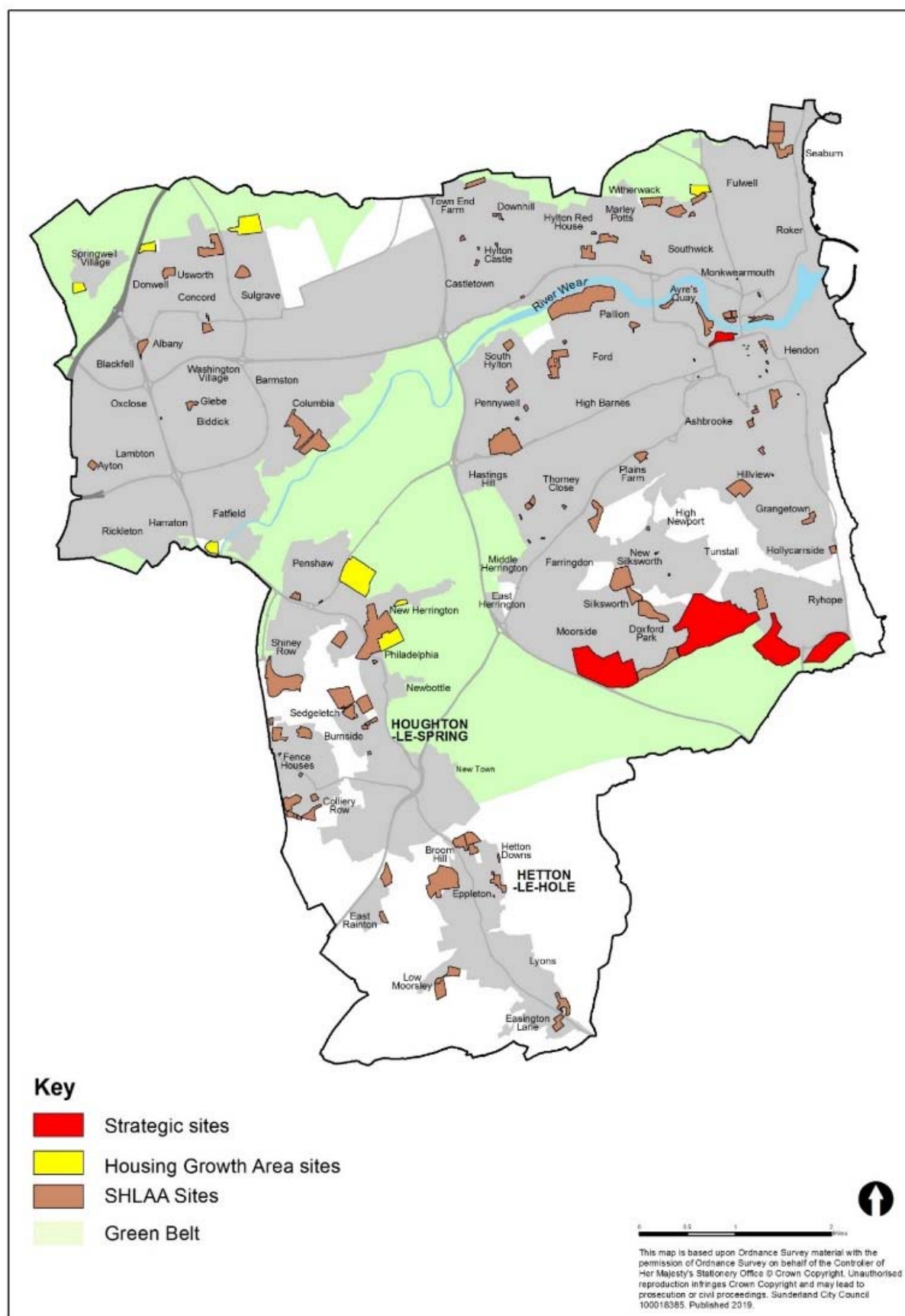
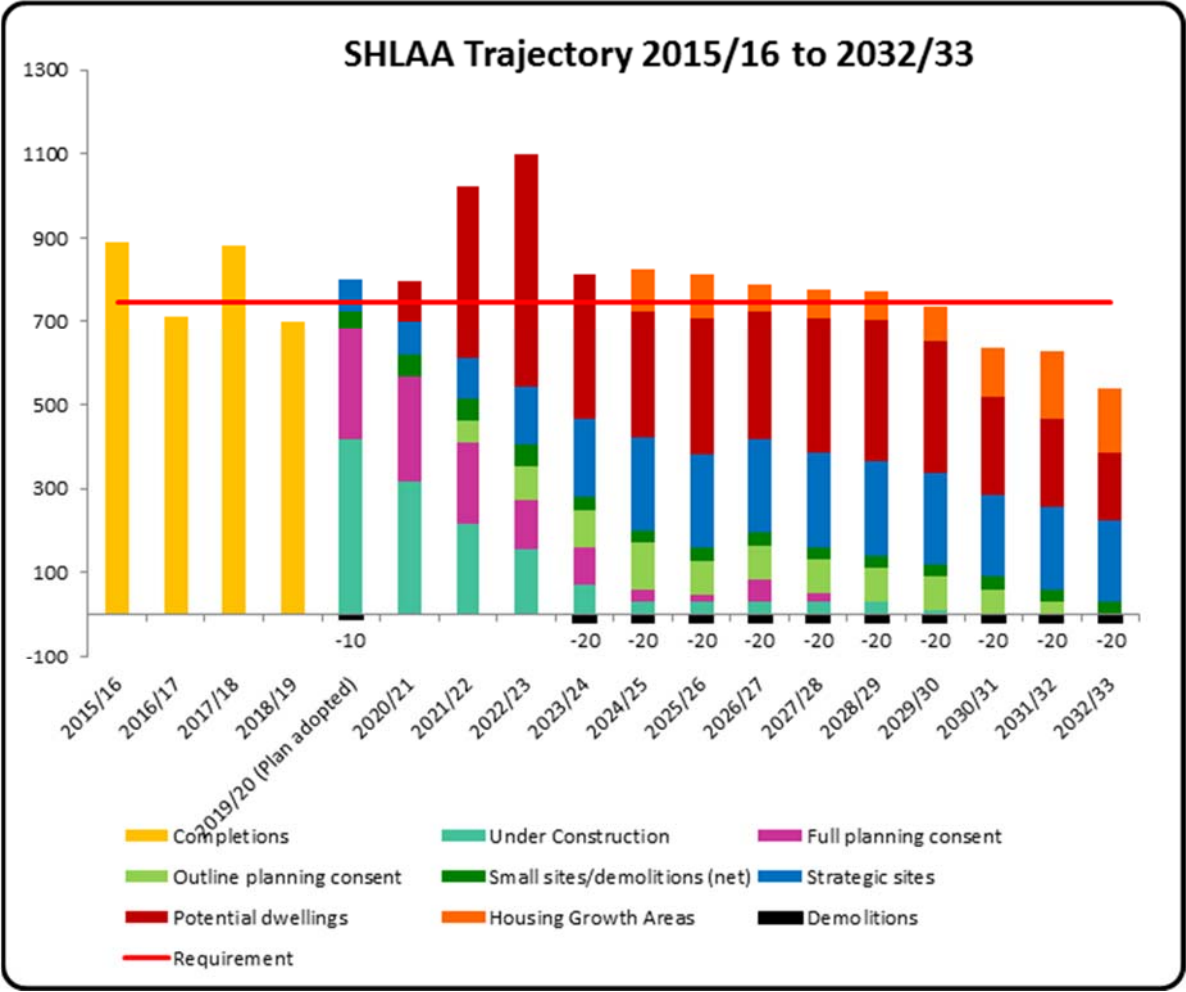
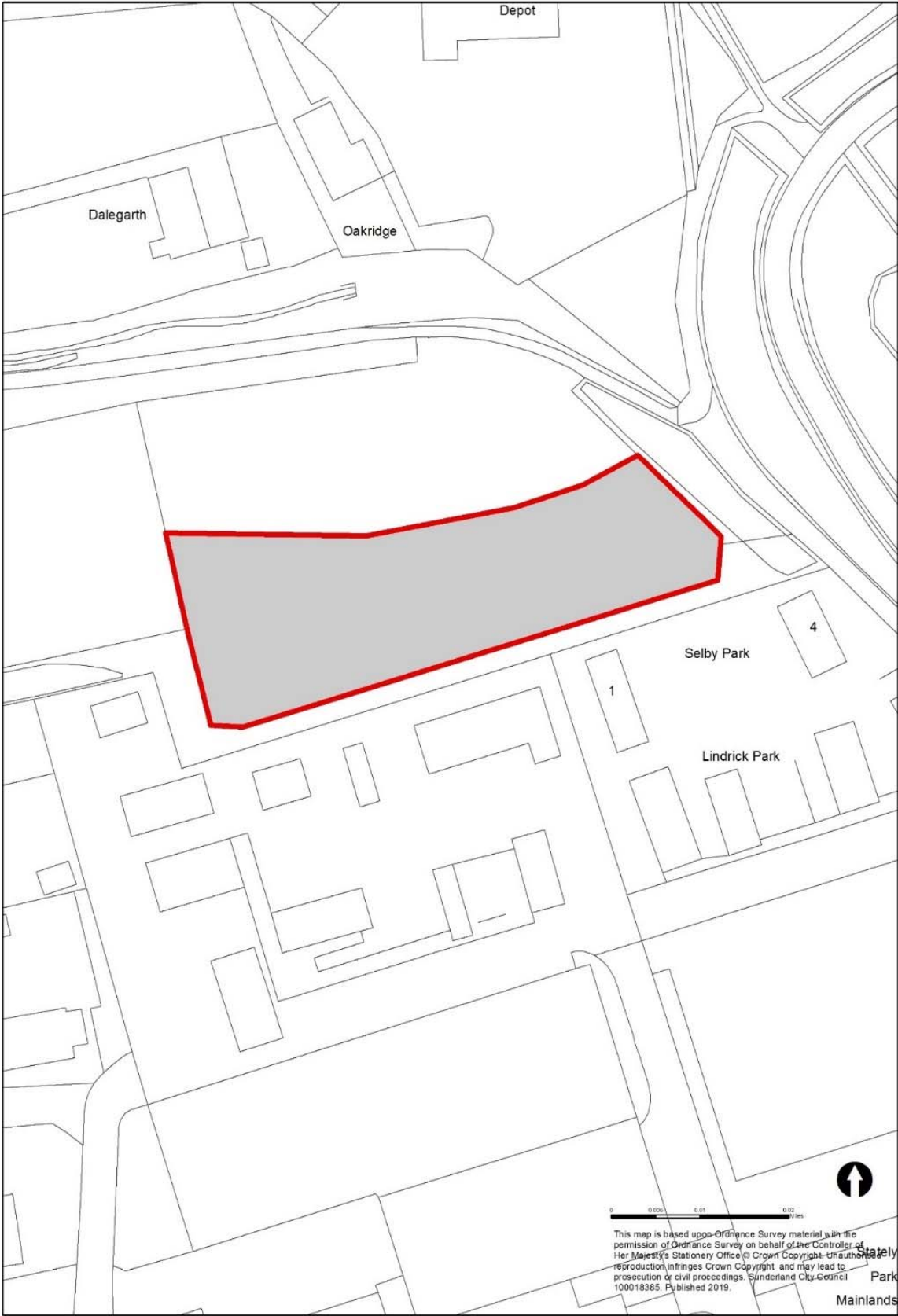


Figure 34 Housing Trajectory (MM14)



(NEW) Figure 35 Station Road North Travelling Showpeople Site (MM17)



(NEW) Figure 36 Land at Market Place Travelling Showpeople Site (MM17)



(NEW) Table 1: Components of Supply (MM19)

Source	Size (ha)
Primary Employment Areas	48.42
Key Employment Areas	26.53
Other Sources	9.12
Completions (2015 – 2018)	13.42
Total	97.49

(NEW) Table 2: Primary Employment Areas – Available Employment Land (MM19)

Allocation	Allocation Size (ha)	Available Employment Land (ha)
PEA1: Sunrise Business Park	14.13	0
PEA2: Rainton Bridge North	23.01	4.71
PEA3: Glover	42.58	0.24
PEA4: Patterson North	89.66	6.63
PEA5: Patterson South	32.61	1.62
PEA6: Stephenson	34.92	1.97
PEA7: Wear	53.22	1.47
PEA8: Nissan	285.15	6.58
PEA9: Turbine Business Park	22.08	6.16
PEA10: Hillthorn Farm	26.17	12.81
PEA11: Doxford International	57.19	0
PEA12: Hylton Riverside	34.76	0
PEA13: Rainton Bridge South	31.81	6.23
Total	747.29	48.42

(NEW) Table 3: Key Employment Areas – Available Employment Land (MM19)

Allocation	Allocation Size (ha)	Available Employment Land (ha)
KEA1: Hendon	37.13	4.8
KEA2: Leechmere	24.49	0.42
KEA3: Pennywell	15.62	0.62
KEA4: Pallion	27.20	1.29
KEA5: Pallion Shipyard	17.34	2.44
KEA6: Deptford	32.61	6.02
KEA7: Low Southwick	15.21	0.41
KEA8: North Hylton Road	33.99	4.75
KEA9: Armstrong	10.96	0
KEA10: Crowther	43.72	1.9
KEA11: Hertburn	13.55	0.21
KEA12: Parsons	16.97	0
KEA13: Swan	3.61	0
KEA14: New Herrington	4.44	0
KEA15: Dubmire	8.16	3.14
KEA16: Houghton Market Place	1.80	0.16
KEA17: Hetton Lyons East	18.88	0.37
Total	325.67	26.53

Figure 41 Settlement Breaks (MM30)

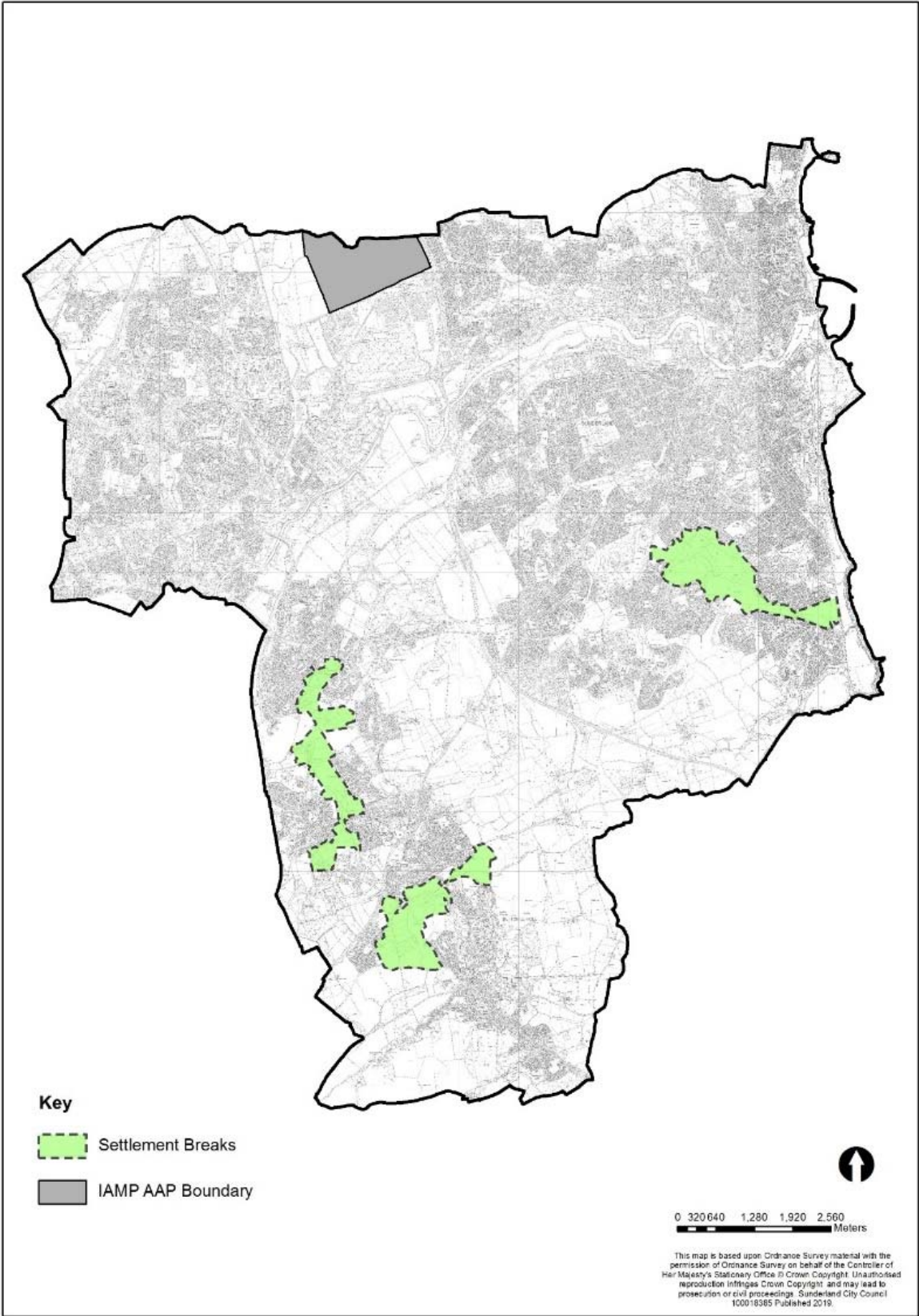
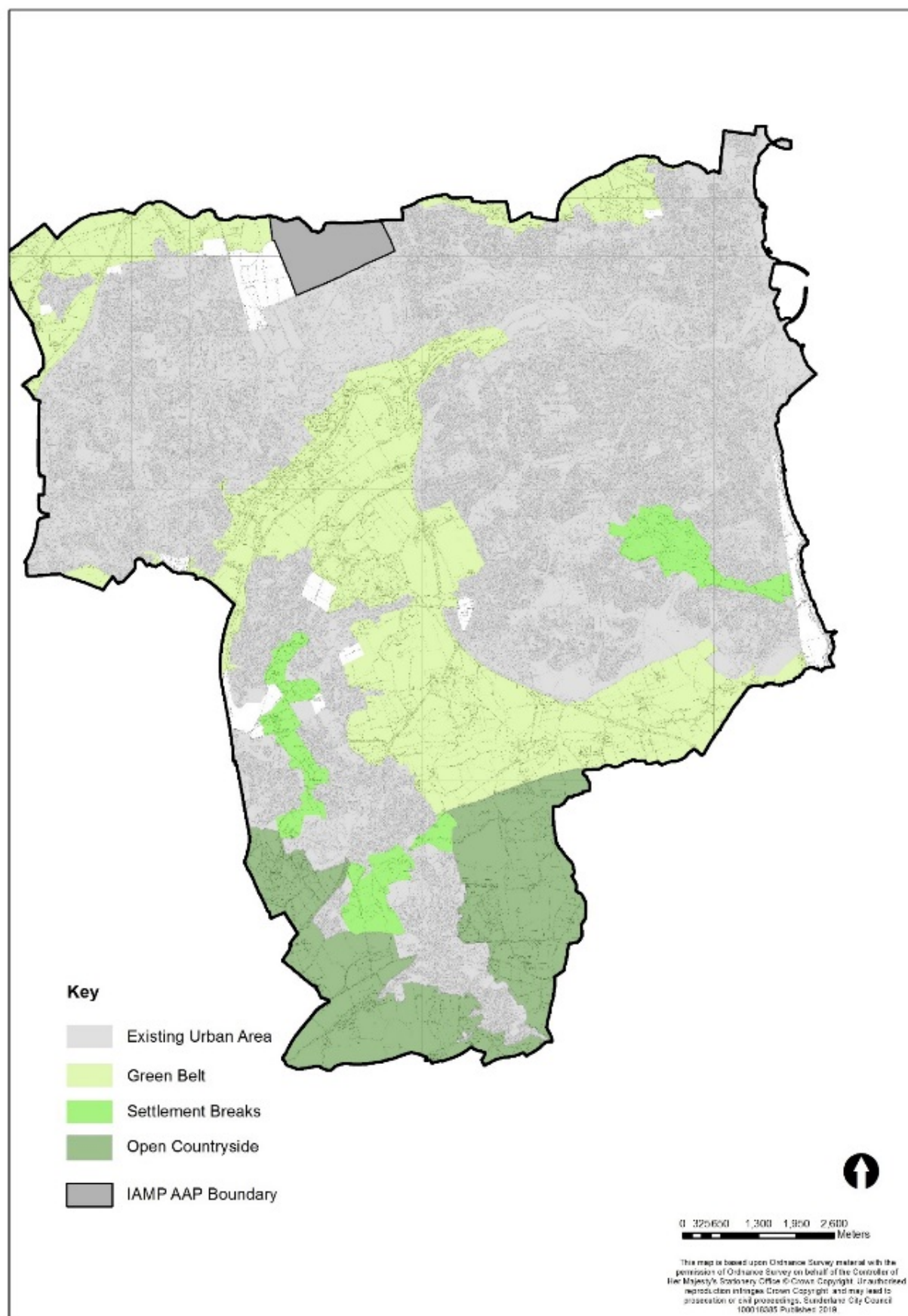
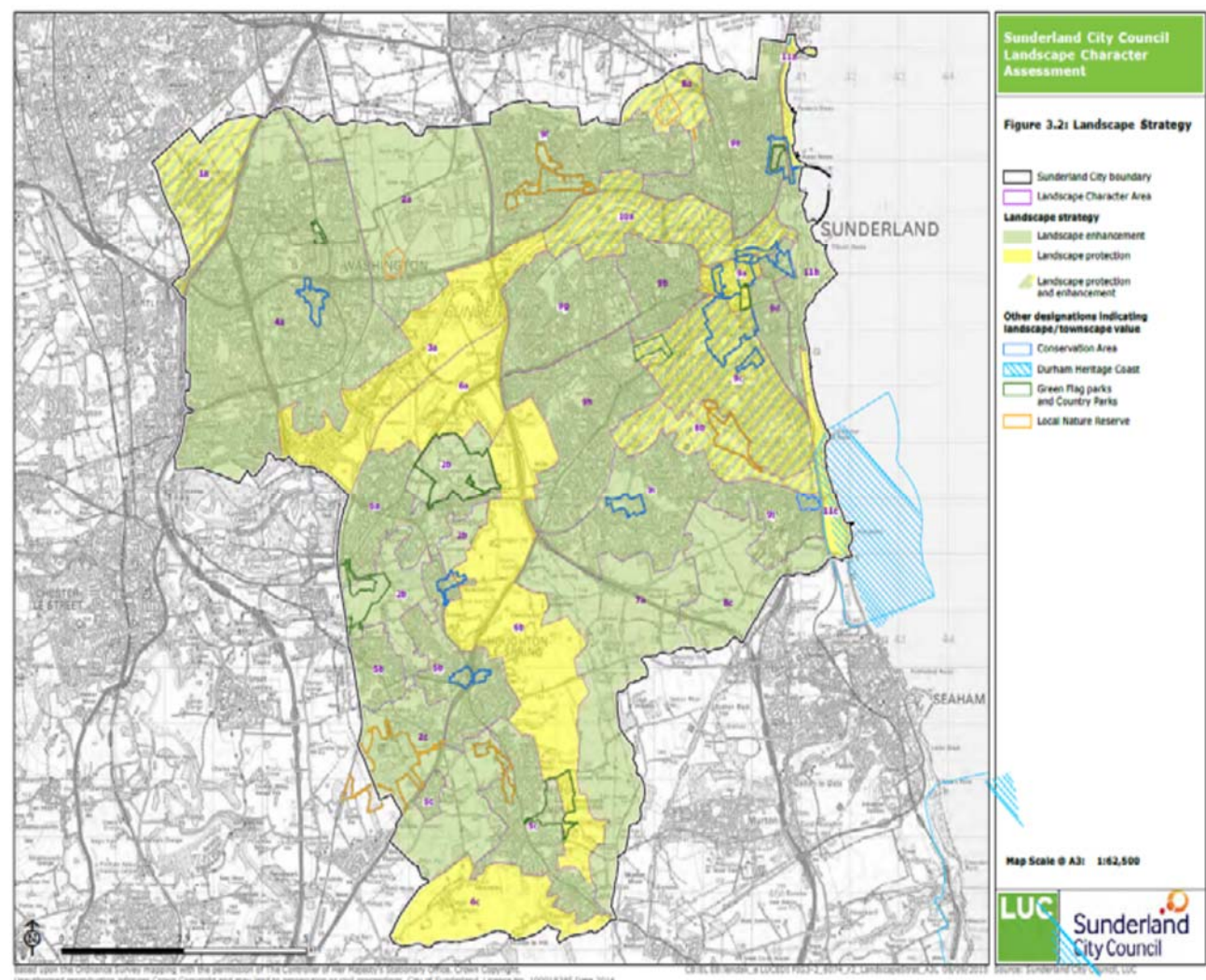


Figure 42 Open Countryside (MM31)



Appendix 3: Areas for Landscape Protection (Valued Landscapes) (MM39)



Appendix 8 Monitoring Framework (MM40)

Implementation and Monitoring Framework

- 6.1 The Implementation & Monitoring Framework for the CSDP is set out in the section below. The Framework links directly to wider Local Plan, the Sustainability Appraisal (SA) and the Authority's Monitoring Report (AMR).
- 6.2 The Framework is structured according to the composition of the CSDP, enabling for easy and direct comparison with the policies, proposals and overall objectives. As the plan period runs until 2033 and given the long-term aspiration and objectives of the overall strategy, it is likely that this framework will evolve and change over time, particularly in light of any new requirements over this timeframe. Therefore, this Framework will also be subject to a process of monitoring, review and amendment as part of the wider Local Plan.

Monitoring Framework

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
Spatial Strategy						
SP1	Development Strategy	Sets out the level of growth required and the spatial strategy to delivery this	<ul style="list-style-type: none"> • Significant shortfall in the number of new homes delivered compared to Policy target • Significant shortfall in the number of new jobs created in key growth sectors compared to Policy target • Significant shortfall in employment land developed • Significant shortfall in new comparison retail development delivered • Failure to deliver sufficient physical, social and environmental infrastructure • Failure to deliver the majority of development to the Existing Urban Area 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Potential review of the strategic approach to identification of land for development • Review of land allocated for development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Housing completions against the overall plan period target for 13,410 net additional homes to 2033 • Housing delivery (net additions) against the plan period requirements of average 745pa net additions • Number of new jobs created • Land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses • Amount (sqm) of new comparison retail floorspace created 	<ul style="list-style-type: none"> • SCC monitoring data • Nomis (ONS data) • Employment Land Review
Area Strategies						
SP2	Urban Core	Sets out the strategy for development within the Urban Core and the principles of development	<ul style="list-style-type: none"> • Development is not brought forward as expected • Failure to improve the range and type of office 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Qualitative/ descriptive analysis of development within identified Areas of Change 	<ul style="list-style-type: none"> • SCC monitoring data • Employment Land Review

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP2 Continued			<ul style="list-style-type: none"> • accommodation within the Urban Core • Failure to diversify the residential offer within the Urban Core • Significant amount of retail development outside of the Primary Shopping Area • Failure to grow the leisure, tourism and cultural economy 		<ul style="list-style-type: none"> • Amount of higher/further education facilities approved • B1a office floorspace (sqm) permitted on Vaux PEA • B1a office floorspace (sqm) permitted within urban core • Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed within the Urban Core • Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in designated primary shopping area • Housing completions and delivery within the Urban Core 	
SS1	The Vaux	Sets out the mix and principles of development expected on the Vaux Site	<ul style="list-style-type: none"> • Significant shortfall in the amount of B1a floorspace delivered compared to Policy target 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • B1a floorspace (sqm) permitted/developed on site • Housing completions on Vaux site 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Employment Land Review

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS1 Continued			<ul style="list-style-type: none"> Significant shortfall in the amount of new homes delivered compared to Policy target Failure to deliver a hotel on the site 		<ul style="list-style-type: none"> Delivery of hotel on site 	<ul style="list-style-type: none"> Retail Health & Capacity Studies Retail Needs Assessment
SP3	Washington	Sets out the spatial strategy for Washington	<ul style="list-style-type: none"> Failure to focus economic growth in identified Employment Areas and the IAMP A significant amount of out-of-centre office, retail and other Main Town use development Failure to deliver new homes within identified Housing Growth Areas 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Potential review of the Plan/Policy Potential review of the strategic approach to identification of land for development 	<ul style="list-style-type: none"> Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within identified Employment Areas Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed within designated town centre Existing and new retail A1, A2, A3 and A5 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review Retail Health & Capacity Studies Retail Needs Assessment

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP3 Continued					<p>floorspace (gross and net sales (sqm) developed in designated primary shopping areas of town centre</p> <ul style="list-style-type: none"> • Percentage of primary frontages in non-A1 use in designated town centre • Length of primary frontages in A1, A2, A3 and A5 retail uses in designated town centre • Housing completions and delivery within identified Housing Growth Areas • Plots created on allocated travelling showpeople sites 	
SS2	Washington Housing Growth Areas	Identifies the Housing Growth Areas in Washington and what is expected to be	<ul style="list-style-type: none"> • Failure to provide a mix of housing types • Failure to secure contributions for 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Housing completions within each HGA • Developer contributions 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Sunderland CCG Data

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS2 Continued		provided/achieved by them	education and healthcare provision	<ul style="list-style-type: none"> Potential review of the strategic approach to identification of land for development Negotiation with developers to ensure delivery of appropriate housing mix Review of S106 contribution collection process/Planning Obligations SPD 	<ul style="list-style-type: none"> collected in each HGA Housing mix in each HGA 	<ul style="list-style-type: none"> SHLAA
SS3	Safeguarded Land	Identifies and protects land to the east of Washington for development beyond the plan period	<ul style="list-style-type: none"> Failure to <u>deliver</u> the amount of development proposed in the Plan 	<ul style="list-style-type: none"> Identify reasons for lack of development Review of land allocated for development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Housing completions against the overall plan period target for 13,410 net additional homes to 2033 Housing delivery (net additions) against the plan period requirements of average 745pa net additions Number of new jobs created Land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses Amount (sqm) of new comparison retail floorspace created 	<ul style="list-style-type: none"> SCC monitoring data Nomis (ONS data) Employment Land Review

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP4	North Sunderland	Sets out how North Sunderland will continue to be regenerated	<ul style="list-style-type: none"> • Failure to secure renewal and regeneration at Marley Potts or Carley Hill • Failure to deliver new homes within identified housing Growth Areas • Significant amount of employment uses permitted outside of identified Employment Areas 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Review of land allocated for development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications granted for regeneration and renewal at Marley Potts and/or Carley Hill • Housing completions and delivery within identified Housing Growth Areas • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment
SS4	North Sunderland Housing Growth Area	Identifies the Housing Growth Areas in North Sunderland and what is expected to be provided/achieved by them	<ul style="list-style-type: none"> • Failure to provide a mix of housing types • Failure to secure contributions for education and healthcare provision 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Review of land allocated for development • Negotiation with developers to ensure delivery of appropriate housing mix • Potential review of the Plan/Policy • Review of S106 contribution collection process/Planning Obligations SPD 	<ul style="list-style-type: none"> • Housing completions within each HGA • Developer contributions collected in each HGA • Housing mix in each HGA 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • SHLAA

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP5	South Sunderland	Sets out how South Sunderland will continue to develop	<ul style="list-style-type: none"> • Failure to secure renewal and regeneration at Hendon, Millfield or Pennywell • Significant amount of employment development outside of identified Employment Areas and The Port • Applications for development approved within Settlement Breaks 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Review of land allocated for development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications granted for regeneration and renewal at Hendon, Millfield or Pennywell • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within identified Employment Areas and The Port • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas and The Port • Number of new residential units completed; number of affordable homes completed; developer contributions collected and housing mix delivered as part of the SSGA • Planning applications received/granted within Settlement Breaks 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment • SSGA Monitoring

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS5	The Port of Sunderland	Sets out how the Port of Sunderland will be reinvigorated	<ul style="list-style-type: none"> • Failure to deliver road and rail links suitable for heavy freight to The Port • Significant waterside development impacting on Port operations • Significant lack in port-related development coming forward 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • New road and rail links to The Port permitted/delivered • Applications granted for waterside development • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within The Port • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within The Port 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Port of Sunderland • Employment Land Review
SS6	South Sunderland Growth Area	Identifies the sites that make up the South Sunderland Growth Area and what is expected to be provided/achieved by them	<ul style="list-style-type: none"> • Significant shortfall in number of new homes delivered compared to Policy aim • Failure to deliver 10% proportion of affordable units • Failure to deliver new primary school • Failure to deliver extensions to existing schools • Failure to deliver new local centre • Failure to deliver Ryhope-Doxford link road 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Negotiation with developers to ensure delivery of appropriate housing mix • Potential review of the Plan/Policy • Review of S106 contribution collection process/Planning Obligations SPD 	<ul style="list-style-type: none"> • Housing completions on each site • Number of affordable homes completed on each site • Developer contributions collected on each site • Housing mix on each site • Delivery of local centre and community and cultural facilities 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • SHLAA • SSGA Monitoring

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP6	The Coalfield	Sets out how the Coalfields will be protected	<ul style="list-style-type: none"> • Significant increase in applications granted in areas of Open Countryside or settlement Break • Failure to deliver new homes within identified housing Growth Areas • Loss of existing Travelling Showpeople sites/plots • Significant amount employment development outside of identified Employment Areas • Significant amount of office, retail and Main Town Centre development outside of the Houghton Town Centre • Failure to secure regeneration at Hetton Downs 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications granted in areas of Open Countryside and Settlement Break contrary to Policy advice • Housing completions and delivery within identified Housing Growth Areas • Plots created on allocated travelling showpeople sites • Travelling showpeople plots created on unallocated sites • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within identified Employment Areas • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas • Existing and new retail A1, A2 A3 and A5 floorspace (gross and net sales sqm) 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP6 Continued					permitted/developed in designated primary shopping areas of Houghton Town Centre <ul style="list-style-type: none"> Percentage of primary frontages in non-A1 use in designated town centre Length of primary frontages in A1, A2, A3 and A5 retail uses in Houghton Town Centre 	
SS7	The Coalfield Housing Growth Areas	Identifies the Housing Growth Areas in the Coalfield and what is expected to be provided/achieved by them	<ul style="list-style-type: none"> Failure to provide a mix of housing types Failure to secure contributions for education and healthcare provision 	<ul style="list-style-type: none"> Identify reasons for lack of development Potential review of the Plan/Policy Negotiation with developers to ensure delivery of appropriate housing mix Potential review of the Plan Review of S06 contribution collection process/Planning Obligations SPD 	<ul style="list-style-type: none"> Housing completions within each HGA Developer contributions collected in each HGA Housing mix in each HGA 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHLAA
Healthy and Safe Communities						
SP7	Healthy and Safe Communities	Sets out how health and wellbeing will be improved	<ul style="list-style-type: none"> Significant decrease in the life expectancy of residents Significant decrease 	<ul style="list-style-type: none"> Identify reasons for the failure to meet policy aims Identify projects/ 	<ul style="list-style-type: none"> Life Expectancy at Birth Obesity Rates 	<ul style="list-style-type: none"> LA Health Profiles SCC monitoring Data

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP7 Continued			<ul style="list-style-type: none"> Significant decrease in healthy life expectancy of residents Increasing polarisation of health outcomes Increase in obesity levels Significant decrease in number of health facilities Significant increase in number of hot food takeaways 	<ul style="list-style-type: none"> interventions to address issues Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Loss of open space to development (ha) Air quality Water quality Number of hot food takeaway units in the plan area Planning applications requiring the submission of a Health Impact Assessment that have had one submitted 	<ul style="list-style-type: none"> Public Health England Outcome Frameworks Air Quality Annual Status Report National CO₂ emissions Environment Agency 'Catchment Data Explorer' Public Health England Hot Food Takeaway Data
HS1	Quality of Life and Amenity	Sets that development should not have an adverse impact on neighbouring uses and take into account existing uses that may have a detrimental impact on development	<ul style="list-style-type: none"> Significant increase in numbers of developments adversely impacting on quality of life and amenity indicators Designation of Air Quality Management Area (AQMA) Significant decrease in air quality Significant increase in emissions Significant decrease in water quality 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review Local Plan Policy requirements and standards for quality of life and amenity Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Air quality Water quality 	<ul style="list-style-type: none"> SCC monitoring data (Environmental Health) Planning applications Environment Agency Air Quality Annual Status Report Water Framework Directive

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
HS2	Noise-sensitive Development	Relates to mitigation requirements relating to noise-sensitive development	<ul style="list-style-type: none"> Significant numbers of noise-sensitive developments in locations likely to be affected by existing sources of noise Significant increase in numbers of noise-generating developments in areas of existing low levels of noise 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review Local Plan policy requirements in relation to noise sensitivity Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Planning applications requiring the submission of a Noise Assessment that have had one submitted 	<ul style="list-style-type: none"> SCC monitoring data (Environmental Health) Planning applications
HS3	Contaminated Land	Sets out the requirements relating to development on contaminated land	<ul style="list-style-type: none"> Significant increase in inappropriately-mitigated development on contaminated land 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review Local Plan policy requirements in relation to mitigating land contamination Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Area of previously-contaminated land decontaminated, reclaimed and brought back into use (ha) 	<ul style="list-style-type: none"> SCC monitoring data (Environmental Health) Planning applications Contaminated Land Strategy Environment Agency
HS4	Health and Safety Executive Areas and Hazardous Substances	Sets out the key requirements relating to development within HSE areas and areas involving hazardous substances	<ul style="list-style-type: none"> Significant increase in hazardous substance installations in inappropriate locations Significant increase in incompatible development uses within close proximity to hazardous substance installations 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review Local Plan policy requirements in relation to hazardous substance installations Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Planning applications approved within HSE zones contrary to those HSE zones 	<ul style="list-style-type: none"> SCC monitoring data (Environmental Health) Planning applications Health & Safety Executive (HSE)

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
Homes						
SP8	Housing Supply and Delivery	Sets out the number of new homes to be developed and how it will be achieved	<ul style="list-style-type: none"> • 5% under delivery on the target in the policy • Sustained underperformance¹ on the five year land supply • Failing the Housing Delivery Test 	<ul style="list-style-type: none"> • 5% under delivery on the target in the policy, the council will prepare and publish an action plan, setting out the key reasons and the actions to bring the building back on track. 15% under the authority will apply a 20% buffer to its 5 year housing land supply • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Housing completions against the overall plan period target for 13,410 net additional homes to 2033 • Housing delivery (net additions) against the plan period requirements of average 745pa net additions • Windfall delivery of new homes on unallocated sites and small sites • Housing conversions – gross and net additions and losses • Housing trajectory • Housing land availability: <ul style="list-style-type: none"> ○ 5-year supply of deliverable sites ○ 15-year supply of deliverable and developable sites (incl. broad areas) 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • SHLAA • SHMA

¹Sustained underperformance is defined as failing to meet the council's annual housing target for at least 3 consecutive years (unless the council is currently ahead of its cumulative requirement at that point in time).

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H1	Housing Mix	To ensure mixed and balanced communities	<ul style="list-style-type: none"> Not delivering the housing mix set out in the current SHMA Failure to achieve 10% of dwellings meeting Building Regulations M4 (2) Category 2 No or little provision of larger (4+ bedroom) detached dwellings, housing for older people and special needs housing 	<ul style="list-style-type: none"> Review evidence base in relation to housing mix Negotiation with developers to ensure delivery of appropriate housing mix Identify projects/interventions to address issues Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Size (by number bedrooms), type (detached, semi-detached, terraced, bungalows, extra care housing, flats/apartments) and tenure (home ownership/private rented, social rented, shared ownership) of new housing completions Number of custom and self-build plots approved 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHMA
H2	Affordable Homes	To ensure a supply of affordable housing of mixed type and tenure	<ul style="list-style-type: none"> Consistent and significant shortfall in the delivery of 15% affordable housing on sites of more than 10 dwellings or on sites of 0.5ha or more Consistent and significant shortfall in the tenure requirements set out in the SHMA 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify projects/interventions to address issues Review of evidence base in regard to affordable housing 	<ul style="list-style-type: none"> Percentage of affordable units permitted by site Affordable tenure split of site permissions (compared with the latest SHMA requirements, eg 80% social rented, 20% intermediate) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHMA
H3	Student Accommodation	To ensure choice for students within the City Centre	<ul style="list-style-type: none"> The number of student bed-spaces outside the Urban Core The number of units reconfigured 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify projects/ 	<ul style="list-style-type: none"> Number of students Number of student bed-spaces with the Urban Core 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H3 Continued			to meet general housing need	interventions to address issues <ul style="list-style-type: none"> Identify the appropriate sites within the Urban Core 	<ul style="list-style-type: none"> Number of student bed-spaces outside the Urban Core 	<ul style="list-style-type: none"> University of Sunderland monitoring data SHLAA
H4	Travelling showpeople, gypsies and travellers	To enable the provision of suitable sites for travelling showpeople and sets the criteria against which sites for gypsies and travellers will be assessed	<ul style="list-style-type: none"> Significant increase in unauthorised gypsies and traveller encampments Failure to deliver 15 plots for travelling showpeople by 2023 and a further 18 plots by 2033 Significant loss of existing travelling showpeople sites/plots 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Plan/Policy Regular review of evidence base to determine need and potential review of the plan 	<ul style="list-style-type: none"> Plots created on allocated travelling showpeople sites Travelling showpeople plots created on unallocated sites Gypsy & traveller pitches created on unallocated G&T sites 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Gypsies, Travellers and Travelling Showpeople Accommodation Assessment (GTAA)
H5	Existing Homes and Loss of Homes	To use the existing housing stock/building as efficiently as possible	<ul style="list-style-type: none"> Significant increase in vacancy rates of existing stock Significant increase in the number of dwellings lost through demolition or change of use 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Work with partners to actively bring vacant dwellings back into use and demolitions and clearance or regeneration 	<ul style="list-style-type: none"> Number of homes lost through demolition, conversions and changes of use (gross and net) Number and percentage of vacant dwellings and empty properties Number of long-term vacant dwellings (6+ months) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHLAA SHMA

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H6	Homes in Multiple Occupation	To ensure that HMOs do not have a detrimental impact on the surrounding area	<ul style="list-style-type: none"> Significant increase in the number of HMOs Significant increase in the concentration of HMOs in a specific area 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify interventions to address issues Review existing and consider the use of new Article 4 Directions Review HMO SPD 	<ul style="list-style-type: none"> Number of HMO units and bedspaces permitted Number of licensable HMOs Number of licensable HMOs in each electoral Ward 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Housing Team data SHMA HMO SPD
H7	Backland and Tandem Development	To protect the character of Sunderland's mature suburbs	<ul style="list-style-type: none"> Increase in number of applications granted for backland or tandem development Significant increase in number of dwellings completed on backland or tandem sites 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aim Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Number of new dwellings permitted within curtilage of existing dwellings 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
Economic Growth						
EG1	Primary Employment Areas	To identify and protect the Primary Employment Areas of the city	<ul style="list-style-type: none"> Limited progress and delivery of Primary Employment Areas Significant development of allocated PEA sites for non-B1/B2/B8 uses 	<ul style="list-style-type: none"> Review land allocations in the Local Plan Identification of reasons for under-delivery Review the provision of land for 	<ul style="list-style-type: none"> PEA land (ha) floorspace (sqm) developed for B1, B2 and B8 uses PEA land (ha) and floorspace (sqm) lost to development for non-B Class uses 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG1 Continued			<ul style="list-style-type: none"> Significant number of ancillary uses permitted over 50sqm Significant increase in applications granted for B1/B2/B8 use outside of identified Employment Areas 	<ul style="list-style-type: none"> B1, B2 and B8 uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Available PEA land (HA) Number of non-B Class ancillary units >50sqm permitted and built on PEA land 	
EG2	Key Employment Areas	To identify the Key Employment Areas and set out when alternative uses would be considered acceptable	<ul style="list-style-type: none"> Limited progress and delivery of Key Employment Areas Significant development of allocated KEA sites for non-B1/B2/B8 uses Significant increase in applications granted for B1/B2/B8 use outside of identified Employment Areas 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Identification of reasons for under-delivery Review the provision of land for B1, B2 and B8 uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> KEA land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses KEA land (ha) and floorspace (sqm) lost to development for non-B Class uses KEA land lost to non-B Class uses contrary to policy Available KEA land (ha) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review
EG3	Other Employment Sites	To set out when development of non-KEA employment land will be considered acceptable	<ul style="list-style-type: none"> Significant loss of non-designated employment land to alternative uses 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Review the provision of land for B1, B2 and B8 uses in the Plan period 	<ul style="list-style-type: none"> Other employment land (ha) and floorspace (sqm) for B1, B2 and B8 uses 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG3 Continued				<ul style="list-style-type: none"> Update the employment land evidence base Potential review of the Plan/Policy 		
EG4	New Employment Areas	Support for new employment uses outside of allocated areas where appropriate	<ul style="list-style-type: none"> Significant development of new employment uses outside of designated employment areas 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Review the provision of land for B1, B2 and B8 uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> New employment land (ha) and floorspace (sqm) permitted for B1, B2 and B8 uses outside of designated employment areas 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review
EG5	Offices	Support for new office developments in specific locations	<ul style="list-style-type: none"> Significant development of new B1a office uses outside of the Vaux, Doxford International, Hylton Riverside and Rainton Bridge South PEAs Significant development of new B1a office uses outside of designated retail centres contrary to the retail hierarchy 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Review the provision of land for B1a office uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> B1a office floorspace (sqm) permitted on the Vaux and Doxford International, Hylton Riverside and Rainton Bridge South PEAs B1a office floorspace (sqm) permitted within designated centres 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review Town Centre & Capacity Studies
EG6	Trade Counters	Sets out the circumstances where trade counters would	<ul style="list-style-type: none"> Significant increase in trade counter 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims 	<ul style="list-style-type: none"> Floorspace (sqm) permitted for 	<ul style="list-style-type: none"> SCC monitoring data

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG6 Continued		be considered acceptable	and factory shop in inappropriate locations contrary to policy (>15% of existing floorspace or >500sqm)	<ul style="list-style-type: none"> Potential review of the Plan/Policy 	ancillary trade counter and factory shop uses within individual industrial areas <ul style="list-style-type: none"> Amount of floorspace permitted for retail uses within industrial areas 	<ul style="list-style-type: none"> Planning applications
Vitality of Centres						
VC1	Main Town Centre uses and Retail Hierarchy	Establishes the retail hierarchy for the city and to protect and enhance the viability and vitality of designated retail centres	<ul style="list-style-type: none"> Significant increase in retail development proposals approved outside of identified centres Significant development of (A1, A2, A3 and A5) retail uses contrary to the sequential approach 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review Local Plan policy and retail site allocations Review the provision of land for A1, A2, A3 and A5 retail uses in the Plan period Update the retail evidence base Review Local Plan Policy and retail site allocations Review the provision of land for A1, A2, A3 and A5 retail uses in the Plan period 	<ul style="list-style-type: none"> Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed in designated city, town, district and local centres Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in the designated primary shopping areas of city and town centres Numbers of vacant retail units and floorspace (gross and net sales sqm) in designated city, town, districts and local centres Numbers of units and retail floorspace (gross and net sales sqm) lost to non-A Class uses within 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies Springboard footfall counts

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC1 Continued					designated city town, district and local centres <ul style="list-style-type: none"> Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in edge-of-centre locations 	
SP9	Comparison Retail	Sets out the amount of comparison retail floorspace that is required in each sub area	<ul style="list-style-type: none"> Development is not brought forward as expected 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Comparison retail floorspace permitted by sub-area (sqm) Comparison retail floorspace completed by sub-area (sqm) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review Retail Needs Assessment
VC2	Retail Impact Assessments	Sets out the circumstances as to when a Retail Impact Assessment will be required	<ul style="list-style-type: none"> Significant increase in numbers of planning applications (both city-wide and in specific centres) requiring Retail Impact Assessments 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy and Retail Impact Assessment thresholds 	<ul style="list-style-type: none"> Planning applications requiring Retail Impact Assessment 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies Employment Land Review Retail Needs Assessment
VC3	Primary Shopping Areas and Frontages	To protect primary retail frontages from non-A1 uses	<ul style="list-style-type: none"> Significant increase in numbers of planning applications granted for non-A1 retail uses within designated primary frontages 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review Local Plan policy and the extents of designations for primary and 	<ul style="list-style-type: none"> Percentage of primary frontages in non-A1 use in designated centres Length of primary frontages in A1, A2, A3 and A5 retail uses in designated 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC3 Continued			<ul style="list-style-type: none"> Significant increase in the percentage of designated primary frontages in non-A1 retail uses (>15% in Sunderland City Centre, >25% in Washington Town Centre, >40% in Houghton-Le-Spring Town Centre) 	secondary frontages <ul style="list-style-type: none"> Update the retail evidence base 	city and town centres	
VC4	Hot Food Takeaways	To protect retail vitality and viability from increases in A5 hot food takeaways and to promote healthier communities	<ul style="list-style-type: none"> >50% increase in the number of planning applications for A5 uses granted within designated shopping centres >50% increase in the number of applications for A5 uses within 400m of the entry points of all schools >50% increase in the number of applications for A5 uses within a ward where obesity is prevalent 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Plan/Policy Update the retail evidence base 	<ul style="list-style-type: none"> Number of A5 hot food takeaway units in designated centres Number of frontages exceeding the table 1 threshold in designated centres Numbers and percentages of vacant retail units and floorspace (gross and net sales sqm) in designated city, town, district and local centres Number of permissions granted for A5 use contrary to policy Obesity levels in year 6 and reception age pupils by ward 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies LA Health Profiles Public Health England Outcome Frameworks

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC5	Protection and Delivery of Community facilities and Local Services	Ensure the protection of existing facilities and where new facilities are proposed ensure they are in the right locations and accessible	<ul style="list-style-type: none"> Significant loss of community, social and cultural facilities 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Plan/Policy Identify projects/interventions to address issues 	<ul style="list-style-type: none"> Community, social and cultural development – D1 and D2 units and floorspace (sqm) additions and losses 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
VC6	Culture, Leisure and Tourism	Supports the development of cultural, leisure and tourism facilities and sets out where they would be considered acceptable	<ul style="list-style-type: none"> Failure to delivery development within the Music, Arts and Culture quarter – specifically a new auditorium. Failure to deliver a new hotel in the Urban Core Failure to deliver a cinema in Washington Town Centre Failure to deliver three sports hubs across the city 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review policy objectives with SCC Regeneration and Economic Development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Completion of the specific proposed culture, leisure and tourism schemes Planning applications for leisure schemes on designated employment land – amount of lost employment land area (ha) and floorspace (sqm) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Sport England/FA
Built and Historic Environment						
BH1	Design Quality	Sets out the design principles that should be used across the city	<ul style="list-style-type: none"> Decline in quality of development constructed Significant increase in applications approved contrary to policy Number of applications awarded Building 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Potential review of design-related SPD's and Masterplans 	<ul style="list-style-type: none"> Schemes awarded Building for Life accreditation Percentage of new build dwellings completions that meet Nationally Described Space Standards 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH1 Continued			for Life Accreditation <ul style="list-style-type: none"> Approval of planning applications which fail to meet NDSS 			
BH2	Sustainable Design and Construction	Sets out the sustainable design principles for major development	<ul style="list-style-type: none"> Decline in quality of sustainable development constructed Significant increase in applications approved contrary to policy Increase in number of major applications submitted without an accompanying Sustainability Statement 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Potential review of design-related SPD's and Masterplans 	<ul style="list-style-type: none"> Planning applications granted that met building regulation MH4 (2) accessible and adaptable standard Planning applications that require a Sustainability Statement 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
BH3	Public Realm	Aims to achieve high quality public realm across the city	<ul style="list-style-type: none"> Decline in quality of public realm Missed opportunities to improve public realm through development 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Potential review of public funding opportunities 	<ul style="list-style-type: none"> Public realm and public art schemes completed 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
BH4	Advertisements	To ensure that advertisements are of a high standard and protect local amenity	<ul style="list-style-type: none"> Significant increase in advertisements approved contrary to policy 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy and enforcement 	<ul style="list-style-type: none"> Advertisement consent appeals allowed 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH5	Shop Fronts	To ensure that shop fronts are of a high standard and protect local amenity	<ul style="list-style-type: none"> Significant increase in shop fronts, signage and shutters approved contrary to policy 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Plan/Policy and enforcement 	<ul style="list-style-type: none"> Number of schemes approved contrary to policy 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
BH6	Quality Communications	Sets out the criteria and supporting information required to assess a planning application	<ul style="list-style-type: none"> Significant increase in visually obtrusive and/or inappropriate telecoms infrastructure Increase in number of applications which fail to provide access to a range of providers 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Review of Infrastructure Delivery Plan 	<ul style="list-style-type: none"> 4G mobile coverage Broadband speeds 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Telecoms providers Ofcom Which?
BH7	Historic Environment	Aims to protect, enhance and manage the city's historic environment	<ul style="list-style-type: none"> Significant loss of harmful impact or deterioration of heritage assets Increased number of heritage assets on Heritage at Risk Register, or otherwise identified as being at risk Lack of progress in adopting CAMS Lack of success in securing funding for addressing heritage at risk 	<ul style="list-style-type: none"> Identify reasons for lack of implementation/ decisions contrary to policy Review objectives of policy with key partners and stakeholders, including Historic England and Tyne & Wear Specialist Conservation Team Potential review of the Plan/Policy Identify potential activities/ interventions to address issues, including reviewing 	<ul style="list-style-type: none"> Appeals allowed in conservation areas and for applications affecting listed buildings, schedule ancient monuments, historic park sand gardens and non-designated heritage assets Number of Grade I and II* Listed Buildings, Scheduled Monuments and Conservation Areas on Historic England's 'Heritage at Risk' Register 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Conservation Area Character Appraisals and Management Strategies (CAMS) Historic England's Heritage at Risk Register

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH7 Continued				funding opportunities	<ul style="list-style-type: none"> Number of formally adopted Conservation Area Character Appraisals and Management Strategies (CAMS) Number of heritage assets at risk restored through successful funding bids Number of Article 4 Directions used 	
BH8	Heritage Assets	Aims to protect and enhance the city's historic assets	<ul style="list-style-type: none"> Significant loss of harmful impacts or deterioration of heritage and archaeologically-important assets Significant number of applications approved contrary to heritage policy and guidance Increased number of heritage assets on Heritage at Risk Register, or otherwise identified as being at risk Lack of progress in adopting CAMS 	<ul style="list-style-type: none"> Identify reasons for lack of implementation/decisions contrary to policy Review objectives of policy with key partners and stakeholders, including Historic England and Tyne & Wear Specialist Conservation Team Potential review of the Plan/Policy Identify potential activities/interventions to address issues, including reviewing funding opportunities 	<ul style="list-style-type: none"> Appeals allowed in conservation areas and for applications affecting listed buildings, schedule ancient monuments, historic parks and gardens and non-designated heritage assets Number of Grade I and II* Listed Buildings, Scheduled Monuments and Conservation Areas on Historic England's 'Heritage at Risk' Register 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Conservation Area Character Appraisals and Management Strategies (CAMS) Historic England – Heritage at Risk Register Tyne & Wear Historic Environment Records
BH9	Archaeology and Recording	Aims to protect and enhance the city's archaeological assets	<ul style="list-style-type: none"> Significant loss of harmful impacts or deterioration of 	<ul style="list-style-type: none"> Identify reasons for lack of implementation/ 	<ul style="list-style-type: none"> Appeals allowed for applications refused as a result of 	<ul style="list-style-type: none"> SCC monitoring data

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH9 Continued	of Heritage Assets		heritage and archaeologically-important assets <ul style="list-style-type: none"> Significant number of applications approved contrary to heritage policy and guidance Enforcement action relating to the (failure to) archaeological record of heritage assets 	decisions contrary to policy <ul style="list-style-type: none"> Potential review of the Plan/Policy Identify potential activities/ interventions to address issues, including reviewing funding opportunities 	archaeological advice <ul style="list-style-type: none"> Planning applications with conditions requiring archaeologically recording of heritage assets 	<ul style="list-style-type: none"> Planning applications Tyne & Wear Historic Environment Records Tyne & Wear Archaeological Service
Natural Environment						
NE1	Green and Blue Infrastructure	Aims to protect, enhance and manage the city's Green Infrastructure Network	<ul style="list-style-type: none"> Significant number of applications approved contrary to Green Infrastructure Strategy and policy Significant loss of Green Infrastructure Significant loss of areas of identified wildlife corridors 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify potential activities/ interventions to address issues8 	<ul style="list-style-type: none"> Planning applications received/granted within areas of Green Infrastructure Network Appeals allowed for applications within areas of Green Infrastructure Network Net gain/loss of areas of Green Infrastructure 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Green Infrastructure Delivery Plan
NE2	Biodiversity and Geodiversity	Aims to protect, enhanced and manage the city's biodiversity and geodiversity assets	<ul style="list-style-type: none"> Loss or reduction in area of designated sites Change in condition of designated sites Change in status of species and 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Review objectives of the policy, in 	<ul style="list-style-type: none"> Planning applications approved affecting nature conservation Change in area of designated sites as a result of planning approval 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Natural England ERIC NE

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE2 Continued			habitats of principal importance <ul style="list-style-type: none"> No net gain or a net loss in biodiversity 	partnership with key stakeholders <ul style="list-style-type: none"> Identify potential measures to address issues Implement a programme of measures and monitor and review progress 		
NE3	Woodlands/ Hedgerows and Trees	Aims to retain and conserve woodlands, hedgerows and trees	<ul style="list-style-type: none"> Loss or reduction in area or quality of woodland, veteran trees, hedgerow, and trees of landscape value Reduction in the number of Tree Preservation Orders and hedgerows covered by the Hedgerow Regulations 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Review objectives of the policy in partnership with key stakeholders Identify potential measures to address issues Implement a programme of measures and monitor and review progress 	<ul style="list-style-type: none"> Change in area and quality of Ancient Semi-natural Woodland, other locally native broadleaf woodland and hedgerows as a result of planning approval Change in number, quality and status of veteran/ancient trees and trees of landscape/amenity value as a result of planning approval Number of Tree Preservation Orders and hedges negatively affected as a result of planning approvals 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Woodland Trust Natural England ERIC NE
NE4	Greenspace	Aims to protect, enhance and manage the quality and quantity of the city's	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy 	Planning applications for development that are approved	<ul style="list-style-type: none"> SCC monitoring data Planning applications Natural England

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE4 Continued		greenspace and set standards for greenspace provision within new development	<ul style="list-style-type: none"> Significant loss of existing greenspace to development Significant reduction in quality of greenspace Reduction in greenspace managed to Green Flag standards 	<ul style="list-style-type: none"> Review objectives if the policy in partnership with council biodiversity and key stakeholders Identify potential activities/ interventions to address issues 	<ul style="list-style-type: none"> contrary to Greenspace Audit Number of greenspaces provided Net gain/loss of greenspace Number of Suitable Alternative Natural Greenspaces (SANGS) created Developer contribution payments received through planning obligations towards Greenspace or outdoor sport and recreation facilities Area (ha) of new amenity greenspace created within major development schemes 	<ul style="list-style-type: none"> Woodland Trust Sport England Greenspace Audit Planning obligations monitoring
NE5	Burial Space	Aims to protect and re-use the city's burial spaces and provide new spaces where appropriate	<ul style="list-style-type: none"> Significant drop in number of cemetery plots available within the city or within key areas Identified requirement for new burial space for specific ethnic/religious group within the city 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify potential activities/ interventions to address issues 	<ul style="list-style-type: none"> Net gain/loss of burial spaces 	<ul style="list-style-type: none"> SCC monitoring data Annual citywide burial space stocktake

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE6	Green Belt	Aims to protect the city's Green Belt against inappropriate development	<ul style="list-style-type: none"> Substantial deletion of land from the Green Belt Development permitted within the Green Belt contrary to Policy/ consultation advice 	<ul style="list-style-type: none"> Identify reasons for Green Belt deletion and/or development Review strategic approach to identification of land for development Review Local Plan and Green Belt designation Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Green Belt area additions and losses (ha) Appeals allowed for applications within the Green Belt 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
NE7	Settlement Breaks	Aims to protect the city's Settlement Breaks against inappropriate development	<ul style="list-style-type: none"> Substantial deletion of land from designated Settlement Breaks Development permitted within the Settlement Break contrary to Policy/consultation advice 	<ul style="list-style-type: none"> Identify reasons for Settlement Break deletion and/or development Review strategic approach to identification of land for development Review Local Plan and Settlement Break designation Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Settlement Break area additions and losses (ha) Appeals allowed for applications within Settlement Break areas 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
NE8	Development in the Open Countryside	Sets out the circumstances when development within the open countryside will be permitted	<ul style="list-style-type: none"> Substantial areas of safeguarded land lost to inappropriate uses Development permitted within the Open Countryside contrary to Policy/Consultation advice 	<ul style="list-style-type: none"> Identify reasons for open countryside development Review strategic approach to identification of land for development Review Local Plan and extent of land designated as open countryside Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Open countryside area additions and losses (ha) Appeals allowed on land designated as open countryside Dwellings approved and built under the NPPF's Rural Exceptions Policy 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE9	Landscape Character	Aims to protect and enhance the city's landscape character	<ul style="list-style-type: none"> Significant number of proposed developments which conflict with or have an adverse effect on existing landscape characteristics 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review strategic approach to identification of land for development Review Local Plan and policy requirements for landscape of new developments <ul style="list-style-type: none"> Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Planning applications approved which conflict with, or have an adverse effect on existing landscape character 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
NE10	Heritage Coast	Aims to protect and enhance the defined Heritage Coast	<ul style="list-style-type: none"> Significant number of proposed developments which conflict with existing coastal characteristics 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review strategic approach to identification of land for development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Appeals allowed for applications within area identified as Heritage Coast 	<ul style="list-style-type: none"> SCC monitoring data Planning applications
NE11	Creating and Protecting Views	Aims to protect and enhance key local views and vistas across the city	<ul style="list-style-type: none"> Significant number of proposed developments which have a detrimental impact on existing views and vistas, as outlined in the Landscape 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review strategic approach to identification of land for development 	<ul style="list-style-type: none"> Appeals allowed for applications impacting key views and vistas as identified in Landscape Character Assessment 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Landscape Character Assessment

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE11 Continued			Character Assessment	<ul style="list-style-type: none"> Review Local Plan and policy requirements for creating and protecting vies Potential review of the Plan/Policy 		
NE12	Agricultural Land	Sets out the circumstances when development on higher grade agricultural land may be permitted	<ul style="list-style-type: none"> Significant number of proposed developments which are unsuitable for higher-grade agricultural land Substantial loss of agricultural land to development Overall reduction in quality of agricultural land 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review strategic approach to identification of land for development Review Local Plan and policy requirements for development on higher-grade agricultural land Potential review of the Policy 	<ul style="list-style-type: none"> Appeals allowed on allocated agricultural land 	<ul style="list-style-type: none"> SCC monitoring data Natural England – Agricultural Land Classification System
Water, Waste and Energy						
WWE1	Decentralised, Renewable and Low Carbon Energy	To encourage the provision of renewable and low carbon energy	<ul style="list-style-type: none"> No increase in delivery of renewable energy schemes to support development 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Explore opportunities to address issues, including funding opportunities Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Number of renewable energy installations Number of renewable energy schemes permitted Generation capacity of permitted/installed schemes 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE2	Flood Risk and Coastal Management	Aims to reduce flood risk, promote water efficiency measures and protect and enhance water quality	<ul style="list-style-type: none"> Any planning permissions granted contrary to NWL, LLFDA and EA advice Significant increase in instances of surface water flooding Significant number of new developments at risk from flooding indicated by the SFRA 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Number of properties identified as being at risk of potential flooding Applications granted contrary to NWL, LLFA and EA advice Number of flooding instances and events Planning applications approved in identified flood zones 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Lead Local Flood Authority (LLFA) Environment Agency 'Catchment Data Explorer' Northumbrian Water Ltd Strategic Flood Risk Assessment (SFRA)
WWE3	Water Management	To reduce the risk of flooding from surface water run-off	<ul style="list-style-type: none"> Significant numbers of new developments do not incorporate SuDS Significant numbers of new developments do not incorporate necessary measures to deal with discharge of surface water 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for 	<ul style="list-style-type: none"> Number of properties identified as being at risk of potential flooding Applications granted contrary to NWL, LLFA and EA advice Number of flooding instances and events Number of new developments incorporating Surface Water Management Solutions (eg SuDS) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Lead Local Flood Authority (LLFA) Environment Agency 'Catchment Data Explorer' Northumbrian Water Ltd Strategic Flood Risk Assessment (SFRA)

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE3 Continued				development (including land allocations in the Local Plan) <ul style="list-style-type: none"> Potential review of the Policy/Plan 		
WWE4	Water Quality	Protect water quality in accordance with the Northumbria River Basis Management Plan	<ul style="list-style-type: none"> Significant number of applications submitted without a water quality assessment Any planning permissions granted contrary to NWL, LLFA and EA advice Significant numbers of new developments do not incorporate SuDS Significant numbers of new developments do not incorporate necessary measures to deal with discharge of surface water 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) <ul style="list-style-type: none"> Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Improvement in groundwater quality 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Lead Local Flood Authority (LLFA) Environment Agency 'Catchment Data Explorer' Northumbrian Water Ltd Strategic Flood Risk Assessment (SFRA)
WWE5	Disposal of Foul Water	Sets out how foul water must be disposed of	<ul style="list-style-type: none"> Any planning permissions granted contrary to NWL and EA advice Significant numbers of new developments do 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external 	<ul style="list-style-type: none"> Development of waste water, sludge or sewage treatment works 	<ul style="list-style-type: none"> SCC monitoring data Planning applications EA planning applications monitoring

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE5 Continued			not incorporate necessary measures to deal with discharge of surface water <ul style="list-style-type: none"> • Increase in the number of applications for development involving non-main methods of drainage – particularly cess pits 	stakeholders, particularly EA and NWL <ul style="list-style-type: none"> • Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) • Potential review of the Policy/Plan 		
WWE6	Waste Management	Encourages the application of the waste hierarchy and seeks to support the delivery of waste management facilities	<ul style="list-style-type: none"> • Significant increase in overall level of waste managed per head of population • Significant increase in the amount of waste sent to landfill and/or reduction in amount managed by sustainable methods 	<ul style="list-style-type: none"> • Identification of reason for under-performance and/or under-delivery • Review objectives of the policy in partnership with key external stakeholders, particularly waste operators • Review evidence base with regard to waste management • Potential review of the Policy/Plan 	<ul style="list-style-type: none"> • Municipal waste arisings • Household waste collected • Percentage of household waste recycled • Development of new waste management facilities 	<ul style="list-style-type: none"> • SCC and regional/sub-regional monitoring data • South Tyne & Wear Waste Management Partnership (STWWMP) • Planning applications • Waste operators
WWE7	Waste Facilities	Sets out the criteria and supporting information require to assess a planning application	<ul style="list-style-type: none"> • Significant increase in overall level of waste managed per head of population • Significant increase in the amount of 	<ul style="list-style-type: none"> • Identification of reason for under-performance and/or under-delivery • Review objectives of the policy in partnership with key 	<ul style="list-style-type: none"> • Development of new waste management facilities • Air quality • Amount of waste sent to landfill and/or reduction in 	<ul style="list-style-type: none"> • SCC and regional/sub-regional monitoring data • South Tyne & Wear Waste Management

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE7 Continued			waste sent to landfill and/or reduction in amount managed by sustainable methods	external stakeholders, particularly waste operators <ul style="list-style-type: none"> Review evidence base with regard to waste management Potential review of the Policy/Plan 	amount of managed by sustainable methods <ul style="list-style-type: none"> Municipal waste arising 	Partnership (STWWMP) <ul style="list-style-type: none"> Planning applications Waste operators Air Quality Annual Status Report National CO₂ emissions
WWE8	Safeguarding Waste Facilities	To protect waste facilities in the City and sets out the circumstances where they would be considered for alternative uses	<ul style="list-style-type: none"> Significant increase in overall level of waste managed per head of population Significant increase in the amount of waste sent to landfill and/or reduction in amount managed by sustainable methods Significant loss of existing waste management facilities 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly waste operators Review evidence base with regard to waste management Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Municipal waste arising Household waste collected Loss of existing and development of new waste management facilities 	<ul style="list-style-type: none"> SCC monitoring data South Tyne & Wear Waste Management Partnership (STWWMP) Planning applications Waste operators
WWE9	Open Waste Facilities	Sets out the criteria that will be used to assess applications for open waste facilities	<ul style="list-style-type: none"> Significant increase in applications granted for open waste facilities Increase in number of open waste facilities granted in inappropriate locations 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly waste operators 	<ul style="list-style-type: none"> New open waste management facilities permitted/developed Planning applications for open waste facilities granted in inappropriate locations 	<ul style="list-style-type: none"> SCC monitoring data South Tyne & Wear Waste Management Partnership (STWWMP) Planning applications Waste operators

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE9 Continued				<ul style="list-style-type: none"> Review evidence base with regard to waste management Potential review of the Policy/Plan 		
WE10	Energy from Waste	Sets out the criteria that will be used to assess application for energy from waste developments	<ul style="list-style-type: none"> Significant number of applications approved without appropriate mitigation Significant number of applications for waste development which do not provide heat and power 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Number of energy from waste schemes permitted Amount of facilities that produce heat and power 	<ul style="list-style-type: none"> SCC monitoring data Planning applications South Tyne & Wear Waste Management Partnership (STWWMP) and regional waste disposal authority data
Sustainable Transport						
SP10	Connectivity and Transport Network	Aims to improve accessibility by sustainable transport modes to local services, centres and key facilities	<ul style="list-style-type: none"> Lack of progress of the schemes identified through the policy Significant increase in traffic flows Significant decrease in the number of cycle trips Lack of progress extending and improving the cycle network Lack of progress securing 	<ul style="list-style-type: none"> Identify reasons for lack on implementation Review of Local Transport Plan projects and priorities Review of the Infrastructure Delivery Plan and the schemes within it Explore opportunities to address under-delivery including 	<ul style="list-style-type: none"> Delivery of the essential transport-related schemes in the Infrastructure Delivery Plan (IDP) Progress of the desirable and aspirational transport related schemes in the Infrastructure Delivery Plan (IDP) Length of new cycleways delivered 	<ul style="list-style-type: none"> SCC monitoring data Infrastructure Delivery Plan (IDP) Nexus/LTP monitoring Tyne & Wear Traffic & Accident Data Unit (TADU) Highways England monitoring Traffic counts Cycle counts

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP10 Continued			<p>improvements to metro and rail networks</p> <ul style="list-style-type: none"> Consent granted for development on land safeguarded for future railway alignments 	<p>accessing additional funding sources</p> <ul style="list-style-type: none"> Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Number of improvements to existing cycleways Bus/metro ridership Applications for development on safeguarded land 	
ST1	Urban Core Accessibility and Movement	Sets out principles for interventions that address accessibility and movement issues in Sunderland Urban Core	<ul style="list-style-type: none"> Failure to develop a coherent NECA Transport Manifesto Lack of progress of specific schemes identified through policy Significant increase in traffic flow through the city centre Lack of progress improving the cycle network Significant decrease in number of cycle trips and travel by sustainable modes Significant decrease in the number of parking spaces in car parks around the ring road Lack of delivery of the bus strategy 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Review of Urban Core specific policies Review of the Infrastructure Delivery Plan and the schemes within it Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Progress delivering the identified schemes in line with IDP phasing Number of improvements to existing cycleways Number of road traffic accidents and road safety levels within the city centre Air quality within Urban Core Number of parking spaces in car parks around the ring road Additional rail services from Sunderland station Bus/metro ridership Public realm schemes implemented 	<ul style="list-style-type: none"> SCC monitoring data Nexus/LTP monitoring Rights of Way Improvement Plan Tyne & Wear Traffic & Accident Data Unit (TADU) Traffic counts Cycle counts Air Quality Annual Status Report National CO₂ emissions

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ST1 Continued			<ul style="list-style-type: none"> Lack of delivery of improvements to public transport facilities Failure to deliver improvements to Sunderland Rail Station 			
ST2	Local Road Network	Sets out the principles on which major highway infrastructure schemes will be developed to support wider policies in the Local Plan	<ul style="list-style-type: none"> When the local network is not capable of supporting the scale of development 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Policy/Plan Review of the Infrastructure Development Plan and Local Transport Plan 	<ul style="list-style-type: none"> Traffic flows monitoring (vehicular and cycling) Number of road traffic accidents on local road network Applications granted contrary to Highways advice 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Transport modelling Tyne & Wear Traffic & Accident Data Unit (TADU)
ST3	Development and Transport	Sets out the criteria and supporting information required to assess a planning application	<ul style="list-style-type: none"> When the local network is not capable of supporting the scale of development Significant shortfall in number of electric vehicle parking and charging infrastructure Consent granted for development on area of safeguarded Definitive Public Rights of Way 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Policy/Plan Review of the Infrastructure Development Plan and Local Transport Plan schemes Review effectiveness of council's ability to secure S106 monies for highways infrastructure 	<ul style="list-style-type: none"> Traffic flows monitoring (vehicular and cycling) Number of road traffic accidents on local road network Number cycleways/ pedestrian routes delivered Travel Plans approved Number of cycle parking/storage spaces approved Number of electric vehicle charging points approved 	<ul style="list-style-type: none"> SCC monitoring data Planning applications (and associated Transportation Assessments and Travel Plans) Rights of Way improvement Plan (ROWIP) Tyne & Wear Traffic & Accident Data Unit (TADU)

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ST3 Continued			<ul style="list-style-type: none"> Increase in number of applications approved which do not meet parking standards 		<ul style="list-style-type: none"> Applications granted contrary to Highways advice 	
Minerals						
SP11	Mineral Extraction	Sets out the criteria that will be used to assess applications for mineral extraction	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy leading to loss of potential mineral resources surface water flooding associated with minerals extraction Increase in flood risk and surface water flooding Loss of supporting minerals infrastructure 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under delivery Review of evidence base Review objectives of the policy in partnership with key external stakeholders Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Flood risk and surface water flooding Capacity of permitted reserves Air quality 	<ul style="list-style-type: none"> SCC and regional/sub-regional monitoring data Planning applications Minerals operators Local Aggregates Assessment Strategic Flood Risk Assessment (SFRA) Air Quality Annual Status Report National CO₂ emissions
M1	Mineral Safeguarding Areas and Infrastructure	Sets out the criteria that will be used to assess applications submitted within mineral safeguarding areas	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy leading to loss of potential mineral resources and waste infrastructure Loss of supporting minerals and waste infrastructure Applications granted for non- 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under delivery Review of evidence base Review objectives of the policy in partnership with key external stakeholders Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Safeguarding and sterilisation of mineral resources Air quality levels Planning applications granted in close proximity to existing waste management sites Number of applications granted in MSA for non- 	<ul style="list-style-type: none"> SCC and regional/sub-regional monitoring data Planning applications Minerals operators Waste operators Air Quality Annual Status Report National CO₂ emissions

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
M1 Continued			mineral development within Mineral Safeguarding Areas		mineral development	
M2	Surface Coal extraction	Sets out the criteria against which applications for surface coal extraction will be addressed	Significant number of applications approved contrary to policy leading to loss of potential mineral resources	<ul style="list-style-type: none"> • Identification of reason for under-performance and/or under delivery • Review of evidence base • Review objectives of the policy in partnership with key external stakeholders Potential review of the Policy/Plan	<ul style="list-style-type: none"> • Opencast coal applications and permissions 	<ul style="list-style-type: none"> • SCC and regional/sub-regional monitoring data • Planning applications Minerals operators
M3	Land Instability and Minerals Legacy	Ensure that development takes into account land instability and minerals legacy	<ul style="list-style-type: none"> • Significant number of applications approved contrary to policy Significant increase in applications requiring a Coal mining Risk Assessment 	<ul style="list-style-type: none"> • Identify reasons for the failure to delivery Policy aims Consider review of the requirements of this and other policies where they prevent effective implantation of this policy • Potential review of the Policy/plan 	<ul style="list-style-type: none"> • Planning applications received and granted in Coal Authority high-risk areas and areas of land instability • Planning applications requiring a Coal Mining Risk Assessment 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications
M4	Restoration and Aftercare	Sets out the standard of minerals and waste aftercare/restoration that will be required	<ul style="list-style-type: none"> • Significant number of applications approved contrary to policy 	<ul style="list-style-type: none"> • Identify reasons for the failure to delivery Policy aims • Consider review of the requirements of this and other policies where the 	<ul style="list-style-type: none"> • Restoration schemes implemented 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Minerals operators • Waste operators

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
M4 Continued				<ul style="list-style-type: none"> prevent effective implantation of this policy Potential review of the Policy/plan 		
Implementation						
ID1	Delivery Infrastructure	Sets out how the council expects infrastructure to be delivered	<ul style="list-style-type: none"> Development is approved without the necessary infrastructure Essential infrastructure schemes are not delivered/on track to delivery within the plan period 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Possible review of the plan if essential infrastructure cannot be delivered 	<ul style="list-style-type: none"> Essential infrastructure projects delivered in line with the Infrastructure Delivery Plan (IDP) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Infrastructure Delivery Plan
ID2	Planning Obligations	Sets out how S106 will be used	<ul style="list-style-type: none"> Legal actions having to be taken against developers for non-payment of S106 monies Contributions are not sought in line with the aims set out in the Planning Obligations SPD 	<ul style="list-style-type: none"> Identify reasons for the failure to delivery Policy aims Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Number of applications approved with a S106 (or similar) agreement for developer contributions Amount of (£) of developer contributions negotiated/secured towards different infrastructure types and affordable housing Amount (£) of developer contributions received towards different infrastructure types and affordable housing 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Infrastructure Delivery Plan

