



# Draft Sunderland Allocations and Designations Plan

Regulation 18 Sustainability Appraisal Report  
Non-Technical Summary

On behalf of **Sunderland City Council**



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# 1 Introduction

## 1.1 Background

- 1.1.1 Stantec UK Ltd (Stantec) has been commissioned by Sunderland City Council (SCC) to undertake a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), of the emerging Sunderland Allocations and Designations Plan ('A&D Plan').
- 1.1.2 This Non-Technical Summary (NTS) of the Sustainability Appraisal Report ('the SA Report') documents the findings of the SA carried out at Regulation 18 stage of plan preparation in respect of the Consultation Draft A&D Plan ('the Draft A&D Plan'). The SA has been undertaken in accordance with Section 19(5) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') and the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').

## 1.2 Sunderland Allocations and Designations Plan

- 1.2.1 Once adopted, the A&D Plan will form the final (third) element of SCC's new statutory Development Plan covering the period 2015 - 2033, which also comprises of the adopted Sunderland Core Strategy & Development Plan (CSDP) (2020) and the International Advanced Manufacturing Park Area Action Plan (IAMP AAP) (2017). The A&D Plan will supersede and replace all remaining saved policies of the Sunderland Unitary Development Plan (1998) and Unitary Development Plan Alteration No.2 (2007).
- 1.2.2 The A&D Plan will directly support the delivery of the Sunderland CSDP (2020) overarching strategy and strategic objectives and more widely contribute to the planning strategy for the SCC area by:
- Allocating the balance of development sites needed to support Sunderland's new spatial strategy. This includes allocation of a sufficient quantum of housing sites to meet objectively assessed need (OAN) over the plan period to 2033 as outlined in Policy SP1 of the CSDP, as well as other required development sites:
    - Limited additional strategic housing allocations (building on those already allocated within the Sunderland CSDP 2020): Riverside Sunderland and Land East of Washington (Washington Meadows), both of which will be supported by Supplementary Planning Document (SPDs);
    - Non-strategic housing allocations selected from candidate sites submitted to the Sunderland Strategic Housing Land Availability Assessment (SHLAA) process. These allocations will be supported by development frameworks within the A&D Plan; and,
  - Retail allocations, informed by the Sunderland Retail Needs Assessment (2016) and Retail Evidence Paper (2020).
  - Spatially define a suite of local designations (ecology, green infrastructure and heritage) to support delivery of Sunderland CSDP's environmental protection policies (including amenity and heritage). The Sunderland A&D Plan is expected to include local ecology, green infrastructure and heritage designations. We understand that a separate programme of technical evidence base work is nearing completion to support the selection of these designations; and,
  - Replacing the remaining saved policies from the Sunderland Unitary Development Plan (1998) and Unitary Development Plan No.2 (2007).

### 1.3 Form of the A&D Plan

1.3.1 The Regulation 18 Draft A&D Plan which has been subject to SA comprise of the following substantive components, which are also expected to be included in the Regulation 19 Proposed Submission A&D Plan in due course:

- Introduction – provides an overview of the purpose and content of the A&D Plan and the approach to its preparation;
- Spatial Vision and Strategic Priorities- This section sets out how this plan will deliver the vision and strategic priorities in the CSDP for Sunderland by 2033.
- Spatial Strategy - outlines the spatial strategy for how and where the future growth of Sunderland will be delivered and contains strategic allocations which are fundamental to the delivery the Local Plan;
- Strategic and Local Policies – This section includes chapters that will guide and manage development covering a range of themes including; Homes; Vitality of Centres; Built and Historic Environment; Natural Environment; Water, Waste and Energy, Sustainable Transport and Minerals. As above, these sections are consistent with the themes contained within the CSDP.
- Implementation and Monitoring - This section sets out how the policies in the A&D Plan will be implemented (including infrastructure and delivery) and how the policies will be monitored.

### 1.4 How to Comment on this SA Report

1.4.1 The SA Report and this Non-Technical Summary (NTS) is being consulted on alongside the Draft A&D Plan. The consultation will run for a period of 8 weeks from 18 December 2020 – 12 February 2021. Details of the consultation are included on the Councils website ([www.sunderland.gov.uk/article/12800/Have-Your-Say](http://www.sunderland.gov.uk/article/12800/Have-Your-Say) ). Comments on the Consultation Draft A&D Plan and this SA Report can be submitted by email to [planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk) , or in writing to Strategic Plans Team, Sunderland City Council, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

## 2 Environmental and Policy Context

### 2.1 Key Sustainability Issues

- 2.1.1 With reference to the environmental topics prescribed within Schedule 2 of the SEA Regulations, a summary of the key sustainability issues identified for the A&D Plan is outlined in **Table 2.1** below and key statutory environmental and heritage designations within SCC are shown in **Appendix A**. The identification of these key sustainability issues has also been informed by consideration of the likely evolution of baseline conditions in the absence of the emerging A&D Plan.
- 2.1.2 The Sunderland CSDP (2020) provides the strategic context for the emerging A&D Plan, including in relation to how key sustainability issues will be addressed over the plan period to 2033. In accordance with the approach outlined in the A&D Plan SA Scoping Report, given the limited time which has elapsed since undertaking the SA of the CSDP, baseline and policy reviews to inform this SA have therefore focused on carrying forward key sustainability issues previously identified for the CSDP which remain of relevance to the A&D Plan *and* identifying baseline or policy changes which result in new or different key sustainability issues. The review outlined below considers the implications of this fully updated set of key sustainability issues for both A&D Plan preparation and the associated SA process.
- 2.1.3 This proportionate approach provides the evidence necessary to identify the relevant key sustainability issues for the A&D Plan and satisfies the information requirements specified in the SEA Regulations. In doing so, the approach avoids a need to collate extensive new comprehensive baseline and policy review appendices which would not change the resulting set of key sustainability issues identified for the A&D Plan and would therefore add little value.
- 2.1.4 As outlined in the A&D Plan SA Scoping Report, the SA of the CSDP addressed a wide range of key issues identified for the SCC area based on environmental, social and economic baseline data and policies reviewed from 2015 – 2019. This included consideration of climate change data and policy requirements (both mitigation and adaptation) as well as biodiversity net gain and wider environmental net gain requirements. Key changes in baseline conditions since commencing the preparation of the CSDP (2015) include:
- Population growth: The SCC Director of Public Health Annual Report 2019 (presented to SCC Cabinet in March 2020) notes a steady increase over recent years in the area's resident population, reaching 277,000 in 2019. The adopted Sunderland CSDP plans to accommodate a population of approximately 290,000 by 2033;
  - Advanced manufacturing growth: Confirmation by Nissan (May 2020) that their Sunderland plant will become the single hub for production of core models for Europe;
  - Multiple Deprivation: Based on the 2019 Indices of Deprivation, Sunderland is ranked as the 33rd most deprived local authority in England; and,
  - COVID-19 Pandemic (2020): The ongoing COVID-19 pandemic has had a severe impact on the economy, employment and the way that society functions. Impacts of the pandemic are likely to be felt for years to come and may affect a wide range of factors such as employment levels and opportunities, local businesses, the housing market, travel patterns and health inequality.
- 2.1.5 Key policy changes include:

#### National Level

- UK withdrawal from the European Union (January 2020): There are potential implications for the manufacturing industry in Sunderland associated with the UK's withdrawal from the EU. This

may impact investment and employment opportunities in the area, including employees of Nissan's factory in Sunderland.

- **More ambitious carbon reduction targets (2019):** In June 2019, the Government increased the UK's legislated target for Greenhouse Gas (GHG) emissions reductions from at least 80% to at least 100% by 2050. This 'Net Zero' target now underpins climate change mitigation action at national, regional and local levels. The increased target follows advice from the UK's statutory Climate Change Committee and responds to the Paris Agreement (2015), an agreement within the United Nations Framework Convention on Climate Change (UNFCCC) which requires action to keep the increase in global average temperature to well below 2 °C above pre-industrial levels and to pursue efforts to limit the increase to 1.5 °C by 2100.
- **Publication of 25 Year Environmental Plan (2018) and Environmental Bill (2020):** A range of new environmental protection targets and measures have been introduced, including a commitment to require biodiversity net gain to be provided within new developments.
- **Updated National Planning Policy Framework (NPPF) (2019):** The NPPF provides an overarching framework for the production of local policy documents and at the heart of this document is a presumption in favour of sustainable development. The Government published an updated version of the NPPF on 9th February 2019, supported by updated online Planning Practice Guidance (PPG). Of relevance to the A&D Plan and this SA process is that the NPPF (2019) and associated PPG stresses the need for planning authorities to demonstrate compliance with the 'Duty to Co-operate' when identifying, assessing and allocating housing sites. This indicates a need for all identified 'reasonable alternative' options for meeting housing needs (refer to Section 5) to be subject to robust assessment prior to the selection of a final suite of housing site allocations. The Government are also consulting on the proposals to the reform of the planning system in England. The Planning for the Future Whitepaper was published in August 2020 and consulted on from 6th August 2020 – 29th October 2020.
- **EA2025 Priorities:** Published in July 2020, this document forms the Environment Agency's new action plan and sets out the organisation's priorities from 2020 to 2025. These are identified as: resilient to climate change, healthy air, land and water, and green growth.

### Regional Level

- **Northumbria river basin district Flood Risk Management Plan (FRMP) 2015 - 2021:** FRMPs are new strategic plans for implementing the Flood Risk Regulations 2009 and the existing National Flood and Coastal Erosion Risk Management Strategy for England. They have been developed for River Basin Districts (RBDs) and Floods Risk Areas (FRAs) and draw together information from a range of existing strategies and plans that are in place and continue to be maintained by Risk Management Authorities. The FRMP for the Northumbria RBD provides an overview of the range of flood risks from different sources across the 4 catchments of the RBD, as defined in the Northumbria River Basin Management and based on the natural configuration of waterbodies.

### Local Level

- **SCC Climate Emergency (March 2019):** SCC and the North East Combined Authority (NECA), which SCC is part of, have both formally declared a climate emergency. SCC has also These declarations have been made with reference to climate change policy changes at national and international levels as noted above. In addition, SCC has also signed the UK 100 Pledge, which is a commitment to shifting to 100% clean energy by 2050, and is currently preparing a Low Carbon Framework and a Council Action Plan. These documents will establish how Sunderland will play its part in address the impacts of climate change.
- **Sunderland City Plan (November 2019):** The City Plan has been developed to address the economic and social challenges that Sunderland faces including; outward migration, ensuring the city centre functions as the economic motor for the whole city, improving the skills and



qualifications of local residents to match the needs of industry in the city, changing poor health behaviours and addressing the high levels of children in need and care. The plan is centred around three themes, which are: a dynamic city, a healthy city and a vibrant city and includes ambitions to provide more and better jobs, move to a low carbon economy and promote health, wellbeing and culture.

- North East Strategic Economic Plan (January 2019): the Strategic Economic Plan was first published in 2014 and was most recently updated in January 2019. This outlines the North East's plan for growing and developing a more productive, inclusive and sustainable regional economy. Its ambition is to increase the number of jobs in the North East by 100,000 between 2014 and 2024, with 70% of these being better jobs, defined as managerial, professional and technical roles. Within this, the four areas identified as having a strong opportunity for growth were: digital, advanced manufacturing, health & life sciences and energy. Other service sectors also identified as playing a key role in supporting the regional economy and offering significant opportunities for employment growth.
- 2.1.6 Having regard to all baseline data, policy reviews and key sustainability issues previously identified through the SA of the CSDP, the above review of recent developments, and comments provided by the SEA Consultation Bodies through SA Scoping, **Table 2.1** below identifies an updated set of key sustainability issues of specific relevance to the emerging A&D Plan and this associated SA.
- 2.1.7 As previously set out within the A&D Plan SA Scoping Report, a suite of more strategic key sustainability issues are identified which are also relevant to the overall statutory Development Plan, including the A&D Plan, but are considered to have been addressed through the CSDP. These issues therefore have more limited implications for the A&D Plan and for this SA but have still been taken into account where relevant.
- 2.1.8 In combination, the suite of key sustainability issues outlined in **Table 2.1** and the additional sustainability issues identified capture all relevant environmental issues, problems and challenges which can be identified from reviewing available environmental baseline data, relevant policy documents and those issues previously identified through the SA of the Sunderland CSDP which remain relevant. For the avoidance of doubt, the provision of extensive new comprehensive baseline and policy review appendices would not change the resulting set of key sustainability issues identified for the A&D Plan.

Table 2.1: Key Sustainability Issues Relating to the emerging A&D Plan

Key Issues	Implications for emerging A&D Plan
<b>Social</b>	
Ageing population	There is a need to plan to provide age friendly development in recognition of the ageing population in the city.
Outward migration of the working age population	There is a need to plan to provide more housing that will support the working age population; this includes larger family housing, to reduce the outmigration of the working age population. It is also important to ensure that the plan delivers sufficient new housing to meet identified needs.
Improve housing choice, in particular addressing the shortfall in affordable and larger family housing.	Seek to meet deficiencies in housing stock identified through the Strategic Housing Market Assessment (SHMA), in particular increasing the delivery of affordable and larger family housing to meet identified needs.
Reduce crime and the fear of crime.	Promote good design and mixed-use developments, to increase usage at all times of the day and improve passive surveillance.
Improve health, well-being and prosperity of residents.	<p>Promote healthy lifestyles in order to promote health outcomes, including through well placed and designed developments that support reductions in health inequalities. Include allocations and designations to protect green spaces used for leisure and recreation that are open and accessible to all.</p> <p>Promote development that helps address deprivation within the City, including access to employment and education, in order to significantly improve the city's IMD ranking.</p>
<b>Environmental</b>	
Need to reduce greenhouse gas emissions to become 'carbon neutral' by 2030.	Support ambitions to become carbon neutral by 2030. Plan positively for renewable forms of energy, such as through designating areas suitable for renewable energy production. Promote sustainable patterns of development to reduce the distance travelled and promote modal shift towards more sustainable transport methods.
Reduce the risk of flooding	Direct development away from those areas at highest risk of flooding and towards Flood Zone 1 where possible, ensure proposals located in flood zones are suitable for their proposed uses and support the deployment of mitigation measures (local and catchment wide) to protect communities from flood risks.
Coastal Erosion and sea level rise	Seek to implement measures to reduce the rate of coastal erosion. Ensure development takes account of likely sea level rises and direct development away from low lying areas particularly at risk.
Conserve and enhance important ecological and geodiversity sites.	<p>Ensure allocations do not have a significant adverse effect upon designated sites and that new developments provide biodiversity net gain to help restore ecological networks.</p> <p>The plan should also aim to identify local areas of ecological importance and ensure adequate protection for the city's biological resources and protected species.</p>

Key Issues	Implications for emerging A&D Plan
Retain and protect the Green Belt.	<p>Retain protection for the openness of the established Green Belt. As a strategic policy matter, the Green Belt was recently reviewed through the Sunderland CSDP (2020), resulting in a limited number of strategic housing release sites being allocated to help meet identified housing needs and to support the implementation of a new spatial strategy for Sunderland.</p> <p>It is not within the scope of the A&amp;D Plan to address strategic policy matters and no further Green Belt review is required as sufficient land outside of the Green Belt is now available for allocation to meet housing needs. The allocations and designations included within the emerging A&amp;D Plan must however continue to protect the openness and support the purpose of the Green Belt.</p>
Enhance landscape character	Ensure that allocations and designations protect the City's rural and urban landscape, with particular emphasis to improving existing poorer quality environments.
Protect and enhance the historic environment	Seek to protect and enhance both designated and non-designated heritage assets based on their significance and the contribution made by their setting.
<b>Economic</b>	
Promote a strong and stable economy, creating jobs.	Seek to ensure that new residential development is provided in areas where there is access to employment opportunities and that new development does not negatively impact jobs of existing communities.
Improve Gross Value Added (GVA) through increased participation, increased productivity, and creating businesses.	Support economic growth in order to help reduce unemployment, create new businesses and increase GVA to help achieve the aspirational targets set out in SCC's Economic Masterplan and North East Strategic Economic Plan.
Promote City for low carbon economy.	Ensure the A&D Plan supports the transition to a low carbon economy in accordance with the NPPF, North East Strategic Economic Plan and the City Deal. This may include designating land suitable for renewable energy production and generation.
Improve infrastructure to facilitate economic growth	Promote investment in infrastructure to support economic growth and deliver the spatial growth ambitions set out in the CSDP.
Support the delivery of the CSDP spatial strategy, including by distributing housing growth in appropriate locations and directing commercial development to the Urban Core.	Ensure continued support for the development of strategic site allocations (housing and employment), as identified within the CSDP (2020) and the IAMP AAP (2017).

## **3 Approach to Sustainability Appraisal**

### **3.1 Overview**

- 3.1.1 In accordance with the SEA Regulations the purpose of SEA is to identify, assess and evaluate the likely significant environmental effects of a qualifying plan, programme or strategy. Under the 2004 Act, the purpose of SA is to assess the contribution of a development plan to delivering sustainable development. SA and SEA therefore share a common focus on assessing environmental and wider sustainability performance and can be undertaken and reported together, as in this report.
- 3.1.2 A common objective of SA, incorporating SEA, is to enhance the environmental and wider sustainability performance of emerging plans and programmes. This is achieved through identifying any likely significant effects from implementation of the emerging plan as drafted, proposing mitigation measures to address any identified significant adverse environmental effects, and identifying enhancement measures to improve the overall performance of the plan as it evolves. As such, SA incorporating SEA is an integral part of good development planning and should not be viewed as a separate or retrospective activity. This means that SA, incorporating SEA, should be undertaken in respect of each emerging substantive component or proposal for an emerging plan at the time when the relevant component or proposal is itself being consulted on.

### **3.2 Previous SA and SEA Reporting**

#### **Previous Sunderland CSDP SA**

- 3.2.1 Stantec previously completed a full SA, incorporating SEA, of the Sunderland CSDP throughout its development, up to the point of plan adoption in February 2020. This included initial appraisal of spatial and growth level options, detailed assessment of CSDP policies and collaborative working with SCC officers to assess a range of strategic site allocations. In line with best practice, mitigation and enhancement recommendations were devised through the SA process and incorporated into the CSDP at Regulation 18, Regulation 19 and post-examination stages to ensure the avoidance of likely significant adverse effects and maximise its sustainability performance.
- 3.2.2 As the A&D Plan is directly linked to the Sunderland CSDP (2020) it is essential that the SA, incorporating SEA, takes account of the methodology and results of the SA previously carried out for the Sunderland CSDP. This is needed to ensure consistency in the treatment of all 'reasonable alternative' candidate housing sites and in the reporting of likely significant effects from different components of SCC's statutory Development Plan. A review of the Sunderland CSDP SA Framework was undertaken as part of the SA Scoping Report for the A&D Plan to identify whether the SA Framework devised for the SA (incorporating SEA) of the CSDP remained valid and allowed the A&D Plan SA to proportionately and effectively respond to key sustainability issues. The A&D Plan SA Scoping Report (June 2020) confirmed that whilst elements from the previous CSDP SA Framework could be retained, a new SA Framework would be required for this SA.

#### **SA and SEA Scoping – A&D Plan**

- 3.2.3 In June 2020, a SA Scoping Report was consulted on with the SEA Consultation Bodies (Natural England, Historic England and Environment Agency). The purpose of the SA Scoping Report was to enable the SEA Consultation Bodies to form a view on the scope/level of detail appropriate for SA Report for the A&D Plan. Of note, the purpose of the SA Scoping Report was not to provide all information specified within the SEA Regulations for inclusion within 'assessment stage' SEA Environmental Reports (as per this SA Report), as only Scoping level information was available at that stage.

- 3.2.4 A key objective of the SA Scoping Report was to identify an evidence-based SA Framework to assess in a systematic way the likely sustainability effects from substantive components of the emerging A&D Plan. This SA Framework comprises a series of Sustainability Objectives, Spatial Criteria and Guide Questions regarding identified socio-economic and environmental issues of relevance to the SCC area and, as outlined above, builds on the previous framework developed for the SA of the Sunderland CSDP.
- 3.2.5 Taking account of the minor modifications requested by the SEA Consultation Bodies, the final SA Framework developed through SA Scoping and which is being used to assess the emerging A&D Plan is provided in full within **Appendix C** of the SA Report.

### 3.3 Preparation of this SA Report

#### Overview

3.3.1 The SA Report has been prepared to accompany the 'Regulation 18' Draft A&D Plan for consultation. The SA Report presents the findings of an appraisal carried out to identify, assess and evaluate the likely significant effects of the substantive proposals contained within the Draft A&D Plan. In doing so, each substantive component or proposal, together with any identified reasonable alternatives (see below), have been subject to assessment against the 15 SA Objectives defined within the finalised A&D Plan SA Framework. The full A&D Plan SA Framework is provided in Appendix C of the main SA report, but in summary the 15 SA Objectives relate to:

- Biodiversity and Geodiversity;
- Housing
- Economy and Employment
- Learning and Skills
- Sustainable Communities
- Health and Wellbeing
- Transport and Communication
- Land Use and Soils
- Water
- Flood Risk and Coastal Erosion
- Air
- Climate Change
- Waste and Natural Resources
- Cultural Heritage
- Landscape and Townscape

#### SA Reporting

3.3.2 All components of the Draft A&D Plan and any identified reasonable alternatives to these were appraised in detail using matrices to identify likely significant effects on the SA Objectives.

This approach allowed for systematic recording of potential effects and their significance. The components of the emerging A&D Plan which have been assessed related to allocations and designations. Assessment criteria have been developed for each of these components based on the guide questions and spatial criteria outlined in the SA Framework in **Appendix C** of the SA Report. The general qualitative scoring system which the assessments have been based on is outlined in **Table 3.1** below.

Table 4.3: SA Scoring System to Establish Likely Significant Effects

Score	Description	Symbol
Significant (Major) Positive Effect	The proposed option/policy contributes significantly to the achievement of the SA Objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the SA Objective but not significantly.	+
Neutral Effect	The proposed option/policy is related to but does not have any effect on the achievement of the SA Objective	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the SA Objective but not significantly.	-
Significant (Major) Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective. Significant Adverse effect predicted; mitigation therefore required in accordance with the SEA Regulations.	--
Uncertain Effect	The proposed option/policy has an uncertain relationship to the SA Objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an assessment to be made.	?
No Clear Relationship	There is no clear relationship between the proposed option/policy and the achievement of the SEA objective or the relationship is negligible.	~

- 3.3.3 The assessment methodology, scoring systems and completed assessment tables for the allocation sites and designation sites are provided in **Appendix D** and **E** of the SA Report, respectively and the outcomes summaries in **Section 5** below. For reasons of brevity the full methodology is therefore not reproduced below, rather attention is drawn to key elements which have underpinned the assessment scope and approach.
- 3.3.4 The appraisal of each plan component was initially undertaken on a pre-mitigation basis, i.e. assuming full implementation of the component as stated in the Draft Sunderland A&D Plan at the time of undertaking the assessment (October 2020) without the provision of additional policy safeguards or mitigation measures. However, recommendations to address identified weaknesses and uncertainties were provided by Stantec to SCC and in most cases have now been incorporated within the final Draft Sunderland A&D Plan prior to its publication for consultation.

### 3.4 Consideration of Reasonable Alternatives

- 3.4.1 Caselaw has established that the consideration of reasonable alternatives in accordance with the SEA Regulations functions as an important evidence base to justify a plan or strategy as prepared, and the non-inclusion of possible other contents, in terms of:
- Demonstrating that proposed plan components (e.g. site allocations) are themselves 'reasonable' (i.e. evidence based and contributing effectively to the implementation of higher-level objectives); and,
  - Determining whether there are any other 'reasonable alternatives' to the proposed components of the plan as prepared which could achieve the same objectives. In the event that reasonable alternatives can be identified, these should be subject to an equal level of assessment (to identify likely significant effects). This process should demonstrate that the selected plan components (i.e. the plan as prepared) performs better in overall terms than any other identified reasonable alternatives.
- 3.4.2 To be eligible for consideration in this SA process (incorporating SEA), reasonable alternatives must therefore be:
- Realistic, in that they are plausible alternatives which could be implemented instead of proposals within the emerging A&D Plan and are consistent with relevant national and other policy frameworks;
  - Related to the objectives of the emerging A&D Plan; and,
  - Within the geographical scope of the emerging A&D Plan, i.e. any reasonable alternatives would need to relate to the distribution or characteristics of future development within the SCC area.
- 3.4.3 Reflecting the components of the emerging A&D Plan, identified reasonable alternative options relating to the selection of both proposed (development) allocations and (environmental) designations have been subject to an equal and proportionate level of SA. The SA process has also confirmed that, based on available information at this stage, there are no other reasonable alternatives which require to be considered and subject to SA.

## 4 How has the SA informed the Draft A&D Plan?

### 4.1 Pre-Assessment Phase

- 4.1.1 Prior to the settled version of the Draft A&D Plan being subject to a formal SA (leading to the preparation of this SA report), the project team undertook a critical friend review of emerging A&D Plan components to identify and address key sustainability issues or uncertainties from emerging content. Informal advice and structured recommendations were provided to SCC officers to allow these reviews to inform the emerging A&D Plan.
- 4.1.2 The review focused on examining the effectiveness of the proposed structure and content of the draft A&D Plan in relation to the core SA issues. Key issues identified during the review related to:
- Requirements for further development of policies allocating strategic sites and greater clarity in the reasoned justifications for allocating these sites within the A&D Plan;
  - Further details needed regarding the rationale for and scope of proposed environmental designations (various types); and,
  - Stronger links between strategic site allocations and associated Supplementary Planning Documents (SPDs) setting out detailed mitigation requirements, with these requirements informed or validated by this SA to confirm they sufficiently address likely significant (adverse) environmental effects.
- 4.1.3 Review comments were also provided on draft policy and supporting text, focused around improving its clarity in order to enhance the overall effectiveness of the emerging Draft A&D Plan. This included consideration of the relationship between finalised CSDP components (e.g. strategic priorities and spatial strategy) and proposed A&D plan components.
- 4.1.4 The SA project team reviewed the final version of the Draft A&D Plan and considers that the SA recommendations summarised have been appropriately addressed, with additional text incorporated within the document. This has made the SA reporting process more efficient and improved the sustainability performance of the Draft A&D Plan.

### 4.2 Assessment Phase

- 4.2.1 The identification of any assumptions and uncertainties is an important element of SA, as all components of the emerging Sunderland A&D Plan need to be unambiguous to ensure they can be implemented as intended. In addition, the SEA Regulations require consideration to be given to *“the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”*. A key role of the SA process, incorporating SEA, is therefore to devise appropriate mitigation and enhancement recommendations in order to address identified uncertainties, resolve deficiencies and strengthen the sustainability performance of the plan or programme being assessed.
- 4.2.2 There are several general methods which can be used to mitigate potential adverse impacts and more widely enhance the contribution of specific plan components to deliver the vision and strategic priorities in the CSDP through the A&D Plan and help achieve sustainable development:
- Implementing additional policies or criteria to address environmental issues either not fully addressed within the plan as drafted or to mitigate specific predicted impacts;



- Adjusting or expanding policies or criteria to ensure they can be implemented successfully in pursuit of sustainable development. This could include, clarifying or making wording less ambiguous or more positive for some policies to help deliver the desired policy output; or,
  - Setting requirements for developers to demonstrate that they have adequately have addressed environmental concerns associated with allocated sites when submitting a planning application.
- 4.2.3 The assessment of each substantive component of the Draft Sunderland A&D Plan was initially undertaken on a pre-mitigation basis, which allowed any ambiguities and other weaknesses to be identified and appropriate mitigation or enhancement recommendations to be devised by the SA project team.
- 4.2.4 A schedule of proposed mitigation and enhancement recommendations was issued by Stantec UK to SCC in October 2020, following which the majority of recommended changes were incorporated into the final version of the Draft Sunderland A&D Plan. Based on this mitigation schedule, the SA of proposed allocations identifies relevant subject policies which should be engaged in the determination of planning applications and design measures to be addressed in development proposals on specific allocated sites specifically to avoid likely significant adverse effects as predicted through the SA process.
- 4.2.5 A summary of all policy and design level SA mitigation and enhancement recommendations made by the project team to inform the Draft A&D Plan, together with a summary of how each recommendation has been actioned by SCC, is provided in Section 6 of the SA Report.

## 5 Sustainability Appraisal Key Findings

### 5.1 Introduction

5.1.1 The SA, incorporating SEA, has been undertaken for each substantive component part of the Draft A&D Plan on a pre-mitigation basis. The following plan components have been subject to SA:

- Development Site Allocations
  - Housing
  - Strategic site allocations: Policy SS8: Riverside Sunderland, SS9: Washington Meadows
  - Non-strategic site allocations: sites allocated under Policy H8.
  - Retail – as identified in Policy VC7: Former Houghton Colliery Site
  - Wind Turbines – as identified in Policy WWE11: Wind Turbines
- Designations
  - Conservation Areas – as identified in Policy BH10
  - Regionally and Locally protected Wildlife and Geodiversity Sites - Policy NE13
  - Wildlife Network – Policy NE14
  - Greenspace – Policy NE15
  - Burial Sites – Policy NE17

5.1.2 A formal SA assessment of the viewpoints and vistas identified within the Draft A&D Plan has not been undertaken as substantive effects would only arise from the related Sunderland CSDP policies (NE11 and NE16), which have already been assessed through the SA of the Sunderland CSDP. The identification of specific viewpoints and vistas would not result in any new or different likely significant effects.

5.1.3 Where land is identified as being safeguarded within the Draft A&D Plan (e.g. in relation to transport and minerals infrastructure as per Policies ST4, ST5 and M5) this has not been subjected to SA as these policies do not propose any substantive actions and therefore it is not anticipated these policies would result in significant effects.

5.1.4 Where designations are identified on a national level (e.g. Scheduled Ancient Monuments), these have also not been subject to SA as they are not designated by SCC and their inclusion within the A&D Plan will have no substantive additional effect.

5.1.5 The SA Report documents the findings of the SA include provides the detailed SA matrices to assess the likely significant environmental and wider sustainability effects of each substantive plan component:

- Appendix D – SA of Allocations
- Appendix E – SA of Designations

- 5.1.6 Drawing on the detailed assessments provided in **Appendices D & E**, the sections below provides a non-technical summary of the key findings from the full assessment documented in the SA Report.

## 5.2 SA of Proposed Allocations

### Strategic Allocations

- 5.2.1 Significant (major) negative effects were identified in relation to SA Objective 3 – Economy and Employment, SA Objective 5 – Sustainable Communities, SA Objective 7 – Transport and Communication, SA Objective 8 – Land Use and Soils, SA Objective 9 – Water, SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air, SA Objective 12 – Climate Change and SA Objective 13 - Waste and Natural Resources. Significant negative effects were predominantly related to; proximity within or adjacent to a Key Employment Areas (KEA) (1 site), proximity to train stations and community/ public facilities (1 site), proximity to water bodies (both sites), location within Flood Zone 3 (both sites) and a mineral safeguarding area (both sites).
- 5.2.2 Significant positive effects were identified in relation to SA Objective 2 – Housing, SA Objective 3 – Economy and Employment, SA Objective 4 – Learning and Skills, SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 7 – Transport and Communication, SA Objective 8 – Land Use and Soils, SA Objective 11 – Air, SA Objective 12 – Climate Change and SA Objective 13 - Waste and Natural Resources. Significant positive effects were predominantly related to provision of housing (both sites), proximity to the labour market (1 site), proximity to primary educational facilities (both sites, secondary and higher education facilities (1 site), proximity to public/ community facilities (1 site), proximity to primary health care facilities (1 site), proximity to bus stops, A roads and pedestrian/cycle routes (both sites), location on brownfield land (1 site), distance from coastline (both sites), distance from air quality management areas (AQMAs) and proximity to recycling centres (1 site).
- 5.2.3 No significant likely significant effects were identified in relation to SA Objectives 1 – Biodiversity and Geodiversity, SA Objective 14 – Cultural Heritage and SA Objective 15 – Landscape and Townscape.

### Individual Housing Allocations

- 5.2.4 Significant (major) negative effects were identified in relation to SA Objective 3 – Economy and Employment, SA Objective 5 – Sustainable Communities, SA Objective 7 – Transport and Communication, SA Objective 8 – Land Use and Soils, SA Objective 9 – Water, SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air, SA Objective 12 – Climate Change and SA Objective 13 - Waste and Natural Resources.
- 5.2.5 Significant negative effects were predominantly related to; location within the boundaries of or adjacent to a Key Employment Areas (KEAs) (for 4 sites), proximity to train stations (33 sites), proximity to open space (7 sites) proximity to public/community facilities (26 sites), located on existing sports and recreational facilities (6 sites), proximity to traffic congestion points (17 sites), proximity to water bodies (35 sites), location within Flood Zone 3 (2 sites), proximity to the coastline (1 site), significant surface water risk (2 sites), being at high risk from fluvial and/or tidal climate change (1 site) and location within a mineral safeguarding area (54 sites).
- 5.2.6 Significant positive effects were identified in relation to SA Objective 2 – Housing, SA Objective 3 – Economy and Employment, SA Objective 4 – Learning and Skills, SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 7 – Transport and Communication, SA Objective 8 – Land Use and Soils, SA Objective 11 – Air, SA Objective 12 – Climate Change and SA Objective 13 - Waste and Natural Resources. Significant positive effects were predominantly related to provision of housing (10 sites), proximity to the labour market (15 site), proximity to primary educational facilities (40 sites,

secondary (30 sites) and higher education facilities (6 site), proximity to public/ community facilities (2 site), proximity to primary health care facilities (32 site), proximity to bus stops (all sites), train stations (11 sites), A roads (34 sites) and pedestrian/cycle routes (46 sites), location on brownfield land (53 site), distance from coastline (56 sites), distance from AQMAs (all sites) and proximity to recycling centres (2 site).

- 5.2.7 No significant likely significant effects were identified in relation to SA Objectives 1 – Biodiversity and Geodiversity, SA Objective 14 – Cultural Heritage and SA Objective 15 – Landscape and Townscape.

### **Retail Allocations**

- 5.2.8 Significant (major) negative effects were identified for the site in relation to SA Objective 5 – Sustainable Communities, SA Objective 7 – Transport and Communication, SA Objective 11 – Air, SA Objective 12 – Climate Change and SA Objective 13 - Waste and Natural Resources. Significant negative effects were predominantly related to proximity to train stations and location within a mineral safeguarding area.
- 5.2.9 Significant positive effects were identified in relation to SA Objective 4 – Learning and Skills, SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 7 – Transport and Communication, SA Objective 8 – Land Use and Soils, SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air, SA Objective 12 – Climate Change and SA Objective 13 - Waste and Natural Resources. Significant positive effects were predominantly related to proximity to primary and secondary education facilities, proximity to public/ community facilities, proximity to primary health care facilities, proximity to bus stops, A roads and pedestrian/cycle routes, location on brownfield land, distance from coastline, distance from AQMAs and proximity to recycling centres.
- 5.2.10 No significant likely significant effects were identified in relation to SA Objectives 1 – Biodiversity and Geodiversity, SA Objective 3 – Economy and Employment, SA Objective 9 – Water, SA Objective 14 – Cultural Heritage and SA Objective 15 – Landscape and Townscape. SA Objective 2 – Housing was not applicable to retail sites.

### **Wind Turbine Allocations**

- 5.2.11 Significant (major) negative effects were identified for the site in relation to SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 7 – Transport and Communication, SA Objective 9 – Water SA Objective, SA Objective 10 – Flood Risk and Coastal Erosion and SA Objective 13 - Waste and Natural Resources. Significant negative effects were predominantly related to location within existing open space (1 site), proximity to waterbodies (10 sites) location within Flood Zone 3 (2 sites) and location within a mineral safeguarding area (2 sites). Significant negative effects were also identified due to proximity to cycle route or footpath/ public right (8 sites) however, as part of the Wind Energy Development Study and associated constraints mapping exercise undertaken to identify potential wind turbine development site, separation distances from bridleways, multi user routes and public rights of way were included (~170m for large turbines) such that it is not anticipated that development will have a direct impact on access.
- 5.2.12 Significant (major) positive effects were identified for the site in relation to SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air and SA Objective 12 – Climate Change. Significant positive effects were predominantly related to distance from the coast (9 sites), distance from AQMAs (all sites) and providing support 'in principle' for wind energy development in appropriate locations.
- 5.2.13 No significant likely significant effects were identified in relation to SA Objectives 1 – Biodiversity and Geodiversity, SA Objective 8 – Land Use and Soils, 14 – Cultural Heritage and SA Objective 15 – Landscape and Townscape. SA Objective 2 – Housing, SA Objective 3

– Economy and Employment, SA Objective 4 – Learning and Skills were not applicable to wind turbine allocations.

### 5.3 SA of Proposed Designations

#### Conservation Areas

- 5.3.1 Reflecting the limited purpose of their designation within the A&D Plan, the suite of proposed Conservation Area designations have only been assessed against SA Objectives 14 – Cultural Heritage and 15 – Landscape and Townscape within the A&D Plan SA Framework. There is no potential for significant effects to occur in relation to other SA Objectives.
- 5.3.2 Significant (major) positive effects identified for all conservation area designation (bar 10.10 The Cedars) due to being located within close proximity a heritage asset. No significant effects identified in relation to SA Objective 15 – Landscape and Townscape

#### Regionally and Locally protected Wildlife and Geodiversity Sites

- 5.3.3 Reflecting the limited purpose of their designation within the A&D Plan, the suite of proposed Wildlife and Geodiversity Sites designations have only been assessed against limited SA Objectives within the A&D Plan SA Framework. There is no potential for significant effects to occur in relation to other SA Objectives.
- 5.3.4 No significant negative effects were identified. Significant positive effects were identified in relation to SA Objective 1 – Biodiversity and Geodiversity, SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 9 – Water, SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air and SA Objective 14 – Cultural Heritage. Significant positive effects were predominantly related to location within close proximity of an International European site (4 sites) and national designations and ancient woodland (29 sites), proximity to areas within the 10% decile on the Index of Multiple Deprivation (7 sites), proximity to a residential or employment area (77), proximity to water bodies (75), location within Flood Zone 3 (42), distance from AQMAs (all sites) and proximity to heritage assets (14 sites).
- 5.3.5 No significant effects identified in relation to SA Objective 15 – Landscape and Townscape.

#### Wildlife Network

- 5.3.6 Reflecting the limited purpose of the designation of the Sunderland Wildlife Network within the A&D Plan, the network has only been assessed against limited SA Objectives within the A&D Plan SA Framework. There is no potential for significant effects to occur in relation to other SA Objectives.
- 5.3.7 No significant negative effects were identified. Significant positive effects were identified in for the site in relation to SA Objective 1 – Biodiversity and Geodiversity, SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 9 – Water, SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air and SA Objective 14 – Cultural Heritage. Significant positive effects were predominantly related to location within close proximity of an International European site and national designations and ancient woodland, proximity to areas within the 10% decile on the Index of Multiple Deprivation, proximity to a residential or employment area, proximity to water bodies, location within Flood Zone 3, distance from AQMAs and proximity to heritage assets.
- 5.3.8 No significant effects identified in relation to SA Objective 15 – Landscape and Townscape.

## Greenspace

- 5.3.9 Reflecting the limited purpose of their designation within the A&D Plan, the suite of proposed Greenspace designations have only been assessed against limited SA Objectives within the A&D Plan SA Framework. There is no potential for significant effects to occur in relation to other SA Objectives.
- 5.3.10 Significant negative effects were identified in relation to SA Objective 7 – Transport and Communication and SA Objective 11 – Air for 1205 sites due to distance from train stations.
- 5.3.11 Significant positive effects were identified in for the site in relation to SA Objective 1 – Biodiversity and Geodiversity, SA Objective 5 – Sustainable Communities, SA Objective 6 – Health and Wellbeing, SA Objective 7 – Transport and Communication, SA Objective 9 – Water, SA Objective 10 – Flood Risk and Coastal Erosion, SA Objective 11 – Air and SA Objective 14 – Cultural Heritage.
- 5.3.12 Significant positive effects were predominantly related to location within close proximity of an International European site (7 sites) and national designations and ancient woodland (70 sites), proximity to areas within the 10% decile on the Index of Multiple Deprivation (26 sites), proximity to a residential or employment area (1523 sites), proximity to train stations (236 sites), proximity to cycle route or footpath/ public right of way (1404 sites), proximity to water bodies (1111 sites), location within Flood Zone 3 (109 sites), distance from AQMAs and proximity to bus stops (all sites) and proximity to heritage assets (87 sites).
- 5.3.13 No significant effects identified in relation to SA Objective 15 – Landscape and Townscape.

## Burial Sites

- 5.3.14 Reflecting the limited purpose of their designation within the A&D Plan, the suite of proposed burial site designations have only been assessed against limited SA Objectives within the A&D Plan SA Framework. There is no potential for significant effects to occur in relation to other SA Objectives.
- 5.3.15 Significant negative effects were identified in relation to SA Objective 7 – Transport and Communication and SA Objective 11 – Air for 22 sites due to distance from train stations.
- 5.3.16 Significant positive effects were predominantly related to proximity to bus stations (all sites), proximity to train stations (3 sites), proximity to cycle route or footpath/ public right of way (27 sites), proximity to water bodies (13 sites), location within Flood Zone 3 (2 sites), distance from AQMAs (all sites) and proximity to heritage assets (17 sites).
- 5.3.17 No significant effects identified in relation to SA Objective 15 – Landscape and Townscape.

## 6 Conclusion

### 6.1 Overview

- 6.1.1 This NTS and an associated SA Report have been prepared to accompany the Sunderland draft A&D Plan. The SA Report has:
- Identified the purpose and legal requirements of undertaking a SA, incorporating SEA, of the emerging Sunderland A&D Plan;
  - Provided an overview of the substantive content of the Draft A&D Plan;
  - Described the approach to undertaking the SA of the Draft A&D Plan;
  - Detailed the findings of the SA carried out in respect of the Draft A&D Plan; and,
  - Proposed mitigation and enhancement measures to improve the effectiveness and environmental performance of the emerging Sunderland A&D Plan.

### 6.2 Likely Significant Effects and Further Mitigation Requirements

- 6.2.1 **Section 6** of the SA Report demonstrates that through identifying weaknesses and recommending associated changes, the SA process has closely influenced the content of the Draft Sunderland A&D Plan. As a result, the Draft A&D Plan is now considered to be more robust and effective in terms of addressing relevant environmental issues. The assessment presented in **Section 7** of the SA Report and summarised in **Section 5** above has been updated to take account of all SA mitigation which has now been incorporated into the Draft Sunderland A&D Plan.
- 6.2.2 As a result of incorporating identified SA mitigation measures, **Section 7** of the SA Report confirms that the final version of the Draft A&D Plan which has been assessed at this stage is not predicted to result in any likely significant adverse effects not capable of being addressed through the development plan, i.e. through the application of specified design requirements and relevant subject policies in the determination of planning applications. This has also helped to enhance the overall sustainability performance of the Draft A&D Plan, resulting in a number of likely significant beneficial effects being predicted to occur through implementation of the plan as currently prepared.
- 6.2.3 Based on the current content of the Draft A&D Plan, no further mitigation measures still require to be incorporated into the emerging A&D Plan specifically to avoid likely significant adverse effects. However, this position and the potential need to incorporate further SA mitigation will be reviewed at Regulation 19 stage to take account of any substantive changes within the Proposed Submission A&D Plan, including potentially in response to representations made at Regulation 18 stage.

### 6.3 Next Stages of the Sunderland A&D Plan Preparation

- 6.3.1 This NTS and associated SA Report is being consulted on in tandem with the Draft A&D Plan. All representations received regarding both documents will be analysed to determine whether any modifications (substantive or non-substantive) need to be made when preparing the 'Regulation 19' Proposed Submission A&D Plan and an associated SA report (including NTS).
- 6.3.2 A further round of consultation and SA reporting will take place on the Proposed Submission A&D Plan prior to the document (with any modifications required post consultation) then being submitted to the Planning Inspectorate to undergo a formal Examination in Public (EiP). The formal EiP will consider the soundness of the A&D Plan and all unresolved issues raised in representations (including in relation to SA reporting). SA reporting will play an important role

in the EiP, including in terms of helping to demonstrate plan soundness and the approach adopted to consider reasonable alternative options.

- 6.3.3 The outcome of an EiP will be the identification by the Examining Inspector of recommended modifications to be incorporated within the finalised A&D Plan before it can be formally adopted. Any such modifications will undergo SEA screening and a further round of consultation, although they are largely binding upon SCC.
- 6.3.4 Once any required modifications are incorporated into the Sunderland A&D Plan, the final document will be presented to a full meeting of SCC for formal adoption as part of the new statutory Development Plan for the SCC area. At this time, a SA Post Adoption Statement will be prepared to explain how the SA process, incorporating SEA, informed the development of the Sunderland A&D Plan through the outset to final adoption and how likely significant effects on the environment will be monitored.

## **6.4 Monitoring**

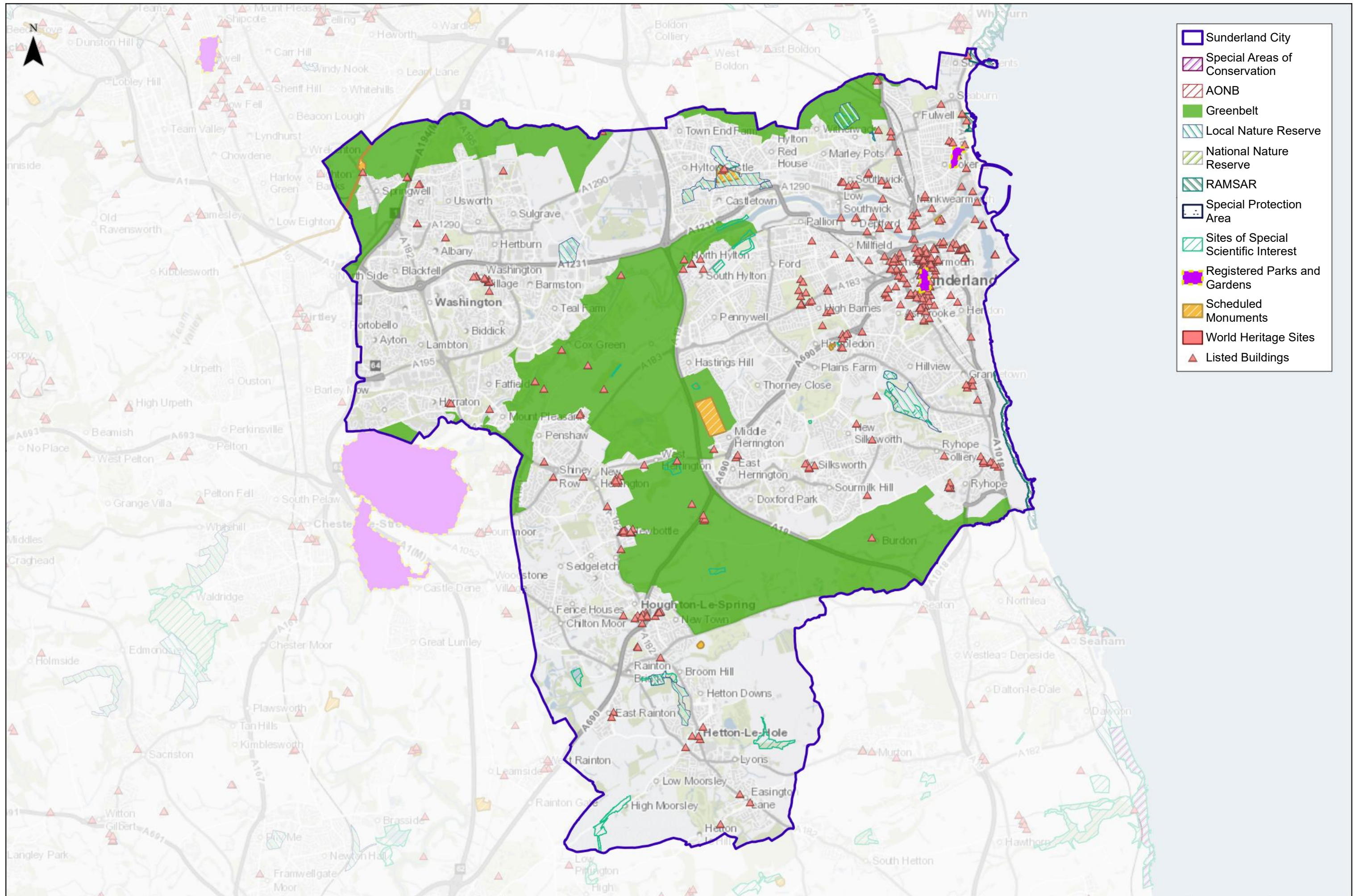
- 6.4.1 In accordance with Section 13 of the 2004 Act, once the Sunderland A&D Plan is adopted, SCC must keep the plan under review. Related to this, the SEA Regulations require this SA Report to provide a “*description of the measures envisaged concerning monitoring*” after the adoption of a plan or programme which is subject to SEA.
- 6.4.2 To comply with the above statutory requirements, SCC has developed a Monitoring Framework for the Sunderland A&D Plan which forms part of a wider Monitoring Framework of the Local Plan. It is understood that it is intended that the policies contained within the CSDP and the A&D Plan will be monitored within one composite Authority Monitoring Report in the future, once the A&D Plan has been adopted. The proposed Monitoring Framework for the A&D Plan is presented in **Appendix F** of the SA Report.

## **6.5 How to Comment on this SA Report**

- 6.5.1 This SA Report is being issued for consultation alongside the draft Sunderland A&D Plan. The consultation will run from 18 December 2020 to 12 February 2021.
- 6.5.2 Comments on the draft Sunderland A&D Plan and this SA Report can be submitted by email to [planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk) or in writing to Strategic Plans Team, Sunderland City Council, Civic Centre, Burdon Road, Sunderland, SR2 7DN.



# **Appendix A Sunderland City Council – Statutory Designations**



- Sunderland City
- Special Areas of Conservation
- AONB
- Greenbelt
- Local Nature Reserve
- National Nature Reserve
- RAMSAR
- Special Protection Area
- Sites of Special Scientific Interest
- Registered Parks and Gardens
- Scheduled Monuments
- World Heritage Sites
- Listed Buildings



**Sunderland Allocations and Designations Plan - Sustainability Appraisal**  
 Statutory Environmental & Heritage Designations

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