



Sunderland Local Plan

**Draft Planning Obligations
Supplementary Planning Document
Consultation Statement**

February 2020

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Draft Planning Obligations Supplementary Planning Document – Consultation Statement (Regulation 12 & 13)

Purpose of the Consultation

The Council carried out a public consultation on a Planning Obligations Supplementary Planning Document Scoping Report outlining its proposal to produce a Planning Obligations SPD to assist in the justification and calculation of developer contributions.

When did we consult?

The scoping report was made publicly available for comment for 8 weeks between 7 August – 2 October 2017 and could be viewed on line on the Council's website¹, on the Council's online consultation portal², at Sunderland Civic Centre and at all Council libraries (in Sunderland's *City Library @ Museum & Winter Gardens*, Washington Galleries and Houghton-le-Spring). Copies were also made available at the 30 public consultation drop-in exhibition events held around the city during August and September 2017 as part of the consultation for the Draft Core Strategy and Development Plan and the SPD scoping report (see Table 1).

Table 1: Draft Core Strategy and Development Plan Consultation Drop-in Events

Wednesday 9 August	10am - 12noon	Springwell Village Hall, Fell Road, Springwell, Gateshead, NE9 7RP
	2pm - 4pm	Ryhope Community Centre, 2 Black Road, Sunderland, SR2 0RX
	6pm - 8pm	Fulwell Methodist Church, Dovedale Road, Sunderland, SR6 8LN
Thursday 10 August	10am - 12noon	Philadelphia Cricket Club, Bunker Hill, Houghton-Le-Spring, DH4 4JE
	2pm - 4pm	North East Business & Innovation Centre (BIC), Wearfield, Enterprise Park East, Sunderland, SR5 2TA
	6pm - 8pm	Harraton Community Association, Bonemill Lane, Washington, NE38 8BQ
Friday 11 August	10am - 12noon	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	2pm - 4pm	Barnwell Primary School, (Monument Centre), Whitefield Estate, Penshaw, Houghton, DH4 7RT
Monday 14 August	10am - 12noon	Holy Trinity Church, High Usworth, Washington, NE37 1NR
	2pm - 4pm	St Chad's Church Hall, East Herrington, Durham Road, Sunderland, SR3 3ND
	6pm - 8pm	Houghton Welfare Hall, Brinkburn Crescent, Houghton-Le-Spring, DH4 5AF
Tuesday 15 August	10am - 12noon	Raich Carter Centre, Commercial Road, Hendon, Sunderland, SR2 8PD

¹ <https://www.sunderland.gov.uk/article/14749/Draft>

² <https://sunderland-consult.objective.co.uk/portal/>

	2pm - 4pm	Customer Service Contact Centre, Fawcett Street, Sunderland, SR1 1RE
	6pm - 8pm	Washington Leisure Centre, Washington, NE38 7SS
Wednesday 16 August	6pm - 8pm	Doxford Park Community Centre, Mill Hill Road, Sunderland, SR3 2 ND
Monday 18 September	10am - 12noon	Raich Carter Centre, Commercial Road, Hendon, Sunderland, SR2 8PD
	2pm - 4pm	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	6pm - 8pm	Barnwell Primary School (Monument Centre), Whitefield Estate, Penshaw, Houghton, DH4 7RT
Tuesday 19 September	10am - 12noon	The Secret Garden, Doxford Park, Silksworth Road, Sunderland, SR3 2PD
	2pm - 4pm	Houghton Welfare Hall, Brinkburn Crescent, Houghton-Le-Spring, DH4 5AF
	6pm - 8pm	San Street Youth Project, Sans Street South, Sunderland, SR1 1HG
Wednesday 20 September	10am - 12noon	Fulwell Methodist Church, Dovedale Road, Sunderland, SR6 8LN
	2pm - 4pm	North East Business & Innovation Centre (BIC), Wearfield, Enterprise Park East, Sunderland, SR5 2TA
	6pm - 8pm	Springwell Village Hall, Fell Road, Springwell, Gateshead, NE9 7RP
Thursday 21 September	10am - 12noon	Philadelphia Cricket Club, Bunker Hill, Houghton-Le-Spring, DH4 4JE
	2pm - 4pm	Ryhope Community Centre, 2 Black Road, Sunderland, SR2 0RX
	6pm - 8pm	Washington Millennium Centre, The Oval, Washington, NE37 2QD
Friday 22 September	10am - 12noon	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	2pm - 4pm	Health & Racquet Club, 3 Camberwell Way, Sunderland, SR3 3XN
	6pm - 8pm	Lambton Street Youth Centre, 25 Falkland Road, Sunderland, SR4 6XA

Which bodies and persons were invited to make representations?

The Council wrote directly to all statutory consultees, general consultation bodies and those who had previously expressed an interest in the Local Plan. Over 1,200 direct letters and emails (see Appendix 1) were also sent out on 28 July 2017 to all statutory consultees and those who had previously responded to the Plan or requested to be included on the Local Plan database (see Appendix 2). The consultation of the Scoping Report was run alongside the consultation of the Draft Core Strategy and Development Plan 2015-2033.

The Council undertook a variety of consultation methods and held a number of events to engage with stakeholders regarding the Scoping Report. Stakeholders were invited to make representations electronically via the Council's online

consultation portal (<http://sunderland-consult.limehouse.co.uk/portal>), and in writing by email planningpolicy@sunderland.gov.uk or letter.

Summary of the main key issues raised by representations and how issues have been taken into account

A total of 4 representations were received in response to the consultation (see Table 2). In summary these related to the timescales for the delivery of the document, support for the inclusion of planning obligations for education, health facilities and the maintenance and enhancement of the historic environment and advice on the pooling restriction to ensure delivery of the appropriate mitigation measures.

Table 2: Draft Planning Obligations Scoping Report – Summary of Representations and Council Responses.

Consultee	Summary of Representations	Council Response
Member of the public	In all sections priority must be given to improving Schools and if necessary the building of new schools, also consideration is a must for medical services ie. Doctors surgeries	The draft SPD includes detailed methodology for seeking developer contributions for education and includes the opportunity to seek contributions for health facilities
Barratt David Wilson Homes North East	Timetable - Given the current status of the Viability Assessment we consider the timetable proposed unrealistic if proper consultation with the development industry is to be had.	The draft SPD has been finalised later than initially planned and now aligns with the consultation on the Core Strategy and Development Plan and supporting evidence base
Historic England	Recommends that consideration is given to ways planning obligations can be used to implement the strategy and policies within the Local Plan which aim to conserve and enhance the historic environment. CIL can be used to fund a wide range of infrastructure and facilities. This flexibility means that many projects may be associated with the repair and maintenance of heritage assets, and it is now well established that heritage is not an adjunct to a healthy economy, but an important component of growth and a source of employment. Historic buildings can accommodate many social and community services and activities, and the historic environment can make a valuable contribution to green infrastructure networks, and offer a range of leisure and recreational opportunities. Physical and transport infrastructure may include historic bridges or coastal/ flood protection structures, while open space can encompass historic areas and townscapes. 'In kind'	Comments and support noted. The draft SPD has been prepared to include the provision to seek contributions for heritage protection and enhancement. CIL has not been adopted in Sunderland.

	<p>payments may include land transfers which enable the transfer of an 'at risk' building as part of a comprehensive regeneration scheme. Welcome the recognition that site specific contributions could include heritage protection. Suggest greater consideration is also given to the conservation and enhancement of heritage assets and their settings. Specific planning obligations and S106 offer opportunities for funding improvements to, and mitigating adverse impacts upon, the historic environment including: archaeological investigations; access and interpretation; public realm improvements; maintenance of heritage assets (including transport, green and social infrastructure, parks and gardens, churchyards and civic spaces); and the repair and reuse of buildings or other heritage assets. Inclusion of these within the Infrastructure List (Regulation 123) would also ensure that it would be possible to fund appropriate initiatives which deliver necessary infrastructure and also help to conserve and enhance the historic environment. Recommend the Charging Schedule is fully informed by an up to date and relevant evidence base which could provide a useful insight into project opportunities for the Regulation 123 list.</p>	
Natural England	<p>Natural England notes that it is proposed to include 'Biodiversity and Geodiversity including Suitable Alternative Natural Greenspace' into the Planning Obligations SPD. We advise to be mindful of the pooling restrictions with regards to Section 106 agreements, so that it can be certain that SANGS/AANGs and other projects to deliver benefits to biodiversity can be delivered.</p>	Comments noted.

Consultation on the Draft Planning Obligations Supplementary Planning Document (Regulation 12 & 13)

Purpose of the consultation

The comments received to the Scoping Report were taken into consideration in the preparation of the Draft Planning Obligations Supplementary Planning Document. This was the first of two stages of consultation prior to adoption of the Supplementary Planning Document.

When did we consult?

A public consultation on the Draft Planning Obligations Supplementary Planning Document took place over a six week period, commencing on Friday 15 June 2018 and finishing at 5pm on Friday 27 July 2018.

Which bodies and persons were invited to make representations

The Council engaged with all statutory consultees, general consultation bodies and all persons who have previously been involved or expressed an interest in the Plan's consultation stages, via written correspondence in the form of a letter or email. Written correspondence was sent to all consultees the week commencing 12 June 2018, in anticipation of the consultation start date on 15 June 2018 (See Appendix 3 for a copy of written correspondence).

How did we consult?

Once again, the consultation on the Draft Planning Obligations Supplementary Planning Document was run alongside the Publication Draft Core Strategy and Development Plan 2015-2033 consultation. A copy of the document was made available to view on line on the council's website³, on the Council's online consultation portal⁴ and at the Sunderland Civic Centre between the hours of 8.30am and 5.00pm, Monday to Friday. Copies were also made available at all the Council's libraries.

A statement of representation procedure was made available on the Council's website, detailing when representations could be made, the deadline for making representations, how consultees could make representations, where and at what times consultation documents were available for the public and interested parties to view.

A series of ten consultation drop in events were held across Sunderland across a two week period. The first week of consultation commenced on Monday 18 June 2018 and finished on Friday 22 June 2018, with the second week commencing on Monday 16 July 2018 and finishing on 20 July 2018. A range of morning, afternoon and evening sessions were arranged to help to reach as wide an audience as possible (Table 3). In addition, a further event was held at Springwell Village Hall at

³ <https://www.sunderland.gov.uk/article/14749/Draft>

⁴ <http://sunderland-consult.limehouse.co.uk/portal>

the request of the Springwell Village Resident's Association and local Ward Members.

Table 3: Consultation Events – Publication Draft Core Strategy and Development Plan

Date	Time	Venue Address
18 June 2018	9.30am – 11.30am	Bunnyhill Community Room, Hylton Lane, Sunderland SR5 4BW
18 June 2018	4.30pm to 7.00pm	Wessington Primary School, Lanercost, Washington NE38 7PY
19 June 2018	11.00am -1.30pm	Houghton Sports Complex Dance Studio, Station Road, Houghton le Spring DH4 5AH
20 June 2018	9.30am – 11.30am	Thorney Close Action & Enterprise Centre, Thorndale Road, Thorney Close, Sunderland SR3 4JQ
22 June 2018	4.30pm – 6.30pm	Ryhope Community Centre, Black Road, Ryhope, Sunderland SR2 0RX
16 July 2018	9.30am – 11.30am	University Sports Hall, Chester Road, Sunderland
17 July 2018	4.30pm – 7.00pm	Barnwell Primary School Sports Hall, Whitefield Estate, Houghton le Spring DH4 7RT
18 July 2018	5.00pm – 6.30pm	Bunnyhill Community Room, Hylton Lane, Sunderland SR5 4BW
19 July 2018	4.30pm – 6.30pm	Silksworth Community Centre, Tunstall Village Road, Sunderland SR3 2BB
20 July 2018	10.00am – 12 noon	Washington Millennium Centre, The Oval, Concord Washington NE37 2QD

Submission of representations were encouraged through the Council's online consultation portal. However, email and written representations were also accepted. Drop boxes were provided at all consultation events and Sunderland Civic Centre for consultees to submit their completed response forms.

Summary of the main key issues raised by representations and how issues have been taken into account

A total of 27 representations were received in response to the consultation. The summary of responses covered the topic areas of affordable housing, education, open space, equipped playspace, viability, health infrastructure, implementation and monitoring fees.

Of the 27 representations, 21 of these were submitted through the Council's online consultation portal from members of the public, which were not relevant to the Draft Planning Obligations SPD.

A full list of representations along with the Council's response can be found in table 4 – Appendix 4.

Next Steps

Following consultation on previous versions of the SPD in 2017 and 2018, the document has been updated where appropriate, to reflect the comments received and changes to national legislation. A final round of consultation will be undertaken early in 2020 before the Planning Obligations SPD will be adopted .

The draft SPD document will carry limited weight in the determination of planning applications until such a time it is adopted as a Supplementary Planning Document.

APPENDIX 1: Draft Planning Obligations Supplementary Planning Document Scoping Report Consultee Letter



Commercial Development
Planning and Regeneration
Civic Centre
Burdon Road
Sunderland
Tel (0191) 520 5555
Web www.sunderland.gov.uk

Date: 28 July 2017
Our ref:
Your ref:

Dear Resident

HAVE YOUR SAY ON SUNDERLAND'S CORE STRATEGY AND DEVELOPMENT PLAN

I am writing to inform you that from 7 August to 2 October 2017, Sunderland City Council will be consulting on the first draft of the Sunderland Core Strategy and Development Plan. This Plan sets out our long-term strategy on development across the city to 2033. It will ensure that the right type of development is focused in the right places to meet the needs for local people and businesses.

By law, all local councils must prepare a long-term plan which sets out how much development should take place, and where, to meet the needs of local people and businesses. The Plan is a framework which will ensure that Sunderland can:

- deliver an additional 13,800 homes
- create 10,300 number of jobs
- create sustainable communities and deliver a mix of homes of different sizes and types to meet our needs
- support a thriving economy through the development of the Urban Core, Centres and employment sites
- improve sustainable transport
- create healthy communities
- deliver infrastructure such as schools and healthcare to support our future growth

In addition, we are also consulting on the evidence base which justifies the Plan and two additional Planning Documents;

- Draft South Sunderland Growth Area (SSGA) Supplementary Planning Document (SPD), SSGA Infrastructure Delivery Study (IDS) and associated evidence bases. SSGA has the ability to accommodate approximately 3000 homes, the draft SPD will guide the future development of the area
- Planning Obligations Scoping Report which sets out how the council has considered the need for planning obligations and established an approach which is appropriate, fair and justified.

Have your say

This Plan will shape the places where we live, work, and socialize. That is why it is important that you have your say.

The consultation will run for a period of 8 weeks, from **Monday 7 August to Monday 2 October**. All representations should be completed and received by the council no later than 5pm on the final day of consultation.

The council will be hosting a number of drop-in events, where officers will be available to answer any questions that you may have. The schedule for these events are overleaf.

Delivering services for a better future



Wednesday 9 August 2017		Monday 18 September 2017	
10 - 12pm	Springwell Village Hall, NE9 7RP	10 - 12pm	Railco Carter Sports Centre, SR2 8PD
2 - 4pm	Ryhope Community Centre, SR2 0RX	2 - 4pm	Hetton Centre, DH5 9NE
6 - 8pm	Fulwell Methodist Church, SR6 8LN	6 - 8pm	Barnwell Academy, DH4 7RT
Thursday 10 August 2017		Tuesday 19 September 2017	
10 - 12pm	Philadelphia Cricket Club, DH4 4JE	10 - 12pm	The Secret Garden, SR3 2PD
2 - 4pm	Business & Innovation Centre, SR5 2TA	2 - 4pm	Houghton Welfare Hall, DH4 5AF
6 - 8pm	Claxton Community Centre, NE38 8BQ	6 - 8pm	San Street Youth & Community Centre, SR1 1HG
Friday 11 August 2017		Wednesday 20 September 2017	
10 - 12pm	Hetton Centre, DH5 9NE	10 - 12pm	Fulwell Methodist Church, SR6 8LN
2 - 4pm	Barnwell Academy, DH4 7RT	2 - 4pm	Business & Innovation Centre, SR5 2TA
Monday 14 August 2017		6 - 8pm	Springwell Village Hall, NE9 7RP
10 - 12pm	Holy Trinity Church, NE37 1NR	Thursday 21 September 2017	
2 - 4pm	St Chad's Church, SR3 3ND	10 - 12pm	Philadelphia Cricket Club, DH4 4JE
6 - 8pm	Houghton Welfare Hall, DH4 5AF	2 - 4pm	Ryhope Community Centre, SR2 0RX
Tuesday 15 August 2017		6 - 8pm	Washington Methodist Centre, NE37 2GD
10 - 12pm	Railco Carter Sports Centre, SR2 8PD	Friday 22 September 2017	
2 - 4pm	Sunderland City Council Customer Service Centre, SR1 1RE	10 - 12pm	Hetton Centre, DH5 9NE
6 - 8pm	Washington Leisure Centre, NE38 7SS	2 - 4pm	David Lloyd Sunderland, SR3 3XN
Wednesday 16 August 2017		6 - 8pm	Lambton Street Youth Centre, SR4 6XA
6 - 8pm	Dorford Park Community Centre, SR3 2ND		

All supporting documentation will be available to view online at www.sunderland.gov.uk/evidence. Reference copies are also available in council libraries at Houghton, Washington Town Centre and City Library @ Museum & Winter Gardens (subject to opening hours) and in the Civic Centre.

The quickest and easiest way for you to respond is online at <http://sunderland-consult.limehouse.co.uk/portal>. You will need to register to comment. If you have already registered during a previous consultation simply enter your username and password.

If you prefer, you can download the comments form from our website www.sunderland.gov.uk/CSDP, pick up a copy from our libraries or from a drop in event and send it to us.

Please email completed comment forms to: Planningpolicy@sunderland.gov.uk or post to: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

After this consultation, the council will take into consideration all views and any additional evidence before consulting on the next version of the Plan.

If you have any queries regarding the consultation, or any other aspect of the Sunderland Local Plan, please do not hesitate to contact us on the contact details listed above.

Yours faithfully

Iain Fairlamb
Head of Planning and Regeneration

APPENDIX 2: Draft Planning Obligations Supplementary Planning Document Scoping Report – Consultees List

E-mail Contacts

Name	Surname	Organisation
Richard	Percy	Abbott Associates
Kelly	Brooks	Accent Foundation
Kevin	Waters	Adlington
Alan	Patchett	Age UK Sunderland
Geoff	Storey	Aggregate Industries UK Ltd
		Amec Foster Wheeler
Maria	Vipond	Anchor Trust
Christopher	Whitmore	Andrew Martin Associates
Mark	Hudson	Asda
Lynn	Scott	Asda
Ashley	Godfrey	Ashley Godfrey Associates
Brian	Jackson	B Supplied Ltd
Richard	Marsden	BDN Ltd
Richard	Marsden	BDN Ltd
Tracey	Brown	BME Womens Group
Katie	Bourne	BNP Paribas Real Estate
Alex	Willis	BNP Real Estate UK
	Griffin	Bournmoor Parish Council
Michael	Hodges	British Aggregates Association
Dave	Calvert	BT (Broadband)
Alban	Cassidy	CA Planning
Chris	Irwin	Camerons Ltd
Lindsey	Hegarty	Carillion Education
Graham	Singleton	CEMEX UK Marine Limited
Mark	Kelly	CEMEX UK Operations Limited
Jeff	Boyd	Cheviot Housing
Brian	Jackson	City Centre Traders Ass
Angela	Mills	City Equals
Carol	Harrier	City Hospitals
Kathy	Bland	City Of Sunderland College
Nigel	Harrett	City Of Sunderland College
Neal	Henley	Civil Aviation Authority
		Civil Aviation Authority
		Coal Authority
Tracy	Collins	Coalfield Forum
Wendy	Socket	Colliers CRE
Pat	Burn	Community Association Federation

John A	Sample	Consultus Building Consultants Ltd
		Cornerstone Telecommunications Infrastructure Limited (CTIL)
Gillan	Gibson	CPRE Durham
		CPRE North East
Richard	Swann	Cundall
Katherine	Brooker	Cushman And Wakefield
Bryan	Attewell	Cycling Touring Club
David	Nelson	Darlington Borough Council
Jill	Davis	Davis Planning Partnership
Eamon	Mythen	DCLG
Phil	Marsh	Dene Consulting Ltd
Mark	Duggleby	Department For Transport
		DPDS
Rachel	Ford	DPP
Katherine	Brooker	DTZ
Claire	Davies	DTZ
Andy	Leas	Durham Biodiversity Partnership
Paul	Anderson	Durham Bird Club
		Durham County Council
Jason	McKewon	Durham County Council
Jim	Cokill	Durham Wildlife Trust
John	Pilgrim	Education Funding Agency
Alex	Jackman	EE
Atul	Roy	EE
		EE
Steven	Longstaff	ELG Planning
		England & Lyle Ltd For Northumbrian Water Limited
Ian	Lyle	England And Lyle
J	Hall	Entec
		Environment Agency
Steve	Staines	FFT Planning
		Four Housing Group/Three Rivers Housing Association
Lynda	Peacock	Framptons
Louisa	Cusdin	Framptons
Sara	Holmes	Frank Haslam Milan
Mark	Oliver	G L Hearn
Anneliese	Hutchinson	Gateshead Council
David	Anderson	Hall Construction Services Limited
Tom	Brown	Hanson UK
	Jobs	Hardings Solicitors
Matthew	Clifford	Hartlepool Borough Council
		Headlight

		Highways England
		Historic England
Ian	Parkin	HJ Banks And Co Ltd
Fiona	Brettwood	HLP Design
William	Leong	Housing 21
Suzanne	Crispin	Husband And Brown Limited
Michal	Chantkowski	International Community Organisation Of Sunderland
John	Shephard	J & J Design
Rebecca	Dawson	Jacksons Solicitors
Richard	Adams	Jones Day
Matthew	Wyatt	JWPC Limited
Keith	Reed	Keith Reed Consultancy
Claire	Norris	Lambert Smith Hampton
Helen	Ryde	Land Of The Three Rivers Local Nature Partnership
Chris	Irwin	LCS Limited
Luke	Plimmer	Martineau
Stephen	Surphlis	Mcaleer And Rushe
Charlton	Gibben	Middlesbrough Borough Council
Nick	Horsley	Mineral Products Association
D	Mckinnon	Modis
L	Armstrong	Murton Parish Council
Damien	Holdstock	National Grid c/o Entec UK Ltd.
Damien	Holdstock	National Grid Transco (British Gas)
Tim	Harrison	National Grid/Capita
Natasha	Rowland	National Trust
		Natural England
Jill	Stephenson	Network Rail
Andy	Bellwood	Network Rail Infrastructure Ltd
Margaret	Lake	Network Rail Town Planning
		Network Rail Town Planning
Pat	Ritchie	Newcastle City Council
		Newcastle City Council
Graeme/Pippa	Mason/Nelso	Newcastle International Airport
Gordon	Harrison	Nexus
Christine	Briggs	NHS South Tyneside Clinical Commissioning Group
Keith	Loraine	Nomad E5 Housing Association Limited
Claire	Jobling	North East Ambulance Service
Peter	Stoddart	North East Ambulance Service
Kevin	Tipple	North East AWP
Frances	Wilkinson	North East AWP
Rachel	Anderson	North East Chamber Of Commerce
Jules	Brown	North Of England Civic Trust

Perry	Vincent	North Of England Refugee Service
Ray	Gibson	North Star Housing Group
Laura	Hewitt	North Tyneside Borough Council
Patrick	Melia	North Tyneside Council
		North Tyneside Council
Jackie	Palmer	North Tyneside Council - Development Directorate
Micah	Boutwood	Northern Gas Networks Ltd.
Alison	Johnson	Northern Powergrid
		Northern Powergrid
Jo-Anne	Garrick	Northumberland County Council
Karen	Ledger	Northumberland County Council
Steven	Mason	Northumberland County Council
		Northumberland County Council
Clive	Coyne	Northumberland National Park Authority
Allan	Brown	Northumbria Police
Ian	King	Northumbria Police
Fiona	Snowball	Northumbria Police
Brian	Stobbs	Northumbria Police
		Northumbria Police HQ
Eamon	Hansberry	O2 And Vodafone (CTIL)
		Office Of Rail Regulation
Martin	Rankin	Open Reach
		Open Reach New Sites
		Open Reach
Doreen	Buckingham	Pallion Action Group
Matthew	Spawton	Partner Construction
R	Smith	Peacock And Smith
Peter	Cranshaw	Peter Cranshaw And Co
Charlotte	Boyes	Planning Potential
Oliver	Mitchell	Planware Ltd
		Planware
Rod	Hepplewhite	Prism Planning
Robin	Wood	R And K Wood Planning LLP
	Rapleys LLP	Rapleys LLP
Rebecca	Wren	Redcar And Cleveland Borough Council
Jonathan	Friend	Riley Consulting
Jean	Hart	Riverside And Wearmouth Housing Association
Michael	Middlemiss	Riverside And Wearmouth Housing Association
Craig	Taylor	Robertson Partnership Homes England
Jonathan	Weastell	Robertson Simpson Ltd
Jonathan	Walton	RPS
Martin	Kerby	RSPB Northern England Office

Christina	Taylor	RSPB Northern England Office
Gary	Hutchinson	SAFC
Garry	Rowley	Samaritans
Emma	Hulley	Sanderson Wetherall
		Seaham Town Council
Pamela	Tate	SHAPS
		Siemens Plc
Barry	Garside	South Hetton Parish Council
L A	Etherington	South Hylton Community Association
John	Anglin	South Tyneside Council
Rachel	Cooper	South Tyneside Council
Audrey	Huntley	South Tyneside Council
Alan	Kerr	South Tyneside Council
Geraldine	Kilgour	South Tyneside Council
Iain	Malcolm	South Tyneside Council
Clare	Rawcliffe	South Tyneside Council
Alan	Smith	South Tyneside Council
Martin	Swales	South Tyneside Council
Ruth	McKeown	South Tyneside Primary Care Trust
Caron	Walker	South Tyneside Primary Care Trust
Andrea	King	South Tyneside Spatial Planning
Liz	Reid	Springwell Village Residents Association
David	Tolhurst	St Matthew's Church
Steven	Prosser	St Modwen
Alastair	Skelton	Steven Abbott Associates
Bryanni	Cartledge	Steven Abbott Associates LLP
Laura	Ross	Stewart Ross Associates
Jane	Palmer	Stockton On Tees Borough Council
Mark	Brooker	Storeys:SSP
Richard	Newsome	Story Homes
Abu	Shama	Sunderland Bangladeshi Community Centre
Dean	Huggins	Sunderland BME Network
Val	Armstrong	Sunderland Carers Centre
Sue	Callaghan	Sunderland Carers Centre
Jill	Fletcher	Sunderland City Council
Stephen	Foster	Sunderland City Council
Gillian	Gibson	Sunderland City Council
Syed	Hussain	Sunderland City Council
John	Kelly	Sunderland City Council
Doris	MacKnight	Sunderland City Council
Barbara	McClennan	Sunderland City Council
Henry	Trueman	Sunderland City Council
Peter	Walker	Sunderland City Council

Paul	Watson	Sunderland City Council
Andrea	Watts	Sunderland City Council
Denny	Wilson	Sunderland City Council
David	Howells	Sunderland College
Gill	McDonough	Sunderland Council For Voluntary Service
Richard	Ord	Sunderland Echo
John	Lowther	Sunderland Green Party
Chris	Alexander	Sunderland Live
Nikki	Vokes	Sunderland North Community Business Centre
Jessica	May	Sunderland Partnership
Tom	Parkin	Sunderland Seafront Traders Association
David	Curtis	Sunderland Volunteer Bureau
Matthew	Pixton	Tarmac
Trish	Kelly	Tees Valley Unlimited
John	Lowther	Tees Valley Unlimited
		Tetlow King Planning
Katherine	Bone	The Bridge Project
		The Forestry Authority (Northumberland And Durham)
Richard	Pow	The Forestry Commission
Keith	Lightley	The Salvation Army
Rose	Freeman	The Theatres Trust
Richard	O'Callaghan	The Woodland Trust
Jane	Evans	Three
Jane	Evans	Three
Helen	Ryde	Three Rivers Local Nature Partnership
Claire	Thompson	Three Rivers Local Nature Partnership
David	Armstrong	Two Castles Housing
John	Allison	Tyne And Wear Fire And Rescue Service
Ian	Cuskin	Tyne And Wear Fire And Rescue Service
John	Hall	Tyne And Wear Fire And Rescue Service
Nigel	Harrison	Tyne And Wear Joint Local Access Forum
Martyn	Boak	U Student Group Ltd
Christopher	Whitfield	UK Land Estates
Trevor	Sirrell	United Utilities
Paul	Andrew	University Of Sunderland
Shirley	Atkinson	University Of Sunderland
Sue	Brady	University Of Sunderland
David	Donkin	University Of Sunderland
Suzanne	Todd	University Of Sunderland
Victor	Thompson	Village Lane Garage
Brian	Watson	Vinvolved
		Virgin Media

		Vodafone And O2
Vicki	Richardson	Walton And Co
Andrew	Moss	Ward Hadaway
		Ward Hadaway
Lucy	Mo	Wear Catchment Partnerships
Clare	Phillipson	Wearside Women In Need
Susie	Clark	We're Talking Homes (North East)
Lauren	Knox	White Green Young Planning
Chris	Creighton	Wm Morrison Supermarkets Plc
Nick	Sandford	Woodland Trust
Nick	Sandford	Woodland Trust
		WYG Group
Robert	Murphy	WYG Planning
Philippa	Abbott	
Julie	Adamson	
J K	Allison	
David	Anderson	
Michael	Barrass	
Linda	Barron	
Peter	Beal	
John	Bell	
Sheila	Bell	
Eric	Blakie	
Julie	Bland	
Kevin	Bond	
Steve	Breeds	
Kayleigh	Brown	
Tracey	Brown	
Denis	Bulman	
Gary	Bunt	
Simon	Burdus	
Graham	Burt	
John	Carruth	
Chris	Checkley	
John	Cooper	
Pauline	Cooper	
Brian	Cree	
Clair	De Fries	
Alexandra	Diamond	
	Dorner	
David	Downey	
Dawn	Draper	
Adam	Eden	

Janine	Edworthy	
Julie	Elliott	
Lesley	Etherington	
Edward	Failes	
Michael	Fearn	
Edward	Flood	
Mike	Foster	
John	Fraser	
Jo-Anne	Garrick	
Ashley	Godfrey	
Matthew	Good	
Angela	Graham	
Malcolm	Graham	
Michael	Gray	
Stephanie	Gray	
A	Greenwood	
David	Gustard	
Lee	Hall	
Michael	Harding	
Alan	Hardwick	
Emma	Hardy	
Meriel	Hardy	
Claire	Harrison-Coe	
Stephen	Hepburn	
Larry	Hetherington	
Ashley	Hicks	
Sharon	Hodgson	
Susan	Hodgson	
Steve	Hopkirk	
Susan	Houghton	
Rebecca	Housam	
Julie	Howell	
R	Hughes	
Matthew	Hunt	
	Jobes	
Gavin	Johnson	
Michele	Johnson	
Kevan	Jones	
Barbara	King	
Angela	Lambton	
Chris	Lambton	
David	Lambton	
Eve	Lambton	

Maureen	Lambton	
Annabel	Lawson	
Emma	Lewell-Buck	
Michael	Lowthian	
Peter	Lynn	
George	Martin	
Jacqueline	McDonald	
E	McEvoy	
Mark	McGovern	
Nick	McLellan	
Ian	Mearns	
Simon	Mearns	
	Miles	
Susann	Miller	
Susanne	Miller	
John	Mills	
Sheila	Moffatt	
Tyler	Moore	
Jennifer	Morrison	
Hannah	Munro	
Charlotte	Nelson	
Jackie	Nicholson	
	Nornington	
Brian	O'Doherty	
Jacky	Owen	
Greg	Pearce	
Mary	Peel	
Jane	Peverley	
Bridget	Phillipson	
Lesley	Pickup	
Bob	Price	
Helen	Proud	
Jon	Quine	
Sophie	Reay	
Elizabeth	Reid	
Colin	Riley	
Bill	Robinson	
Caroline	Robinson	
	Rutherford	
Andrea	Scollen	
Hugh	Shepherd	
Claire	Simmons	
Greg	Skeoch	

Laura	Skitt	
Ken	Smithson	
Steve	Snowball	
Lizzie	Spencer	
Jayne	Stearson	
Lewis	Stokes	
Jo	Storie	
Richard	Swann	
Stephen	Taylor	
Angela	Templeman	
Martin	Terry	
Kathryn	Tew	
Brian	Thompson	
Helen	Thompson	
Peter	Thompson	
Chris	Thorp	
Martin	Tibbo	
Stuart	Timmiss	
E	Tinker	
Bernadette	Topham	
Nichola	Traverse-Healey	
Kevin	Ullah	
Geoffrey	Walker	
Joanne	Walker	
Julie	Watson	
James	Wharton	
Lisa	Wild	
Martin	Wilkes	
Linda Mary	Wood	
Helen		

Postal Contacts

Name	Surname	Organisation
		3 Network
		Action For Children
John	Murray	Aged Merchant Seamans Homes
Ernie	Thompson	Alzheimers Society
Lita	Bacon	Ashbrooke Residents Association (Treasurer)
David	Auld	Auld Brothers
		BAE Systems
Marion	McGuinness	Banardos

Michael	Jenkins	Bank Top Residents Association
		Barclays Bank
G	Kellett	Boundary CA
		British Airport Association Property
		British Gas
R	O'Neil	British Gas Trans Co
C	Herbert	British Geological Survey
		British Telecom
		British Telecommunications Group Plc
		Cable & Wireless
Michelle	Quinn	Castletown Community Association
		Centric Telecom
Rita	Nelson	Chief Officer Relate North East
		Citizens Advice Bureau
J	Nichols	Columbia Community Association
Anee	Ramshaw	Community Access Point
		Co-Operative Group
		Council For Voluntary Service- Sunderland
		DEFRA
N	Dorward	Deptford And Millfield CA
Jillian	Pate	Dickinson Dees
Matthew	Hard	DLP Consultants
		Doxford Park Community Association
Pauline	Yorke	Durham Aged Mineworkers Homes Association
		Durham Constabulary
S	Brown	Easington Lane Access Point
		East End Community Association
Ben	Thurgood	Energis Communications Ltd.
K	Lorraine	Enterprise 5
Allen	Creedy	Ethical Partnership
		Everything Everywhere Limited
Brenda	Browell	Farringdon Residents Association
		Faultbasic Ltd.
Brian	Stobbs	Force Architectural And Planning Liaison Officer
		Fujitsu Service
J	Martin	Gilley Law/Lakeside CA
		Gladman Developments
		God TV
		Grangetown Community Association
Roy	Chamberlain	Haig Homes
P	Kendall	Harraton Community Association
		Help The Aged
Syed Musaddique	Ahmed	Hendon Islamic Society

Linda	Brewis	Hendon Young Peoples Project
		Hercules Unit Trust
		Hetton Town Council
Anne	Ramshaw	Houghton Racecourse Community Access Point
A	Birkbeck	Houghton Racecourse Community Association
		Hutchinson 3G UK Limited
Norah	Brown	Hylton Castle Residents Association
Gillian	Walker	Jane Gibson Almshouses
Michael	Armstrong	Job Centre Plus
		John Martin Associates
		Jomast Developments
P	Razaq	Kans And Kandy
Allen	Close	Kepier Almshouses
		Lambton Community Association
K	Mayman	Little Lumley Parish Council
		Lord Durham Estates
		Lord Lambton's VS
		M&G Real Estate
v		M Nicol & Company
		Mill Telecom Ltd.
Eddie	Arnold	Millfield CORPS Salvation Army
		Mobile Operators Association
		Mono Consultants Ltd
		N Power
		N Power Renewables
		National Farmers' Union
		NEDL
		Network Rail
		New Herrington WMC And Institute
		New Herrington Working Men's Club
		NHS Commissioning Board
		NHS South Tyneside CCG
Kevin	Fitzpatrick	Nissan Motor Manufacturing (UK)
		North East Ambulance Service
		North East Building And Development Ltd.
		North East Electric Traction Trust
vJohn	Barnham	North Regional Association For Sensory Support
Anne	Ambrose	North Welfare Rights Service
		Northern Electric Distribution Ltd.
		Northern Gas Networks Ltd.
		Northumbria Police HQ
		Northumbria Water Ltd.
		Npower

Andy	Bower	Npower Renewables
		O H Properties
Pippa	Cheetham	O&H Properties
		O&H Properties Ltd
		O2
		O2 (UK) Ltd.
		Oakapple Group Ltd
Wood	Frampton	Orange Communications
M	Maddocks	Ouston Parish Council
		Pele Housing Association
Edna	Rochester	Pennywell Community Association
	Shale	Penshaw Community Association
		Pittington Parish Council
		Powergen Retail Ltd.
		Public Health England
Marion	Gibb	Redhouse And District Community Association
		Rickleton Community Association
Donald	Cholston	Rotary Club Of Bishopwearmouth
P	Hadley	Ryhope Community Association
		Save The Trident Group
		Scope London Offices
		SHAW Support Services
Angela	Doige	Shiney Advice And Resource Project
J	Mawston	Shiney Row Community Association
P	Burn	Silksworth Community Association
Linda	Parker	Social Enterprise Sunderland
Mike	Brunning	Sound Waves
Martin	Swales	South Tyneside Council
		South Tyneside Primary Care Trust
I	Maw	Southwick Youth And Community Association
Denise	Wilson	Springboard Sunderland Trust
Suzanne	Shaftoe	Springwell Community Association
Timothy F	Evershed	Springwell Gospel Hall Trust
A	Templeman	Springwell Village Residents Association
M	Lydiatt	St Matthews (Newbottle)
		Stirling Investment Properties
Gina	Smith	Sunderland Carers Centre
David	Bridge	Sunderland Civic Society
		Sunderland Clinical Commissioning Group
Tony	Compton	Sunderland Deaf Society Limited
		Sunderland Federation Of Community Associations
Pat	Burn	
		Sunderland Maritime Heritage

		Sunderland Mosque
		Sungate
Stewart	Tag	Tees Valley Trust Limited
		The Bridges
		The Crown Estate
	Bulmer	The Fulwell Society
Steve	Carnaby	The Planning Inspectorate
		The Trustees Of Lord Durham's 1989
		Thompson Park Community Association
Ryan	Molloy	Thompsons Of Prudhoe
		Thorney Grove Ltd
Peter	Ottowell	Three Rivers Housing Group
		T-Mobile Customer Services
		Trilogy Developments
		TWRI
		Tyne And Wear Passenger Transport Authority
Ian	Ayris	Tyne And Wear Specialist Conservation Team
Philip	Marsh	University Of Sunderland
Annette	Guy	Village Community Association
		Vodafone
		Vodafone Ltd.
Simon	Williamson	Washington Millennium Centre
A	Godfrey	Wearside Gateway
Anita	Lord	Wearside Women In Need
J	Hicks	West Community Association
Chris	Francis	Wildfowl And Wetlands Trust
		Wm Morrison Supermarkets Plc
John	Turnbull	Youngs RPS
Richard & Janette	Abdu	
John	Adamson	
V	Adgar	
A & M	Ainslie	
P & K	Aitken	
Balal	Ali	
Paul	Alison	
A M	Amour	
Beverley Anne	Andersen	
Ava	Anderson	
George & Caroline	Anderson	
R	Anderson	
S	Anderson	
Rachel	Andrews	
P H	Anthony	

Constance	Applegarth	
P & K H	Appleton	
Carol	Armstrong	
J M	Armstrong	
M	Arnott	
S	Ashford	
Joan	Ashman	
A	Askew	
Ian Marley	Baltal	
Dan & Matt	Banning	
Cally, Gwen & Jodie	Bannister	
Lawrence	Barnaby	
John & Margaret	Barnes	
Peter Michael	Barras	
Mark	Barton	
M	Bates	
J K	Baxter	
Christopher	Bell	
I T	Bell	
J	Bell	
J & F M R	Bell	
Paul	Bell	
A	Beresford	
J	Bewick	
Donna & Christopher	Bishop	
H J	Bishop	
W	Black	
N	Blackburn	
Katelynn	Bland	
I C & F P	Blue	
Susie	Blyth	
Joe	Bonalie	
Adrian	Bonner	
Susan	Booker	
S	Boyd	
A M & T E	Bradford	
Lynn	Bridnall	
C	Brown	
Geoffrey Raymond	Brown	
Joseph	Brown	
K	Brunger	
C	Buddle	
Gracie	Burn	

Kathleen	Burns	
Samantha, Max & Eve	Burns	
M	Burrows	
Fred	Burton	
J U & Maureen	Byron	
A	Cairns	
Alison	Campbell	
Mrs T	Campbell	
Ada, John, Jacob & Carolyn & James	Carr	
David	Carr	
R	Carr	
W	Carrick	
John	Carruth	
Mary	Cartwright	
Morgan, Jennifer & Graham	Chantler	
Jason & Dawn	Charlton	
Nicholas	Charlton	
George	Chicken	
Ingrid	Chidgey	
R W & J	Chilton	
Charlie	Clapp	
Allison, Joseph & John	Clarke	
John & Alwynne	Clarke	
Edward James	Cleary	
Tom	Cleary	
Barry Howard & Marian Ann	Clegg	
Paula Jayne	Clegram-Brown	
A & N D	Clements	
John	Colclough	
A & D M	Coleclough	
David	Colley	
J	Common	
Sean Joseph	Conlan	
Lisa	Conlon	
Rachel	Cooper	
A	Cope	
Margaret	Copeland	
M	Corrigan	
D, P & B	Coulson	
Frances	Cowie	
	Coyle	

Paul & Debbie	Craig	
Linda	Cryan	
J D, P W & P J	Cullen	
J	Cullinson	
K J	Curran	
Alice	Curtis	
Joan	Cuthbertson	
S	Cuthbertson	
I & T	Dalby	
	Darwin	
Alan C	Davidson	
Elaine	Davidson	
Gavin	Davis	
John George, Linda, Donald & Angela	Davis	
Mark	Davis	
George & Kathleen	Davison	
Irene Elizabeth & Nicholas John	Davison	
M	Dawson	
C	De Frie	
A	Deary	
K	Deary	
Sharon	Deehan	
R	Delaney	
A	Dinning	
Kevin	Dobson	
G	Dodsworth	
E	Dorans	
Hugo Denis & Deborah Elaine	Dowd	
John	Dowson	
Paul, Natalie & Sharnie	Drew	
Simon Anthony George	Driver	
M	Duke	
Stephanie	Dunn	
Kay	Elder	
T	Elliott	
	Ellis	
Carol Anne	Elmy	
Kate Jane	Elmy-Tolic	
C & Y	Embleton	
C	Etheridge	
William	Evans	

Sean Patrick	Evennett	
James	Ewing	
Maureen	Failles	
Craig	Falcus	
Laurence	Fanin	
K	Farrah	
K, J, E, K & N	Faulkner	
Amy, Grahame & Helen	Fife	
E	Fife	
Terry	Firman	
James Donnison, D & O	Fletcher	
D & C A	Flinn	
R & H	Florance	
D	Flynn	
N I	Foggin	
Alan	Foley	
Brenda & F D	Footie	
Colin	Ford	
Colin	Ford	
Michael Ronald	Ford	
J	Forster	
G D	Foster	
A	Franklin	
R C	Fraser	
M	Freeman	
S	Gair	
P	Gale	
Alan & Kathleen	Galsworthy	
Alan Anthony	Galsworthy	
Sharon Louise	Galsworthy	
Gordon	Gardner	
A	George	
Stuart & Paula	Gibbons	
D	Gilhespy	
Z	Gillbanks	
G	Gilligan	
Denise	Gillott	
M E & J	Glaister	
Donald	Glynn	
Wayne & Deborah	Godfrey	
S	Goodrick	
Sarah	Gordon	
E, D & J	Graham	

Beverley Anne	Gray	
S	Gray	
Peter & Sandra	Greig	
Watson	H	
Alan & Bridget	Hall	
Alison Ann	Hall	
Anthony & Elizabeth	Hall	
N	Hall	
Peter	Hall	
Stephen	Hall	
W & A	Hall	
Sam	Hamed	
Frank, Denise & Mark	Hannan	
Keith & Angela	Hardy	
Lisa & Ian	Harris	
Michael	Hartnack	
Lynn	Hartridge	
Amanda & Jordan	Hauxwell	
Deborah Lynn	Haynes	
George	Haynes	
Kathleen	Haynes	
Margaret	Haywood	
E	Henderson	
John	Henderson	
John William & Elaine	Henderson	
R J	Hephurn	
A G	Heslop	
R	Hewitt	
P J	Hibbery	
R	Hillier	
Mark	Holland	
Gavin I	Holmes	
S M	Holt	
Barbara	Hope	
E & W	Hopkirk	
S	Hopkirk	
Stephen	Hopkirk	
David, Sarah, Jane & Keith	Horrigan	
Daniel	Horvath	
Stefan	Horvath	
B	Houghton	
Norma	Houghton	

Margaret	Hovarth	
K	Hughes	
Richard & Sandra Maria	Humphrey	
Ann	Huntley	
Bert	Huntley	
Nicola	Hurst	
Jawid	Iqbal	
E	Irwin	
J B	Irwin	
R	Jackson	
Brett	Jacobson	
Marilyn Margaret	Jacobson	
Wesley Terence	Jacobson	
S	Jacques	
C	Jamasa	
Raymond	Jary	
Marie	Jasper	
Paul	Jefferson	
Terry & M A	Jennings	
Gary & Susan	Johnson	
Jennifer	Johnson	
Lyndsey	Johnson	
M	Johnson	
Robert	Johnson	
Mark	Jones	
Christian	Kerr	
K	King	
A	Kirton	
C	Knight	
Sam	Lake	
Dennis	Lambton	
M	Lambton	
Ellie	Land	
Neil	Latkin	
Jan	Lawson	
Patricia	Lawson	
John	Lee	
R A	Lee	
Z	Lend	
A & J	Leng	
G	Lennox	
Anthony	Leonard	

M	Lewins	
Joanne	Lisgo	
Mary	Lisle	
M	Livingstone	
Alexander	Logan	
Alison Jane	Logan	
Annabel	Logan	
Marcus	Logan	
Stuart	Logan	
P & H	Lowery	
John Austen	Lowrie	
Richard & Gemma	Lumsdon	
Carol	Lynn	
James	Magree	
Gillian Alfreda	Main	
Jeffrey Alexander	Main	
Joyce	Mallon	
Fiona	Marran	
Scott	Marshall	
E & W	Martin	
Mavis	Martin	
L	McAllister	
Malcolm & Margaret	McArthur	
T & D	McCartney	
	McConnell	
S	McDougall	
Steven, Karen, Lee & Craig	McGill	
K	McGlen	
Joyce	McInnes	
G	McIntyre	
N	McIver	
A E	McKeon	
J	McKeon	
W	McKeon	
Lynne	McKevitt	
Jill	McKnight	
Angela	McLeish	
Patrick	McLoughlin	
C	Meek	
D	Meek	
Rebecca	Mello	
Diane	Merchant Brown	

Joe	Merrigan	
I	Metcalf	
Robin	Midson	
James	Midwood	
L	Midwood	
Donald / Linda	Miles	
Audrey	Miller	
R & F	Miller	
S & K	Miller	
Clive	Milner	
John Stuart	Moor	
John D	Moore	
Marilyn	Moore	
L	Morgan	
Marian	Morgan	
E E	Morris	
K	Morris	
Maureen	Morrow	
D	Mulholland	
Jean & James	Mulholland	
L	Mulholland	
Peter	Mullen	
	MURLEY	
M	Murphy	
Raymond	Murphy	
Mr & Mrs D	Murray	
C	Nelson	
Catherine	Nelson	
Diane	Nelson	
I	Nelson	
J	Nelson	
M P	Nelson	
P	Nelson	
D	Nesbitt	
H	Nesbitt	
J	Nesbitt	
J	Nesbitt	
M	Nesbitt	
Susan	Nesbitt	
V	Nesbitt	
Richard	Nichol	
George	Nicholson	
Gladys	Nicholson	

J	Nicholson	
Patrick	O'Hare	
Elizabeth	Oliver	
Eric	Oliver	
Gwenyth	Oliver	
S	Oliver MRICS	
S W	O'Neill	
Elizabeth	O'Sullivan	
Kevin	O'Sullivan	
E & W	Oxley	
Lily	Oxley	
Catherine	Parker	
Grahame	Parker	
Keith	Parker	
Kevin Gerard	Parker	
D	Parkin	
M	Parkin	
E & W	Parkinson	
M	Parkinson	
M	Paterson	
Alan	Patrick	
R	Patterson	
A	Pattison	
W A	Pattison	
J P	Pearson	
Jennifer	Pearson	
Joan	Pearson	
M E	Peel	
P	Peele	
D	Percival	
M	Perriam	
Bruce	Perrie	
Mavis	Perrie	
R	Phillips	
S	Phillips	
A	Pickering	
A	Pickering	
J	Pickering	
K	Pickup	
T	Pickup	
S	Pinder	
E	Pleasants	
K	Pleasants	

M	Pleasants	
S	Pleasants	
V A	Pleasants	
Muriel	Plemper	
Audrey	Polkinghorn	
R	Polkinghorn	
W	Portsmouth	
Evelyn	Postlethwaite	
L	Potter	
N	Potter	
N	Potter	
S	Potter	
Eileen	Potts	
R	Prest	
Hazel	Pringle	
L	Purvis	
Shirelle	Quinn	
Tony	Quinn	
D	Rae	
L	Rae	
L	Rafferty	
L	Rafferty	
Wendy	Ramsey	
Anne	Rathbone-Wells	
Luke	Raymond	
Mohammed	Razaq	
A	Rennie	
M B	Rennie	
Alex	Reynolds	
Margaret	Richards	
Robert	Richards	
Lisa	Riley	
S	Riley	
Felicity	Ripley	
Philip	Ritzema	
R	Ritzema	
Katie	Roberts	
A	Robertson	
Gillian	Robertson	
K	Robinson	
M	Robinson	
Ruth	Robinson	
Leslie	Robson	

Pat	Robson	
R J	Robson	
Sandra Jacqueline	Robson	
Thomas William	Robson	
Lucy	Rouse	
D	Routledge	
Robert Henderson	Ryan	
Claire	Scott	
Conner	Scott	
Kevin	Scott	
L	Scott	
M	Scott	
Samantha	Scott	
Shay	Scott	
T	Scott	
M A	Scott-Gray	
Betty	Senior	
Ronnie	Senior	
T D	Seymour	
Lee	Sharpe	
Lesley	Sharpe	
Kevin	Sheppard	
Robert William	Shield	
Christine Eileen	Shovlin	
Janice	Simm	
David	Simpson	
M	Simpson	
Stephanie Pamela	Simpson	
Ronnie	Singh	
Doreen	Smith	
Judith Mary	Smith	
M	Smith	
Ray	Smith	
Lucy	Snowden	
Beatrice	Snowdon	
D	Southern	
C	Spence	
Albert	Spencer	
William	Spencer	
Anna	Steanson	
Mark	Steanson	
Olivia	Steanson	
Penelopy	Steanson	

D	Steel	
Carole	Stephenson	
Foster	Stephenson	
G	Stephenson	
M	Stephenson	
A	Stevens	
D	Stoker	
V	Stothard	
J	Strong	
Pauline	Stubbings	
A	Swan	
D	Swan	
Michelle	Sweeney	
Stephen	Swinburn	
Dianne	Talbot	
B	Tate	
J	Tate	
Linzi	Tate	
David	Tatters	
Audrey	Taylor	
B	Taylor	
Barry	Taylor	
Ben	Taylor	
Christine	Taylor	
G	Taylor	
Gordon	Taylor	
Graham	Taylor	
Jean	Taylor	
P & H	Taylor	
Brian	Teggert	
Mitchell	Templeman	
S C	Templeman	
John	Thew	
F J	Thirlaway	
I	Thirlaway	
A & E	Thompson	
C	Thompson	
Delice V	Thompson	
G J	Thompson	
J	Thompson	
J	Thompson	
Malcolm	Thurgood	
Rosina	Thurgood	

Carol Ann	Tierney	
Michael	Tierney	
A	Tiffen	
Terry	Tiffen	
Wilfred	Tindale	
A	Todnor	
M	Trewhitt	
S	Trewhitt	
L	Tuff	
D	Tunstall	
Clare	Turnbull	
J H	Turnbull	
John	Turnbull	
M	Turnbull	
E	Tweedy	
Beverley Anne	Tyson	
John George	Tyson	
Amy	Tyzack	
John Anthony	Valente	
Carole	Vorley	
Edith	Waites	
Lynn	Wales	
Michael	Wales	
C J	Walker	
M	Walker	
Christina	Ward	
Matilda Natalie	Ward	
William James	Ward	
Maxine	Warrener	
J	Watson	
Maureen	Watson	
P	Weatherburn	
L & S	Webb	
Michael	Webb	
Xenia	Webster	
David	Weir	
Helen	Weir	
Ann	White	
R A	White	

W	White	
D	Whitfield	
F	Whitfield	
John Denis	Whittaker	
Jeremy	Wicking	
Brian	Wilkinson	
D	Wilkinson	
S	Wilkinson	
C	Williams	
Caitlyn	Williams	
Glynis	Williams	
L	Williams	
Lee	Williams	
Lesley	Williams	
William	Williams	
David	Wilson	
J	Wilson	
George	Wind	
Janet	Wind	
Anthony Charles	Winstanley	
Carole	Winstanley	
Mark	Wiper	
J	Wiseman	
A	Wombwell	
Clare	Wood	
Dale Royce	Wood	
J	Wood	
L W	Wood	
M	Wood	
R	Wood	
Mr & Mrs M	Wright	
John	Young	
S	Young	

APPENDIX 3: Draft Planning Obligations Supplementary Planning Document Consultee Letter



Commercial Development
Planning and Regeneration
Civic Centre
Burdon Road
Sunderland
Tel (0191) 520 5555
Web www.sunderland.gov.uk

Date: 12 June
Our ref:
Your ref:

Dear Resident

HAVE YOUR FINAL SAY ON SUNDERLAND'S CORE STRATEGY AND DEVELOPMENT PLAN 2015-2033 PUBLICATION DRAFT

I am writing to inform you that from 15 June to 27 July 2018, Sunderland City Council will be consulting on the Publication Draft of the Sunderland Core Strategy and Development Plan 2015-2033. This is the final stage of consultation before Sunderland City Council submits the Plan to the Secretary of State for the Ministry of Housing, Communities and Local Government for examination. This Plan sets out our long-term strategy on development across the city to 2033. It will ensure that the right type of development is focused in the right places to meet the needs for local people and businesses.

You may have submitted comments to us last year on our draft Plan. We have listened to what you had to say and prepared the final version of the Plan known as the Publication Draft which is available to view online at <http://sunderland-consult.limehouse.co.uk/portal>, on the council's website at www.sunderland.gov.uk/CSDP and at the Sunderland Civic Centre from 8.30am to 5.00pm Monday to Friday, during the consultation period.

All comments received at the Draft Plan stage have been summarised and the council has prepared a response. These are available to view on the website.

This Plan will cover the entire administrative boundary of Sunderland and will ensure that Sunderland can:

- deliver an additional 13,410 homes
- create 7,200 number of jobs
- create sustainable communities and deliver a mix of homes of different sizes and types to meet our needs
- support a thriving economy through the development of the Urban Core, Centres and employment sites
- improve sustainable transport
- create healthy communities
- deliver infrastructure such as schools and healthcare to support our future growth

We are also consulting on an additional planning document, the Draft Planning Obligations Supplementary Planning Document, which sets out how and when we will seek planning obligations from development proposals.

Have your say
It's important to have your say as this is your last opportunity to tell us what you think. This consultation is slightly different to previous rounds of consultation. Although it will be run by the council, its purpose is to seek your views on whether the Plan and associated documents are sound (i.e. appropriate, based on robust evidence and consistent with government policy) and legally compliant. To explain what this means, we have prepared a guidance note which can be found on the council's website. It is very important that any comments you make at this stage of the Plan are linked to these requirements or soundness tests in order to be considered by the Planning Inspector.

Delivering services for a better future



Comments of support or objection are invited on the Plan. The consultation will run for 6 weeks, from Friday 15 June to Friday 27 July. All comments must be submitted within this period and received by the council no later than 5pm on 27 July 2018. Please note that comments received after 5pm on Friday 27 July 2018 will not be considered. Only comments received within this period, by deadline, have a statutory right to be considered by the Planning Inspector at examination. A copy of all comments will be made available for the public to view and reviewed by a Planning Inspector, and therefore, cannot be treated as confidential. Data will be processed and held in accordance with the General Data Protection Regulation 2018.

How to submit comments

If you would like to make comments on the Plan, please complete a "Representation Form" and submit to the council in the following ways:

- The quickest and easiest way for you to respond is online at <http://sunderland-consult.limehouse.co.uk/portal>. You will need to register to make a representation. If you have already registered during a previous consultation simply enter your username and password; or
- If you prefer, you can download the representation form and guidance note from the Council website www.sunderland.gov.uk/CSDP or pick up a copies from a drop in event or the Civic Centre Reception (see dates and times below) and send it to us at:
 - o Email: planningpolicy@sunderland.gov.uk; or
 - o Post to: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN
- Representation forms can also be requested from the Strategic Plans team by telephoning (0191) 561 1577 or emailing: planningpolicy@sunderland.gov.uk

If you would like to be notified of any of the following steps, please let us know which step by completing Question 9 of the "Representation Form"

- That the Core Strategy and Development Plan 2015-2033 Publication Draft has been submitted to the Secretary of State for Ministry of Housing, Communities & Local Government for examination;
- The publication of the Planning Inspector's Report on the Core Strategy and Development Plan 2015-2033; and/or
- The adoption of the Core Strategy and Development Plan 2015-2033.

We will be hosting drop-in events, where officers will be available to answer any questions that you may have and to help you complete your representation form, relating to legal and procedural compliance and soundness. The schedule for these events is:

Date	Time	Venue Address
18 June 2018	9.30am – 11.30am	Bunnyhill Community Room, Hyton Lane, Sunderland SR5 4BW
18 June 2018	4.30pm to 7.00pm	Wessington Primary School, Lane Coast, Washington NE38 7PY
19 June 2018	11.00am – 1.30pm	Houghton Sports Complex Dance Studio, Station Road, Houghton le Spring DH4 5AH
20 June 2018	9.30am – 11.30am	Thornley Close Action & Enterprise Centre, Thorndale Road, Thornley Close, Sunderland SR3 4JQ
22 June 2018	4.30pm – 6.30pm	Ryhope Community Centre, Black Road, Ryhope, Sunderland SR2 0RX
16 July 2018	9.30am – 11.30am	University Sports Hall, Chester Road, Sunderland
17 July 2018	4.30pm – 7.00pm	Barnwell Primary School Sports Hall, Whitefield Estate, Houghton le Spring DH4 7RT
18 July 2018	5.00pm – 6.30pm	Bunnyhill Community Room, Hyton Lane, Sunderland SR5 4BW
19 July 2018	4.30pm – 6.30pm	Silksworth Community Centre, Tunstall Village Road, Sunderland SR3 2BB
20 July 2018	10.00am – 12 noon	Washington Millennium Centre, The Oval, Concord Washington NE37 2QD

Next steps

After this consultation, the council will take into consideration all views and any additional evidence before submitting a final copy of the Plan to the Secretary of State.

If you have any queries regarding the consultation, or any other aspect of the Sunderland Local Plan, please do not hesitate to contact us using the details above.

If you have received this letter and no longer wish to be contacted about the Core Strategy and Development Plan, please contact us in writing at: planningpolicy@sunderland.gov.uk or Strategic Plans and Housing Team, Sunderland Civic Centre, Burdon Road, Sunderland, SR2 7DN and we will remove you from the consultation database.

Yours faithfully



Iain Fairlamb
Head of Planning and Regeneration

APPENDIX 4: Draft SPD Consultation Responses (2018)

	Respondent	Consultation Point	Comment	Council Response
1	Keith Cameron		I think it is a disgrace that the green belt is being devastated locally. Springwell Village will no longer be a Village. The area round Penshaw Monument & Herrington Park is a fantastic green space for enjoying family time. To build so many houses on the land without increasing roads will turn it into a constant roadblock.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
2	Karen Jones		Building houses at Herrington is wrong. It's greenbelt land where birds nest and is a place of natural beauty next to Herrington Park	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
3	Kirsty Oliver		I OBJECT TO HRS12	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
4	Stephanie Pickering		Building on Green Field/Playing Fields ant Southern Playing Fields in Rickleton. Council Booklet page 23 states: The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; The Proposed building on the Southern Playing Fields will remove 7 football pitches - whilst proposals to move to 3G pitches on the Northern Area Playing fields have been suggested this will result in 7 grass pitches at Rickleton being lost PLUS at least 2 at the Northern Area to accommodate the proposed 3G pitches - therefore a minimum of 9 full size football pitches will be lost forever - thus the statement above is broken as whilst the Council may deem these	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

			<p>proposed pitches better provision they are certainly NOT equal or better quantity.</p> <p>The council need to exhaust ALL Brownfield sites for housebuilding before allowing builders to buy sports fields, especially those that are used by hundreds of people per week, if the council has been led to believe these sports fields are not being used fully, they need to ensure they visit them at weekends and evenings not through the day when everyone is at work and school. Huge areas of Sunderland have potential brown field sites that builders would build on if they were their only options, if you potentially offer greenfield sites to builders, they would ALWAYS choose these over brownfield sites.</p>	
5	Andrew Bean		<p>I strongly object to the proposal of a highway being built through Elba Park.</p> <p>The area is one of the only areas remaining which are dedicated to leisure and nature in the area</p> <p>The area is always filled with families with young children and a highway through this area would no doubt pose such a risk that the area would become unused and no doubt the death of all wildlife in the area</p> <p>I also live in Elba Park and the proposed site of the new highway is approximately 20 feet from my property. It is totally unacceptable that a highway is built so close to major residential housing, the disruption, noise and traffic pollution caused by this is something which is unacceptable. I do not feel that this has been taken into consideration by the council and how close the road will be to properties. The existing road which passes alongside the Biddick estate is at a much greater distance to housing and is not comparable</p>	<p>This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.</p>

			<p>Finally I would question the cost of such a project and the benefits it would bring, the proposal talks of bringing economy to Houghton town centre however the majority of persons attending the town centre do so on foot or via public transport. The layout and infrastructure of the town centre is not equipped to deal with additional vehicular volume which will result in this highway being an expensive and unnecessary mistake</p> <p>I hope that the considerations raised are taken into account</p> <p>Thank You</p>	
6	David Tatters		<p>The impact of your plans will have a significant impact on the wellbeing of people living in Barmston, Sulgrave and concord. The disproportionate amount of industrial and retail expansion is having an effect now. In the future it will be intolerable because you have not taken into account traffic density, traffic noise and the sheer over whelming effect of surrounding our villages with additional industrial and retail activity. We are surrounded by eight industrial areas and a retail park now, there are at least 360 major units in the industrial areas alone. The traffic noise level from the A1231 is at an extremely high level now, further traffic from the additional approved planned development is going to make it more difficult for residents. The traffic noise starts at 0445 and last until 0300 the next morning, we also worry about the levels of pollution from all the traffic. I am advised that planners do not take traffic noise into consideration, I would invite the planning department to come and have a listen. Residents are starting to e mail their councillors regarding this problem. I would also advise that the traffic on Spire Road at the Peel Centre in Washington is going to get worse due to the approval of more popular retail units, couple that with the HGV units going to the various industrial sites means that noise and</p>	<p>This representation was considered as part of the CSDP. Not relevant to SPD. No change required.</p>

			pollution levels from vehicles will increase. The safety of residents in the area will also be at risk.	
7	Kelly Stockton		I would like to object to the development of the road through Elba Park. I believe that it is important to ensure a wide area of green recreational space where family's can enjoy the outdoors together. Can we not think of more sustainable solutions which protects the natural environment and animal habitats. Re open the old train lines or use this and develop a road next to it.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
8	David Hicks		I object to the development of the road near Elba Park. perhaps the road could be built closer to the old railway line and not destroy animal habitats.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
9	Julie Shaw		I oppose SP10 • 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. The road is going to run straight through a park which is used by myself and many people everyday. We walk our dogs, cycle, observe nature which will be detrimentally impacted on if this road goes ahead. The park is currently a safe place for children and dogs away from moving traffic. If this road goes ahead we will all be in danger and at risk of a car collision. It will bring pollution, noise and disturbance. There is nothing positive about this plan as if you ask the residents who live by the park and/or use it you will be advised that no one wants this. We have had no correspondence sent to us about this proposal? Why is this? Your proposals state you want to maintain semi rural character. Placing a road through an award winning park full of rural character and wildlife can only be described as absolutely ludicrous. New houses need to be built to meet demand but where do you expect these families to take their	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

			children if you are destroying a safe environment full of nature and education opportunities?? Therefore I strongly object to SP10	
10	Julie Weedy		I object to the sp10 proposal to put a road through Elba Park. The park is used daily by dog walkers, cyclists, horse riders and family's with their children. Not to mention the wildlife that live in the park! A road would totally destroy the tranquility of the park and force out the wildlife that have lived here for years. Surly there is an alternative route that can be used instead of destroying an award winning park such as Elba, there is an old railway line sitting there unused! Use that. Elba Park is a part of our community the residents who live near by are always out helping to keep it clean and tidy for everyone to enjoy and it should be left as it is , it has already had 500 homes built on it encroaching onto the wildlife and now you want to put a road through it! It's ridiculous. I strongly object.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
11	Kara Bell		Do not build houses on this area this is a nice patch of countryside for the people of penshaw and Herrington. Many people come to Herrington country park for the experience and part of this is seeing the beautiful fields and cattle surrounding. Houses will destroy the experience for many.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
12	Julie Hedley		I was dismayed to see ther are proposals to build a road through Elba Country Park, this amazing local resource was one of the best things created for this area and now you plan to bulldoze a road through it. I object in the strongest possible terms, this area is rich in wildlife which has built up over the years of the parks maturity, the housing which isn't yet complete was sold on the strength of being adjacent to such a lovely green area. Running alongside the park is a disused railway line In desperation I suggest this as a possible alternative location. Sunderland Council would appear to be hell bent on the destruction and minimising of our green spaces which have taken years to mature and cannot be replaced with a token	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

			nod to a green belt or corridor. I am furious at this stupidity and ignorance.	
13	Adele Carter		There are other areas other than Green Belt that can be considered for building why not use that? there is "brown land" to buy and build on but because of greed and corruption within the council it's cheaper to use green belt. In the area there is only 35% green belt and is the lowest in the region so why reduce it further?	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
14	Catherine Carr		<p>As a National Trust member I strongly object to the use and development of land that is green in order to provide housing for a population that is already housed in other areas, some in desperate need of development. The finances should be utilised to develop Sunderland, Philadelphia and Houghton area.</p> <p>Currently I live in the Penshaw area where applications to schools are competitive, with my child being one of the 70 applicants to a 30 pupil class. Another 400 houses would not assist this issue in the short or medium term.</p> <p>Medical general practice surgeries are not sufficient for the current residents</p> <p>I know the long term view from the developer is that doctors surgeries and schools can be built in the future, this is not a guarantee and only offers potential future issues with building, congestion, disruption, etc</p> <p>The building and development will cause extreme interruption to the local area, even after building the local traffic congestion issues would be massive increases.</p> <p>The area real currently has epic green field views for runners and cyclists, encouraging local revenue by park run and walk activities. A development would hinder this due to a decrease of beauty and access</p>	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.

15	Sophie Smith		the planning for a road through Elba Park would spilt the Park in two and destroy wildlife.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
16	Kim Lomax		I might sound a bit selfish but those animals have been there for as long as I can remember. I can't manage to take my children to a farm. But other than that I worry about schools and doctors surgeries there isn't any appointments available now without having to be on hold for a long time before being told there isn't any.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
17	Norman Heron		If Joe Bloggs was unhappy that our council had chosen Penshaws Greenbelt to build houses on when there are 3000 empty homes in Sunderland, he might wish to choose the option that states it has not been positively prepared, as our council have failed to look at this before suggesting our Greenbelt land. Joe Bloggs might say it was not justified because the need for housing can be found elsewhere and that there is no need to build more when 3000 stand empty. Joe Bloggs may wish to say that our councils plan is not consistent with National Planning Policy Framework - as stated on paragraph 87, building on greenbelt must only be in exceptional or special circumstances, such as the need for a hospital and there is no other land available etc this does not include housing.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
18	Ann Emery		My views are as follows, we already greatly benefit as a community from penshaws greenbelt. We do not want our VALUABLE open space being transformed into an ugly housing estate. The traffic will increase immensely on an already very busy road Chester Road. School places that are already difficult for resident parents to secure will become almost impossible when hundreds more children move into penshaw. The same prediction can be made in regards to our already struggling gp services.	This representation was considered as part of the CSDP. Not relevant to the SPD. No change necessary.

19	Michael Collier		<p>This site is part of the greenbelt within the City of Sunderland and wasn't considered suitable for development in Sunderland's own report in 2016. In that report it was mentioned that there is a biodiversity value, it is a wildlife corridor with landscape value. All of these features will be lost if permission is given to build more than 100 high value homes.</p> <p>The answer to relieve the housing crisis must be for affordable homes to be built to help younger people gain access to the housing market, Sunderland has plenty of brownbelt sites which could be utilized, creating homes in pleasant surroundings without ruining the greenbelt, Pennywell is one area which springs to mind as well as areas in Hendon. I notice the three ward councillors are also opposed to the plan.</p>	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
20	Paul Thompson		<p>The statement in this paragraph "Greenspace relates to public and private open space and is identified within the city's Greenspace Audit as including amenity greenspace, provision for children and young people, natural and semi-natural greenspace, formal parks and country parks, allotments and community gardens, outdoor sports facilities, school playing fields and grounds, cemeteries and church grounds, civic spaces and coast and estuary" totally contradicts the current application by Miller Homes, UOS, SCC and WYG application ref 18/00609/FU4</p>	This representation was considered as part of the CSDP. Not relevant to the SPD. No change required.
21	Christopher Smith		Blank submission	No comment made.
22	NHS Sunderland CCG	Section 2.4 para 6	<p>This comment pertains to the para starting 'This document ..'. As a general comment it is noted that the SPD does not form part of the Sunderland Local Plan. Conscious of the recent case R (oao Skipton Properties Limited and Craven District Council 2017) it is important that the SPD does not include proposals which should be in the Local Plan and not in an SPD.</p>	Comment noted. The SPD supports policies, particularly Policy ID2, within the CSDP. The content of Policy ID2 was dealt with at the Plan's

				examination therefore there is no concern that the SPD contains wording that should be in CSDP Policy ID2
23	NHS Sunderland CCG	3.1	<p>Whilst supporting the reference to health facilities in the last bullet point, health infrastructure should be expressly listed as a bullet point in its own right. This is necessary amongst other things acknowledging that health is a particular issue in the City and that all of its premises are at capacity.</p> <p>Following on from the above, health infrastructure is not referred to in Section 12 of the SPD (Other Site Specific Planning Obligations). The respond is concerned at this apparent omission, health infrastructure should be a priority in the City. Health infrastructure should have a specific section within the SPD as does education, open space, equipped play space, ecology, sport and recreation, highways and public transport.</p>	Noted. Reference to health infrastructure added to Section 12. The Council will continue to work constructively with Sunderland CCG to establish if there is evidence of health infrastructure need across Sunderland.
24	NHS Sunderland CCG	Figure 2 page 8	Health Infrastructure should be expressly listed as a type of infrastructure. The threshold for when contributions are required towards Health Infrastructure should be at applications for 50 dwellings or more. For student accommodation the threshold should be set at 50 bedspaces or more.	Comments noted. This representation was considered as part of the CSDP.
25	NHS Sunderland CCG	page 8 para 2	It is noted that bedspaces are set out in para 10.26 of the Plan and it is further understood that the Council work on the basis of 1 bedspace per person. As a general comment in other authorities	Comments noted. This representation was considered as part of the CSDP. The Council will

			<p>where health infrastructure contributions are sought lower occupancy rates are used, namely;</p> <p>33 occupancy rate in 1 & 2 bed properties</p> <p>07 occupancy rate in 3 bed properties</p> <p>73 occupancy rate in 4 bed properties</p> <p>02 occupancy rate in 5+ bedroom properties</p> <p>There will be a need to work through the approach in progressing both the Plan and the SPD.</p>	<p>continue to work constructively with Sunderland CCG to establish if there is evidence of health infrastructure need across Sunderland.</p>
26	NHS Sunderland CCG	Section 12	<p>Section 3.1 in the other site specific requirements bullet reference health facilities. For whatever reason health facilities do not appear to be considered within Section 12. The CCG are concerned that health infrastructure is not seen as a priority in the City and that contributions will be limited especially acknowledging the para 14.4 of the SPD which states that where it is demonstrated that the full amount of planning obligations cannot be delivered due to viability the City Council will determine where the available contributions should be directed. The CCG are concerned that this is indicative that contributions will be other than to healthcare infrastructure. The CCG's suggested approach is set out in their response to policy ID2 of the Plan.</p> <p>Without prejudice this apparent omission health infrastructure should have a specific section within the SPD as does education, open space, equipped play space, ecology, sport and recreation, highways and public transport. Health is a particular issue in Sunderland and all premises being at capacity. In the circumstances it is not sound to leave health infrastructure to 'other' assuming its omission was an oversight.</p>	<p>A paragraph on health has been identified within "other specific requirements". The Council has worked, and will continue to work, closely with Sunderland CCG to ensure a robust, evidenced calculation, which can be used by the CCG to request contributions for health.</p>
27	NHS Sunderland CCG	14.4	<p>Disagree, when full contributions cannot be made for viability reasons, contributions required by a development should be apportioned amongst the infrastructure required to mitigate the</p>	<p>The City Council will direct reduced funds on a case-by-case basis in</p>

			impact of the development by way of an equal percentage discount to each requirement. The methodology should be set out in the Policy and not in an SPD.	accordance with national legislation. No change necessary.
28	Mr David Gallagher - NHS Sunderland CCG	3.1	<p>Scant mention of the need / intention to use section 106 monies to support health infrastructure.</p> <p>The addition of significant numbers of new home - 13,410 or 745 new dwellings each year, will increase population size and create increased demand for services</p> <p>While funding for health services is allocated nationally based on population and a formula, this funds service provision eventually. It does not account for infrastructure such as buildings and premises from which they are delivered.</p> <p>This capital funding is not available to Clinical Commissioning Groups, who receive funding to commission services.</p> <p>Greater commitment to other use of section 106 funding needs to included otherwise there is a significant risk that where current facilities do not have any further capacity, health care services will not be able to cope with the increased population resulting from the plan</p>	The Council will continue to work constructively with Sunderland CCG to establish if there is evidence of health infrastructure need across Sunderland to warrant a dedicated health chapter within the SPD.
29	Story Homes Ltd	Chapter 3 – Summary of Requirements	<p>Story Homes wishes to thank Sunderland City Council for the opportunity to comment on the draft Planning Obligations Supplementary Planning Document (SPD).</p> <p>Page 8 provides the number of bed spaces for different sizes of dwellings, which reiterates those provided in the draft Core Strategy Development Plan 2015 – 2033 (CSDP), and are follows:</p> <p>One bedroom dwelling = 2 bedspaces</p> <p>Two bedroom dwelling = 3 bedspaces</p> <p>Three bedroom dwelling = 5 bedspaces</p> <p>Above three bedrooms = 1 additional bedspace per bedroom.</p>	

			<p>This methodology is not reflective of actual populations per site and occupancy rates. It is unrealistic to assume that 5 people occupy every 3 bedroom property. In calculating open space requirements in County Durham, the Council assumes an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). Story Homes respectfully requests that both the Planning Obligations SPD and the CSDP are amended to assume an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). For consistency, this is to ensure that any contributions / obligations required that relate to the number of bedrooms are fair and reasonably related in scale and kind to the development, to comply with Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations).</p>	<p>This has been updated in line with the CSDP whereby a 3 bedroom dwelling equates to 4 bedspaces.</p>
30	Story Homes Ltd	Chapter 4 – Affordable Housing	<p>The third paragraph refers to Policy H3 of the draft CSDP. However, the relevant policy in the Publication Plan is now 'Policy H2 – Affordable Housing'.</p> <p>Story Homes welcomes the revisions to Policy H2 which now set out that affordable housing can be <i>"...grouped in small clusters"</i> throughout mixed housing schemes and that this is reflected in the draft SPD. Reference was previously made to 'pepper potting'.</p> <p>Story Homes objects to the 15% affordable housing requirement that is set out in 'Policy H2 – Affordable Housing'. A lower affordability target should be adopted to ensure that the associated requirements do not negatively impact on future housing delivery</p>	<p>Noted and SPD updated to reflect this change.</p> <p>No change required. This comment relates to the CSDP consultation and has</p>

			<p>across the city. Story Homes also considers that “at least 15%” is open ended and not precise. Any higher levels would not have been viability tested by the Council as part of the Plan preparation process which is contrary to the NPPF (paragraphs 173 and 174).</p> <p>Story Homes considers that requiring affordable housing to be <i>“indistinguishable in terms of appearance from the market housing”</i> is too restrictive. Affordable housing should only be required to be of a ‘similar design and building standard’ as market housing. The second from last paragraph under section 4.5 advises the dwellings should be fully integrated with the market housing and in small clusters of 3 or 4 dwellings across the site. Story Homes welcomes the references to small clusters; however, reference to 3 to 4 dwellings per cluster is overly prescriptive and that the cluster size should depend on the size of the development and the number of affordable homes being provided. In the experience of Story Homes, Registered Providers like affordable homes to be located close to each other for efficiencies in property management and can be deterred if the units are spread around the site too much. Story Homes suggests that the reference to 3 or 4 dwellings is removed from the SPD. Story Homes has made similar comments to paragraph 6.21 of the draft CSDP.</p> <p>Story Homes supports the recognition on page 10 that if there are viability issues, as demonstrated through a viability assessment, that consideration will be given in the first instance to reviewing the tenure split on a sliding scale in the first instance and then reducing the percentage of affordable housing to a percentage that is viable.</p>	<p>been dealt with through the CSDP process.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
31	Story Homes Ltd	Chapter 5 – Education (Section 5.4)	<p>Story Homes is supportive of the need to pay education contributions towards school place provision. However, they have a few minor comments on the text within this chapter of the draft SPD.</p>	

			<p>Section 5.4 sets out how the contribution will be calculated and what factors will be considered. One of the criteria is that the cumulative impact of planning applications with either full or outline permission which may impact on the availability of places at schools within the vicinity of the development should be taken into account. Story Homes recognises the need to take into account other committed development. However, it is suggested that a mechanism be included in the S106 Agreement which recognises that in the event a committed development does not come forward, that any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places for that school.</p> <p>Section 5.4 sets out the average number of school places per dwelling size. Story Homes suggests that text is included to specify whether there are any exemptions, such as accommodation for the elderly given it is unlikely that such households would include school age children.</p>	<p>In the event that planning permission is superseded, quashed or expires the Council considers any vacant school places which would have otherwise been filled as a result of the development are reincluded in the total availability of spaces at the school. Text added to SPD to clarify.</p> <p>Noted and SPD updated to clarify this.</p>
32	Story Homes Ltd	Chapter 6 – Open Space (Amenity greenspace and allotments)	<p>The draft SPD seeks a requirement of 15 allotment plots per 1,000 households and where contributions in lieu are proposed then contributions of £85.50 per dwelling is sought. However, Story Homes considers that this requirement is onerous and unsound in terms of the CIL Regulations. The associated evidence base (Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8)) and clearly sets out that Sunderland has 50% more allotments than the national average recommendation. It is therefore not considered that this requirement can be justified for all future developments. Story Homes considers that the need and demand for allotments is assessed on a ward-by-ward basis across the City and it is determined on a case-by-case basis whether or not a contribution is required towards future allotment provision. A</p>	<p>Noted. Text added to Chapter 6 to clarify when a contribution will be sought.</p>

			contribution should only be sought where there is an identified need and / or deficit; otherwise such a request would fail to comply with the tests set out in the CIL Regulations.	
33	Story Homes Ltd	Chapter 7 – Equipped Play Space (Section 7.4)	This section states that a contribution for £704 for equipped play areas will be sought for dwellings of 2 bedrooms or more. However, any requirement for a contribution needs to accord with the CIL Regulations and be justified, necessary and based on an adequate, up-to-date and robust assessment of need which considers the quality, quantity and accessibility of existing provision. A contribution should only be requested if there is an identified need. Story Homes suggests that this section is amended to make this clear, to ensure compliance with national legislation.	Noted. Text added to Chapter 7 to clarify when a contribution will be sought.
34	Story Homes Ltd	Chapter 12 - Other site-specific planning obligations	Chapter 12 of the draft SPD advises that there is an extensive range of site-specific matters for which planning obligations will be sought including infrastructure and services, some of which are listed. Story Homes requests that clarify is provided regarding the other site-specific planning obligations to ensure that any requests comply with the CIL Regulations and to ensure a transparent approach. The NPPF is clear that SPDs <i>“should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”</i> (2012 NPPF, para. 153). Story Homes considers that text should be included in Chapter 12 which clarifies that the viability of a development will be taken into account when considering any other site-specific planning obligations. Furthermore, the Planning Practice Guidance states that <i>“planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms”</i> (Planning Practice Guidance, ID ref: 23b-004).	Paragraph 1 of Section 12 states site-specific obligations would only be sought ‘where provision is required to make the development acceptable in planning terms.’ No change required. Section 13 and Appendix 2 set out detailed information and guidance in relation to site viability when seeking developer contributions. No change required.

			<p>Appendix 3 and the reference to monitoring fees in Appendix 1 should be removed from the SPD. Such clauses within planning obligations are not justified since they are not necessary to make development acceptable in planning terms, as required by NPPF (para. 204). Furthermore, this matter was considered in the high court (<i>Oxfordshire County Council v Secretary of State for Communities and Local Government & Others [2015] EWHC 186 (Admin)</i>). Relevant extracts from the judgment states:</p> <p><i>“It seems to me that the Circular and the Guidance envisaged that the cost of essential administration, monitoring and enforcement would be met out of the authority’s own budget, not by charging the developer. An authority is able to incur expenditure incidental to its functions under section 106 by virtue of section 111 of the Local Government Act 1972.” (paragraph 41)</i></p> <p>“There is nothing in the wording of the TCPA 1990, the Planning Act 2008, the CIL Regulations, the NPPF or the Guidance which suggests that authorities could or should claim administration and monitoring fees as part of planning obligations.” (paragraph 45)</p> <p>As such, Story Homes considers there is no justification for the Council to require developers to pay monitoring fee costs and that the monitoring requirements should therefore be removed from the SPD and not be included as a requirement in the new Local Plan.</p>	<p>The amended CIL Regulations 2019 permits LPAs to seek monitoring fees, and as such monitoring fees will be sought on this basis.</p>
36	Taylor Wimpey	Chapter 3 – Summary of Requirements	<p>Taylor Wimpey wishes to thank Sunderland City Council for the opportunity to comment on the draft Planning Obligations Supplementary Planning Document (SPD).</p> <p>Page 8 provides the number of bed spaces for different sizes of dwellings, which reiterates those provided in the draft Core Strategy Development Plan 2015 – 2033 (CSDP), and are follows:</p> <p>One bedroom dwelling = 2 bedspaces Two bedroom dwelling = 3 bedspaces</p>	<p>This has been updated in line with the CSDP whereby a 3 bedroom dwelling equates to 4 bedspaces.</p>

			<p>Three bedroom dwelling = 5 bedspaces Above three bedrooms = 1 additional bedspace per bedroom.</p> <p>This methodology is not reflective of actual populations per site and occupancy rates. It is unrealistic to assume that 5 people occupy every 3 bedroom property. In calculating open space requirements in County Durham, the Council assumes an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). Taylor Wimpey respectfully requests that both the Planning Obligations SPD and the CSDP are amended to assume an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). For consistency, this is to ensure that any contributions / obligations required that relate to the number of bedrooms are fair and reasonably related in scale and kind to the development, to comply with Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations).</p>	<p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
37	Taylor Wimpey	Chapter 4 – Affordable Housing	<p>The third paragraph refers to Policy H3 of the draft CSDP. However, the relevant policy in the Publication Plan is now ‘Policy H2 – Affordable Housing’.</p> <p>Taylor Wimpey welcomes the revisions to Policy H2 which now set out that affordable housing can be “...grouped in small clusters” throughout mixed housing schemes and that this is reflected in the draft SPD. Reference was previously made to ‘pepper potting’. Taylor Wimpey objects to the 15% affordable housing requirement that is set out in ‘Policy H2 – Affordable Housing’. A lower affordability target should be adopted to ensure that the associated requirements do not negatively impact on future housing delivery across the city. Taylor Wimpey also considers that “at least 15%” is open ended and not precise. Any higher levels would not have been</p>	<p>Noted and SPD updated to reflect this change.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>

			<p>viability tested by the Council as part of the Plan preparation process which is contrary to the NPPF (paragraphs 173 and 174).</p> <p>Taylor Wimpey considers that requiring affordable housing to be <i>“indistinguishable in terms of appearance from the market housing”</i> is too restrictive. Affordable housing should only be required to be of a ‘similar design and building standard’ as market housing. Taylor Wimpey supports the recognition on page 10 that if there are viability issues, as demonstrated through a viability assessment, that consideration will be given in the first instance to reviewing the tenure split on a sliding scale in the first instance and then reducing the percentage of affordable housing to a percentage that is viable. The second from last paragraph under section 4.5 advises the dwellings should be fully integrated with the market housing and in small clusters of 3 or 4 dwellings across the site. Taylor Wimpey welcomes the references to small clusters; however, reference to 3 to 4 dwellings per cluster is overly prescriptive and that the cluster size should depend on the size of the development and the number of affordable homes being provided. In the experience of Taylor Wimpey, Registered Providers like affordable homes to be located close to each other for efficiencies in property management and can be deterred if the units are spread around the site too much. Taylor Wimpey suggests that the reference to 3 or 4 dwellings is removed from the SPD. Taylor Wimpey has made similar comments to paragraph 6.21 of the draft CSDP.</p>	<p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
38	Taylor Wimpey	Chapter 5 – Education (Section 5.4)	<p>Taylor Wimpey is supportive of the need to pay education contributions towards school place provision. However, they have a few minor comments on the text within this chapter of the draft SPD.</p>	<p>In the event that planning permission is superseded, quashed or expires the Council considers any vacant school places which</p>

			<p>Section 5.4 sets out how the contribution will be calculated and what factors will be considered. One of the criteria is that the cumulative impact of planning applications with either full or outline permission which may impact on the availability of places at schools within the vicinity of the development should be taken into account. Story Homes recognises the need to take into account other committed development. However, it is suggested that a mechanism be included in the S106 Agreement which recognises that in the event a committed development does not come forward, that any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places for that school.</p> <p>Section 5.4 sets out the average number of school places per dwelling size. Story Homes suggests that text is included to specify whether there are any exemptions, such as accommodation for the elderly given it is unlikely that such households would include school age children.</p>	would have otherwise been filled as a result of the development are reincluded in the total availability of spaces at the school. Text added to SPD to clarify.
39	Taylor Wimpey	Chapter 6 – Open Space (Amenity greenspace and allotments)	<p>The draft SPD seeks a requirement of 15 allotment plots per 1,000 households and where contributions in lieu are proposed then contributions of £85.50 per dwelling is sought. However, Taylor Wimpey considers that this requirement is onerous and unsound in terms of the CIL Regulations. The associated evidence base (Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8)) and clearly sets out that Sunderland has 50% more allotments than the national average recommendation. It is therefore not considered that this requirement can be justified for all future developments. Taylor Wimpey considers that the need and demand for allotments is assessed on a ward-by-ward basis across the City and it is determined on a case-by-case basis whether or not</p>	Noted. Text added to Chapter 6 to clarify when a contribution will be sought.

			a contribution is required towards future allotment provision. A contribution should only be sought where there is an identified need and / or deficit; otherwise such a request would fail to comply with the tests set out in the CIL Regulations.	
40	Taylor Wimpey	Chapter 7 – Equipped Play Space (Section 7.4)	This section states that a contribution for £704 for equipped play areas will be sought for dwellings of 2 bedrooms or more. However, any requirement for a contribution needs to accord with the CIL Regulations and be justified, necessary and based on an adequate, up-to-date and robust assessment of need which considers the quality, quantity and accessibility of existing provision. A contribution should only be requested if there is an identified need. Taylor Wimpey suggests that this section is amended to make this clear, to ensure compliance with national legislation.	Noted. Text added to Chapter 7 to clarify when a contribution will be sought.
41	Taylor Wimpey	Chapter 12 - Other site-specific planning obligations	Chapter 12 of the draft SPD advises that there is an extensive range of site-specific matters for which planning obligations will be sought including infrastructure and services, some of which are listed. Taylor Wimpey requests that clarify is provided regarding the other site-specific planning obligations to ensure that any requests comply with the CIL Regulations and to ensure a transparent approach. The NPPF is clear that SPDs <i>“should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development”</i> (2012 NPPF, para. 153). Taylor Wimpey considers that text should be included in Chapter 12 which clarifies that the viability of a development will be taken into account when considering any other site-specific planning obligations. Furthermore, the Planning Practice Guidance states that <i>“planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms”</i> (Planning Practice Guidance, ID ref: 23b-004).	Paragraph 1 of Section 12 states site-specific obligations would only be sought ‘where provision is required to make the development acceptable in planning terms.’ No change required. Section 13 and Appendix 2 set out detailed information and guidance in relation to site viability when seeking developer contributions. No change required.

			<p>Appendix 3 relates to monitoring fees, whilst Appendix 1 advises that a monitoring fee of £500 will be charged on granting planning permission for each discounted market value dwelling.</p> <p>Appendix 3 and the reference to monitoring fees in Appendix 1 should be removed from the SDP. Such clauses within planning obligations are not justified since they are not necessary to make development acceptable in planning terms, as required by NPPF (para. 204). Furthermore, this matter was considered in the high court (Oxfordshire County Council v Secretary of State for Communities and Local Government & Others [2015] EWHC 186 (Admin)). Relevant extracts from the judgment states:</p> <p>“It seems to me that the Circular and the Guidance envisaged that the cost of essential administration, monitoring and enforcement would be met out of the authority’s own budget, not by charging the developer. An authority is able to incur expenditure incidental to its functions under section 106 by virtue of section 111 of the Local Government Act 1972.” (paragraph 41)</p> <p>“There is nothing in the wording of the TCPA 1990, the Planning Act 2008, the CIL Regulations, the NPPF or the Guidance which suggests that authorities could or should claim administration and monitoring fees as part of planning obligations.” (paragraph 45)</p> <p>As such, Taylor Wimpey considers there is no justification for the Council to require developers to pay monitoring fee costs and that the monitoring requirements should therefore be removed from the SPD and not be included as a requirement in the new Local Plan.</p>	<p>The amended CIL Regulations 2019 permits LPAs to seek monitoring fees, and as such monitoring fees will be sought on this basis.</p>
43	Burdon Lane Consortium (Taylor Wimpey, Persimmon)	Various	<p>Chapter 3 – Summary of Requirements</p> <p>The Burdon Lane Consortium (consisting of Taylor Wimpey, Persimmon Homes and Story Homes) wishes to thank Sunderland City Council for the opportunity to comment on the draft Planning Obligations Supplementary Planning Document (SPD).</p>	

	Homes and Story Homes)		<p>The Consortium welcomes the recognition on page 5 that planning applications for sites within the South Sunderland Growth Area will be considered separately to the standards within this document. However, they would still like to make comments on this document. Page 8 provides the number of bed spaces for different sizes of dwellings, which reiterates those provided in the draft Core Strategy Development Plan 2015 – 2033 (CSDP), and are follows:</p> <p>One bedroom dwelling = 2 bedspaces Two bedroom dwelling = 3 bedspaces Three bedroom dwelling = 5 bedspaces Above three bedrooms = 1 additional bedspace per bedroom.</p> <p>This methodology is not reflective of actual populations per site and occupancy rates. For instance, it is unrealistic to assume that 5 people occupy every 3 bedroom property. In calculating open space requirements in County Durham, the Council assumes an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms).</p> <p>The Consortium respectfully requests that both the Planning Obligations SPD and the CSDP are amended to assume an average occupancy rate of 2.4 people per dwelling (regardless of the number of bedrooms). For consistency, this is to ensure that any contributions / obligations required that relate to the number of bedrooms are fair and reasonably related in scale and kind to the development, to comply with Regulation 122 of the Community Infrastructure Levy Regulations (CIL Regulations).</p> <p>Chapter 4 – Affordable Housing</p> <p>The third paragraph refers to Policy H3 of the draft CSDP. However, the relevant policy in the Publication Plan is now 'Policy H2 – Affordable Housing'.</p>	<p>This has been updated in line with the CSDP whereby a 3 bedroom dwelling equates to 4 bedspaces.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
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			<p>The third bullet point in section 4.1 and second from last paragraph under section 4.5 advise that when part of a mixed housing scheme affordable housing should be grouped in small clusters throughout the site. The Consortium considers that references to “small clusters” and “small clusters of 3 or 4 dwellings” is overly prescriptive and that the approach to the location should depend on the size of the development and the number of affordable homes being provided. In the experience of the house builders which make up the Consortium, Registered Providers like affordable homes to be located close to each other for efficiencies in property management and can be deterred from taking on provisions if the units are not appropriately located.</p> <p>The Consortium considers that requiring affordable housing to be “indistinguishable in terms of appearance from the market housing” is too restrictive, as sought in the fourth bullet point in Section 4.1. Affordable housing should only be required to be of a ‘similar design and building standard’ as market housing.</p> <p>The Consortium supports the recognition on page 10 that if there are viability issues, as demonstrated through a viability assessment, that consideration will be given in the first instance to reviewing the tenure split on a sliding scale in the first instance and then reducing the percentage of affordable housing to a percentage that is viable.</p> <p>Chapter 5 – Education</p> <p>The Consortium is supportive of the need to pay education contributions towards school place provision. However, they have a few minor comments on the text within this chapter of the draft SDP.</p> <p>Section 5.4 sets out how the contribution will be calculated and what factors will be considered. One of the criteria is that the cumulative impact of planning applications with either full or outline</p>	<p>Noted and SPD updated to reflect this change.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p> <p>No change required. This comment relates to the CSDP consultation and has been dealt with through the CSDP process.</p>
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			<p>permission which may impact on the availability of places at schools within the vicinity of the development should be taken into account. The Consortium recognises the need to take into account other committed development. However, it is suggested that a mechanism be included in the S106 Agreement which recognises that in the event a committed development does not come forward, that any vacant school places that would have been taken up by that development can then be reincluded in the total number of vacant places for that school.</p> <p>Section 5.4 sets out the average number of school places per dwelling size. The Consortium suggests that text is included to specify whether there are any exemptions, such as accommodation for the elderly given it is unlikely that such households would include school age children.</p> <p>Chapter 6 – Open Space (Amenity greenspace and allotments)</p> <p>The draft SPD seeks a requirement of 15 allotment plots per 1,000 households and where contributions in lieu are proposed then contributions of £85.50 per dwelling is sought. However, the Consortium considers that this requirement is onerous and unsound in terms of the CIL Regulations. The associated evidence base (Sunderland Green Infrastructure Strategy (page 7) and Green Space Audit Report (page 8)) and clearly sets out that Sunderland has 50% more allotments than the national average recommendation. It is therefore not considered that this requirement can be justified for all future developments. The Consortium considers that the need and demand for allotments is assessed on a ward-by-ward basis across the City and it is determined on a case-by-case basis whether or not a contribution is required towards future allotment provision. A contribution should only be sought where there is an identified</p>	<p>In the event that planning permission is superseded, quashed or expires the Council considers any vacant school places which would have otherwise been filled as a result of the development are reincluded in the total availability of spaces at the school. Text added to SPD to clarify.</p>
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			<p>payment was due at the rate of 4% per annum above the base rate of the Bank of England. A rate of 4% is excessively high and no justification has been provided as to how this figure has been derived. As such, the Consortium objects to this rate of interest.</p> <p>Appendix 1 and 3</p> <p>Appendix 3 relates to monitoring fees, whilst Appendix 1 advises that a monitoring fee of £500 will be charged on granting planning permission for each discounted market value dwelling.</p> <p>Appendix 3 and the reference to monitoring fees in Appendix 1 should be removed from the SDP. Such clauses within planning obligations are not justified since they are not necessary to make development acceptable in planning terms, as required by NPPF (para. 204). Furthermore, this matter was considered in the high court (Oxfordshire County Council v Secretary of State for Communities and Local Government & Others [2015] EWHC 186 (Admin)). Relevant extracts from the judgment states:</p> <p>“It seems to me that the Circular and the Guidance envisaged that the cost of essential administration, monitoring and enforcement would be met out of the authority’s own budget, not by charging the developer. An authority is able to incur expenditure incidental to its functions under section 106 by virtue of section 111 of the Local Government Act 1972.” (paragraph 41)</p> <p>“There is nothing in the wording of the TCPA 1990, the Planning Act 2008, the CIL Regulations, the NPPF or the Guidance which suggests that authorities could or should claim administration and monitoring fees as part of planning obligations.” (paragraph 45)</p> <p>As such, the Consortium considers there is no justification for the Council to require developers to pay monitoring fee costs and that the monitoring requirements should therefore be removed from the SPD and not be included as a requirement in the new Local Plan.</p>	<p>Section 13 and Appendix 2 set out detailed information and guidance in relation to site viability when seeking developer contributions. No change required.</p> <p>Accepted and text added to Chapter 1</p> <p>Accepted and document amended to be consistent with the CSDP.</p> <p>Accepted and document updated.</p> <p>The amended CIL Regulations 2019 permits LPAs to seek monitoring fees, and as such monitoring fees will be sought on this basis.</p>
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