

REPORT OF THE CABINET – ITEM 1 - SUBMISSION OF THE CORE STRATEGY AND DEVELOPMENT PLAN TO THE SECRETARY OF STATE FOR EXAMINATION IN PUBLIC

Appendix D: Core Strategy and Development Plan Publication Draft – Summary of Main Issues Statement

1. Introduction

Introduction

Consultation and engagement has been a key element to the preparation of the Plan. NPPF para 155 states “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.” At each stage of Plan preparation, the Council has followed the following legislation and guidance:

- The Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Development) (England) Regulations (2004) (as amended)
- The Localism Act (which amended sections of the above 2004 Act).
- The Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG).

The Council has published a Consultation Statement which comprehensively demonstrates how the Councils have satisfied the requirement of their SCIs and met the requirements of Regulation 22 (1) (c) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI. 2012 No.767) (2012 Regulations) by demonstrating:

- *Which bodies and persons the local planning authority invited to make*
- *representations under regulation 18;*
- *How those bodies and persons were invited to make representations made under regulation 18;*
- *A summary of the main issues raised by the representations made pursuant to regulation 18;*
- *How any representations made pursuant to regulation 18 have been taken into account;*
- *If representations were made pursuant to regulation 18 and regulation 20, the number of representations made and a summary of the main issues raised in those representations; and*
- *If no representations were made in regulation 20, that no such representations were made.*

Consultation background

The council has worked proactively to engage as involve as many people in the process as possible to ensure that the whole community has an opportunity to have their say and influence the Plan. The Council has exceeded both the requirements of national guidance and regulations listed above and their SCI. In line with our commitment to early and meaningful community engagement, extensive public consultation has preceded, and informed, each stage of the Plan preparation. The Council has undertaken almost continuous consultation with their communities, and with other stakeholders including developers, landowners and infrastructure providers to input into the Plan's development.

The Council has consulted extensively on the Plan since 2005 and has undertaken 8 separate rounds of consultation on the Plan, as listed below.

Early Engagement Regulation 18	Stage 1	LDF Key Issues & Options Consultation	November 2005 - January 2006
	Stage 2	LDF Core Strategy Preferred Options Draft Consultation	December 2007 – February 2008
	Stage 3	LDF Sustainability Appraisal Scoping Report Consultation	May – July 2009
	Stage 4	LDF Alternative Approaches Consultation	15 September – 6 November 2009
	Stage 5	Local Plan Draft Core Strategy & Development Management Policies Consultation	1 August – 11 October 2013
	Stage 6	Local Plan Core Strategy Growth Options Consultation	19 May – 1 July 2016
	Stage 7	Local Plan Draft Core Strategy & Development Plan Consultation	7 August – 2 October 2017
Regulation 19 (Current Stage)	Stage 8	Local Plan Core Strategy & Development Plan Publication Draft Consultation	15 June – 27 July 2018

Purpose of Statement

The purpose of this statement is to demonstrate how the Council has met the Town and Country Planning (Local Planning) (England) Regulation 22. This statement summarises the main issues raised by representations during Regulation 19 stage of preparing the Core Strategy and Development. This Statement also sets out how the Council has taken the representation submitted into account.

This Statement should be considered alongside the Core Strategy and Development Plan Schedule of Representation and the Core Strategy and Development Plan Schedule of Proposed Modifications. The reference (PD) refers to representation in the Schedule of Representation and (M) refers to any minor modifications identified in the Schedule of Modifications.

2. Summary of Main Issues

This section of the statement highlights the main issues raised against each policy and chapter in the Plan. It also sets out how the Council has taken the representation submitted into account.

General Comments on Publication Draft CSDP

Representations were made generally to the Plan, the main issues identified included;

- The Trustees of Athenaeum Pension Scheme (APS) (PD38), Developer Mr Delaney and Sunderland Clinical Commissioning Group (CCG) (PD62) supports the Plan. The CCG considers it is a vital component to securing Sunderland's long term economic future.
- Northumberland County Council (PD822) raised no comments and will continue to work with the Council through Duty to Cooperate.
- Residents raised the following views generally about the Plan:
 - does not adequately plan for jobs or infrastructure;
 - it does not support Localism or Neighbourhood Plans;
 - it does not protect greenfield/Green Belt;
 - it does not prioritise brownfield land before greenfield sites;
 - assumptions are based on debatable predictions;
 - it seeks a high growth option and ignores the impact of Brexit on the economy and population growth; and
 - it does not meet the needs for affordable housing.

The Council has taken these representations into account but consider the Plan to be sound and therefore do not propose to make any modifications to the Plan. The Council consider that the Spatial Strategy is justified. The Strategic Housing Land Availability Assessment has identified all land available and deliverable in Sunderland during the Plan period. The majority of the housing requirement will be met in the existing urban area and on brownfield sites. As the Plan is being submitted during transition, the OAN has been calculated in accordance with the National Planning Policy Framework (2012) (NPPF). The Council has taken into consideration the latest population projections and the economic projection of Brexit. The affordable housing requirement for the Plan is set out in the Housing Chapter.

No current Neighbourhood Plans have been submitted to the Council, but in accordance with the Localism Act (2011) the Council welcomes neighbourhood plans in Sunderland.

Consultation

Residents expressed their concerns that the consultation undertaken on the Publication Draft of the Plan was ineffective and inadequate. Residents raised concerns that their views have not been taken into consideration.

The council has worked proactively to engage as involve as many people in the process as possible to ensure that the whole community has an opportunity to have their say and influence the Plan. The Council has exceeded both the requirements of national guidance and regulations listed above and their SCI. In line with our commitment to early and meaningful community engagement, extensive public consultation has preceded, and informed, each stage of the Plan preparation. The Council has undertaken almost continuous consultation with their communities, and with other stakeholders including developers, landowners and infrastructure providers to input into the Plan's development. The Consultation Statement contained within the Compliance Statement demonstrates how the Council has met and exceed the requirement for consultation.

Chapter 1 - Introduction

The following main issues were identified by representation to the introduction chapter;

- Friends of Sunderland's Green Belt (FSGB) (PD3011) expressed concerns that the plan period should be reduced to 3-5 years on the basis that there has been a delay in the production of the Plan since the start of its plan period (2015) and there being a duty to regularly review Local Plans.
- M&G Real Estate are concerned regarding the approach taken by the Council to allocate land in the Development Plan.

As set out in the Plan, the Local Plan is being progressed in three parts. The Core Strategy and Development identified strategic allocations/designations and includes development management policies. The Allocations and Designations Plan which will progress in accordance with Council's Local Development Scheme will allocate sites to meet the requirements identified in the Core Strategy and Development Plan. The Plan period is for 18 years, which meets the NPPF requirement to Plan for 15 years. The Plan will be reviewed every five years.

Chapter 2 - Sunderland Today

The following main issues were identified by representations to the Sunderland Today chapter;

- Landowner, R Delany (PD26) supported the paragraph which seeks to ensure more housing choice. However would like to see the Plan deliver more executive homes. Sunderland University (PD102) requests that the Plan clarify that there is a growth in student numbers.
- Sunderland CCG (PD63) supported the chapter and highlighted that public health is an issue in the city and health infrastructure implications of proposed developments must be considered and mitigated when granting planning permission.
- The Minerals Products Association (PD4288, PD4302) supported the chapter and requested that cross reference to the five existing minerals infrastructure sites in Appendix 3 be made, that introductory text which sets the scene be provided within the minerals chapter (paras 2.76 – 2.77), and queried why policy SP11 requires developers to demonstrate need when para 2.77 states that Tyne & Wear authorities do not provide enough minerals to meet needs.
- Sunderland Civic Society (PD624) considers Figure 3 does not illustrate population growth.
- Friends of (PD3012) are concerned that there is a lack of reference to the historical settlement of the coalfields. They are also concerned the population and economic projections are not appropriate.
- Residents raised the following concerns:
 - Settlement breaks should not be removed and the Plan should not subdivide the city into character areas (PD226).
 - Statements within the chapter are not supported by evidence (PD895)

In response to the representations raised by Sunderland Civic Society (PD624), The Minerals Products Association (PD4288, PD4302) and Sunderland University (PD102) the Council have proposed a number of minor modifications as set out in the Schedule of Modifications (M1, M2, M71).

The Plan establishes five character areas to reflect the spatial characteristics of Sunderland. The Council recognises that there has been a significant amount of development in the Settlement Break and therefore proposed through policy NE7 to protect the Settlement Breaks. Chapter 2 explains the key characteristics of Sunderland today, it is based on a comprehensive evidence base and all documents referred to are contained in the Submission Document Library.

Chapter 3 -Spatial Vision and Strategic Priorities

The following main issues were identified by representations to Spatial Vision and Strategic Priorities chapter;

- In regards to the spatial vision, Northumbrian Water (PD148), the Environment Agency (PD209), Burdon Lane Consortium (PD2056), Sunderland CCG (PD64) and Wynyard Homes (PD4691) expressed support for the spatial vision. As did, the University of Sunderland, however they did suggest a minor modification. Although Persimmon (PD3901) and Karbon Homes (PD3380) both expressed general support for the spatial vision, they suggest an amendment to bullet point 8, to make reference to demands and affordable housing.
- Residents raised the following in regards to the spatial vision;
 - Inadequate consultation and lack of infrastructure identified (PD239)
- Historic England (PD90) in regards to the Strategic Priorities support the strategic priorities and suggested that the title be changed from "Built environment" to "Built and historic environment" to encompass all elements of the historic environment. Karbon Homes (PD3380), Persimmon (PD3901) and Harworth Estates (PD2104) support strategic priority 4. M&G Estates (PD3597) requested strategic priority 6 be amended to reflect the NPPF. The Minerals Products Association (PD4327 & PD4386) requested the strategic priorities identify minerals policies. The CCG (PD65) support strategic priority 3.
- The Sunderland Civic Society (PD851) objected to paragraph 3.2 on the basis of the target population and the housing target being too high, the use of mid-year estimates being unreliable, and insufficient information to make realistic projections on the 2033 population levels.

In response to the representations raised by Persimmon (PD3901), Karbon Homes (PD3380), Historic England (PD90), M&G Estates (PD3597) and the Minerals Products Association (PD4327 & PD4386) the Council have proposed a number of minor modifications as set out in the Schedule of Modifications (M4, M5, M7, M8, M9, M10 & M11). The Council do not proposed to make any further modifications to the vision or strategic priorities as they consider them to be sound.

Spatial Strategy

The following main issues were identified by representations to spatial strategy and Policy SP1 chapter;

Key diagram

- Developers Hellens (PD4839) request the key diagram is amended to make reference to their alternative site. FOSG (PD4839) considers the amendment to the greenbelt and inclusion of SSGA cannot be justified and therefore should not be included in the Key diagram.
- Residents raised the following in regards to the spatial strategy;
 - Object to development on the Green Belt (PD708) and consider there to be no exceptional circumstances (PD86).
 - A resident agrees that the Green Belt Boundary should be amended (PD410).
 - There is no justification to deviate from the standardised methodology, population projections are outdated (PD307) and economic projections are consider to be too high (PD86) and not justified (PD414).
 - Brownfield land should be prioritised (PD991, PD988)
 - The spatial strategy will result in increased congestion in Sunderland (PD991, PD988).

- There is no evidence to suggest that building houses provides economic growth - Experian jobs growth forecasts suggest a cautious approach due to unknown economic influences and shrinking population. This has been used as the justification for detached housing on the Green Belt;
- a deviation away from the Government's calculation of housing requirement for 593 dwellings per annum and use of an OAN uplift;
- the failure to use of brownfield sites before other green sites;
- there being no clear evidence regarding the viability of brownfield sites in Sunderland;
- the provision of large detached homes, as they are not the focus of government policy and there is not a shortfall of this type of housing stock; and
- the new Green Belt boundary does not follow recognisable or permanent features.
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- Springwell Village Residents Association (PD4919, PD5022) object to the spatial strategy. Residents believe that there is too much development on Greenfield and Green Belt land proposed in the Plan, which is contrary to the NPPF which prioritises development on brownfield land. There is no evidence that the Council has prioritised brownfield land and the brownfield register has not been updated since December 2017. Residents object to Paragraph 4.13 as there is no evidence to support the number of houses proposed for IAMP workers. In addition, no reasoning has been provided to deviate from standardised approach for housing requirement if 9,600 jobs were previously created and there were no house price pressures. Residents object to Paragraph 4.14, as no evidence has been provided that there is a need for the proposed number of houses to support economic growth.
- A Councillor (PD4590) objected to the allocation of North Hylton on the grounds that there are no exceptional circumstances to justify the loss of Green Belt.
- Developers including Barratt David Wilson Homes (PD5115), Hellens (PD236, PD236), Bellway Homes (PD1857) consider the housing requirement should be increased and the OAN should be uplifted. Bellways consider the jobs growth is too pessimistic and the higher headship rates should be taken into account. Wynyard Homes support the housing requirement and acknowledge that this should be treated as a minimum. They support the uplift to the OAN above the standardised methodology to support economic growth, including the IAMP.
- Developers including Hellens (PD236) support the amendments to the Green Belt, whereas other developers such Mr Delany (PD28) object to the boundary and have suggested alternative sites.
- Barratt David Wilson Homes (PD5115) considers the SHLAA to be unrealistic and therefore a buffer, windfall allowances and demolition allowance should be included in the Plan. Persimmon (PD3893) seeks clarification for residential development in the absence of a five year land supply.
- Developers including Bellway (PD732) and Mr Ford (PD165) disagree with the Settlement Break methodology and the case for exceptional circumstances. They consider it more appropriate for the spatial strategy to allocated site in the Settlement Break. Paul Mackings Consulting Ltd (PD2902) considers employment sites including Hendon Paper Mill should be allocated for development in advance of Green Belt.
- Sunderland Civic Society (PD723 PD1027), The Green Party (PD4461) and CPRE North East (PD1249) question the housing projections and the OAN. CPRE (PD723) does not consider it justified to deviate from the standard methodology.
- Highways England (PD4804) will be undertaking further modelling work to assess the impacts on the SRN. Northumbrian Water (NWL) (PD149) support the overall principal for continued sustainable development. Durham County Council note the Councils position on OAN.
- Hellens suggested that Paragraph 4.24 should be amended to make clear that not all development in Settlement Breaks would have major impacts (PD4664).

In response to the representation raised by Hellens (PD4664) the Council has proposed an additional modification as set out in the Schedule of Modifications (M14).

The Council consider the housing requirement established in the Plan to be consistent with the latest OAN calculation identified with the SHMA Addendum 2018. As the Council is submitting during transition period, it is not appropriate for the Council to consider the standardised methodology in accordance with the NPPF 2018.

A number of developers suggested alternative sites and boundaries have been suggested by landowners/developers. The Council have taken these into consideration. The Council has set out its justification for site selection and the spatial strategy in the compliance statement. The Council considers the spatial strategy for distribution of housing in Sunderland to be justified as it seeks to readdress the imbalance of housing land across the city. The Settlement Break Report justifies the revised boundary for the Settlement Breaks and why it is not appropriate to remove alternative parcels of land. The Council has considered the release of employment land for development as set out in the Employment Land Review. The Plan identifies employment sites which are necessary to meet the identified need for the Plan period.

SP1 Spatial Strategy

- FOSG (PD3014, PD3015) object to the uplifting of the OAN to support economic growth and considers there is no evidence that there is a housing shortfall. They expressed concerns that job numbers are based on one data source and Government data is not used and there is an over-reliance on the IAMP, which may not deliver as anticipated.
- Landowners, developers and the HBF (PD1182) generally support the policy (PD4207). Persimmon Homes (PD3905), Hellens Group (PD4712), Story Homes (PD5556), Taylor Wimpey (PD3470) and Esh Developments (PD1827) supports the minimum target and commend the Council for setting a housing requirement above the standardised methodology, which is required to support economic growth. However, Persimmon considers the housing requirement should be increased to support an uplift in Household Representative Rates for 25 to 44 year olds and to help the Council address the affordable housing imbalance.
- Karbon Homes (PD3382) supports the housing requirement set out in policy SP1. Karbon recognise that this exceeds the Government's indicative assessment using the standardised methodology, but this is a baseline figure which should be a minimum. Karbon support the housing growth areas. Miller Homes (PD889) support the housing figure but are disappointed that it's not the same as the previous draft.
- The Central Gospel Hall Trust (PD145) supports policy SP1 and the overall strategy in terms of the level and distribution of growth, which is consistent with national policy and seeks to address the historic mismatch between economic growth and housing. The spatial strategy for Washington is supported. The amendments made to the Policies Map are also supported.
- Siglion (PD2912) request additional sites to be included in the SHLAA
- Northumbrian Water (PD2681) welcomes confirmation in SP1 and Paragraph 4.10 that the housing requirement is a target which is both needed and anticipated rather than a ceiling. Northumbrian Water suggests the former Fulwell Reservoir site for housing and propose it for inclusion in the CSDP.
- The Trustees of Athenaeum Pension Scheme (PD39, PD40) agree that an amendment to the Green Belt boundary is the most sustainable option. Additionally agree that exceptional circumstances have been demonstrated. The Trustees of Athenaeum Pension Scheme support policy SP1 (2)(v) to the extent that it supports delivering the right homes in the right locations through the A & D Plan and through amending the Green Belt boundary to allocate Housing Growth Areas.

- Harworth Estates (PD2005, PD2126) supports proposed economic growth in the Plan including the IAMP and allocation for 95 hectares of employment land but do not consider there are exceptional circumstances to amend the Green Belt.
- South Tyneside Council (PD4363) support the spatial strategy.
- Getten Construction (PD2616) consider the housing target is too low and should be increased to address the imbalance. The developer also suggests an alternative site at Albany Park to be allocated for housing development.
- Urban and Civic (PD855) considers the policy only deals with the theoretical quantitative capacity for new comparison retail floorspace.
- Thompsons of Prudhoe (PD191) consider that the Plan has failed to amend the Green Belt boundary for other purposes other than housing. The location of Springwell Quarry in the Green Belt would potentially limit the future development of the site by limiting the number of structures and development that can occur.
- Burdon Lane Consortium (PD 2061) welcomes the spatial strategy, which includes the SSGA which is a long standing commitment by Sunderland City Council. The Consortium believe that focussing growth in this area represents a sound and sustainable approach.
- Highways England suggested further modelling work is needed on the Strategic Road Network.
- NHS Sunderland CCG (PD66) suggest that the policy is amended to ensure that the impacts of development are mitigated and suggests an additional criterion to make it sound. They would also request the IDP to be updated to include health care (PD67).
- Sunderland Civic Society (PD866) request clarity of the flexibility allowance.
- CPRE North East considers there to be a discrepancy as the population is proposed for a 4% increase yet the housing stock is planned to rise by 11%. CPRE questions whether the 745 OAN figure is justified in light of Brexit, the 4% population growth and the Government standard method proposing 593 OAN. In relation to the revised NPPF, it is considered that the Council has not demonstrated sufficient reason to justify taking such a significantly different approach from the standardised method. Sunderland Green Party objects to the policy as the exceptional circumstances have not been justified for Green Belt incursion. The Party suggests the OAN is an inflated figure (weighted and using outdated methodology) and not justified, especially with latest population figures being low.
- The Minerals Products Association objects to the policy as it had failed to include reference to minerals within the spatial strategy.
- A significant number of Springwell and Seaburn residents and other members of the public responded to object to policy SP1 for a range of reasons, including;
 - the Council has not produced evidence to support building over 13,000 homes when the government requires 7610;
 - need can be met on brownfield land;
 - sufficient land in brownfield register to deliver necessary housing;
 - Inadequate consideration has been given to bringing empty homes into use.
 - the Council has not used the latest population projections. The requirement is based on the older 2014 based population projections, rather than the 2016 based projections which are lower;
 - the uplift to the housing requirement is predicated on one employment site – the IAMP, whose workers will be spread across a wide area;
 - there is overprovision of housing across North East authorities as there is double counting of housing numbers across local authorities;
 - there is no evidence or justification for economic growth intervention required, due to higher GVA in the north east;

- there are enough unemployed workers in Sunderland to fill the jobs growth and there is double counting of workforce growth;
- consented housing schemes pre-empted the Core Strategy;
- exceptional circumstances have not been demonstrated to release Green Belt land;
- economic growth level based on a 2016 consultation;
- the OAN is already inflated/based on ambitious figures/assumes high population growth;
- OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.
- more homes in SHLAA than needed to meet 745 homes per annum;
- the 10% buffer effectively equates to the homes needed to go into the Green Belt;
- The housing densities used are too low;
- Experian assumptions are not convincing and proposals for mainly executive housing is not consistent with the NPPF;
- There is uncertainty over IAMP due to Brexit;
- Development should be focused in the city centre ;
- Housing should be provided for first time buyers and the elderly;
- House prices are static so there's no evidence of demand;
- It directly conflicts with the proposed Renewable Energy Centre and Climate Change Action Plan which the council has set out how they are seeking to reduce CO2 emissions etc.
- need for retail floor space is too high.
- consultation has been inadequate;
- the plan has not been amended to reflect previous objections;

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper.

The Council carefully considered the alternative sites put forward through the Green Belt Assessment and boundary review, however these have been discounted for various reasons as set out within the evidence base. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

The Council has prepared an Infrastructure Delivery Plan, which has been informed by a Transport Assessment and Education Plan. This details the strategic infrastructure needed to deliver the plan. Other policies of the plan require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure.

SP2 Urban Core

The following main issues were identified by representations to Policy SP2;

- A representation (PD4623_ was received which was supportive of the objective of Policy SP2 to promote a leisure led mixed-use development, but was critical that this does not prejudice the future development or expansion of the Football Club. The representation expressed concern regarding parking, traffic congestion and pedestrian circulation implications of new development with an understanding that these matters will be addressed through forthcoming Stadium Village Masterplan

- Historic England (PD91) welcomes the recognition of the Sunderland Heritage Action Zone with policy SP2, however it is not mentioned in the supporting text. Historic England request additional text to reflect the rich historic environment within the Urban Core.

In response to the representation raised by Historic England (PD) the Council has proposed an additional modification as set out in the Schedule of Modifications (M16).

SS1 The Vaux

The following main issues were identified by representations to Policy SS1;

- The policy was supported by South Tyneside Council, CPRE North East and Historic England (PD4363, PD1383 & PD93). CPRE North East recommended that house types should be mentioned for the Vaux site, as happens with other policies in the plan.
- Highways England suggested further modelling work is needed on the Strategic Road Network (PD4840).
- Siglion suggested modifications to the policy to ensure its flexibility for a wider range of uses (PD3060).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council consider that the policy is consistent with the planning permission which is currently being implemented on site.

SP3 Washington

The following main issues were identified by representations to Policy SP3;

- A significant number of residents object to the policy on the following grounds:
 - Brownfield sites have not been considered before Green Belt
 - Concerns over merging of Springwell and Washington
 - Impact on infrastructure including schools, GPs, road network etc.
 - Impact on air quality
 - Impact of industrial expansion of Washington on quality of life.
- Springwell Residents Association object to the policy. Concerns about the methodology used for the Green Belt Assessment, removal of a defensible Green Belt boundary, that more homes would be built, impact on Bowes Railway, impact on road network, Green Infrastructure corridor, landscape and views (PD4966)
- Sunderland Civic Society concerned that the policy has no justification and will merge Sunderland and Washington. Housing requirement is over ambitious, will undermine the purpose of the Green Belt and separateness of Springwell (PD767, PD1036 & PD1161).
- CPRE North East object on the grounds that no exceptional circumstances have been demonstrated, the OAN is not consistent with the standard methodology, it would result in a weaker Green Belt boundary and does not take account of a large brownfield site at Pallion (PD1277).
- Barratt David Wilson Homes and Hellens Group support the policy. However, Barratt David Wilson Homes would like the safeguarded land to the east of Washington to be allocated for development (PD1609, PD5269 & PD241)
- Story Homes broadly support the policy, but would like larger allocations for sites HGA2 and HGA4 (PD5562). Bellway Homes would like site ay East House Farm to be safeguarded (PD1897).
- Mr Hutchinson (landowner) would like an additional site allocated at Glebe House Farm (PD2013).
- Sport England object to the development of site HGA6 until an up-to-date Playing Pitch Assessment shows it as being surplus to development . Sport England acknowledge the emerging Park Life programme may render the site surplus to requirement (PD4475).

- M & G Real Estate support the growth proposed but concerned that development which may affect deliverability is resisted in advance of the Allocations and Designations Plan (PD3603).
- The Central Gospel Hall Trust and Sunderland City Council's (landowners) support the policy (PD146 PD3376).
- Thompsons of Prudhoe concerned that the plan only proposed to amend Green Belt boundaries for housing, which could limit development at Springwell Quarry (PD192).

In response to the representations raised by Sport England (PD4475), the Council have proposed minor modifications as set out in the Schedule of Modifications (M18).

The Council has taken into consideration the remaining representations and are not proposing to make any further modifications to this policy. The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper.

The Council carefully considered the alternative sites put forward through the Green Belt Assessment and boundary review, however these have been discounted for various reasons as set out within the evidence base. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

The Council has prepared an Infrastructure Delivery Plan, which has been informed by a Transport Assessment and Education Plan. This details the strategic infrastructure needed to deliver the plan. Other policies of the plan require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure.

SS2 Washington Housing Growth Areas

The following main issues were identified by representations to Policy SS2;

- A significant number of residents object to the policy on the following grounds:
 - Exceptional circumstances have not been demonstrated.
 - Would result in the merging of Springwell with Washington and Gateshead.
 - The number of houses will be higher than those stated
 - Impact on infrastructure
 - Impact on road network
 - Impact on schools
 - Impact on health services
 - Loss of greenspace
 - Loss of playing fields (HGA6)
 - The sites are not suitable
 - Object to the evidence base including OAN and Green Belt Exceptional Circumstances paper
 - Sunderland has less Green Belt than neighbouring authorities.
 - Impact on wildlife
 - There are numerous brownfield sites available for development.
 - Loss of playing fields would have adverse impact on health
 - Impact on heritage, particularly the Bowes Railway.
 - If new homes are needed, they should be low cost starter homes and accessible homes
 - Concerned about noise impact from quarry on site HGA1.
 - Springwell is taking a disproportionate level of growth.
 - Consideration has not been given to cross boundary issues

- Question the need for new housing in a low wage economy
 - Concerned that site HGA6 is being brought forward for financial reasons
- Barratt David Wilson Homes broadly support the policy, but approach is too prescriptive which may impact viability. Concerned about some vague criteria for site HGA3 (PD1611). Sunderland City Council (landowner) support the policy in particular sites HGA5 and HGA6 (PD3274). Story Homes broadly support the policy but would like a larger allocation made for sites HGA2 and HGA4 (PD5598). Hellens broadly support the policy but would like a larger allocation made for site HGA1 (PD242).
 - Paul Mackings Consulting Ltd and Getton Construction Ltd concerned that not all non- Green Belt sites have been considered, such as Hendon Paper Mill and Albany Park (PD2943 & PD2600).
 - Sunderland Civic Society concerned that housing requirement is overambitious and unachievable; that site HGA2 would merge Springwell and Washington and spoil panoramic views (PD632 & PD1815). CPRE North East object on the grounds that exceptional circumstances have not been justified, that the OAN does not comply with the standard methodology, would result in weaker Green Belt boundaries and would affect the free-standing nature of the village (PD1069).
 - Mr Ford (landowner) considers that exceptional circumstances have not been demonstrated (PD169, PD170, PD171 & PD172).
 - Sunderland Green Party concerned that the volume of responses from Springwell residents have not been taken into account, limited school capacity, loss of green space and playing fields (PD4534).
 - Sunderland NHS CCG support criterion 2 of the policy (PD68).
 - Highways England consider that additional modelling work is required (PD4841). Historic England welcome protection for Bowes Railway SAM, but would welcome reference to the potential for archaeological investigation (PD94).
 - Durham County Council welcome changes to the policy (PD1391).
 - Mineral Products Association advise that Figure 20 is incorrect (PD4350).

In response to the representations raised by the Mineral Products Association (PD4350) the Council have proposed a minor modification as set out in the Schedule of Modifications (M17).

The Council has taken into consideration the representations and are not proposing to make any further modifications to this policy. The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper.

The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology. The Council has prepared an Infrastructure Delivery Plan, which has been informed by a Transport Assessment and Education Plan. This details the strategic infrastructure needed to deliver the plan. Other policies of the plan require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure.

The Council have been working closely with Highways England on updated modelling work to assess the impact of the Plan upon the Strategic Road Network. In response to the representations raised by Historic England, a Statement of Common Ground has been signed to indicate that no modifications are required, as the existing heritage policies provide adequate policy coverage.

SS3 Safeguarded Land

The following main issues were identified by representations to Policy SS3;

- Sunderland Civic Society consider that both sites are retained in the Green Belt (PD677).
- Residents are concerned that removal of Green Belt to the south east of Springwell would place further risk on local infrastructure and that it would not result in durable Green Belt boundaries (PD8431, PD252 & PD257). Springwell Residents association object to the policy. Concerned that once protection is removed land will come forward for housing and further affect village character and infrastructure. Will conflict with the aims to provide a defensible boundary (PD5014).
- CPRE does not consider that exceptional circumstances have been demonstrated to remove the land from the Green Belt. Proposals would lead to weaker Green Belt boundaries and affect the character of Springwell Village (PD1392).
- Barratt David Wilson Homes support the exceptional circumstances case, but would like their site at Washington Meadows to be allocated for development (PD5324). Church Commissioners for England consider that phase 2 of the South Ryhope site should be allocated or identified as safeguarded land (PD5246). Bellway Homes consider that insufficient level of growth is being proposed within Washington. Would like to see site at East House Farm safeguarded (PD1921).
- Hellens Group and Hellens Land Ltd consider that additional land should be removed from the Green Belt for safeguarding at HGA7 and at Hastings Hill (PD4794 & PD4872). Story Homes consider that the safeguarded land south east of Springwell should be allocated and the land to the north of site HGA4 allocated or safeguarded (PD5652).
- Clive Milner (landowner) wishes for the safeguarded land to the east of Washington to be allocated as it is deliverable. Debates the deliverability of site HGA1. Land to the south of new access road should be removed from the Green Belt (PD231). Mr Gregson (landowner) considers that land at Burdon should be safeguarded (PD1657 & PD1668). Mr Hutchinson (a local landowner) would like an additional site at Glebe House Farm to be safeguarded (PD2025).
- Taylor Wimpey feel that there is limited sites available for development at Houghton-le-Spring and therefore suggest allocating or safeguarding their site east of Seaham Road (PD3972).
- Highways England consider that additional modelling work is required (PD4842). Homes England support the identification of safeguarded land to the east of Washington and would support its allocation within the plan period (PD4341). The Environment Agency express concerns over flood risk and amenity issues on the land to the east of Washington. Whilst acceptable as safeguarding land the EA would find the plan unsound if it was allocated, as it would require a sequential and exceptions test (PD208).
- South Tyneside Council note the policy and welcome the opportunity to enter into discussions to ensure the long term integrity of the Inter-District GI Corridor, how impacts on the road network and local ecology would be managed and maintained (PD4385).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy.

The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundaries. This is set out within the Exceptional Circumstances report. In regards to the safeguarded land identified, the Council has identified safeguarded land in accordance with the NPPF to ensure that the Green Belt boundaries endure well beyond the end of the plan period. The Green Belt Boundary Review indicates why the Council have chosen to amend Green Belt boundaries in certain areas and not others. It is considered that the proposals would result in strong defensible Green Belt boundaries.

The Council have been working closely with Highways England on updated modelling work to assess the impact of the Plan upon the Strategic Road Network. The Council will continue to work closely with South Tyneside Council and Gateshead Council on cross boundary planning matters.

SP4 North Sunderland

The following main issues were identified by representations to Policy SP4

- The Trustees of Athenaeum Pension Scheme support HGA8 (PD41).
- Hellens Group support the policy but suggest a larger allocation for site HGA7 (PD4730).
- Sport England object to the development of site HGA6 until an up-to-date Playing Pitch Assessment shows it as being surplus to development . Sport England acknowledge the emerging Park Life programme may render the site surplus to requirement (PD4499).
- South Tyneside Council support the policy (PD4396).
- A number of residents, Sunderland Civic Society, CPRE North East and Pawz for Thought object to the policy and the allocation of sites as Housing Growth Areas for the reasons set out in Policy SS4.

In response to the representation raised by Sports England (PD4499) the Council has proposed an additional modification as set out in the Schedule of Modifications (M20). The Council's Green Belt Assessment considered the larger Hellens site, but discounted as it scored strongly against Green Belt purposes.

SS4 North Sunderland Housing Growth Areas

The following main issues were identified by representations to Policy SS4

- A significant number of residents objected to the allocation of site HGA7 on the following grounds:
 - Exceptional circumstances have not been demonstrated and development would be contrary to the NPPF.
 - Unreliable evidence base
 - Impact on biodiversity
 - Allocation is flawed as it has not considered HRA impact or impact on wildlife and green infrastructure corridor.
 - Impact on views from the A19
 - Impact on Area of High Landscape Value.
 - Impact on infrastructure
 - Impact on road network
 - Impact on Grade I Listed building.
 - Concern over consultation process.
 - New housing should be built on brownfield sites.
 - The OAN calculation is flawed.
 - Distance from local services.
- Sunderland Civic Society raised similar issues to residents and also expressed concerns over noise and pollution impact from nearby roads (PD1058). CPRE North East raised similar issues to residents and also that the proposal will dramatically and adversely affect the existing community (PD1162).
- Cllr Denny Wilson objects to site HGA7 on the grounds that there are exceptional circumstances, the impact of the site on designated ecological sites, protected species, wildlife corridors and that it would result in urban sprawl (PD5503). Cllr Doris MacKnight expressed concerns over the impact of the development on the environment and access (PD411).
- Pawz for Thought raised similar concerns to the residents and also the order in which evidence documents were prepared (PD275). Naturally Wild Consultants Ltd objected to the policy due to

impact on biodiversity, contravention of NERC Act 2006, impact on green corridor and that exceptional circumstances have not been demonstrated (PD163 & PD1536). Sunderland Green Party object to both allocations. HGA 7 due to loss of agricultural land, unsustainable location and impact on landscape, and HGA8 because of loss of playing fields (PD4478).

- Mr Ford (a local landowner) concerned that non-Green Belt sites have not been considered first. Also indicates that a HRA is required for HGA8 (PD174). Paul Mackings Consulting Ltd concerned that not all non- Green Belt sites have been considered, such as Hendon Paper Mill (PD2952).
- Historic England would like references to designated assets to be updated for site HGA8 (PD95). Highways England consider that additional modelling work is required (PD4843).
- The Trustees of Athenaeum Pension Scheme support the objectives of the policy, but support a larger allocation for site HGA8. (PD42 & PD43). Hellens Group support the policy, but suggest some wording changes for Site HGA7 (PD4761).

In response to the representations raised by Historic England (PD95) the Council has proposed an additional modification as set out in the Schedule of Modifications (M19). The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

SP5 South Sunderland

The following main issues were identified by representations to Policy SP5

- A resident expressed concerns over housing development in South Hylton (PD419).
- Burdon Lane Consortium support the policy (PD2074). Persimmon Homes support the SSGA, but object to the inclusion of the Hendon Paper Mill site as an employment area. They consider that residential use is appropriate on this site (PD3923). Paul Mackings Consulting Ltd would also like the site to be removed as an employment allocation and used for housing (PD2916).
- Hellens Land Ltd support the policy overall, but would also like their land at Hastings Hill to be removed from the Green Belt and allocated for housing (PD4857).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In regards to the Hendon Paper Mill site (PD3923), as set out in the Plan and Compliance Statement, the site is required to ensure an adequate supply of employment land within Sunderland over the plan period. The Council has considered the site at Hastings Hill (PD4857) but consider that due to the impact on the purposes of the Green Belt it is not appropriate to remove this site from the Green Belt.

SS5 The Port of Sunderland

The following main issue was identified by representations to Policy SS5

- Environment Agency advise that the Level 2 SFRA should be submitted as part of the evidence base (PD207).

The Council and the Environment Agency has agreed a Statement of Common Ground, which confirms that the Council will submit the SFRA Level 2 as part of the Submission Documents (PD07)

SS6 South Sunderland Growth Area

The following main issues were identified by representations to Policy SS6

- Burdon Lane Consortium, Bellway Homes and Persimmon Homes support the policy (PD2236, PD1824 & PD3943). In addition, Burdon Lane Consortium express concerns that requiring all development to accord with the SSGA SPD may affect site viability and believe that the entire

allocation could be developed within the plan period (PD2257 & PD2267). However, Bellway Homes would like the alignment of the Ryhope-Doxford Link Road to be moved. Barratt David Wilson Homes advise that the plan should account for a slower delivery rate for the SSGA (PD5361).

- A local landowner supports the policy (PD1580). Church Commissioner for England support the policy, but feel that a larger site should be allocated to the south of Ryhope (PD5243).
- Sunderland Civic Society and Karbon Homes suggest that the affordable housing requirement should be increased to 15% (PD904 & PD3383).
- Historic England support the policy (PD96). Highways England consider that additional modelling work is required (PD4845). Durham County Council advise that previously raised highways issues have now been resolved (PD1388).
- Two residents object to the allocation as there are numerous brownfield sites available and because of the increased traffic (PD988 & PD991). Sunderland Civic Society consider that the allocation is not required, as the scale of development proposed is overstated (PD921). A resident supports the proposed alignment of the Ryhope-Doxford link road (PD4169).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council considers that the build out rates are consistent with the SHLAA, which was prepared with input from the development industry.

In responses to the issues raised in regards to infrastructure and affordable homes, an Infrastructure Delivery Study and Viability Assessment have been undertaken for the SSGA. Due to the significant levels of infrastructure required, there is a lower affordable housing requirement to ensure the site remains viable. Furthermore, three of the four sites already have planning permission with agreements in place for 10% affordable housing.

The Ryhope-Doxford link road is consistent with that contained within the existing UDP and the draft SSGA SPD. The final alignment will be subject to detailed survey work and design.

SP6 The Coalfield

The following main issues were identified by representations to Policy SP6;

- Hellens broadly support the policy but oppose the inclusion of Settlement Breaks and suggest that their site at Broomhill is removed from the Settlement Break (PD4667). Persimmon Homes object to Settlement Breaks and request that their site within the Newbottle/Sedgeleth sub area is removed from the Settlement Break (PD3935). Wynyard Homes would like their site at Quarry House Lane to be removed from the Settlement Break (PD4695).
- Esh Developments support the policy, particularly site HGA11. Agree that amendments to the Green Belt are required to support sustainable growth (PD1872). Taylor Wimpey generally support the policy, but would like a minor boundary amendment to HGA9. Taylor Wimpey also suggest that their site east of Seaham Road is removed from the Green Belt (PD3507).
- Mr Delaney (a local landowner) suggested a number of modifications to the wording of the policy. Also requested that SHLAA site 468B is allocated for residential development (PD30).
- CPRE North East do not consider exceptional circumstances have been demonstrated for Green Belt release due to the housing requirement being above the standard methodology and proposals leading to weaker Green Belt boundaries. Proposals do not take account of proposed development on brownfield sites (PD1324). Sunderland Civic Society do not consider that Green Belt release is requires as the housing requirement is over ambitious and unachievable (PD978).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy.

A number of developers suggested alternative sites and boundaries have been suggested by landowners/developers. The Council have taken these into consideration. The Council has set out its justification for site selection and the spatial strategy in the compliance statement. The Council considers the spatial strategy for distribution of housing in Sunderland to be justified as it seeks to readdress the imbalance of housing land across the city. The Settlement Break Report justifies the revised boundary for the Settlement Breaks and why it is not appropriate to remove alternative parcels of land.

The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

SS7 The Coalfield Housing Growth Areas

The following main issues were identified by representations to Policy SS7;

- A significant number of residents object to the Housing Growth Areas, in particular the allocation of site HGA9. Specific objections that have been raised include:
 - The proposals are not consistent with the NPPF.
 - All reasonable alternative sites have not been considered, including brownfield sites and empty homes.
 - Impact on infrastructure including roads, schools, GPs etc.
 - Flood risk
 - Environmental impact, including impact on wildlife, pollution.
 - Lack of demand for housing – disagree with housing requirement which is overly ambitious.
 - Impact of Brexit has not been considered in growth forecasts.
 - Impact on Penshaw Monument.
 - Lack of transparency over site selection methodology
 - Inadequate consultation.
 - Development should focus on regeneration of city centre.
 - Concern over ability of country park to host events.
 - Loss of agricultural land.
 - Impact on the identify of Penshaw.
- For site HGA11, a resident would like the policy to make clear that its delivery is dependent on completion of infrastructure from adjacent site (PD893).
- Sunderland Civic Society objects to impact of HGA9 on openness of location and suggests smaller boundary. Also consider that the housing requirement is over ambitious (PD4495).
- CPRE North East object to the policy on the grounds that the OAN is not consistent with the standard methodology and will lead to weaker Green Belt boundaries (PD1171). Sunderland Green Party object to Site HGA9 based on the volume of objections, impact on road network, loss of agricultural land and distance from local facilities. (PD717).
- National Trust concerned about the impact of siteHGA9 on the setting of Penshaw Monument. Acknowledge that the policy seeks to address this, but feel that the impact of the whole development should be considered, not just its boundary design (PD4022).
- Highways England require additional modelling work to be undertaken (PD4846).
- For site HGA11 Historic England welcome the reference to the areas historic past, but would also like the policy to make reference to Newbottle Conservation Area (PD97).

- Barratt David Wilson Homes do not support the policy due to its interaction with other policies (PD5309). Persimmon Homes support site HGA11 but consider that part 3 of the policy would not be consistent with the NPPF (PD3948).
- Wynyard Homes concerned that the Council is over-reliant on brownfield sites with viability constraints. Would like site at Quarry House Lane to be allocated for development (PD4695). Paul Mackings Consulting Ltd object on the grounds that all non-Green Belt sites have been considered, including Hendon Paper Mill site (PD2953). Colin Ford (and owner) does not consider that exceptional circumstances have been justified for Green Belt release in the coalfield sub area, when there are Settlement Breaks which could be developed (PD176).
- Esh Developments and Taylor Wimpey support the policy but suggest minor amendments to align to the NPPF. Esh suggest minor amendments Policy HGA10 relating to position of community building and need to protect trees. Taylor Wimpey suggest minor amendments to Site HGA10 (PD1875 & PD3536)

In response to the representation raised by Historic England (PD97) the Council has proposed an additional modification as set out in the Schedule of Modifications (M21). The Council considers that no further modifications have been required to make the policy sound.

A number of developers suggested alternative sites and boundaries have been suggested by landowners/developers. The Council have taken these into consideration. The Council has set out its justification for site selection and the spatial strategy in the compliance statement. The Council considers the spatial strategy for distribution of housing in Sunderland to be justified as it seeks to readdress the imbalance of housing land across the city. The Settlement Break Report justifies the revised boundary for the Settlement Breaks and why it is not appropriate to remove alternative parcels of land.

The Council consider that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

Healthy and Safe Communities

The following main issues were identified by representations to the Healthy and Safe Communities chapter;

SP7 Healthy and Safe Communities

The following main issues were identified by representations to Policy SP7;

- Historic England supported the recognition that the historic environment plays a role in improving health and wellbeing, as noted in part 6(iv).
- The Coal Authority support the inclusion of policy SP7 but request that unstable land is added into criteria 6vi.
- NHS Sunderland CCG support the policy in general terms but consider the threshold for Health Impact Assessment should be lowered for housing schemes and extended to cover student accommodation. The CCG suggested that thresholds should be included within the policy criterion 6 viii).
- Bellway Homes objects to Policy SP7 on the grounds that setting a mandatory requirement for when a Health Impact Assessment must be undertaken is not appropriate and would introduce an additional burden on developers. A HIA should only be required where the impact on health would be notable. Burdon Lane Consortium objects to the requirement for a HIA to be prepared for major

developments as there is no national requirement for this and it would not be consistent with the EIA regulations.

- Persimmon Homes objects to the requirement to prepare and submit a Health Impact Assessment as this is onerous and unjustified as these issues are already addressed by other policy and guidance. It would introduce regulatory red tape and not be compliant with national policy. Story Homes objects to policy SP7 (6vii) and paragraph 5.5 – requiring all developments of 100 dwellings or more to submit a HIA is overly onerous and is not consistent with national policy. Story's proposes that these sections should be deleted.
- Kentucky Fried Chicken Limited objects to criterion 5 of policy SP7 on the grounds that it uses negative assumptions and cross referencing to Policy VC4 implies that unhealthy eating outlets equates directly to hot food takeaways, irrespective of the choice of food they serve.
- A resident objected to the policy on the grounds that the proposed Renewable Energy Centre in Washington conflicts with the policy.

In response to the representations raised by NHS Sunderland CCG (PD69), the Council have proposed minor modifications as set out in the Schedule of Modifications (M23).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. With regard to the comments from Kentucky Fried Chicken Limited, it was not considered to be necessary to amend the policy as just seeks to indicate that Policy VC4 will help to deliver the aspiration in the policy.

HS1 Quality of Life and Amenity

The following main issues were identified by representations to Policy HS1;

- NHS Sunderland CCG support the policy (PD70).
- Story Homes, Persimmon Homes and Burdon Lane Consortium support the policy but suggest that wording of criterion 1 and 2 is made consistent (PD5312, PD3973 & PD2325).
- The Coal Authority support policy HS1 and notification in criteria 1 viii) that issues of land stability should be addressed (PD1251)
- The Minerals Products Association support the policy but indicate it is unclear how the policy relates to scoping for EIA development or the requirements of Policy SP11 (PD4361 & PD4471).

In response to the representations raised by Story Homes, Persimmon Homes and Burdon Lane Consortium, the Council have proposed minor modifications as set out in the Schedule of Modifications (M24). In response to the representations raised by the Mineral Products Association, the Council have proposed minor modifications as set out in the Schedule of Modifications (M25). With regard to the representations from the Coal Authority, other policies of the plan already address land instability issues.

HS2 Noise-sensitive Development

The following main issues were identified by representations to Policy HS2;

- The Minerals Products Association support the policy but feel that it should make clear that proposals should not impact unreasonably on existing uses (PD4378).

In response to the representations raised by the Mineral Products Association, the Council have proposed minor modifications as set out in the Schedule of Modifications (M26).

HS3 Contaminated Land

The following main issues were identified by representations to Policy HS3;

- Burdon Lane Consortium and Persimmon Homes support the policy, but recognise de-contamination can be costly, so suggest that the policy allows for planning obligations to be reduced if they affect viability (PD2404 & PD3981).
- The Environment Agency support the policy but would like to see reference to controlled waters (PD214).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council has signed a Statement of Common Ground with the Environment Agency, which agrees that no changes to the policy are required. With regard to the representations from developers Policy ID2 already allows for planning contributions to be reduced if they would affect viability.

HS4 Health and Safety Executive Areas and Hazardous Substances

No key issues were raised against Policy HS4

Homes

SP8 Housing Supply and Delivery

The following main issues were identified by representations to Policy SP8;

- Miller homes support the policy (PD890). Most housebuilders supported the policy but considered the target too low. Karbon Homes (PD3385) support the policy and acknowledge that the requirement exceeds the Government's standardised methodology and is therefore positively prepared.
- The Central Gospel Hall Trust (PD147) supports policy SP8 in terms of the amount and spatial distribution of new housing and the range of sources of housing supply which are consistent with national policy. The Trust also supported the reference to the contribution that windfall sites, particularly on previously developed land can make to the housing supply.
- Burdon Lane Consortium (PD 2421), Esh Developments (PD1850), Hellens Land Ltd (PD4885) and Taylor Wimpey (PD3590) welcomed the use of an employment-led scenario for the OAN and agreed that the number should be represented as a minimum and could go higher which would go further towards meeting identified affordable housing need. Hellens Land Ltd (PD4885) Stated that the OAHN for Sunderland is greater than the 745 dpa identified within the SHMA Addendum and the OAN identified by Sunderland.
- Story Homes (PD977) broadly supports policy SP8 and the minimum housing requirement of 745dpa, however would consider that a minimum housing requirement of 880pda is needed. The Council's approach to not using the standardised methodology is supported.
- Barratt David Wilson Homes supports the approach to exceed the minimum target but have concerns that the Plan can only just meet the target (PD5382). The target and buffer is insufficient as there are delivery concerns regarding the sites and SHLAA.
- Persimmon (PD3996) generally support the identification of the housing requirement inclusive of economic growth aspirations and the principle of seeking to exceed this, however they consider the requirement is too low. The Home Builders Federation (PD1183) generally supports the Council's ambition to work with partners and landowners to exceed the minimum target but also consider that the housing requirement is too low and requires further consideration. Bellway Homes (PD1888) supports the proactive approach, but also states the housing requirement is too low.
- Wynyard Homes fully support policy SP8 in terms of working to exceed the minimum housing requirement and support the types of sites that will achieve this. However, Wynyard Homes would like land at Quarry House Lane to be included as a Housing Growth Area and would like the site to be assessed as part of the SHLAA.(PD4697).

- Bellway Homes (PD1888) suggests that the policy needs to make reference to the need to safeguard sites for future residential development and Barratt David Wilson Homes (PD5382) also suggest reference to releasing safeguarded land to meet housing need.
- Barratt David Wilson Homes (PD5382) also suggested that a definition of 'sustained under-performance' should be set out within the plan.
- O+H Properties raised concerns over two strategic sites not included (PD4219). They proposed the Groves site be included as a strategic allocation in the Plan as allocating the site in the future Site Allocations Plan would leave a policy vacuum, as site does not currently feature in the Core Strategy. They also suggested a draft policy. In addition the consultancy suggested that a full explanation be provided why the proposed Green Belt site at Newbottle was not considered at Stage 3 Green Belt Review.
- The Church Commissioners for England (PD5245) supports the approach to release sites from Green Belt to meet housing requirement, however disagree that the most suitable sites have been chosen. They consider that Phase 2 of South of Ryhope site should be deleted from Green Belt and included as a housing allocation. They disagree with the scoring detailed in the Green Belt Assessment and question whilst originally passing to Stage 2 of the Assessment the site was later discounted at Stage 1. Considers that all issues can be mitigated such as ecological issues. The Church Commissioners also suggested that the SHLAA sites should be included within the policies map (PD1776).
- Ray Delaney (PD 31,PD32 & PD33) supported criterion 1 but concerned that sites are not allocated in this plan, especially site 464B and states that it should be allocated. The landowner suggested that criterion 3 should be amended to allow other sites to come forward. Criterion 5 was supported but an additional criterion was suggested to ensure that self-build dwellings should not be limited to a proportion of larger sites. It was also suggested that the policy should make a commitment to small and medium builders, in line with the NPPF which requires that 20 percent of allocated should be half a hectare or less.
- The Home Builders Federation (PD4522) considers that an allowance for 50 residential dwellings for small sites is only appropriate where it can be evidenced that these small sites will continue to come forward and there will remain a deliverable supply. The HBF supports the Council that an empty homes and windfall allowance has not been included. The HBF also supports that the Plan has made an allowance for demolitions.
- Springwell Village Residents Association (PD5036) raised concerns with policy SP8 as there is no evidence to deviate from the standardised methodology and is therefore not justified or effective.
- Friends of Sunderland Green Belt (PD3016) raised concerns over the Council exceeding a minimum target if that target involves the deletion of Green Belt land, as this would cause greater harm than benefit.
- Sunderland Civic Society (PD987) state that policy SP8 is not justified due to the annual target being greater than the baseline requirement. The society do not agree with reference to the target being a minimum, as exceeding the target would exacerbate the adverse consequences for the city and be damaging to the stability of the housing market, regeneration, sustainable development, containment of the built up area and integrity of the Green Belt.
- Historic England (PD99) welcomed the intention to work closely with owners of empty properties to encourage reoccupation. Highways England suggested further modelling work is needed on the Strategic Road Network.
- A resident (PD78) disagreed with housing development proposed on Green Belt sites as the level of housing development would have significant impacts on local amenities (GPs, schools and shops) and transport provision and infrastructure. A resident (PD77) concerned over the development of a site at Seaburn for housing and a further resident (PD8498) expressed concerns over the

consultation process being inadequate and the seafront lacking facilities as well as bus services no longer using Park Lane Interchange. The resident also considers that there is scope to develop on brownfield land rather than green belt and green field sites and does not agree with the term safeguarded land.

- Mrs M R Swinburn (PD1498) expressed concerns that a site they put forward within the Green belt has not been included within the supply.

In response to the representations raised by the majority of house builders, the Council does not feel it necessary to make any modifications as the housing requirement set out within the plan is consistent with the Council's latest OAN calculation which is contained within the SHMA Addendum 2018 and is considered to be realistic and achievable. Policy SP8 specifies that the target of 745 additional dwellings per year is a minimum. The allowance for small sites of 50 units per year is considered appropriate and is evidenced through the SHLAA. The SHLAA indicates on average over the past 5 years 47 units are delivered each year.

In response to the representations raised by Springwell Residents Association, Friends of Sunderland Green Belt and Sunderland Civic Society, the Council does not feel it necessary to make any modifications as due to the shortfall in the housing supply greenbelt deletions are required to meet the housing target of 745 additional dwellings per year. No additional green belt land over and above that already indicated through the plan will be deleted to exceed this target. The Council consider that exceptional circumstances exist which justify an amendment to the Green Belt.

In response to the representations raised by Wynyard Homes, the Council does not feel it necessary to make any modifications as the site referenced within the representation at Quarry House Lane is within the settlement break and as such is to be retained for such purposes. In response to the representations raised by Bellway Homes (PD1888) and Barratt David Wilson Homes (PD5382) in relation to safeguarded land, the Council have proposed additional modifications as set out in the Schedule of Modifications (M27).

With reference to 'sustained under performance', the definition of this is set out within the Council's Monitoring Report.

In response to the representations raised by O+H Properties the Council does not feel it necessary to make any modifications as the plan allocates sites it intends to remove from the greenbelt and strategic allocations, such as Vaux which is considered to have a huge positive impact on the future of the city's economy and the SSGA, where around 3,000 new homes are proposed. It is the council's intention to allocate sites in the existing urban areas through the allocations and designations plan, of which Groves will be one. The greenbelt site references in the representation was discounted at stage 2 as it performs strongly against greenbelt purposes.

In response to the representations raised by the Church Commissioners, the Council does not feel it necessary to make any modifications as the evidence indicates that the site at South Ryhope site would have a fundamental impact on the Green Belt (namely in terms of urban sprawl and countryside encroachment). Furthermore, the impact to settlement merging between Sunderland and Seaham is significant, virtually reducing the Green Belt gap to the County Durham side only.

Both Green Belt reports make clear that the land in question provides a fundamental role to Green Belt purpose and it should remain as such. In terms of biodiversity, the Council additionally considers that the proximity of Ryhope Dene Local Wildlife Site (which forms Ancient Semi-Natural Woodland) together with

the proximity of the European protected coastline (which thereby invokes significant Habitats Regulations Assessment issues) are highly significant factors that limit further development within this area.

In response to the representations raised by the Church Commissioners and the policies map, the Council does not feel it necessary to make any modifications as the CSDP is a strategic plan and as such sets out the strategic allocations on the policies map. The Allocations and Designations Plan will allocate housing sites needed.

In response to the representations raised by Mr Ray Delaney, the Council does not feel it necessary to make any modifications as sites identified in the SHLAA will be allocated through the Allocations and Designations plan and not through this strategic plan. Policy SP8 is considered flexible enough to allow other appropriate housing sites to come forward, especially as it references the development of windfall sites. It is not considered appropriate to include self-build as an additional criteria to what will make up the housing requirement within policy SP8 as self-build will fall within a number of the criterions.

In response to the representations raised by Ray Delaney in relation to self-build, the Council has proposed an additional modification as set out in the Schedule of Modifications (M30 & M79).

In response to the representations raised by a resident and a development sites at Seaburn, the Council does not feel it necessary to make any modifications as the SHLAA does identify the site as a housing development, however it is the Allocations and Designation Plan that will allocate sites. In regards to this site, a planning application is currently under consideration.

In response to the representations raised by the late Mrs M R Swinburn, the Council does not feel it necessary to make any modifications as the site is considered fundamental to the purposes of the Green Belt and a strong robust boundary is in place and should be retained.

The Council is working with Highways England to prepare a model for the Strategic Road Network.

H1 Housing Mix

The following main issues were identified by representations to Policy H1;

- Barratt David Wilson Homes (PD5413) supports the principle of providing a broad mix of housing, however the Local Plan should not dictate the housing mix and the Policy should be flexible. Siglion (PD3042) supports the principle of delivering a diverse housing mix.
- Persimmon Homes (PD4004) state that point H1 (1iii) should seek to optimise density and promote an uplift in town and city centres and locations well served by public transport.
- Karbon Homes (PD3386) generally supports Policy H1, however they suggested an amendment to point iv) to allow for schemes not to deliver this requirement if it would make a scheme unviable
- Burdon Lane Consortium (PD2454), Esh Developments (PD1912), Hellens Land Ltd (PD5039), Taylor Wimpey (PD3697), Barratt David Wilson (PD5413/PD1616), Persimmon Homes (PD4004), Story Homes (PD861), Bellway Homes (PD1937), Siglion (PD3042) and the Home Builders Federation (PD4685) all raised concerns to Policy H1 on the grounds that the 10% requirement for homes to meet building regulations M2(2) Category is not effective, would be onerous, has not been evidenced is not consistent with the requirements set out in the PPG or the Written Ministerial Statement and would impact on viability. Barratt David Wilson state that the standard should encourage not require (PD5413).
- Friends of Sunderland Green Belt (PD3017) raised concerns to Policy H1 on the grounds that proposals to deliver large family homes is not sustainable or justified and that a policy to re-unify buildings which have been subdivided would be easier and more deliverable

- Karbon Homes (PD3386) strongly support point 2 and suggested more detail to be included within the policy regarding accommodation for older persons.
- Bellway Homes (PD1937) suggest that the onus should be on the Council to demonstrate that need for older persons accommodation and self-build housing exists, rather than on the developer to evidence that it doesn't. Persimmon Homes (PD4004) also have concerns over the requirement for older persons accommodation as this is not justified, evidence based and the viability implications have not been tested.
- Wynyard Homes (PD4698) support the principle of Policy H1 to create mixed and sustainable communities. There is evidence of need for larger family homes and bungalows, so requiring this as part of larger housing sites is supported. Wynyard Homes also supported the development to consider the inclusion of self-build and custom build plots, but this should not be a requirement and considered on a site by site basis.
- Mr A Hutchinson (PD2050) offered strong support to reference to self-build and custom house developments. Land at Glebe House Farm was promoted for self-build or custom build.
- Mr R. Delaney (PD33) stated that housing mix should include provision of a range of sites; executive homes should be included in criterion 1 in accordance with the SHMA; and criterion 3 should be amended to deliver self-build dwellings which contribute to the supply.
- Two residents (PD972 + PD806) stated that more needs to be done to bring empty properties back into use before developing beyond the centre of the city, and the policy does not meet the needs of those wanting to self-build. A self-build site at Hutton Close, Houghton-le-Spring was promoted for self-build (PD4315).

In response to the representations raised by Barratt David Wilson Homes the Council does not feel it necessary to make any modifications as the policy is considered to be flexible, by stating that developments should contribute to meeting housing needs as identified through the SHMA or other evidence, rather than setting out that developments must provide.

In response to the representations raised by Persimmon Homes the Council does not feel it necessary to make any modifications as through this policy higher densities will be encouraged in locations which have good public transport locations and are located in close proximity to centres. With regards development optimising density, this is included within NPPF 2018 and as this plan is to be submitted through the transitional arrangements the policies are in compliance with the National Planning Policy Framework 2012.

In response to representations raised by Karbon Homes (PD3386) the Council has proposed an additional modification as set out in the schedule of modifications (M28).

In response to the representations raised by the majority of house builders in relation to accessible and adaptable dwellings, the Council does not feel it necessary to make any modifications as it is considered that the evidence as set out within the SHMA justifies the reasoning behind the policy requirements for accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.

In response to the representations raised by the Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as the need for these types of properties is evidenced through the SHMA (2017), in order to rebalance the housing stock within the city more closely with need and aspirations of Sunderland residents.

In response to the representations raised by Karbon Homes in relation to older persons, the Council does not feel it necessary to make any modifications as the policy itself makes reference to bungalows and ensuring choice of suitable accommodation for older people. The background text also references the SHMA and low stock levels of bungalows in 6.10 and 6.12 refers to alternative designs and layouts for older peoples accommodation. This level of detail is considered appropriate.

The policy is worded as such that it is not a requirement of all housing schemes to provide accommodation for older people. The intention of this aspect of the policy is such that the council through their evidence base identify where there is a particular need for developers to consider within housing schemes. In response to the representation raised by Bellway Homes (PD1937) and Persimmon Homes (PD4004) the Council has proposed an additional modification as set out on in the schedule of modifications (M29).

The intention of the policy in relation to self-build and custom house building is for developments to consider the inclusion, it is not a requirement. It is proposed to amend the background text to make clearer that the policy also supports appropriate self-build developments. In response to the representation raised by Wynyard Homes (PD4698) and Mr.R.Delaney (PD33) the Council has proposed an additional modification as set out on the Schedule of Modifications (M30).

In response to the representations raised by Mr A Hutchinson the Council does not feel it necessary to make any modifications as the Land at Glebe House Farm is to be retained as Green Belt.

In response to the representations raised by Mr R Delaney and executive homes, the Council does not feel it necessary to make any modifications as reference is made to developments contributing to meeting the needs as identified through the SHMA within this criteria and it is not considered that the provision of executive dwellings needs to be referenced separately in this part of the policy.

In response to the representations raised by residents, the Council does not feel it necessary to make any modifications as Policy H5 of the Plan seeks to manage the existing housing stock by bringing empty properties back into use and supporting programmes of improvement, renewal and replacement.

In response to the representations raised by the resident promoting Hutton Close site the Council does not feel it necessary to make any modifications as the Council does not support the site suggested at Hutton Close for development due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability.

H2 Affordable Homes

The following main issues were identified by representations to Policy H2;

- Esh Developments (PD1922), Hellens (PD5047) and Taylor Wimpey (PD3722) supported the policy (and supporting 6.23 text on viability). Wynyard Homes (PD4701) support policy H2 in principle, but consider that the text from Paragraph 6.23 should be incorporated into the Policy.
- Karbon Homes (PD3387) generally support policy H2, but suggested the definition to accord with the revised NPPF to allow more flexibility. They also suggested that point 2 of the policy is limiting to certain tenures including rent to buy and this point should be deleted from Policy H2.
- Bellway Homes (PD1946), Home Builders Federation (PD4738), Siglion (PD3026), Story Homes (PD982) and Persimmon Homes (PD4045) raise concerns to policy H2 on the grounds that the affordable housing requirement is too high and should be reduced, it is too restrictive and will affect site viability and the fact that the viability assessment identifies brownfield sites as unviable.
- Persimmon Homes (PD4045) are concerned that cumulative impacts of other policy requirements in the Plan will affect viability. Persimmon suggests that a large proportion of urban sites would not be

viable with a 15% affordable housing requirement and disagree with the residual values used in the whole plan viability assessment.

- Friends of Sunderland Green Belt (PD3018) state that the 15% requirement is too low, and suggest that affordability is not a problem in Sunderland.
- Barratt David Wilson Homes (PD5439) supports the need for affordable housing and the 15% requirement, but feels that the tenure split should be 70% affordable rent and 30% intermediate tenure. They are concerned that policy requirement may impact site viability and the need to undertake site specific viability assessments on a regular basis. Hellens (PD5047) advises that seeking a tenure split is too prescriptive and Persimmon (PD4045) suggest a need for flexibility on tenure split when viability is an issue.
- Esh Developments (PD1922), Hellens (PD5047), Taylor Wimpey (PD3722), Siglions (PD3026), Burdon Lane Consortium (PD2506) and Story Homes (PD982) recommended an alteration to paragraph 6.21 that clustering should not be prescriptive in terms of the size of each cluster and should be proportionate to the scale of the overall development. The wording should be amended to better reflect the RPs requirements that the housing they manage should be closely related for operational purposes.
- Burdon Lane Consortium (PD2506) should make clear the different affordable housing requirements are in place for SSGA and some aspects of the policy are too precise and restrictive.
- Story Homes (PD982) challenge sub point 4 as restrictive and suggest proposed policy and paragraph wording.
- Northumbrian Water (PD2700) supports para 6.23 of the policies supporting text.
- Persimmon Homes (PD4045) state that to ensure the policy remains beyond the transitional arrangements, the 10% requirement for homes to be made available for affordable home ownership should be included and the affordable housing definition in the glossary revised.

In response to the representations raised by Wynyard Homes, the Council does not feel it necessary to make any modifications as to include the text from paragraph 6.23 into the policy would make the policy quite lengthy and policies should be succinct. Information that is set out within background text still carries weight and has to be complied with.

In response to the representations raised by Karbon Homes the Council does not feel it necessary to make any modifications as the plan is being submitted under transitional arrangements it is in compliant with the NPPF 2012 rather than the 2018 version. It is not considered appropriate to remove the requirement for affordable dwellings to be retained in affordable use in perpetuity, as this would remove affordable stock from the city and limit the choice of properties for existing and future residents.

In response to the representations raised by Bellway Homes, HBF, Siglions, Story Homes and Persimmon Homes and Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance. SCCs Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable. In recognition that the full 15% may not be deliverable on all sites, particularly brownfield sites, the policy allows flexibility for the affordable housing requirement to be reduced down and the tenure split to be reviewed.

In response to the representations raised by Barratt David Wilson Homes, Hellens and Persimmon the Council does not feel it necessary to make any modifications as it is not considered that the affordable housing needs of the city's existing and future residents will be met by specifying a 70/ 30 tenure split. Evidence through the 2017 SHMA indicates an overall preference for 79.4% social/affordable rent. In addition to this, the viability work suggested that a 80/20 split should not be detrimental to viability and

the policy as set out is considered flexible enough to allow this tenure split to be negotiated if viability is an issue.

In response to the representation raised by Esh Developments (PD1922), Hellens (PD5047), Taylor Wimpey (PD3722), and Siglion (PD3026), Burdon Lane Consortium (PD2506) and Story Homes (PD982) it is agreed that the size of the cluster should be proportionate to the scale of the overall development and the Council has proposed an additional modification as set out in the Schedule of Modifications (M32).

In response to the representations raised by Burdon Lane Consortium (PD2506) in relation to SSGA the Council has proposed an additional modification as set out in the Schedule of Modifications (M31).

In response to the representations raised by Story Homes and sub-point 4, the Council does not feel it necessary to make any modifications as ensuring the affordable properties are indistinguishable from market housing allows for better integration and avoids the affordable housing being immediately identified.

In response to the representations raised by Persimmon Homes, the Council does not feel it necessary to make any modifications as the plan is to be submitted via the transitional arrangements and as such is in compliance with NPPF 2012 and is not required to include 10% of affordable homes for home ownership, nor revise the definition within the glossary.

H3 Student Accommodation

The following main issues were identified by representations to Policy H3;

- Sunderland University (PD184) supported the policy subject to amendment to confirm which elements of the Urban Core are acceptable for student accommodation and clarify the definition of "student accommodation needs".
- Friends of Sunderland Green Belt (PD3055) objected to the policy on the grounds that recent university statistics suggest that the student population is declining and will continue to decline.

In response to the representation raised by the University of Sunderland (PD184) in relation to a reference to the SPD being included to further define need, the Council has proposed an additional modification as set out in the Schedule of Modifications (M34). The Council and University of Sunderland have signed a Statement of Common Ground.

In response to the representations raised by Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as the University have plans and strategies in place to target students in its key growth areas and those of the region, which the CSDP supports to assist in making Sunderland an entrepreneurial, University City. This policy is in place to ensure that the new student accommodation meets the needs of students, in terms of its location and its quality

H4 Travelling Showpeople, Gypsies and Travellers

The following main issues were identified by representations to Policy H4;

- A resident suggests there is no proven demand for the allocation of land for Travelling Showpeople it is not in the public interest to allocate land for this use.
- A resident highlighted specific concerns in regard to access arrangements, impact on the local road network, safety of local children and noise generation with the proposed site allocation.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by residents the Council does not feel it necessary to make any modifications as Sunderland's Gypsy and Traveller and Travelling Showpeople accommodation Assessment Update (2017) identifies the need for a total of 33 plots for Travelling

Showpeople in the SCC area over the CSDP plan period to 2033, of which 15 plots are required in the short term (up to 2022/23) and a further 18 plots in the medium to longer term.

Any noise impact on existing residential properties to the south at Lake Road and to the west will be limited. Screening could also be put in place between the existing industrial estate and the proposed site. Consideration could also be given to restricting the hours that fairground equipment can be maintained, so as to avoid any detrimental impacts on existing residential properties nearby. As large refuse vehicle access the site currently, amenity issues with large trucks carrying fairground equipment would have no further impact on the amenity of nearby residential properties. Access to the site is considered wide enough for vehicles carrying fairground equipment. It is currently accessed by large refuse vehicles and the safety element should be no worse due to the current operation of the depot.

H5 Existing Homes and Loss of Homes

The following main issue was identified by representations to Policy H5;

- Historic England supports the intention to bring empty properties back into use, particularly in 'Sunderland Historic High Streets' Heritage Action Zone.

H6 Homes in Multiple Occupation (HMOs)

The following main issues were identified by representations to Policy H6;

- Friends of Sunderland Green Belt suggest policy H6 is not justified as it would be most appropriate to use existing stock as opposed to building new, larger houses, to rebalance the stock.
- The University of Sunderland (PD185) support the policy but propose a modification to point 5 to ensure consistency with other housing policy documents and avoid over supply when looking at HMOs and student accommodation collectively.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as where appropriate the council encourage converting residential properties back into single households where they have previously been divided into a number of smaller units. However the council recognise that to convert back to a single large dwelling house is not always viable.

In response to the representations raised by the University of Sunderland (PD185), the Council does not feel it necessary to make any modifications as further information on need is set out in detail within the Student Accommodation SPD. The Council and University of Sunderland have signed a Statement of Common Ground and the Council has proposed an additional modifications as set out in the Schedule of Modifications (M33).

H7 Backland Tandem Development

No key issues were raised against Policy H7;

Economic Growth

The following main issues were identified by representations to the Economic Growth chapter;

- Northumbrian Water (PD150) supported the chapter and supported economic growth and inward investment in to the city. M&G Real Estate (PD3604) supported the general structure set by the policies in the chapter as they deemed them to be appropriate and sound. However, highlighted that there should be a stronger test introduced for changes away from employment uses.
- The Minerals Product Association (PD4386) set out there was no consideration given to the economic growth of the minerals sector or its downstream value.

The Council has taken into consideration the representations and are not proposing to make any modifications to this chapter. In response to Northumbrian Water, the Council acknowledges the support for the chapter.

In response to the representations raised by M&G Real Estate, the Council does not feel it necessary to make any modifications. The chapter sets a balance between protection and flexibility, setting a hierarchy of employment sites (primary employment areas, key employment areas and non-designated employment sites) to determine the level of protection for each site typology. This will ensure a balanced approach to employment land protection. In response to the representations raised by the Mineral Products Association, the Council does not feel it necessary to make any modifications. The economic growth of the minerals sector and its downstream value is recognised, however it is not considered necessary to make reference to it in this chapter. The link between minerals extraction and economic growth has been recognised in the table of strategic priorities.

EG1 Primary Employment Areas

The following main issues were identified by representations to Policy EG1;

- The National Grid (PD807) support the policy and highlighted that Primary Employment Sites PEA4, PEA8, PEA10 are crossed by National Grid High voltage electricity transmission overhead lines.
- Prestige Car Direct Property Services (PD4592) proposed that the land at Ferryboat Lane be included as part of the employment allocation for PEA1.
- Siglion (PD3005) said the policy did not place enough emphasis on the benefits of Mixed Use development.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledge the National Grid support for the policy.

In response to Prestige Car Direct Property Services, although the Council has identified a tight supply of available employment land, it is not considered necessary to designate additional land at Ferryboat lane.

In response to Siglion, Primary Employment Areas (PEAs) are those existing employment areas which are considered essential to the long-term success of the city. These are located within the strongest demand areas and should be entirely protected from non-employment uses unless exceptional circumstances can be evidenced in order to ensure employment needs are met. The policy is flexible to enable land to come forward for alternative uses, where exceptional circumstances exist.

EG2 Key Employment Areas

The following main issues were identified by representations to Policy EG2;

- Various representations set out requests for sites to be removed from employment land allocations, these were; Deptford site, (see PD240), Hendon Paper Mill Site (PD2842 & PD4061) and Emily's Nursery (PD4223).
- Sunderland Civic Society (PD824) was concerned with the open-ended nature of policy EG2.2 and the possible opportunity for retail uses to locate on key employment areas. Friends of Sunderland Green Belt (PD3020) state that there is an excess of employment areas in Sunderland and these areas would be better for housing, without using green field or Green Belt.
- Siglion (PD2886) set out Town End Farm and Hetton Lyons South have been omitted from list of areas to be safeguarded for employment uses and request more flexibility so that mixed use with residential is also appropriate.
- North East Property Partnership (PD4509) are concerned that the policy is too restrictive. Concerned that criteria in Part 2 of policy are necessarily burdensome requiring two years marketing would not enable land agent to be fleet of foot. That marketing should be limited to 6 months and should be able to be commenced ahead of a property becoming vacant. Also, citations 2i to 2iv should be recast so that non b class development will be accepted where any one of the citations are met.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy.

In response to the requests to remove various sites from their employment land designation, The Council considers the overall supply of available employment land to be particularly tight relative to projected employment land needs. It is therefore considered necessary for sites to be retained as employment land. It should be noted that the policy gives sufficient flexibility to allow for non B use where if it can be demonstrated that there is no reasonable prospect of the site being brought forward for employment use.

The proposed changes set out in the response from the North East Property Partnership, are not considered acceptable. Key employment areas are important to ensuring a sufficient supply of sites to support employment land. Consequently, the use of land for non B use will need to satisfactorily meet all four citations set out in part 2 of policy EG2. Additionally, the Council deem a 24 month period for marketing to be reasonable terms. This is justified in the context of a tight supply of available employment sites.

In response to Friends of Sunderland Green Belt, the City has a particular tight balance between available employment land supply and projected employment needs. Consequently, there is a justified need to retain employment land over the plan period. In response to Siglion, although the supply of employment land is particularly tight, the Council has identified a sufficient stock of employment sites to meet identified employment need and thus there is no need to designate sites at Town End Farm or Hetton Lyons South.

In response to the Civic Society, the policy seeks to safeguard key employment areas for employment uses as this is necessary to meet employment need. Alternative uses would be assessed on their own merits. Any retail development would be required to be in accordance with the sequential test.

EG3 Other Employment Sites

No key issues were raised against policy EG3

EG4 New Employment Areas

No key issues were raised against policy EG4

EG5 Offices

The following main issue was identified by representations to Policy EG5;

- Friend of Sunderland Green Belt (PD3021) state there no evidence of commercial need for offices. Better to use space for mixed use residential close to transport hubs.

The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. In response to Friends of Sunderland Greenbelt, the Council undertook an Employment Land Review (2016) which outlined a need for 15 ha of land for office based development over the plan period. Consequently, there is sufficient evidence of commercial offices over the plan period and a justified need for policy EG5.

EG6 Trade Counters

No key issues were raised against policy EG6

Vitality of Centres

VC1 Main Town Centre Uses and Retail Hierarchy

The following main issues were identified by representations to Policy VC1;

- Urban and Civic (PD838) support the definition of Houghton-le-Spring as a Town Centre and the identified boundary which includes the former Houghton Colliery site.
- M&G Real Estate (PD3606) support the policy but suggest the CSDP overestimates retail need and does not consider there to be any available sites in Washington Town Centre. They suggest an amendment to paragraph 2 to say major instead of principal and assert that point 7 could encourage out-of-centre development.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by M&G Real Estate, the Council considers this Policy clear in the proposed hierarchy of centres and which are the sequentially preferred locations for main town centre uses. Only if it can be sequentially demonstrated that there are no suitable sites available within any designated centre will retail parks will be preferred over other out-of-centre sites. The Policy is not considered to encourage out-of-centre development.

SP9 Comparison Retail

The following main issues were identified by representations to Policy SP9;

- M&G Real Estate (PD3609) are concerned that Policy SP9 refers to sub areas generally and may encourage out of centre proposals. They claim the Policy offers insufficient protection to Washington Town Centre prior to the adoption of the A&D Plan and that the Policy should make clear that development should be directed to designated centres, that delivery will be phased and impose stronger restrictions on out of centre development.
- Urban and Civic (PD872) states Policy SP9 only deals with the theoretical quantitative capacity for new comparison retail floorspace. It does not include reference to qualitative needs, for either convenience or comparison retailing. SP9 (rather than paragraph 8.11) should also make clear that the Houghton Colliery site will be the preferred location for new retail development in Houghton-le-Spring.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by M&G Real Estate, Policy VC1 requires proposals for main town centre uses to follow the sequential assessment approach; therefore adequate protection will be afforded to designated centres prior to the provision of retail allocations through the A&D Plan.

In response to the representations raised by Urban and Civic, the Sunderland Retail Needs Assessment (2016) acknowledges the qualitative need for a further supermarket at least medium in size within the Coalfield sub-area, so as to reduce unnecessary levels of car travel. A suitable site will be allocated to meet this need through the A&D Plan. Allocations are not being made through the CSDP.

VC2 Retail Impact Assessments

The following main issue was identified by representations to Policy VC2;

- M&G Real Estate (PD3612) suggest the Policy does not take account of the potential cumulative impacts of development and suggest that the threshold is restricted to 1,000sqm. The policy should include an element of phasing until the A&D Plan is adopted.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to representations raised by M&G Real Estate, Sunderland City Centre is a large sub-regional centre, which is well positioned to withstand significant adverse impacts from out-of-centre retail developments. The NPPF default threshold will continue to apply for comparison retail developments which are likely to affect the city centre. The thresholds chosen for each centre are consistent with the recommendations of the Sunderland Retail Needs Assessment (2016).

VC3 Primary Shopping Areas and Frontages

The following main issues were identified by representations to Policy VC3

- Historic England (PD101) support the diverse range of uses proposed for Secondary Frontages.
- Siglion (PD3120) put forward that 15% A1 rule should be more flexible and there should be more flexibility for marketing of A1 use for 24 months.

- M&G Real Estate (PD3615) suggest the shopping frontage policy is not appropriate for Washington Town Centre, in particular requirement to market a property for 24 months. A subsidiary policy should be provided for Washington.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to representations raised by Siglion and M&G Real Estate, the Sunderland Retail Needs Assessment (2016) recommends a marketing period of 6-24 months for non-A1 uses within Primary Frontages. The higher end of this range has been taken forward because part 4 of the policy already offers a degree of flexibility for non-A1 development within Primary Frontages. It is considered that a shorter marketing period will not provide sufficient opportunity for A1 development to come forward and that 24 months provides an appropriate balance to ensure long term vacancies are avoided and the prominence of A1 uses is retained within Primary Frontages. This Policy is consistent with the recommendations of the Sunderland Retail Needs Assessment (2016).

VC4 Hot Food Takeaways

The following main issues were identified by representations to Policy VC4

- Kentucky Fried Chicken (PD256) suggest Policy VC4 is not based on objective evidence; does not take account of healthy options; and is not clear how the Policy will be monitored.
- Planware Ltd (PD1147) suggest the NPPF provides no justification to use planning to seek to influence people's dietary choices and there is no adequate evidence to justify the assumption that locating A5 uses within certain distances of schools or designated centres causes adverse health consequences.
- Siglion (PD2849) suggest the requirements for retail units to be marketed for 24 months before A5 use can be sought does not contribute to the vitality of Sunderland or the provision of active uses.
- Urban and Civic (PD937) assert that the Policy could prevent Class A5 uses being brought forward, based on a review of current levels of obesity in the wards surrounding a site. As A5 uses (in the consultee's opinion) are widely regarded as "main Town Centre uses" this could have a detrimental impact to the proposal at Houghton Colliery.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by KFC, Planware, Siglion, and Urban and Civic, the Policy is consistent with the evidence base and recommendations of the Sunderland Retail Needs Assessment (2016) and the Public Health - evidence in relation to the use of the planning system to control hot food takeaways (2018).

VC5 Protection and Delivery of Community Facilities and Local Services

The following main issues were identified by representations to Policy VC5

- The Theatres Trust (PD223) support the Policy as it will provide protection for Sunderland's valued social, community and cultural facilities.
- NHS Sunderland CCG (PD71 & PD72) supports the Policy as drafted and in particular the reference to 'delivery' – but suggest specifically referencing the delivery of health infrastructure within the Policy.

In response to NHS Sunderland CCG (PD71 & PD72), The Draft Infrastructure Delivery Plan (2018) and Draft Planning Obligations SPD (2018) have been prepared to support the delivery of the CSDP. These outline the necessary supporting infrastructure required to support the growth proposed and the Councils approach to planning obligations.

Paragraph 8.32 of the CSDP (2018: p75) includes examples of community facilities such as education, health care and family support. A definition of 'community facilities' is included in the CSDP glossary. The description references health care, childcare, cultural and social services.

The Council has proposed additional modifications as set out in the Schedule of Modifications (M36, M76). These include cross-referencing this Policy to SP7 Healthy and Safe Communities and including a definition of Local Services in the glossary.

VC6 Culture, Leisure & Tourism

The following main issues were identified by representations to Policy VC6

- Historic England (PD102) supports the encouragement of temporary and meanwhile uses for vacant buildings, as noted in (vii).
- The Theatres trust (PD225) supports part 1 of the policy.
- Washington AFC (PD233) supports the Plan and the identification of the three football hubs, but suggests land is removed from the Green Belt to accommodate a new stand at Northern Area Playing Fields.
- Siglion (PD3103) is supportive of the policy but it is considered that policy changes and additional supporting text regarding modern leisure should be included as the policy in current form is not effective or justified.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy.

The Council acknowledges the support from Historic England, Theatres Trust, Washington AFC and Siglion.

In response to Washington AFC, it is considered too late to make amendments to the established Green Belt at this point in the plan-making process. In the Council's most recent Green Belt Review, this site was not considered suitable as a Green Belt deletion site for any purpose. In any event, the reasons put forward by Washington AFC are not considered to meet the exceptional circumstances required to amend the Green Belt boundary.

In response to Siglion, the Council considers this policy to be sound as it supports cultural, leisure and tourism industries generally, including modern forms of leisure. No modifications are considered necessary.

Built and Historic Environment

BH1 Design Quality

The following main issues were identified by representations to Policy BH1

- Historic England (PD103) supports the approach to high quality design. In part (11) it is important to recognise that there may be cumulative impacts from tall buildings.
- Barratt David Wilson Homes (PD1623), Bellway Homes (PD1948), Home Builders Federation (PD4749), Taylor Wimpey (PD2517), Avant Homes (PD1519), Story Homes (PD876), Hellens Land (PD5056), Karbon Homes (PD3388) Esh Developments (PD1933), Burton Lane Consortium (PD2517) and Persimmon Homes (PD2517) do not consider that the introduction of national space standards has been evidenced.
- Springwell Village Residents Association (PD5048) considers that Site HGA1 conflicts with Point 10 of Policy BH1 due to the impacts on Hauler House and railway line of Bowes Railway, which is a Scheduled Ancient Monument.
- Burdon Lane Consortium (PD2517), Esh Developments (PD1933), Hellens Land (PD5056) and Taylor Wimpey (PD3742) consider parts 8, 10 and 13 of the Policy onerous and overly restrictive.

- Esh Developments (PD1933) considers paragraph 9.5 should state that design codes for large scale developments should not be mandatory requirements.
- Hellens Land (PD5056) considers Paragraph 9.5 should state that design codes for large scale developments should not be mandatory requirements.
- Story Homes (PD876) set out it was not clear when the requirement for Masterplans or development frameworks will be applied.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the issues on national described space standards, the Policy is not considered to threaten the viability or deliverability of housebuilding and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a variety of house types and sizes coming forward which meet NDSS.

In response to Springfield Village Residents Association, the Council considers each Housing Growth Area (HGA) site to adhere to the guidance outlined in this policy. HGA1 South West Springwell states that development should ensure that the open aspect to Bowes Railway Scheduled Ancient Monument (SAM) is retained and more constraints/parameters are highlighted within the Development Framework (2018).

In response to Burdon Lane Consortium, Esh Developments, Hellens Land and Taylor Wimpey on parts 8, 10 and 13 being too onerous; this subsection of the policy aims to achieve good design and sustainable development, in line with the requirements of the NPPF. The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive.

In response to Esh Developments and Taylor Wimpey on the issue of design codes, Masterplans and development frameworks; design codes and development frameworks are not mandatory requirements and are only required where appropriate. The supporting text clarifies that the need for design codes will be established at the pre-application stage. If it can be demonstrated as part of the application process that the policy requirements are not appropriate or viable, a proposal may still be acceptable on balance when determined on its merits.

In response to the representation raised by Historic England (PD103) the Council has proposed an additional modification as part of a Statement of Common Ground and set out in the Schedule of Modifications to include a reference to the cumulative impacts of development (M37).

BH2 Sustainable Design Construction

The following main issues were identified by representations to Policy BH2

- The Environment Agency (PD219) supports the policy and suggests it is delivered in accordance with Policy WWE2 and WWE3.
- Burdon Lane Consortium (PD2535) generally supports the policy but consider it is inflexible and onerous in places.
- Historic England (PD104) welcomes the positive approach to sustainable design and construction.
- Barratt David Wilson Homes (PD1625) suggests the policy repeating national policy.
- Bellway Homes (PD1957) suggests part 1 of Policy BH2 is not consistent with the Written Ministerial Statement which indicates that energy requirements for new homes are a matter solely for building regulations.
- Persimmon Homes (PD4088) claims the requirement to maximise energy efficiency and integrate the use of low carbon energy is too onerous and that some of the requirements for the Sustainability Statement would be onerous and not deliverable.

- Story Homes (PD886) supports the Council's aims of ensuring that new development is sustainably designed and constructed. However, sub-point 1 may have viability implications, sub point 4 requires an excessive level of information, and the requirements for green roofs and Sustainability Statements are too onerous.
- The Home Builders Federation (PD4783) generally support the use of low carbon and renewable energy, however would question if the policy is in accordance with the government intentions as set out in Fixing the Foundations and the Housing Standards Review which identifies energy to be a matter solely for Building Regulations with no optional standards.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledge support from the Environment Agency, Burdon Lane Consortium and Historic England.

In response to the additional comments above, the requirement to maximise energy efficiency and integrate the use of low carbon and renewable energy is not inconsistent with national policy. The Planning and Energy Act 2008 permits Local Authorities to request: a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In any event, Policy BH2 offers guidelines for sustainable development as opposed to a requirement. The Council considers these guidelines reasonable and they are only applicable to major developments, where possible.

BH3 Public Realm

No key issues were raised against policy BH3

BH4 Advertisements

No key issues were raised against policy BH4

BH5 Shop Fronts

The following main issue was identified by representations to Policy BH5

Historic England (PD105) welcome part 3 and paragraph 9.19 but suggest the policy could be strengthened.

In response to the representations raised by Historic England (PD105), the Council have proposed minor modifications to the supporting text of paragraph 9.19 through a Statement of Common Ground as set out in the Schedule of Modifications (M39).

BH6 Quality Communications

The following main issues were identified by representations to Policy BH6

- Virgin Media (PD3) welcome the intention of the policy but felt could be improved by ensuring that broadband networks are installed as standard and that multiple operators are, at the very least, consulted.
- Burdon Lane Consortium (PD2551) supports the policy but the inclusion of digital infrastructure is not within the control of the development industry, so the policy could raise deliverability issues.
- Persimmon Homes (PD4106) supports the policy but express concern over impacts of deliverability, as digital infrastructure is not within the control of the development industry. The NPPF only requires local planning authorities to support the expansion of such infrastructure.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to Virgin Media, the Council considers the Policy to be sound and consistent with the requirements of the NPPF (2012).

In response to Burdon Lane Consortium and Persimmon Homes, the NPPF (2012) states that, in preparing Local Plans, local planning authorities should support the expansion of electronic communication networks, including telecommunications and high speed broadband. This policy supports such development but at the same time must ensure that such equipment is sympathetically designed to Sunderland's townscape and countryside. This is in line with paragraph 43 of the NPPF (2012) which suggests that communications infrastructure should be sympathetically designed and camouflaged.

BH7 Historic Environment

The following main issues were identified by representations to Policy BH7

- Historic England (PD107 & PD106) welcomed the very positive and comprehensive approach taken to the historic environment within this chapter and through this policy but request the CSDP incorporates reference to the distinction historic environment of Sunderland.
- The Minerals Products Association (PD4395) states that the policy seek to conserve and enhance the historic environment, but there is no indication of how the plan will meet the demand for the extraction of building stone for the repair of heritage assets or other such conservation uses.
- Springwell Village Residents Association (PD5057) considers that Site HGA1 conflicts with Policy BH7 due to the impacts on the setting of the Bowes Railway SAM and associated heritage assets.
- A resident (PD8202) states that policy BH7 needs to be considered regarding Penshaw Monument and its environs with the view potentially being harmed by the proposed Renewable Energy Centre and the building of homes on land adjacent to Herrington Country Park.

In response to the representation raised by Historic England (PD107) the Council has proposed a minor modification as part of a Statement of Common Ground which is set out in the Schedule of Modifications. This is to include a reference to the distinctive historic environment of Sunderland in paragraph 9.23 (M40).

In response to the Mineral Products Association policy BH7 relates to the conservation and enhancement of the historic environment and the source of building materials is not relevant to this Policy.

In response to the Springwell Village Residents Association, The Council considers each Housing Growth Area (HGA) site to comply with the requirements of this policy. HGA1 South West Springwell states that development should ensure that the open aspect to Bowes Railway Scheduled Ancient Monument (SAM) is retained. HGA1 at South West Springwell is not considered to negatively impact on the setting of Bowes Railway Scheduled Ancient Monument (SAM) but will protect the open aspect to the SAM. More justification is set out in the Development Framework (2018) for this site.

In response to the comments raised by a resident, HGA9 at Penshaw is not considered to impact on Penshaw Monument. The Policy text requires development to "minimise any impact on the areas landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building". The development of this site will meet the plan area's OAN and contribute to townscape quality. Further justification is set out in the Development Framework (2018) for this site.

BH8 Heritage Assets

The following main issues were identified by representations to Policy BH8

- Durham County Council (PD1393) welcome Criteria 6 which will allow the significance of the Lambton Castle Grade II of Special Historic Interest and Lambton Estate Park and Garden of Local

Interest within County Durham which lies to the south of Sites HGA5 and 6 to be properly considered.

- Historic England (PD108) supports the policy and considers it be a very positive approach to protecting and enhancing heritage assets. However would suggest some minor modifications to the final sentence of part (1).
- Story Homes (PD5329) has concerns with BH8 (sub point 8) relating to non-designated heritage assets. The wording is inconsistent with NPPF and should be reworded accordingly.
- Burdon Lane Consortium (PD2574) state Part 8 of Policy BH8 which relates to non-designated heritage assets is more onerous than the NPPF which advises that the significance of the non-designated heritage asset should be taken into account.
- Persimmon Homes (PD4113) state policy BH8 is more onerous than the NPPF in relation to the conservation of non-designated heritage assets, as it requires these to be conserved rather than the significance of these taken into account.
- A resident (PD8203) Policy BH8 needs to be considered regarding Penshaw Monument and its environs with the view potentially being harmed by the proposed Renewable Energy Centre and the building of homes on land adjacent to Herrington Country Park.
- Mineral Products Association (PD397) policy BH8 seeks to conserve and enhance the historic environment, but there is no indication of how the plan will meet the demand for the extraction of building stone for the repair of heritage assets or other such conservation uses.

The Council acknowledge Durham Country Councils response. In response to the representation raised by Historic England (PD108) the Council has proposed a minor modification as part of a Statement of Common Ground which is set out in the Schedule of Modifications. This is to include a reference to *any contribution made* by the setting of heritage assets (M41).

In response to the representations asserting that the Policy is more onerous than the NPPF (PD2574, PD4113, PD5329), the Council has proposed an additional modification as set out in the Schedule of Modifications (M42). This is to ensure the Policy is consistent with national policy.

In response to the residents comment, Policy HGA9 at Penshaw is not considered to impact on Penshaw Monument. The Policy text requires development to "minimise any impact on the areas landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building". The development of this site will meet the plan OAN and contribute to townscape quality. Further justification is set out in Development Framework (2018) for this site.

In response to the Mineral Products Association, Policy BH8 relates to the conservation and enhancement of heritage assets and the source of building materials is not relevant to this Policy.

BH9 Archaeology and Recording of Heritage Assets

The following main issues were identified by representations to Policy BH9

Historic England (PD109) support the approach, however part 1 needs clarification in accordance with paragraph 132 and 133 of the NPPF.

Burdon Lane Consortium (PD2599) suggests part 2(I) of Policy BH9 should seek to sustain, conserve and enhance as opposed to protect. The Policy is more onerous than the NPPF as this does not require the preservation of archaeology in situ.

In response to the representation raised by Historic England (PD109), the Council has proposed additional modifications as part of a Statement of Common Ground which are set out in the Schedule of Modifications (M43 and M44).

The Council agrees with Historic England that Policy BH9.1 could be amended to more closely align with the NPPF (2012). The Council agrees with Historic England that Policy BH9.1 should also recognise non-designated assets of equivalent archaeological significance.

In response to the Burdon Lane Consortium, the Council considers this Policy to be consistent with the NPPF (2012). It gives preference to the preservation of heritage assets of archaeological interest in situ, but does not require it. This is not considered overly onerous.

Natural Environment

The following main issues were identified by representations to the Natural Environment Chapter in general:

- A significant number of objections were received by residents in conjunction with Fulwell, Seaburn and South Bents Neighbourhood Forum who objected to the plan and this chapter on the grounds there is no justification to amend the Green Belt boundaries and that the incorrect approach has been taken to the identification of defensible Green Belt boundaries.

The Council has taken into consideration the representations by the Fulwell, Seaburn and South Bents Neighbourhood Forum and is not proposing to make any modifications to this policy. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The Council has also undertaken a full review of the Green Belt as well as a Green Belt Boundary Assessment that has examined the entire Green Belt boundary and recommended a robust and durable boundary that will endure beyond the plan period.

NE1 Green Infrastructure

The following main issues were identified by representations to Policy NE1

- Northumbrian Water are fully supportive of policy NE1 and are very pleased to see the inclusion in point iv) of reference to flood risk and watercourse management as part of climate change mitigation and adaptation.
- Historic England (PD110) welcome this policy, in particular the recognition (in paragraph 10.2) that GI can include historic environments.
- Natural England (PD2762) sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife corridors which will obviously be affected by development.
- The Environment Agency (PD212 & PD213) supports the policy but suggest a number of modifications to the policy and supporting text.
- A land owner Colin Ford (PD178) considers the policy to be unsound as it does not acknowledge the potential for development to enhance existing ecological area and green infrastructure.
- CPRE (NE) (PD1181) sets out that a Natural Capital approach should be referenced in the plan, ensuring that development, where appropriate, takes it into account and applies its principles. Blue spaces needs to be mentioned in the Glossary.
- Church Commissioners For England (PD1790) set out that NE1 is considered to be unsound as there is a disconnect between the aspirations of the GI corridor locations and the developments proposed to come forward through the SHLAA. There is insufficient evidence in the Plan to justify the GI

network and as a result it is considered that the GI corridor shown on Figure 40 should be removed at Philadelphia.

- Persimmon Homes (PD4127) have concerns with the identification of a district corridor in Figure 40 around the village of Newbottle and intersecting with the western edge of Newbottle and Persimmon Homes' current development of North of Coaley Lane. The new development effectively joins Newbottle and Sunnyside and the characteristics of a district corridor no longer apply.
- Persimmon Homes (PD1961) also object to Policy NE1 on the grounds that development that incorporates GI and can maintain links through such corridors should be permitted and where GI can be enhanced through development this should be encouraged.
- Springwell Residents Association (PD5068) state sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife corridors which will be affected by development.
- Taylor Wimpy (PD3769) supports the policy as well as Figure 40 and paragraph 10.5.
- A resident (PD3250) supports Policy NE1, which reflects National Guidance in the NPPF.

The Council acknowledges support for the policy from Northumbrian Water, Historic England, Natural England, Taylor Wimpey and comment from a resident. In response to the representations raised by the Environment Agency (PD212 & PD213), the Council have proposed minor modifications as set out in the Schedule of Modifications (M45, M46, M48 & M73).

In response to the comment raised by the land owner, Mr Ford, the Council disagrees with this assumption and would reiterate that the policy states that in order to maintain and improve the GI network, development should address the points listed. At no point does this policy state that all development will have an adverse impact on green infrastructure. The Council would agree with Mr Ford's second point that it is possible for development to achieve net gains to GI corridors, but would reassert that the policy does not imply anything to the contrary.

In response to CPRE, the Council considers that the Plan (read as a whole) contains a full range of policies that address the needs of natural capital and will ensure that development, where appropriate, takes it into account and applies its principles. Bluespaces are now included in the Glossary.

In response to sites put forward by the Church Commissioners and Persimmon Homes, the Council does not feel it necessary to make any modifications to the Plan and to Figure 40 as the policy requirements are not considered to be onerous, and that the identified GI corridors are appropriate and are justified through the GI Strategy Framework. Further detail regarding the corridors can be considered in the forthcoming GI Delivery Plan and the Allocations & Designations Plan.

In relation to Persimmon Homes comment regarding incorporation of GI, the Council does not feel it necessary to make any modifications to this policy. The Council considers that the policy does not preclude development from within these corridors but seeks to protect corridor connectivity and function, and this approach follows NPPF paragraph 171 which states that Plans should "*take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure*". In this respect the Council does not support the objection and that the current policy wording is sound.

In relation to Springwell Residents Association comment, the Council has provided detailed responses regarding sites HGA1, HGA2 and HGA3 under Policy SS2 and considers that the impact to these corridors is minor and can be adequately mitigated for.

NE2 Biodiversity and Geodiversity

The following main issues were identified by representations to Policy NE2:

- Natural England (PD2751) sets out broad support for much of the policy including support for inclusion of net gains for biodiversity. However, find the policy overall to be unsound because it lacks a clear reference to the mitigation measures proposed in the Habitats Regulations Assessment, whilst there is uncertainty whether these measures can be delivered.
- Historic England (PD111) welcome the recognition that burial spaces are often of historic interest and included designated assets.
- Story Homes (PD5341) set out the policy is not sound as it is neither effective nor consistent with national policy. Paragraph 114 of the NPPF states that local planning authorities should plan positively for the "creation, protection, enhancement and management of networks of biodiversity and green infrastructure". Paragraph 10.14 should therefore be amended otherwise the policy as currently drafted is not sound.
- Bellway Homes (PD1970) does not object to principles of Policy NE2, however Part 4 is not considered to be consistent with the NPPF, which allows for adverse impacts where mitigation can be offered.
- Hellens Land Ltd (PD5080) and Taylor Wimpey (PD3784) set out general policy support but minor changes requested to NE2 (1) and (6), and state that paragraphs 10.14 and 10.5 conflict in relation to wildlife corridors and GI corridors.
- Siglion (PD3147) are concerned that the policy does not sufficiently outline the expectations of developers for applications that require a HRA. Similarly, it does not fully consider strategic priorities resulting in it failing to be effective.
- Church Commissioners of England (PD1795 & PD5249) considers the policy does not accord with national guidance- policy is too prescriptive with regards to net gains in biodiversity.
- Northumbrian Water (PD2656) state that the policy is not fully consistent with the NPPF- the NPPF does not require all planning proposals to provide a net increase in biodiversity, nor does it require proposals with less than significant adverse harm to biodiversity to be relocated on alternative sites.
- Burdon Lane Consortium (PD2679) welcome changes to Policy NE2 from the previous draft, but further minor changes are required to make policy effective.
- A landowner, Mr Ford (PD179), sets out that the policy is unsound as it is deficient in including a section which acknowledges this potential, and should be amended to encourage development which has the ability to deliver positive benefits to the biodiversity and geodiversity of the area.
- A resident (PD3251) supports the policy.

In response to the representations raised by Natural England (PD2751), the Council has proposed minor modifications as set out in the Schedule of Modifications (M49). The Council acknowledge the support from Historic England and from the local resident.

In response to Story Homes comment, the proposed changes to Policy NE2(6) and paragraph 10.14 are not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects. In response to the representations raised by the Church Commissioners (PD1795 & PD5249, Northumbrian Water (PD2656), Taylor Wimpey (PD3784) and Hellens Land (PD5080), the Council has proposed minor modifications as set out in the Schedule of Modifications (M47).

In response to Bellway Homes, the Council considers that part 4(i) and (ii) allows for development provided that the need for the development clearly outweighs the need to safeguard the intrinsic value of the site, and is in line with paragraph 113 of the 2012 NPPF.

In response to Siglion, the Council has undertaken HRA for all allocated sites for the Core Strategy, and as a result, 2 sites have been identified as having a potential impact on the European sites. Mitigation

measures has been identified for both of these sites and are included in the Core Strategy HRA. This Plan does not allocate housing- this will be addressed in full at the next Plan stage (Allocations & Designations), and will be supported by an appropriate strategic mitigation strategy for impacts on European designations.

In response to Burdon Lane Consortium (PD2679) the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policy NE1 and NE2. The additional text of criterion (6) of NE2 is not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects.

NE3 Woodlands/Hedgerows and Trees

The following main issues were identified by representations to Policy NE3:

- Persimmon Homes (PD4143) are concerned that no definition is given to what is considered to represent a significant tree, woodland or hedgerow.
- A resident (PD3254) supports the policy NE3, which reflects National Guidance in the NPPF.
- Taylor Wimpey (PD3807) supports the revisions to Policy NE3 and the supporting text.

In response to the representation made by Persimmon Homes, the Council does not propose to make any modification to the policy. This is because the CSDP Glossary already defines the term significant tree, that the policy provides detail in relation to woodland and to Tree Preservation Orders (TPOs), refers to the importance of hedgerows being defined by the Hedgerow Regulations 1997, and states that trees and hedgerows should be considered on individual merit as well as their contribution to amenity and interaction within the broader landscape setting. The Council acknowledges the support from Taylor Wimpey and the local resident.

NE4 Greenspace

The following main issues were identified by representations to Policy NE4:

- The Environment Agency (PD213) supports the policy and suggests that the policy also references bluespace in title/text to promote and strengthen the requirement and provision of bluespace.
- Miller Homes (PD894) support policy NE4 and the supporting evidence base.
- A resident (PD3255) supports Policy NE4, which reflects National Guidance in the NPPF.
- Hellens Land (PD5082), Taylor Wimpey (PD3807) Persimmon Homes (PD4149) and the Burdon Lane Consortium (PD2699) set out issues regarding Paragraph 10.25, stating it should recognise that SUDS and verges can provide natural greenspace within developments. Paragraph 10.25 is not reflective of household occupancy rates and should follow County Durham approach and to comply with tests within NPPF paragraph 56.
- In addition, Persimmon Homes (PD4119), Burdon Lane Consortium (PD2699) and Story Homes (PD5367) consider that the bedspace figures used in Paragraph 10.26 are too high and that average occupancy rates should be used.
- Barratt David Wilson Homes (PD1628) are concerned that Part 3 stem I) of Policy NE4 requires onsite greenspace of 0.9ha per 1,000 bedspaces, which would result in between a quarter and a third of potential housing sites being greenspace. The Policy is inconsistent with Policy ID2.
- Siglion (PD3033) state that the policy should be amended to place a stronger focus on the encouragement of delivering greenspace on sites for development where possible and practicable to do so and how any new greenspaces contribute and enhance existing facilities in the neighbourhood. Flexibility in the supporting paragraphs is also required so that SUDS can form part of the greenspace provision.

- CPRE North East (PD1195) states there is no consideration in this Policy or elsewhere in the Plan to Local Green Space as defined in the NPPF when designated in a Neighbourhood Plan. This should be addressed in the Core Strategy.

In response to the Environment Agency representation, the Council does not propose to make any policy modification, because the emphasis of the policy focuses on greenspace, whilst still informed by the principles of green and blue infrastructure. This matter has been accepted by both parties in a Statement of Common Ground. The Council acknowledges support from Miller Homes and the local resident.

In response to representations made by Hellens Land, Taylor Wimpey, Persimmon Homes, the Burdon Lane Consortium and Story Homes, the Council does not feel it necessary to make any modification to this policy. The Council considers that the provision within the policy relates to the provision of amenity greenspace, rather than natural greenspace, which neither conventional grass verges nor SUDs would normally provide. Furthermore, the Council reiterates that paragraph 10.25 refers to heavily engineered SUDs to not be included within the calculation, so does not necessarily discount all forms of SUDs from the calculation. The Council's ultimate aim is to ensure that developments come forward that provide amenity greenspace that local residents can use, enjoy and appreciate. The Council also considers that the approach in Policy NE4 and paragraph 10.26 is realistic, and that if developers advocate use of the County Durham methodology, the Council would need not only to adopt the household occupancy rate but also significantly raise the hectare/1000 population rate to be applied the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology.

In response to representations made by Barratt David Wilson Homes (PD1628), Taylor Wimpey (PD3820), Persimmon Homes PD4149), Burdon Lane Consortium (PD2699) and Story Homes (PD5367, the Council acknowledges that the table within paragraph 10.26 by revised to show that three bedroom dwellings equate to 4 bedspaces, which is set out in the Schedule of Modifications (M51).

In response to the representation made by Barratt David Wilson Homes regarding the high level of greenspace that would be required within potential housing sites, the Council disagrees with this conclusion and contends that a far lower percentage of housing sites would be given over to greenspace.

In response to representations made by Siglion, the Council does not feel it necessary to make any modification to this policy. This is because the policy allows for necessary flexibility in greenspace approach, particularly when sites lie in areas with existing high levels of greenspace quantity, and off-site provision or contributions may be deemed more appropriate to enable quality improvements to existing greenspace to take place.

In response to representations made to CPRE North East, no policy modifications are proposed. As the policy sets out, greenspace provision will be protected, conserved and enhanced, and any impact on greenspaces from proposed development will need to consider, amongst other things, the quality and local value of a greenspace site. This approach enables a more balanced and thorough investigation to be undertaken when assessing a site's special quality or local community significance, as opposed to designation of Local Green Spaces, which may only apply to a limited number of sites. The Allocations & Designations Plan will designate greenspaces.

NE5 Burial Space

No key issues were raised against policy NE5

NE6 Green Belt

The following main issues were identified by representations to Policy NE6:

- Ei Group (PD837) would like to see Copt Hill Public House removed from Green Belt and considered as a housing allocation.
- Siglion (PD2865) state that brownfield sites in the Green Belt should be given the same level of weight as those which are in settlement areas, provided that they have been assessed as compliant with other relevant policies.
- Historic England (PD112) welcome the recognition in part (iv) that the Green Belt is playing a purpose in preserving the setting and special character of conservation areas. This should be reflected in the site assessment contained in the Development Frameworks for Policy HG11.
- Mineral Products Association (PD4417) state it would be helpful if Policy NE6 or the supporting text reflected the wording of the NPPF and made clear which types of development are not inappropriate in the Green Belt.
- Ray Delaney (PD34) would prefer criterion 3 to be changed to 'will be permitted'.
- A landowner, Mr Gregson (PD312), sets out that Policy NE6 is not sufficiently flexible, and fails to identify and safeguard sufficient areas of land in Green Belt for future development. Further sites should be identified and safeguarded to meet needs arising beyond the plan period, particularly since the Green Belt has not been reviewed for almost 30 years in the city. 176 hectares of land at Burdon should be safeguarded.
- Hellens Land (PD5100) generally support the policy, but suggested that their land interest to the east of A19 at Middle Herrington should be removed from the Green Belt as the site represents an anomaly and makes no contribution to Green Belt purpose.
- CPRE North East (PD1203) Support for the policy, but there needs to be strategic and collective review of the Green Belt across the 5 Tyne and Wear Authorities to consider its future boundary, and to make consistent with the revised NPPF.
- Wynyard Homes (PD4705) supports policy NE6 which is consistent with the NPPF, but questions the need to release land from the Green Belt, when appropriate non-Green Belt sites are available, such as land at Quarry House Lane.
- Taylor Wimpey (PD3838) supports the policy and welcomes the revisions to policy NE6 and the supporting text which aligns with the requested changes submitted as part of their responses to the Draft CSDP, and policy E11 (as it was then referenced).
- Landowners, Ms Taylor and Ms McClelland (PD4369), state that the policy (and supporting Green Belt Reviews) recommend site deletions that do not take account or address the 5 purposes of Green Belt. There are no exceptional circumstances for justifying this as there are non-Green Belt sites available, including a site they put forward in Settlement Break at Houghton-le-Spring.
- A landowner, Mr Hutchinson (PD2053), agrees that there are exceptional circumstances to amend the Green Belt but disagrees with the exclusion of Glebe House Farm as an HGA.
- Springwell Village Residents Association (PD5081) set out that the Policy cannot be delivered if Sites HGA1,2 and 3 are removed from the Green Belt. The removal of these sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield and urban sites. Removal of these sites would also conflict with the requirement to preserve the setting and special character of Springwell Village.
- A land owner, Mr Ford (PD180), considers that Parcel 1 of the Settlement Break should be deleted as it does not form any of the functions of the Settlement Break nor does it contribute towards the GI network. It is considered that the Settlement Break Report is not robust, Mr Ford has put forward a site for development in Settlement Break to the north of Hetton Bogs.
- A significant number of number of residents/members of the general public objected to the policy and the removal of sites HGA1, HGA2, HGA3, HGA4 and HGA7 on the following grounds;

- The removal of HGA sites from the Green Belt is not justified or consistent with national policy;
- Removal of HGA sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield sites;
- The policy and HGA sites do not take account or address the 5 purposes of Green Belt and the exceptional circumstances do not justify their release as alternative non-Green Belt sites are available;
- Brownfield and empty homes should be used before Green Belt land;
- The evidence base to demonstrate the exceptional circumstances for Green Belt release or justify the boundary changes is not reliable;
- The removal of a policy from the Plan which sought to “preserve the setting and special character of Springwell Village”;
- Merges Springwell Village and Washington which is contrary to the purposes of Green Belt; and
- The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries;
- A landowner, Mr Delaney, objected to the words 'may be permitted' in criterion 3 and proposed that it be changed to 'will be permitted' to provide certainty.

In response to the various comments relating to proposals to take sites out of the Green Belt by landowners and developers, the Council does not feel it necessary to make any modifications and does not support the sites put forward. The Council has set out its spatial approach/justification to housing land supply and set out its approach towards allocating sites and safeguarding sites via 3 separate Green Belt Review papers, an Exceptional Circumstances Paper and a Green Belt Boundary Assessment.

In response to the various comments relating to proposals to take sites out of Settlement Breaks by landowners and developers, the Council does not feel it necessary to make any modifications and does not support the sites put forward. The Council has undertaken a Settlement Review and only sites which are considered fundamental have been retained within the Settlement Breaks. The Council has set out its spatial approach/justification to housing land supply and set out its approach towards allocating sites and safeguarding sites within the Green Belt via 3 separate Green Belt Review papers, an Exceptional Circumstances Paper and a Green Belt Boundary Assessment.

In response to representations made by Siglion, the Council does not feel it necessary to make any modifications because it is not the role of the CSDP to repeat the NPPF, which provides detail regarding the use of previously developed land (brownfield land) within the Green Belt.

In response to representations made by the Mineral Products Association, the Council does not feel it necessary to make any modifications because it is not the role of the CSDP to repeat the NPPF.

In response to the representations raised by Mr Ray Delaney (PD34), the Council has proposed minor modifications as set out in the Schedule of Modifications (M52).

In response to representations made by CPRE the Council has worked closely with neighbour local authorities to make them aware of potential changes to Sunderland's Green Belt. All of the Tyne and Wear local authorities (and County Durham) have considered (or are currently considering) their future Green Belt boundaries in relation to their own Local Plan, and have liaised with neighbour authorities on Green Belt matters. Sunderland's proposed changes impact on only 5% of the city's Green Belt, and these

changes seek to minimise impact to neighbouring authority areas and to minimise overall impact to Green Belt purpose.

In response to representations made by Springwell Village Residents Association and various other local residents the Council has taken into consideration the representations and is not proposing to make any modifications to this policy. The Council has set out its spatial approach/justification to housing land supply and this includes prioritising the development of brownfield land when preparing the plan, and considering the viability of a range of site typologies through the Viability Assessment. Further details are provided in the 3 Green Belt Review papers, the Exceptional Circumstances Report and the Green Belt Boundary Assessment.

NE7 Settlement Breaks

The following main issues were identified by representations to Policy NE7:

- A land owner, Mr Ford (PD180), considers that Parcel 1 of the Settlement Break should be deleted as it does not form any of the functions of the Settlement Break nor does it contribute towards the GI network. It is considered that the Settlement Break Report is not robust.
- Landowners, Ms Taylor and Ms McClelland (PD4398), propose a site for residential development within Settlement Break at Hutton Close, Houghton-le-Spring. It is considered that the loss of part of the settlement break would be a much more attractive and more reasonable alternative place for housing than the Green Belt.
- Story Homes (PD5432) is not opposed to the selective use of Settlement Breaks where justified. However, Settlement Breaks are a restrictive policy which is not prescribed in national policy. The NPPF seeks a more flexible and positive approach and proposed settlement breaks could preclude development on potential development sites which are sustainable. To ensure that Policy NE7 is sound, Story Homes proposed additional text be added to ensure the CSDP is positively prepared and effective.
- Persimmon Homes (PD4151) previously supported the review of Settlement Breaks as a means of identifying additional land supply. If Council is to retain Settlement Breaks it is correct to review these, especially if Green Belt deletion is proposed. However, Persimmon feel that Settlement Breaks as a tool are overly restrictive and preclude otherwise sustainable development from taking place. They are not endorsed nationally and their use should be reconsidered. As a minimum it should be made clear that if a five year supply cannot be evidenced that the policy is considered out-of-date. Persimmon supports the removal of area 4 from the High Dubmire/Dairy Lane/Houghton sub area and objects to the retention of area 5 of the Newbottle and Sedgeleth subarea. Overall Persimmon disagrees with recommendations of the Settlement Break Review.
- Wynyard Homes (PD4709) set out there is a degree of conflict between Policy NE7 and the NPPF as Settlement Breaks are not afforded the same level of protection. Consider that land at Quarry House Lane should not be included in the Settlement Break between East Rainton and Hetton-le-Hole. With significant buffer of tree planting, open grassland and wetland proposed housing could be developed without unacceptably impinging on the Settlement Break.
- Avant Homes (PD1503) states that the policy as it is not sufficiently flexible to enable sustainable sites to come forward during the plan period and is not in line with national policy. Avant suggest that the proposed Settlement Break area should exclude the site put forward by them beside Tunstall Hills.
- Hellens (PD4674) set out that the Settlement Break policy is a restrictive policy and not prescribed in national policy. The NPPF does not preclude development in open countryside, but encourages sustainable development. If the Settlement Break policy endures the consultee

requests that the boundaries are reviewed and based on logical boundaries. Hellens put forward a site at Broomhill to be excluded from Settlement Break.

- Residents (PD961 & PD1009) state that the revised boundaries of Settlement Breaks removes too much land, to the detriment of Settlement Break purposes.

In response to the various comments relating to proposals to take sites out of Settlement Breaks by landowners and developers, the Council does not feel it necessary to make any modifications and does not support the sites put forward. The Council has undertaken a Settlement Review and only sites which are considered fundamental have been retained within the Settlement Breaks. The Council has set out its spatial approach/justification to housing land supply and set out its approach towards allocating sites and safeguarding sites within the Green Belt via 3 separate Green Belt Review papers, an Exceptional Circumstances Paper and a Green Belt Boundary Assessment.

In response to the residents comments, the 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development.

NE8 Development in the Open Countryside

The following main issues were identified by representations to Policy NE8:

- Karbon Homes (PD3389) supports policy NE8 and the reference to rural exception sites, but to be effective it is necessary to provide more detail on rural exception sites and their potential contribution to affordable housing supply. Karbon considers it would be more appropriate to have a separate policy for rural exception sites.
- Taylor Wimpey (PD3854) and Hellens land (PD5119) objects to the policy because it could preclude development on sites which are sustainable. Taylor Wimpey propose that once a five year land requirement cannot be demonstrated that sustainable sites within open countryside be considered for development and this should be stated in the policy/supporting text.
- Story Homes (PD5447) recognises that the area of Open Countryside relates to a relatively small area of the City towards the south and west. However, policy NE8 could preclude development on sites which are sustainable and therefore object to the policy. National policy seeks a more flexible and positive approach.
- Persimmon Homes (PD4158) are concerned that the policy is overly restrictive and will potentially preclude the development of sustainable, edge of urban settlement sites.
- Harworth Estates (PD2094) objects to policy NE8 (and paragraph 10.37) on the grounds that the consultee's site beside Rainton Meadows (agricultural land /paddocks) is incorrectly identified as open countryside. However, the site is with the settlement boundary and is surrounded by built development. By designating a deliverable housing site on the edge of a business park as 'open countryside' the Core Strategy is conflicting with NPPF paragraph 21 and restricting growth in the area, and conflicts with "supporting a rural economy".
- A landowner, Mr Delaney (PD35), requested confirmation that the policy would not be applied in the Green Belt.

In response to representations made by Story Homes, Taylor Wimpey, Hellens Land, Harworth Estates and Persimmon Homes, the Council does not propose to make any modifications to this policy, or support any sites put forward within the identified area of open countryside. The Council has set out its spatial approach/justification to housing land supply and is supported by the Strategic Land Review, which demonstrates that all of these open countryside areas are remote and rural, with numerous physical and environmental constraints/features. These features help to create an overall area of higher landscape value and provide quality wildlife/Green Infrastructure corridors. They represent the least sustainable development areas in the city. It is not considered appropriate to develop land within the open countryside

which is to be protected and enhanced, when suitable measures are in place to assist in bringing forward house building if delivery is not in line with the target.

In response to the representation made by Karbon Homes, the Council does not feel it necessary to make any modifications to this policy. For the most part, Sunderland forms part of the Tyne and Wear urban conurbation, and few areas could be considered to be genuinely rural. Within the area of open countryside only minor hamlets exist, and these are isolated in nature. Neither could be considered sustainable development or justify a genuine need to provide affordable homes for families within these hamlets. The Council therefore concludes that the present Policy provides sufficient context at this strategic level, and that the issue will be considered further at the A&D Stage of the Plan.

In response to the representations made by Mr Delaney, the Council can confirm that NE8 applies to a specifically allocated area that is separate from the Green Belt.

NE9 Landscape Character

The following main issues were identified by representations to Policy NE9:

- Taylor Wimpey (PD3877) supports the revisions to Policy NE9 and the supporting text which aligns with the requested changes submitted as part of their responses to Draft CSDP, and Policy E16 (as it was then referenced).
- Historic England (PD113) welcome the reference to the Historic Landscape Characterisation Report within this section within para 10.46.
- A resident (PD3256) supports policy NE9, which reflects National Guidance in the NPPF.

The Council acknowledges the support set out above.

NE10 Heritage Coast

The following main issues were identified by representations to Policy NE10:

- Durham County Council (PD1396) welcomes policy NE10 which is consistent with Durham County Council's previous representations which recommended that the CSDP would benefit from a specific policy on the Heritage Coast.
- The Environment Agency (PD209 & PD210) supports the policy and suggests some minor amendments to incorporate estuary edge techniques to soften hard edges and create habitat to enhance coastal ecosystems where opportunities arise.

In response to the representations raised by Environment Agency (PD209 & PD210), the Council has proposed minor modifications as set out in the Schedule of Modifications (M54). This modification is the addition of some supporting text relating to estuary edge techniques and supporting habitat and coastal ecosystems. The Council acknowledge the support from Durham County Council.

NE11 Creating and Protecting Views

The following main issues were identified by representations to Policy NE11

- The National Trust (PD4056) strongly supports reference to the long distance and panoramic views of [and from] Grade I listed Penshaw Monument within the supporting text of policy NE11 and the acknowledgement that these views make a substantial contribution to the quality of environment. In this respect we welcome the protection from intrusive developments afforded to these exceptional views in paragraph 10.48.
- A resident supports (PD3257) supports policy NE11 as it reflect National Guidance and the NPPF.

- Taylor Wimpey (PD3878) supports the revisions to Policy NE11 and the supporting text which aligns with the requested changes submitted as part of our responses to Draft CSDP, and Policy E15 (as it was then referenced).
- Springwell Village Residents Association (PD5091) state that the policy at Site HGA1 conflicts with Policy NE11 due to the impacts on Hauler House and railway line of Bowes Railway SAM. The site would particularly conflict with Part 3 of the Policy.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to Springwell Village Residents Association, the Council considers that this comment relates more to Policy SS2 (HGA1) as opposed to the objectives of Policy NE11. The above impacts are discussed in detail in the Council's response to Policy SS2 (HGA1).

In response to Taylor Wimpey, National Trust, and the resident comment, the Council acknowledge the support.

NE12 Agricultural Land

The following main issues were identified by representations to Policy NE12

- CPRE North East (PD1221) supports the policy and puts forward that all Grade 2 agricultural land should be safeguarded from development. Furthermore, in line with NPPF paragraph 170, the benefits of Natural Capital needs to be considered in all cases where agricultural land is considered including lower grade land lying on the Magnesian Limestone Plateau.
- Taylor Wimpey (PD3892) supports the revisions to policy NE12 and the supporting text which aligns with the requested changes submitted as part of our responses to Draft CSDP, and Policy E16 (as it was then referenced).
- Natural England (PD2764) suggest the supporting text of Policy NE12 on Agricultural Land should make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land, in line with NPPF para 112.

The Council acknowledge the support of Taylor Wimpey. In response to the representations raised by Natural England, the two parties have agreed that such a reference would replicate NPPF policy, and have agreed that such reference is not required in the CSDP text.

In response to the representations raised by CPRE, the Council considers that no modification is necessary to the policy because that the proposals put forward are not in line with the NPPF which does not advocate safeguarding all Grade 2 agricultural land from development. There is no known evidence to justify the protection of lower grade land lying on the Magnesian Limestone Plateau.

Water, Waste and Energy

The following main issue was identified by representations to Chapter 11;

- Thompsons of Prudhoe consider that the chapter should address the management of all waste streams not just municipal waste (PD193).

The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. In response to Thompsons of Prudhoe, the Policies of the Plan deal with the management of all waste streams. Policy WWE8 indicates that the Council will safeguard all existing waste management sites from inappropriate development, not just those identified in Table 2.

WWE1 Decentralised, Renewable and Low Carbon Energy

The following main issues were identified by representations to Policy WW1

- CPRE North East is concerned that the plan does not designate areas that are suitable for wind energy or make clear if no areas are considered suitable (PD1421).
- A resident objects to the policy as the location of the proposed Renewable Energy Centre Washington conflicts with the policy (PD8205).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. With regards to the CPRE comment, the CSDP will be followed by an Allocations and Designations Plan (DPD) which will set suitable locations for wind energy development, where appropriate.

With regards to the resident comment, the policy sets an appropriate and justified approach to assessing decentralised, renewable and low carbon energy applications.

WWE2 Flood Risk and Coastal Management

The following main issues were identified by representations to Policy WW2

- Northumbrian Water support the policy (PD152).
- The Environment Agency supports but suggests a minor modification to make clear that development other than water compatible or essential infrastructure in Flood Zone 3b (Functional flood plain) would not be supported (PD215).
- Bellway Homes suggest that the policy should be amended to make clear that sites in higher flood risk areas can come forward subject to engineering solutions (PD1976).
- Taylor Wimpey and Hellens Land Ltd broadly support the policy but suggest that it could be amended to indicate that development can result in betterment for the site and surrounding area (PD3894 & PD5141)

The Council has not proposed any modifications, as a result of the comments above; however, modifications were made for clarity purposes. The policy is considered to be sound. With regard to the comment from the Environment Agency, the Council and Environment Agency have agreed through the signed Statement of Common Ground that no changes are required. With regard to Taylor Wimpey and Hellens Land comment, it is not considered necessary to set this detail out within the policy and background text.

In response to Bellway Homes, the CSDP sets out a justified approach to flood risk management. This approach does not preclude the possibility of development within high risk flood zones, but such proposals must meet provisions set by Policy WW2 and the plan as a whole.

WWE3 Water Management

The following main issues were identified by representations to Policy WW3

- The Environment Agency supports this policy (PD216).
- Northumbrian Water support the policy. However, they indicate that there is a need for a new storage reservoir in the Wearside Area and are concerned that there is no reference to this in the Plan. (PD152 & PD833).
- Story Homes, Burdon Lane Consortium, Taylor Wimpey and Hellens Land Ltd broadly support the policy but feel that it should be amended to improve flexibility and avoid duplication with Policy WWE2 (PD5372, PD2732, PD3904 & PD5152).
- The Wears Rivers Trust welcomes the Plan's supports the policy (PD1483).

The Council has not proposed any modifications, as a result of the comments above; however, a modification was made for clarity purposes. The policy is considered to be sound. The Council acknowledge support from the Environment Agency and Wears Rivers Trust.

In response to; Story Homes, Burdon Lane Consortium, Taylor Wimpey and Hellens Land Ltd the Council do not consider further changes are required. The Council consider the policy is sufficiently flexible and its policy scope is district to that of WWE2. In response to Northumberland Water; the Council has sought to address infrastructure requirements through the Infrastructure Delivery Plan with Northumbrian Water not expressing the need for a reservoir. In any event the Allocation and Designations Plan (DPD) will seek to allocate and designated land for the purposes of infrastructure requirements.

WWE4 Water Quality

The following main issue was identified by representations to Policy WW4

- The Environment Agency and Taylor Wimpey support the policy (PD211 & PD3914).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledges the support from the Environment Agency and Taylor Wimpey.

WWE5 Disposal of Foul Water

The following main issues were identified by representations to Policy WW5

- The Environment Agency supports this policy, but would like the policy to require any development proposing to discharge trade effluents to provide a Water Management Plan (PD217).
- Northumbrian Water broadly supports the policy, but would like it to also cover water treatment works (PD2669).

In response to the representation raised by the Environment Agency the Council have proposed a modification which will be put to the appointed planning Inspector during the examination. This was agreed within the Statement of Common Ground with the Council and the Environment Agency. In response to Northumbrian Water the policy deals with foul water disposal, rather than drinking water it is therefore not considered that any modifications are required to address the comments raised by the Northumbrian Water.

WWE6 Waste Management

The following main issues were identified by representations to Policy WW6

- Historic England support the policy (PD114).
- South Tyneside Council welcome the ongoing support to the South Tyneside and Wear Joint Municipal Waste Management Strategy (PD4424).
- Durham County Council suggest that further duty-to-cooperate discussions are held regarding the disposal of inert waste (PD1400).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council will undertake further duty-to-cooperate discussions with regard to the disposal of inert waste. Any necessary allocations will be made through the Allocations and Designations Plan. The Council acknowledges support from Historic England.

WWE7 Waste Facilities

No key issues were raised against policy WW7

WWE8 Safeguarding Waste Facilities

The following main issues were identified by representations to Policy WW8

- Durham County Council welcome amendments to the policy (PD1399).
- Thompsons of Prudhoe express concern regarding the loss of recycling capacity between 2020 and 2025. Would like to see Springwell Quarry identified as a safeguarded site (PD193).

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledge Durham County Councils comments. In response to Thompsons of Prudhoe, the policy safeguards all existing waste management sites. Any necessary allocations will be made through the Allocations and Designations Plan.

WWE9 Open Waste Facilities

The following main issue was identified by representations to Policy WW9

- Thompsons of Prudhoe concerned that the policy fails to acknowledge push by Government to recycle more (PD193).

The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. In response to Thompsons of Prudhoe the Plan already seeks to push the management of waste up the waste hierarchy.

WWE10 Energy From Waste

The following main issue was identified by representations to Policy WW10

- A resident objected to the policy on the grounds that the proposed Renewable Energy Centre in Washington conflicts with Policy WWE10 (PD8206).

The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. The comment relates to a planning application, rather than the policies of the Plan.

Sustainable Transport

The following main issues were identified by representations to the Sustainable Transport Chapter;

- South Tyneside Council (PD4451) welcomes policies within Chapter 12 and will continue to work with Sunderland in regards to development planning and traffic modelling.
- The Minerals Products Association (PD4433) identify that no indication is given of the likely resource requirements to deliver the infrastructure planned in the CSDP.
- One resident (PD8500) claims that the CSDP consultation was inadequate and cites a lack of basic facilities at Seaburn; bus services no longer using Park Lane Interchange; and traffic calming measures along the seafront as reasons for making representation.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by the Minerals Product Association, the Council does not feel it necessary to make any modifications. The Maintaining Levels of Minerals Supply Topic Paper and Local Aggregates Assessment provide an indication of the likely resource requirements. The Council will continue to work with neighbouring authorities on mineral planning issues through the North East Aggregates Working Party and will allocate any necessary sites through the A&D Plan.

In response to the representations raised by a resident the Council does not feel it necessary to make any modifications. The CSDP public engagement strategy was in accordance with the Council's statutory requirement as Local Planning Authority. The process is outlined in the CSDP Consultation Statement (2018).

SP10 Connectivity and Transport Network

The following main issues were identified by representations to Policy SP10

- A significant number of residents made representation to policy SP10 on the grounds that the identification of a road through Elba Park (Central Route) would;

- split the Green Flag Park into two;
- reroute traffic through existing neighbourhoods;
- adversely affect wildlife of which there are protected species and habitats;
- impact walking and cycling routes;
- reduce recreation/exercise areas;
- lead to more traffic congestion;
- increase levels of pollution;
- result in loss of greenspace which contributes to general wellbeing;
- impact on the quality of life of local residents (increased noise and speeding traffic);
- increase traffic on the A19 and A1; and
- Residents suggested an alternative alignment be explored alongside the Leamside Line away from existing residential development.
- Bellway Homes generally support policy SP10 and the Doxford-Ryhope link road but would like the alignment to be altered so that it does not impact their land interest. Burdon Lane Consortium support policy SP10 and the delivery of the Ryhope to Doxford Park Link Road.
- Durham County Council welcomes the safeguarding of the Leamside Line in Sunderland which complements the safeguarding of this line through the emerging County Durham Plan.
- Harworth Estates supports the safeguarding of Leamside Line. There is agreement with Network Rail to connect the Leamside Line to the national rail network at Pelaw and there is a working group established to consider this. One resident welcomes the Council's support for the expansion of the Metro system.
- CPRE North East suggests the policy should outline how the Leamside Line could be re-used in future. The policy could also set out how the Durham Coast line could be improved and provide more detail on how provisions for walking and cycling can be improved.
- Highways England suggested further modelling work is needed on the Strategic Road Network.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by a number of residents, the Council does not feel it necessary to make any modifications as the Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented. The planning permission includes mitigation through the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.

ST1 Urban Core Accessibility and Movement

The following main issue was identified by representations to Policy ST1

- Historic England (PD115) welcomes the intention to reduce the 'barrier' effect of the ring road, as set out in part (7).

No modifications proposed as a consequence of this representation

ST2 Local Road Network

The following main issues were identified by representations to Policy ST2

- Northumbrian Water (PD2714) supports the policy with amendments to the text to make the policy effective: *"where an existing access is to be used, substandard accesses will be, if possible, improved and/or upgraded in accordance with the current standards for the category of road;"*

- A significant number of residents/general public objected to the policy via Springwell Residents Association on the grounds it is at odds with Policies SS2 and SS3 as development at Springwell would have unacceptable adverse impacts on the Local Road Network.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by Northumbrian Water the Council does not feel it necessary to make any modifications as Policy ST2(2) provides a framework to assess all planning applications. All applications must satisfy points i) to vi), otherwise unacceptable impacts to the local road network would occur. The council considers it appropriate to retain the criteria within the policy to assess applications.

In response to the representations raised by Springwell Residents Association the Council does not feel it necessary to make any modifications. A Transport Assessment has been prepared for the Policy SS2 sites and for Policy SS3 and the findings will have to be implemented as the site comes forward. The noise that would be generated during the construction of the site would be temporary and hours of work can be controlled by condition on the planning application.

ST3 Development and Transport

The following main issues were identified by representations to Policy ST3

- Burdon Lane Consortium (PD2760) supports the policy with amendments to the policy text to be consistent with Paragraph 32 of the NPPF which relates to the residual impacts of development being severe. It is suggested that it is not clear what the Council's parking and home charging standards are. It is claimed highway mitigation is not always necessary prior to development taking place and it could affect site viability.
- Persimmon Homes (PD4159) points to inconsistencies between Policy ST3 and the NPPF. The tests in the policy could be amended to ensure consistency with the NPPF. The policy requirements for home charging apparatus could be clearer and it is not always necessary for mitigation to be provided before development commences.

The council acknowledges that highway mitigation is not always necessary prior to development taking place. In response to the representations raised by Persimmon Homes (PD4159) and Burdon Lane Consortium (PD2760), the Council has proposed additional modifications as set out in the Schedule of Modifications (M60).

Minerals

The following main issues were identified by representations to the Minerals Chapter;

- The Minerals Products Association object to the policies within the Minerals chapter, with the exception of Minerals Safeguarding, as they fall short of the requirements of the NPPF (PD4456).

The Council has taken into consideration the representations and are not proposing to make any modifications. It is considered that the policies are consistent with the NPPF and that any necessary allocations will be made through the Allocations and Designations Plan.

SP11 Mineral Extraction

The following main issues were identified by representations to Policy SP11:

- The Coal Authority support the policy (PD1252).
- The Environment Agency supports the policy with minor amendments (PD218).

- CPRE North East support the policy but would like reference to establishing liaison committees where appropriate (PD1379).
- The Minerals Products Association consider that the policy is weak and repetitive. It is considered that need for minerals is already established by evidence base, so should not be a policy requirement (PD4464, PD4361 & PD4456).

In response to the representations raised by the Environment Agency and the Minerals Product Association (PD218, PD4361 & PD4456), the Council have proposed minor modifications as set out in the Schedule of Modifications (M63). In response to the representations raised by the CPRE North East (PD1379), the Council have proposed minor modifications as set out in the Schedule of Modifications (M64).

With regard to the comments from the Minerals Product Association no further modifications are proposed as it is considered that the need for minerals may change during the plan period.

M1 Mineral Safeguarding Areas and Infrastructure

The following main issues were identified by representations to Policy M1:

- The Coal Authority supports the policy (PD1253).

No modifications proposed.

M2 Surface Coal Extraction

The following main issues were identified by representations to Policy M2:

- Durham County Council welcome the changes to the policy (PD1401).
- The Coal Authority supports the policy (PD1255).

No modifications proposed.

M3 Land Instability and Minerals Legacy

The following main issues were identified by representations to Policy M3:

- The Coal Authority support the policy (PD1256).
- The Minerals Products Association consider that the policy should be moved as it implies that the policy only relates to mineral development (PD4471).

In response to the representations raised by the Minerals Product Association, the Council have proposed minor modifications as set out in the Schedule of Modifications (M25).

M4 Restoration and Aftercare

No key issues raised to Policy M4

Infrastructure and Delivery

ID1 Delivering Infrastructure

The following main issues were identified by representations to Policy ID1

- Burdon Lane Consortium (PD2779) support the policy with amendments to make clearer that contributions will only be sought where they meet the tests provided in Regulation 122 of the CIL Regulations. Story Homes (PD5386) also state the policy is not consistent with the planning obligations test.

- Burdon Lane Consortium (PD2779, PD2760) and Story Homes (PD5386) suggested that point 2 of the policy is overly restrictive as it may not be feasible for the timing and prioritisation of the delivery of essential infrastructure to accord with the IDP.
- NHS Sunderland CCG (PD73) suggests the policy may not be effective, as the Infrastructure Delivery Plan and schedule needs updating in terms of Healthcare.

In response to the representations raised by Burdon Lane Consortium (PD2779) and Story Homes (PD5386) the Council has proposed an additional modification as set out in the Schedule of Modifications (M66 & M68). In response to the representations raised by Burdon Lane Consortium and Story Homes the Council does not feel it necessary to make any modifications to point 2 of the policy.

In response to the representations raised by NHS Sunderland CCG the Council does not feel it necessary to make any modifications as the IDP is a live document and will be reviewed annually and updated where necessary to ensure scheme timings and prioritisation are accurate and current. The Council have agreed a Statement of Common Ground (SoCG) with the CCG and the IDP is referred to in more detail within this document.

ID2 Planning Obligation

The following main issues were identified by representations to Policy ID2

- Bellway Homes (PD1986) suggest part 1 of the policy should make clear that it may not apply in all cases. Bellway suggests that the explanatory text regarding CIL in the supporting text should be in the policy. They recommend that the policy should also make clear that each site will be assessed on its merits.
- Burdon Lane Consortium (PD2800), Persimmon Homes (PD4160) and Story Homes (PD5421) suggest the use of planning obligation monitoring fees are not justified, not consistent with the NPPF and not necessary to make applications acceptable in planning terms and suggest reference to this is removed.
- Karbon Homes (PD3391) support the inclusion of point 3 to policy ID2, however they feel that the benefits of regeneration and meeting housing need in Paragraph 14.15 should be in the Policy. Due to uncertainty over grant funding and increased build costs planning obligations may become undeliverable. Further viability assessment should be undertaken to consider the viability of affordable schemes.
- NHS Sunderland CCG (PD74) objects to the policy as when viability issues arise, contributions should be apportioned with equal percentages towards the various infrastructures required to mitigate rather than prioritising those with priority needs.

The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representation raised by Bellway Homes, the Council considers paragraphs 14.12 to 14.16, provide sufficient clarity in regard to planning obligations and viability issues that may affect a proposals viability and deliverability and demonstrates that each proposal will be assessed on its merits. The Council also considers paragraph 14.11 should remain in the supporting text of the policy as it would reiterate existing national policy.

In response to the representation raised by Burdon Lane Consortium , Persimmon Homes and Story Homes the Council considers it appropriate and justified to seek monitoring fees and provides justification in the Infrastructure Compliance Paper.

In response to the representation raised by Karbon Homes the Council does not consider it appropriate to include specific reference to "regeneration" and "housing need" within the policy, as they are identified within paragraph 14.15 for example only. Inclusion within the policy would serve to exclude other infrastructure requirements.

In response to the representation raised by NHS Sunderland CCG the Council consider as the infrastructure needs of an area vary throughout the city and may change over time, that it would not be appropriate to establish a prescriptive approach for Planning Obligations.

Appendices

The following main issues were identified by representations to the Appendices:

Appendix 2

- Sport England does not consider that the Council have an up-to-date Built Sports Facilities Strategy (PD4462).
- Natural England consider that the Sustainability Appraisal should take account of HRA mitigation. Suggest using monitoring indicators which take account of the effects of the plan, rather than wider issues (PD2787 & PD2808).
- & H Properties consider that a HRA for the whole city is undertaken (PD4250).
- A resident objects to the inclusion of Site 87 as deliverable housing site in the SHLAA (PD290).
- Two residents consider that Site 464B should be included as a firm proposal in the SHLAA and not a windfall site (PD282 & PD283).
- The Environment Agency would like the SFRA Level 1 and SFRA Level 2 documents to be submitted as part of the evidence base and support the Green Infrastructure Strategy (PD206).
- A resident indicated that the Schedule of Representations was not published in time as part of the evidence base (PD3239). Miller Homes support the inclusion of land at South Bents in the SHLAA (PD888).

The Council have an up-to-date Built Sports Facility which forms part of the submitted evidence base.

The Council has submitted the SFRA Level 1 and Level 2 as part of the evidence base.

Appendix 3

- Mineral Products Association consider that Appendix 3 would benefit from identifying the existing mineral infrastructure sites (PD4473).

In response to the representations raised by the Minerals Product Association, the Council have proposed minor modifications as set out in the Schedule of Modifications (M70 and M71).

Appendix 5

- Mineral Products Association consider that the scale of information goes beyond that required for restoration (PD4477).

In response to the representations raised by the Minerals Product Association (PD4477), the Council have proposed minor modifications as set out in the Schedule of Modifications (M65).

In response to the representations raised by Natural England, the Council have updated the Monitoring Framework.

Glossary

The following main issues were identified by representations to the Glossary:

- Sunderland NHS CCG would like a definition for local services to be included (PD71).
- A resident would like a definition for executive homes and self-build dwellings to be included (PD37).
- The Environment Agency suggested a spelling correction for Magnesian Limestone (PD218)

In response to the representations raised by Sunderland NHS CCG, the Council have proposed minor modifications as set out in the Schedule of Modifications (M76).

In response to the representations raised by a resident, the Council have proposed minor modifications as set out in the Schedule of Modifications (M79).

In response to the representations raised by the Environment Agency, the Council have proposed minor modifications as set out in the Schedule of Modifications (M77).

