

DEVELOPMENT
MANAGEMENT
SUPPLEMENTARY PLANNING
DOCUMENT

Consultation Statement

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Introduction

The Town and Country Planning (Local Planning) (England) Regulations 2012, requires that before a local planning authority adopt a supplementary planning document it must prepare a statement setting out:

- i. the persons the local planning authority consulted when preparing the supplementary planning document;
- ii. a summary of the main issues raised by those persons; and
- iii. how those issues have been addressed in the supplementary planning document.

This Consultation Statement sets out details of the consultation Sunderland City Council has undertaken in the preparation of the Development Management Supplementary Planning Document (DM SPD).

What is the Development Management Supplementary Planning Document

SPDs add further detail to the policies in Development Plans. They can be used to provide further guidance for development on specific sites or on particular issues, such as design. SPDs are capable of being a material consideration in planning decisions but are not part of the development plan.

Sunderland's Local Plan consists of three development plans, the Core Strategy and Development Plan (CSDP) (adopted 2020), the Allocations and Designations Plan (emerging) and the International Advanced Manufacturing Park (IAMP) Area Action Plan.

The purpose of the Development Management SPD is to provide additional detailed planning guidance in relation to household extensions and alterations, urban design, parking standards and advertisements. The SPD provides additional guidance to the policies identified below:

HS1 Quality of Life and Amenity

1. Development must demonstrate that it does not result in unacceptable adverse impacts which cannot be addressed through appropriate mitigation, arising from the following sources:
 - i. air quality;
 - ii. noise;
 - iii. dust;
 - iv. vibration;
 - v. odour;
 - vi. emissions;
 - vii. land contamination and instability;
 - viii. illumination;
 - ix. run-off to protected waters; or
 - x. traffic.
2. development must ensure that the cumulative impact would not result in unacceptable adverse impacts on the local community; and
3. development will not normally be supported where the existing neighbouring uses would unacceptably impact on the amenity of future occupants of the proposed development.

BH1 Design Quality

To achieve high quality design and positive improvement, development should:

1. create places which have a clear function, character and identity based upon a robust understanding of local context, constraints and distinctiveness;
2. maximise opportunities to create sustainable, mixed-use developments which support the function and vitality of the area in which they are located;
3. be of a scale, massing, layout, appearance and setting which respects and enhances the positive qualities of nearby properties and the locality;
4. retain acceptable levels of privacy and ensure a good standard of amenity for all existing and future occupiers of land and buildings;
5. promote natural surveillance and active frontages, including the provision of appropriate lighting, to assist in designing out crime;

6. clearly distinguish between public and private spaces, including appropriate use of hard and soft boundary treatments which reflect the character of the area;
7. create visually attractive and legible environments through provision of distinctive high quality architecture, detailing, building materials;
8. provide landscaping as an integral part of the development including retaining landscape features and reflecting surrounding landscape character and where appropriate and viable, the enhancement and upgrading of public realm and existing green infrastructure;
9. maximise the opportunities for buildings and spaces to gain benefit from sunlight and passive solar energy;
10. avoid, where possible, disruption to established views of important buildings, structures and landscape features;
11. in the case of tall buildings, form a positive relationship with the skyline and topography of the site and the surrounding area;
12. create safe, convenient and visually attractive areas for servicing and parking which does not dominate the development and its surroundings;
13. encourage durability and adaptability throughout the lifetime of the development to accommodate a range of uses; and
14. from 1 April 2021, meet national spaces standards as a minimum (for residential).

Large-scale developments should be supported by detailed Masterplans or development frameworks, and where appropriate, design codes.

BH2 Sustainable Design and Construction

Sustainable design and construction should be integral to development. Where possible, major development (as defined in the 2019 Framework) should:

1. maximise energy efficiency and integrate the use of renewable and low carbon energy;
2. reduce waste and promote recycling during construction and in operation;
3. conserve water resources and minimise vulnerability to flooding;
4. provide details of the type of materials to be used at the appropriate stage of development;
5. provide flexibility and adaptability, where appropriate, allowing future modification of use or layout, facilitating future refurbishment and retrofitting;
6. include opportunities to incorporate measures which enhance the biodiversity value of development, such as green roofs;
7. include a sustainability statement setting out how the development incorporates sustainable resource management and high environmental standards; and
8. maintain an appropriate buffer between sensitive development and existing waste water treatment works to ensure amenity and operational continuity, in accordance with Government Code of Practice guidance.

BH4 Advertisements

Development for advertisements should:

1. be well designed and sympathetic to the character and appearance of their location and the building to which they relate, having regard to matters such as size, materials, construction, location, level of illumination and cumulative impact with other signage on the building and within the vicinity; and
2. for illuminated advertisements and signs, not adversely affect the amenity and/or safety of the surrounding area.

ST3 Development and Transport

Development should:

1. provide safe and convenient access for all road users, in a way which would not:
 - i. compromise the free flow of traffic on the public highway, pedestrians or any other transport mode, including public transport and cycling; or
 - ii. exacerbate traffic congestion on the existing highway network or increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists and other vulnerable road users;
2. incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network;
3. submit an appropriate Transport Assessment/Transport Statement and a Travel Plan. This must demonstrate that appropriate mitigation measures can be delivered to ensure that there is no detrimental impact to the existing highway;

4. include a level of vehicle parking and cycle storage for residential and non-residential development, in accordance with the council's parking standards;
5. provide an appropriate level of electric vehicle parking and charging infrastructure for commercial and non-residential development to suit site specific requirements, and make provision for the installation of home charging apparatus on major residential schemes; and
6. safeguard the existing network of Definitive Public Rights of Way. If this cannot be accommodated, then a diversion and/or alternative route shall be provided.

Consultation on the Development Management SPD

The Council, in accordance with the Statement of Community Involvement has undertaken two rounds of public consultation.

Stage 1 – Development Management Scoping report	21 September 2020 to 19 October 2020
Stage 2 – Development Management Draft SPD	18 December 2020 to 12 February 2021

Persons the local planning authority consulted when preparing the supplementary planning document

At both stages, the Council wrote to all persons on the Local Plan Database, this includes statutory consultees, general consultation bodies and those who had previously expressed an interest in the Local Plan. Copies of the correspondence inviting persons to make representations on the SPD is included in Appendix 1.

Consultation at each stage

Stage 1 Scoping Report

Public consultation on the DM SPD Scoping Report took place over a four-week period, commencing on Monday 21st September 2020 and finishing on Monday 19th October 2020.

The consultation on the Scoping Report included writing to all consultees in the Local Plan database (Appendix 1) publishing the SPD and supporting documents on the Council's website and making available to view the Scoping Report at Sunderland Civic Centre between the hours of 8.45am and 5.15pm, Monday to Thursday; and 8.45am and 4.45pm on Friday. A statement of representation procedure was published within the correspondence sent out and on the Council's website. The statement detailed when representations could be made, the deadline for making representations, how consultees could make representations and where and at what times consultation documents were available for the public and interested parties to view.

In total, representations from 4 consultees were received. In summary the only substantive comment made during this consultation was in relation to sewerage capacity relating to potential development sites within the Urban Core.

Table 1 summaries the representations received. All representation were taken into consideration when preparing the Draft DM SPD.

Stage 2 Draft SPD

Public consultation on the Draft DM SPD took place over an eight-week period, commencing on Friday 18 December 2020 and ending on Friday 12 February 2021.

The consultation on the Draft SPD included writing to all consultees in the Local Plan database (Appendix 1) publishing the SPD and supporting documents on the Council's website and making available to view the Draft SPD at Sunderland Civic Centre between the hours of 8.45am and 5.15pm, Monday to Thursday; and 8.45am and 4.45pm on Friday. A statement of representation procedure was published within the correspondence sent out and on the Council's website. The statement detailed when representations could be made, the deadline for making representations, how consultees could make representations and where and at what times consultation documents were available for the public and interested parties to view.

In total, representations from 11 consultees were received. Table 2 summaries the representations received. All representations were taken into consideration when preparing the final DM SPD for adoption.

A summary of the main issues raised by those persons and how those issues have been addressed in the Supplementary Planning Document

Table 1: Stage 1 Development Management Scoping Report SPD

Consultee	Summary of Representations	Council's Response
Coal Authority	No specific comments.	Comments noted.
Historic England	No specific comments. Look forward to engaging with the Council during the preparation of the SPD.	Comments noted.
Highways England	No Specific comments to make at this stage but look forward to future engagement particularly with regard to parking standards and home working.	Comments noted.
Bob Latimer	Neither the sewerage network or Hendon sewage Treatment Works have the capacity to manage sewerage flows from developments within the Urban Core.	These comments relate to the Riverside Sunderland SPD which was being consulted upon at the same time at the DM SPD Scoping Report.
Bob Latimer	Neither the sewerage network or Hendon sewage Treatment Works have the capacity to manage sewerage flows from developments within the Urban Core. Concerned that the proposals would result in more foul discharges into the sea at Seaburn and Whitburn.	These comments relate to the Riverside Sunderland SPD which was being consulted upon at the same time at the DM SPD Scoping Report.

Table 2: Stage 2 Draft Development Management SPD

Consultee	Summary of Representations	Council's Response
Highways England	At paragraph 3.17 HE request text which helps to encourage working from home and thereby reducing the need to travel. HE suggest; a super-fast fibre broadband connection for all dwellings, inclusion of an office/working from home space rather than, or in addition to a garage; and secure, dedicated place to store bicycles/scooters for dwellings of all sizes.	The Council have a supportive planning policy set out CSDP BH6: Quality Communications which supports the delivery of high-quality digital infrastructure. Consequently, it is not considered necessary for a similar requirement within the DM SPD. In addition, the Council are committed to improving high speed access to the internet as part of its City fibre plans. Ductwork is planned to be installed within new Council led highway schemes to help enable future expansion of the network.
Highways England	At paragraph 3.29 HE suggest that a balance needs to be sought between encouraging/facilitating multi-car households and reducing on-street parking/pavement parking. Consequently, it is recommended that the same number of car parking spaces is available prior to extending should be maintained and/or the number provided should be relative to the ultimate size of the property/number of bedrooms.	The Council have made amendments to paragraph 3.29 to highlight that the LPA would expect alterations to a dwellinghouse to maintain a level of parking in accordance with the parking standards as set out in the DM SPD (Section 8).
Highways England	HE recommend that the Design Process diagram (page 23) under stages 2 and 3, includes more specific reference to reducing the need to travel by car, proximity planning, the availability of amenities, accessibility and connectivity via sustainable travel modes.	It is considered that the design process diagram as drafted is appropriate and draws out the main components of the design process.
Highways England	HE support the advice provided in this section 5.8 and would emphasize that public open space/amenity greenspaces will be even more important in post-Covid environment.	The Council note the comments made.
Highways England	HE is very supportive of the guidance provided in paragraphs 6.1 – 6.8.	The Council note the comments made.
Highways England	HE suggest at paragraph 7.11 that communal cycle storage where on plot provision is unachievable' should be essential not just given 'consideration'. Free, secure cycle parking provision should be prioritised over any car parking in areas of high density living.	The Council consider that the existing wording is sufficient to promote cycling within development.
Highways England	HE recommend (at paragraph 7.11) that access and main entrances to buildings give priority to active modes over motor vehicles. In addition, that the access points are well connected and way finding signage clearly directs people arriving at/leaving the development to nearby public transport stops and interchanges, amenities and landmarks via walking and cycling routes. Also, communal entrance spaces should provide areas for sustainable travel information and maps.	The Council has set out new text at paragraph 7.11 in the 'we advise you subsection' to address this comment
Highways England	HE state more importance should be given (at paragraph 7.15 and 7.16) to smarter homes and sustainable low carbon developments.	It is considered that the SPD sets out sufficient guidance in relation to smarter homes and sustainable low carbon developments as set

	HE suggest a range of possible subsections and content in including; reducing the need to travel, planning for homeworking, minimal levels of accessibility, incorporation of active travel neighbourhoods, 20-minute neighbourhoods, 15-minute city principles, mobility and flexible working hubs, implementation of ambitious and robust travel plans.	out in paragraphs 7.15 and 7.16. Moreover, the Council's Local Plan provides a sustainable strategy of growth and the policies within the plan seek to reduce the need to travel and support sustainable and active transport modes. Consequently, it is not considered that changes suggested are required.
Highways England	In section 8, HE suggest that the requirement to provide electric vehicle charging (EV) should be stronger and clearer. Also, HE request more guidance is provided on the levels of EV charging required at non-residential developments, potentially as a ratio of gross floor area as part of car parking standards.	It is considered that the Council already have a positive planning policy which sets out the need to provide a level of electric vehicle charging at CSDP Policy ST3, however additional text has been provided to encourage EV charging points to be delivered as part of development schemes.
Highways England	In relation to residential developments, HE suggest that wherever possible, residential developments should include one charger per parking space/dwelling.	It is considered that the Council already have a positive planning policy which sets out the need to provide a level of electric vehicle charging at CSDP Policy ST3. It is therefore not considered for additional criteria, however additional text has been provided to encourage EV charging points to be delivered as part of development schemes.
Highways England	HE suggest that one car parking space per one-bedroom dwelling is excessive, particularly in areas of high accessibility.	The Council consider that in general the level of parking is proportionate and reflects sustainable transport opportunities in Sunderland. However, the standards have been updated to reflect that there are no parking requirements for 1 space dwelling unit within the City Centre Parking Zone which is a highly accessible location.
Highways England	HE recommend that if a site achieves a 'low' accessibility score, efforts should be made (and documented in the site Transport Assessment) to improve its accessibility.	The Council have added new text at paragraph 8.3 which reflects the suggestion made.
Highways England	HE state the score for residential development with an accessibility level of low or medium has been omitted from the document.	It is noted that the draft version of the SPD omitted 'the low level' for the Residential Accessibility Questionnaire. This has now been added.
Highways England	HE state that Annex A of DfT Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development' should be referenced in the Advertisement Section. In addition, HE suggest that text should be included which states developers are advised to HE as well as the Local Highway Authority about any proposals for advertising or signs near to the SRN.	The SPD has been updated to reference this within the Advertisement Section (Section 9).
BBGA	The BSGA consider that section 5 (Advertisements) fairly reflects the requirements of the law and national policy and procedural advice. In addition, the BSGA suggest the document is reviewed to put "its" and "their" in the proper place according to the number of the subject (e.g. 9.6 "Proposed advertisements ... its setting").	The Council have revised text to improve the readability of paragraph 9.6.
BBGA	The consultee makes the following suggestion at paragraph 9.10 "where motorists need to take care" would be better expressed as "where motorists need to take more care".	The SPD has been updated so that the word 'more' is added to paragraph 9.10 as suggested.

BBGA	To align with the PPG, the consultee makes the suggestion that the document at paragraph 9.1 or 9.2 references the MHCLG Outdoor Advertisements and Signs – A Guide for advertisers”.	The SPD has been updated so that the guide is referenced at paragraph 9.2
Sports England	Sport England give broad support to a range of principles set out in the SPD.	The Council acknowledge the broad support.
A Carr	There will be many instances where a Design and Access Statement is not required. Therefore, to ensure accuracy and consistency, the wording should make reference to the applications where Design and Access Statements are required as per the guidance contained within NPPG. Modification sought: Clarification required on when Design and Access Statements are required.	The Council have added the word ‘where’ to acknowledge that Design and Access Statements are not always required. However, it is not considered that this SPD should set out in what circumstances a Design and Access Statements is required.
A Carr	In relation to the Creating a Distinctive Identity and Character subsection It would be helpful to be provided with more examples of the ‘rich heritage’, and local distinctiveness. Delivering this is just as much about the process between developer and the LPA, so an outline of how the LPA can help input into this process would also be helpful. A series of case studies could be an effective way of presenting this. Modification sought: Clarification required on how to achieve a distinctive identity and character using case studies where possible.	It is not considered necessary for additional examples to be provided. The onus is on the developer to align proposals with the principles of the DM SPD. In addition, Conservation Area Character Appraisal Management Strategies provide helpful examples for proposals which fall within Conservation Areas.
A Carr	Detailed Design Aspects of Residential Developments - Whilst the points made in relation to ‘facades and detailing’, ‘corner treatments’ and ‘materials’ are helpful, they fail to include local examples. There is an opportunity for the Council to provide further information/examples for developers to use in their design evolution. Modification sought - further information and local examples required to help guide developers.	It is not considered necessary for additional examples to be provided. The onus is on the developer to align proposals with the principles of the DM SPD. In addition, Conservation Area Character Appraisal Management Strategies provide helpful examples for proposals which fall within Conservation Areas.
A Carr	The stated separation distances are useful, and it is reassuring to note that there is some flexibility in the text, recognising that there may be instances where a reduction is acceptable. The document states, ‘for every 1m in difference of ground levels add 2m to the horizontal difference.’ We would emphasise the need to treat this approach with caution as a 3 metre difference in ground levels would require an additional 6 metres adding to the separation distance, which would mean 27 metres between main facing windows. There is a point where increasing the separation distance adds no real value to the real objectives the guidance is trying to achieve (e.g. avoiding overlooking, loss of privacy). Modification sought: Recognition that separation distances are purely a guide which needs to be balanced against all other considerations.	The SPD already sets out at paragraph 5.23, that where separation standards aren’t achieved, proposals will be determined on their individual merits. It is considered that this offers the sufficient level of flexibility.
Avant Homes	The consultee requests local examples of ‘facades and detailing’, ‘corner treatments’ and ‘materials’. The consultee states there is an opportunity for the Council to provide information/examples for developers to use in their design evolution, without being overly prescriptive.	It is not considered necessary for additional examples to be provided. The onus is on the developer to align proposals with the principles of the DM SPD. In addition, Conservation Area Character Appraisal Management Strategies provide helpful examples for proposals which fall within Conservation Areas.

Avant Homes	Suggests that more detail and examples are provided of what makes the identity and character of Sunderland distinctive.	It is not considered necessary for additional examples to be provided. The onus is on the developer to align proposals with the principles of the DM SPD. In addition, Conservation Area Character Appraisal Management Strategies provide helpful examples for proposals which fall within Conservation Areas.
Avant Homes	Design and Access Statements are not always required. The SPD should be amended to make clear when Statements are needed.	The Council have added the word 'where' to acknowledge that Design and Access Statements are not always required. However, it is not considered that this SPD should set out in what circumstances a Design and Access Statements is required.
Avant Homes	Use of porous or permeable materials may not always be the most appropriate solution. A balance needs to be achieved between SUDs and development requirements.	Paragraph 3.17 sets out developers should consider permeable paving, in addition, paragraph 3.32 strongly encourages the use permeable materials. Consequently, it is considered there is sufficient flexibility within the SPD where permeable paving is not considered appropriate.
Avant Homes	Supports flexibility in separation distances. Suggest that additional flexibility is provided with regard to separation distances with ground level change, so that it is balanced against other considerations	The SPD already sets out at paragraph 5.23, that where separation standards aren't achieved, proposals will be determined on their individual merits. It is considered that this offers the sufficient level of flexibility.
Transport North East	The emphasis in the SPD on prioritisation of non-car modes is welcomed, as is the proposed linkage to parking provision at new developments to levels of public transport accessibility. This should help to sustain and develop the city's public transport network and contribute to the goal of achieving a carbon neutral North East. Transport North East also welcome the guidance encouraging the creation of a well-connected, safe, attractive and permeable network of streets, with public green space and protection of biodiversity – this will encourage active travel modes and support the objectives to create a healthier, carbon-neutral region with appealing sustainable transport choices.	The Council acknowledge the support.
Homes England	Homes England have no specific comments to make on the document but welcome the strong design emphasis contained within the SPD.	The Council acknowledge the support.
Taylor Wimpey	Taylor Wimpey believe the requirement to add 2m for every 1m change in ground levels is very onerous. Sunderland's topography is challenging and will add a significant policy constraint which could reduce the development capacity on land. Durham County Council applies a similar approach, but the requirement is to add 1m for every 1m change in ground levels. Taylor Wimpey considers this is a more reasonable standard to apply in Sunderland and it would also be consistent with the adopted guidance in County Durham.	The SPD already sets out at paragraph 5.23, that where separation standards aren't achieved, proposals will be determined on their individual merits. It is considered that this offers the sufficient level of flexibility
Taylor Wimpey	Taylor Wimpey highlight that it is often good practice to reduce front to front separation distances in order to emphasise an entrance to a street, provide containment and to help control vehicle speeds. Taylor Wimpey considers that the important factor to consider is the	The SPD already sets out at paragraph 5.23, that where separation standards aren't achieved, proposals will be determined on their

	amenity space that is afforded within the homes and private external spaces. They suggest it important that separation distances are provided as a guide with sufficient flexibility for architects and urban designers to deliver their own vision and design principles within a development. In addition, Taylor Wimpey also note that the NPPF requires policies and decisions to promote the effective use of land and such standard if imposed without any flexibility can reduce the capacity on sites.	individual merits. It is considered that this offers the sufficient level of flexibility.
Taylor Wimpey	The Council has concluded that a Sustainability Appraisal is not required to assess the requirements set within it. The encouragement to provide porous paving is different to most of the other design standards in the SPD as it relates to water entering the ground. The emphasis on porous paving has evolved since the CSDP was prepared and examined and therefore the Taylor Wimpey does not consider that it has been fully assessed in the Sustainability Appraisal.	Paragraph 3.17 sets out developers should consider permeable paving, in addition, paragraph 3.32 strongly encourages the use of permeable materials. Consequently, it is considered there is sufficient flexibility within the SPD where permeable paving is not considered appropriate. As paragraph 1.3 highlights SPDs generally do not require the preparation of a SA as they provide additional planning guidance building upon planning policies contained within an adopted Plan. The Council has consulted with the statutory agencies and the requirement for a SA of the SPD has not been identified.
Taylor Wimpey	The maintenance of porous paving is a key concern in private areas of developments which are not covered by maintenance regimes. Therefore providing porous paving would conflict with the wording of CSDP policy WWE4, which requires whole life management and maintenance. The housebuilder therefore has significant concerns regarding the effectiveness of porous paving as part of a SUDS strategy for the life of the development and recommends it should not be imposed as a requirement.	Paragraph 3.17 sets out developers should consider permeable paving, in addition, paragraph 3.32 strongly encourages the use of permeable materials. Consequently, it is considered there is a sufficient level of flexibility within the SPD where permeable paving is not considered appropriate.
Taylor Wimpey	The approach to add 1m for every 1m change in levels to side/gable elevations is also not justified as a standard approach as there would no risk of overlooking. Whilst Taylor Wimpey acknowledge the potential for increased or decreased overbearing, there are other considerations such as orientation, building height, roof profile, etc which can be designed to minimise this. Again, this reiterates the need to view any distances as guidance only	The SPD already sets out at paragraph 5.23, that where separation standards aren't achieved, proposals will be determined on their individual merits. It is considered that this offers the sufficient level of flexibility.
Taylor Wimpey	Taylor Wimpey does not oppose the parking standards. However, there is some uncertainty due to the variations based on the accessibility score. Taylor Wimpey deem the approach to be sensible on the face of it but can foresee different ways of interpreting the assessment and potential for disagreement on a matter where there needs to be clarity at an early stage in the design process. For instance, when measuring the distance to the nearest bus stop, is this measured from the site boundary or could different parts of the same site be subject to different parking standards? An alternative approach which would provide more	It is considered that the guidance provides sufficient clarity. With regard to the specific instance identified, the guidance sets out at Appendix 1 that the measurement would generally be taken from the centre of the site.

	certainty would be to include a map which clearly identifies the high, medium and low areas.	
Taylor Wimpey	Taylor Wimpey consider the preferred approach to avoid a street scene which is dominated by parked vehicles, too challenging as the parking standards for both on plot spaces and visitor parking spaces is designed to avoid ad-hoc street parking. Taylor Wimpey's approach is to include a range of house types on its sites and this includes dwellings with integral parking and side parking. This approach requires more space which, coupled with the other design requirements, such as overly onerous separation distances identified in the DM SPD, results in an inefficient use of land which is contrary to part 11 of the National Planning Policy Framework (NPPF). To achieve the required densities on sites, compliance with the separation distances as currently drafted is likely to mean that there is less space for dwellings with side parking and this requirement could be to the detriment of more car dominant street scenes. To address this point, the parking and other design requirements need to be sufficiently flexible so that they do not compete or conflict to a point where developments are unviable due to an ability to achieve sufficient density of dwellings.	The importance of a coherent street scene is articulated within the SPD at section 6. It is not considered that the guidance would render inefficient use of space. On the contrary, the guidance reinforces the importance of good design and seeks to ensure legible streets for all. It is considered that there is sufficient flexibility built into the guidance.
Taylor Wimpey	Taylor Wimpey acknowledges the intentions to incorporate tree planting and landscaping adjacent to roads in order to create attractive street scenes. However, such requirements need to be balanced with other design requirements and trees will be challenging to accommodate if the Council maintains its current approach to separation distances. Resulting implications for imposing the separation distances as currently drafted will mean that dwellings will need to be situated closer to the road edge which limits the opportunities for both front gardens and other landscaping.	It is considered that separation distances would not preclude street trees and that the guidance would be in broad alignment with proposed changes to the NPPF regarding street trees.
Taylor Wimpey	The SPD includes a requirement for 14m separating a main facing window with a side (gable) elevation. This relates to 1 and 2 storey dwellings. This standard is high and potentially onerous whereas 12m separation has been the standard guidance for some time. For instance, in a comparable situation (main elevation to side), Durham County Council's standards are 13m for 2 storey dwellings and 10m for 1 storey dwellings. Taylor Wimpey request that this is also amended to align with the approach taken in neighbouring County Durham. The representation wishes to add the following text: "The Council will consider the application of separation distances on a site by site basis and, where justified, will accept some instances where it is not possible to fully meet the standards."	The separation distances are consistent with those used by the Council for a number of years and are considered appropriate. Notwithstanding this, it is considered that adequate flexibility is included within the SPD to enable developers to justify any reductions in spacing standards on a site by site basis.

Taylor Wimpey	Taylor Wimpey suggest the separation standards seem onerous in comparison to neighbouring local authorities. In certain instances, it could lead to viability issues if the capacity of a site is compromised. The drive from the Government and in national planning policy to make effective and efficient use of land and these standards could reduce the ability of sites in Sunderland to achieve this.	The Council encourage the inclusion of landscaping and trees within new residential developments however spacing standards are for the lifetime of the development and landscaping and tree planting are a potentially removable feature, therefore it is considered that the guidance is appropriate in order to maintain a satisfactory standard of amenity. It is considered that the SPD offers the sufficient level of flexibility where required.
Environmental Agency	The Environment Agency have reviewed the submission in detail and have no further comments to make in addition to those made on the Allocations and Designations plan in relation to biodiversity.	The Council note the comments made.
Nexus	Nexus welcomes the presumption in favour of non-car modes as set out in the document. Transport section of the document. In particular, the proposed linkage of parking provision at new developments to levels of public transport accessibility in the surrounding area will help to sustain and develop the city's public transport network and discourage car use by residents and businesses in areas well served by buses and Metro. This policy should provide positive incentives for developers to focus on urban sites with greater potential for the densification of development through a lower requirement for on-site parking provision.	The Council acknowledge the support provided.
Coal Authority	Authority has no specific comments to make on the consultation documents noted above.	The Council note the comments made.

Appendix 1 – Letters



Date: Monday 21 September 2020

Our ref: CSDP/MM

This matter is being dealt with by: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland, SR2 7DN

Tel: 0191 561 1577

Email: planningpolicy@sunderland.gov.uk

Dear Sir/Madam,

REVISED DRAFT RIVERSIDE SUNDERLAND SUPPLEMENTARY PLANNING DOCUMENT (SPD), DEVELOPMENT MANAGEMENT SPD SCOPING REPORT AND HOMES IN MULTIPLE OCCUPATION SPD

I am writing to inform you that Sunderland City Council is consulting on a number of Supplementary Planning Documents (SPD), including the Revised Draft Riverside SPD, the Development Management (DM) SPD Scoping Report and the Homes in Multiple Occupation (HMO) SPD.

Consultation will take place over a four-week period, commencing on 21 September 2020 and closing on 19 October 2020. Due to current situation with COVID-19 our methods of engagement will differ from what we have undertaken previously. As such, during the consultation period copies of the SPDs and supporting documents (including the Riverside Sunderland SEA Determination Statement) will only be available in the Civic Centre, Burdon Road, Sunderland, SR2 7DN during normal opening hours (8.45am-5.15pm Monday - Thursday and 8.45am-4.45pm Friday) and on the council's website at

<https://www.sunderland.gov.uk/article/12733/Supplementary-Planning-Documents-SPDs->

We would welcome any comments you may wish to make on this SPDs. Please email: planningpolicy@sunderland.gov.uk; or if you cannot send comment electronically please post to: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

Please note that comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

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

Yours faithfully



Catherine Auld
Assistant Director of Economic Regeneration
Strategic Plans and Housing Team
Civic Centre
Burdon Road
Sunderland
SR2 7DN

Tel: 0191 520 5555
Web: www.sunderland.gov.uk
planningpolicy@sunderland.gov.uk

Date: 18 December 2020
Our ref:
Your ref:

Dear Sir/Madam

CONSULTATION ON DRAFT ALLOCATIONS AND DESIGNATIONS PLAN; DEVELOPMENT MANAGEMENT SUPPLEMENTARY PLANNING DOCUMENT (SPD), LAND EAST OF WASHINGTON (WASHINGTON MEADOWS) SPD SCOPING REPORT AND SUPPORTING EVIDENCE BASE.

CONSULTATION ON PROPOSED LOCAL WILDLIFE SITE DESIGNATIONS

ADOPTION OF RIVERSIDE SUNDERLAND SPD AND HOMES IN MULTIPLE OCCUPATION SPD

I am writing to inform you that Sunderland City Council is consulting on a number of planning documents including the Allocations and Designations Plan, the draft Development Management SPD, the Land East of Washington (Washington Meadows) SPD Scoping Report and the supporting evidence base.

Consultation will take place over an eight-week period, commencing on 18 December 2020 and closing on 12 February 2021. Due to the current situation with COVID-19 our methods of engagement will differ from what we have undertaken previously. As such, during the consultation period copies of the Plan, the SPDs and key supporting documents will only be available in the Civic Centre, [Burdon Road, Sunderland, SR2 7DN during normal opening hours \(8.30am-5.15pm Mon-Thurs and 8.30am-4.45pm Fri\)](#) and on the Council's website at <https://www.sunderland.gov.uk/article/12800/Have-Your-Say>.

We would welcome any comments you may wish to make on these documents. Please email: planningpolicy@sunderland.gov.uk; or if you cannot send comments electronically, please post to: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN. Due to the current COVID-19 restrictions, the Council would strongly encourage representations to be submitted by email where possible.

Please note that comments cannot be treated as confidential. Your personal information, such as your postal and e-mail address will not be published, but your name and organisation (if relevant) will.

Local Wildlife Sites

Alongside the consultation on the above planning documents, the Council is also consulting on proposed Local Wildlife Sites. This includes changes to the boundaries of existing Local Wildlife Sites and the designation of new ones where appropriate. Copies of the proposals are available on the Council's website at <https://www.sunderland.gov.uk/article/12800/Have-Your-Say> and at the Civic Centre during normal opening hours. The consultation will also take place over the same eight week period, commencing on 18 December 2020 and closing on 12 February 2021. Comments to the Local Wildlife Sites consultation should be made in writing to planningpolicy@sunderland.gov.uk or by post to Strategic Plans, Sunderland Civic Centre, Burdon Road, Sunderland, SR2 7DN. Again the Council would strongly encourage responses to be made by email where possible.

Adoption of Riverside Sunderland SPD and Homes in Multiple Occupation SPD

In accordance with Regulation 11 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) notice is hereby given that Sunderland City Council adopted the Riverside Sunderland SPD and Homes in Multiple Occupation SPD on 18 December 2020.

A number of modifications were made to the SPDs pursuant to Section 23 of the Planning and Compulsory Purchase Act 2004 (the Act). These are set out in their respective Adoption Statements. In accordance with Regulation 35 of the 2012 Regulations the following documents have been made available:

- Riverside Sunderland SPD
- Riverside Sunderland SPD Adoption Statement
- Riverside Sunderland SPD Statement of Consultation
- Homes in Multiple Occupation SPD
- Homes in Multiple Occupation SPD Adoption Statement
- Homes in Multiple Occupation SPD Statement of Consultation

The documents listed above are available to view on the Council's website at

<https://www.sunderland.gov.uk/article/14748/Adopted->. Paper copies are available to view at Sunderland City Council, Civic Centre, Burdon Road, Sunderland, SR2 7DN ([8.30am-5.15pm Mon-Thurs and 8.30am-4.45pm Fri](#)).

Any person aggrieved by the decision to adopt the SPDs may apply to the High Court under Section 113 of the Act for a judicial review of the decision to adopt the documents. Any such applications must be made promptly and in any event, not later than three months after the day on which it was adopted.

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

Yours faithfully



Catherine Auld

Assistant Director of Economic Regeneration