

CABINET MEETING – 30 May 2018

EXECUTIVE SUMMARY SHEET – PART I

Title of Report:

Proposed Consultation on the Regulation 19 draft of the Core Strategy and Development Plan and also upon the Planning Obligations Supplementary Planning Document

Author(s):

Executive Director of Economy and Place

Purpose of Report:

This report provides the findings of the Regulation 18 Draft Core Strategy and Development Plan Consultation that took place between 7 August and 2 October 2017. It is also the purpose of this report to:

- seek approval to undertake six weeks of statutory consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on the draft Core Strategy and Development Plan (the Plan) (Appendix 2) and associated documents (as listed in Appendix 3), and
- seek approval to undertake final consultation on the Draft Planning Obligations Supplementary Planning Document (Appendix 4) following the consultation on the Scoping Report.

Description of Decision:

It is recommended that Cabinet :-

- Note the outcomes and key messages from the Regulation 18 Draft Plan Consultation Statement (Appendix 1);
- Approve the Regulation 19 draft of the Core Strategy and Development Plan (2015-33) (Appendix 2) and associated documents (Appendix 3) for public consultation;
- Note that following the statutory consultation, and the referral of the draft Plan to the Council's Economic Prosperity Scrutiny Committee, a further report will be submitted to Cabinet in accordance with the Council's Budget and Policy Framework Procedure Rules;
- Approve for consultation the Draft Planning Obligations Supplementary Planning Document (SPD) (Appendix 4);
- Delegate authority to the Head of Planning and Regeneration in consultation with

the Deputy Leader of the Council and Portfolio Holder for Housing and Regeneration to make any appropriate and necessary minor amendments to the proposed Regulation 19 draft version of the Plan and supporting documents prior to the commencement of the consultation period.

Is the decision consistent with the Budget/Policy Framework? *Yes

If not, council approval is required to change the Budget/Policy Framework

Suggested reason(s) for Decision:

The decision is required to progress the Plan to the next stage (Regulation 19 statutory consultation) and the Planning Obligations Supplementary Planning Document to the second stage of the prescribed two stage consultation process. In addition, the Regulation 19 consultation on the Plan will ensure that it is progressed in accordance with the agreed timetable set out within the Local Development Scheme.

Alternative options to be considered and recommended to be rejected:

There are no alternative options. Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that various bodies and stakeholders be notified that the council is publishing a local plan, and that they are invited to make representations.

Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that various bodies and stakeholders be notified that the Council is preparing a supplementary planning document and invited them to make representations.

Impacts analysed;

Equality ☒ **Privacy** ☒ **Sustainability** ☒ **Crime and Disorder** ☐

Is the Decision consistent with the council's co-operative values? Yes

Is this a "Key Decision" as defined in the Constitution? Yes

Is it included in the 28 day Notice of Decisions? Yes

PROPOSED CONSULTATION ON THE REGULATION 19 DRAFT OF THE CORE STRATEGY AND DEVELOPMENT PLAN AND ALSO UPON THE PLANNING OBLIGATIONS SUPPLEMENTARY PLANNING DOCUMENT.

Executive Director of Economy and Place

1. Purpose of the Report

1.1 This report provides the findings of the Regulation 18 Draft Core Strategy and Development Plan Consultation that took place between 7 August and 2 October 2017.

1.2 It is also the purpose of this report to:

- seek approval to undertake six weeks of statutory consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on the draft Core Strategy and Development Plan (the Plan) (Appendix 2) and associated documents (as listed in Appendix 3), and
- seek approval to undertake final consultation on the Draft Planning Obligations Supplementary Planning Document (Appendix 4) following the consultation on the Scoping Report.

2. Description of Decision (Recommendations)

It is recommended that Cabinet :-

- Note the outcomes and key messages from the Regulation 18 Draft Plan Consultation Statement (Appendix 1);
- Approve the Regulation 19 draft of the Core Strategy and Development Plan (2015-33) (Appendix 2) and associated documents (Appendix 3) for public consultation;
- Note that following the statutory consultation, and the referral of the draft Plan to the Council's Economic Prosperity Scrutiny Committee, a further report will be submitted to Cabinet in accordance with the Council's Budget and Policy Framework Procedure Rules;
- Approve for consultation the Draft Planning Obligations Supplementary Planning Document (SPD) (Appendix 4);
- Delegate authority to the Head of Planning and Regeneration in consultation with the Deputy Leader of the Council and Portfolio Holder for Planning and Regeneration to make any appropriate and necessary minor amendments to the proposed Regulation 19 draft version of the Plan and supporting documents prior to the commencement of the consultation period.

3. Introduction/Background

- 3.1 The Sunderland Local Plan aims to establish a policy framework that guides and shapes development. It will set the parameters for this to be achieved, and encourage and support development in coming forward. It will ensure that Sunderland is a city that is open for business and growth, providing jobs and prosperity for local people, delivering housing to meet the needs of all of our communities, and tackling deprivation within the city.
- 3.2 Sunderland's Local Plan is being prepared in three parts:
- Part One - Core Strategy and Development Plan which will set out an overarching strategy for future change and growth in the city and includes detailed development management policies and strategic allocations and designations.
 - Part Two – Allocations and Designation Plan which will set out site-specific policies for the development, protection and conservation of land in the city.
 - Part 3 - International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP), which sets out site specific policies for the land to the north of the Nissan Plant.
- 3.3 This Report relates to the preparation of the Core Strategy and Development Plan, hereafter referred to as the Plan.

Preparation of the Core Strategy and Development Plan

- 3.4 Local Plans must be prepared in accordance with the Duty to Co-operate and legal and procedural requirements as set out in the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations 2012. The Plan must also be considered to be a sound Plan which means it has been positively prepared and seeks to meet the objectively assessed needs for development and infrastructure requirements, is justified, is the most appropriate strategy, is effective and is consistent with national policy.
- 3.5 The council has been preparing the Core Strategy and Development Plan since 2005 and has consulted on numerous iterations of the Plan. Following substantial changes to regulations and national policy, the council made the choice to rebase the Plan to 2015. Since then, the council has undertaken two rounds of consultation on the Plan. Firstly the Growth Options consultation in 2016, which sought residents and stakeholder's view on three different options on the level of growth Sunderland should plan for.
- 3.6 The council prepared the Draft Plan in 2017. The Draft Plan was consulted on for eight weeks between 7 August and 2 October 2017. The consultation was carried out in compliance with the council's Statement of Community Involvement.

Draft Plan Consultation Feedback

- 3.7 The council received over 6000 representations to the Draft Plan. The Draft Plan Consultation Report (Appendix 1) sets out how the consultation was undertaken and details the key messages against each policy. A schedule of Representations, which summarises each representations received and the council's response will be published on the Councils website and consultation portal during the consultation period.
- 3.8 The council has undertaken a comprehensive analysis of all representations received and where possible has made changes to the Regulation 19 Draft (Appendix 2) to reflect comments received.

Evidence

- 3.9 The National Planning Policy Framework requires development plan policies to be based on up-to-date and relevant evidence. The Local Plan evidence base is comprised of documents that have informed the Plan. In addition, the Regulation 19 Draft has been subject to a number of statutory impact assessments, including Sustainability Appraisal (incorporating Strategic Environmental Assessment), Habitats Regulations Assessment, and an Equalities Impact Assessment. A Health Impact Assessment was undertaken at the Draft Plan Regulation 18 stage and the outcomes of this assessment taken into consideration. All of these documents will be consulted on as part of the proposed forthcoming consultation process.

Duty to Cooperate

- 3.10 The duty to co-operate was introduced by the Localism Act 2011, which amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on Authorities and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. It is not a duty to agree, but authorities should make every effort to secure the necessary co-operation on strategic cross boundary matters before they submit their Local Plans for examination. The council continues to work closely with its neighbours to address strategic planning issues.

Accordance with the National Planning Policy Framework (NPPF)

- 3.11 Local Plan must be in accordance with the NPPF. The government has published for consultation an update to the NPPF. In the update, paragraph 209 states that "*The policies in the previous Framework will apply for the purpose of examining plans, where plans are submitted on or before () (this will be the date which is six months after the date of the final Framework's publication). In these cases the examination will take no account of the new Framework.*" Therefore as the Plan will be submitted during the transitional period, the Plan will be assessed against the current NPPF.

4. Current Position

- 4.1 The council will be consulting on the Regulation 19 Draft of the Plan. This is the version of the Plan that, if agreed by full Council in due course, will be submitted to the Secretary of State for examination in public. Prior to this, the council will undertake the final consultation outlined in the Recommendations above, to give residents and stakeholders the opportunity to have their say on matters of 'soundness'.
- 4.2 The Regulation 19 Draft sets out the overarching strategy and policies to ensure that Sunderland's future needs are met. The Plan will ensure that new growth is delivered in the most sustainable way, ensuring that the development of new homes is matched by the provision of opportunities for new employment, accessible local services and a high quality environment.
- 4.3 The Plan sets out how new development, growth and investment in Sunderland will be distributed to 2033. It identifies locations where development should take place in order to create sustainable communities and includes policies to ensure:

- ***We provide sufficient homes of all types, sizes and tenures to meet the needs of its existing and future communities –***
Housing provision is a fundamental element of the plan. Sunderland's population is expected to continue to grow by 2033 and therefore we must plan to meet our housing needs. The current NPPF requires councils to undertake an assessment of objectively assessed housing needs, commonly referred to as an OAN. The starting point for this calculation is the ONS population projections and DCLG household projections. However, national Planning guidance also requires that 'plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population in the housing market area'.

The council commissioned independent consultants to establish the OAN calculation for Sunderland which has been calculated to be an average 745 net additional dwellings per annum over the plan period from 2015 to 2033. The OAN calculation is based on reasonable assumptions which took into account baseline demography, adjustments to reflect local demographic trends, past delivery, market signals, future jobs and other local circumstances.

The Government in September 2017 published its 'planning the right homes in the right places: consultation proposals'. This outlined the Government's proposed approach to a standard methodology for the calculation of housing need, which has now been incorporated into the draft revised National Planning Policy Framework (March 2018). Under the proposed standard methodology that takes account of demographic change and affordability, the objectively assessed need for housing for Sunderland would be 593 net additional dwellings each year. However this is a starting point for calculating housing requirements. The Draft Planning Practice Guidance states "*The*

method relies on past growth trends and therefore does not include specific uplift to account for factors that could affect those trends in the future. Where it is likely that additional growth (above historic trends identified by household projections) will occur over the plan period, an appropriate uplift may be applied to produce a higher need figure that reflects that anticipated growth. Circumstances where an uplift will be appropriate include, but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund)." Within the plan period the IAMP will be delivered alongside other strategic infrastructure that will facilitate growth and change historical trends, the council considers that the standard approach is not appropriate in Sunderland's case. Other evidence suggests that if the council was to adopt this approach they would be unable to support economic growth in the city without increasing the amount of people commuting into the city for work and therefore this is not considered to be a sustainable approach as it would ultimately result in the council planning for economic decline.

The Spatial Strategy sets a housing requirement of a minimum of 13,410 new homes for the Plan period 2015-2033. The strategy seeks to deliver sustainable patterns of housing development by:

- delivering the majority of development in the existing urban area which supports the sustainability of existing communities;
- protecting the Sunderland character and environmental assets; and
- delivering the right homes in the right locations.

The majority of the homes, 90%, will be delivered on land within existing communities. The Plan will allocate strategic sites including the South Sunderland Growth Area which will accommodate approximately 3,000 new homes and the Allocations and Designations Plan (Part 2 of the Local Plan) will allocate other sites in the existing urban area. Of the 13,410 homes needed during the Plan period 2479 have already been completed. These sites are identified in Appendix 7 of the Plan..

In accordance with national policy and guidance from the Planning Inspectorate, the Plan must ensure there is an adequate supply of housing land to meet identified needs and that this should include an appropriate buffer in case some identified sites are not developed as expected. Even without this buffer, the council is not able to identify sufficient sites in existing communities to meet identified housing needs.

Prior to the consideration of the Green Belt, the council has exhausted all alternative options and has further scrutinised and updated the Strategic Housing Land Availability Assessment (SHLAA) to ensure that all types of land has been considered to determine its suitability for housing. This has included:

- Greenspaces – following the Greenspace Audit, the council identified sites which were surplus to requirement and where appropriate included them in the SHLAA.
- Employment land – areas of surplus employment land identified through the Employment Land Review have been included within the SHLAA.
- Open countryside – the council has identified land on the urban edge which could be developed without being detrimental to the open countryside character.
- Settlement Breaks - The Settlement Break Review assessed every parcel of land within these areas to determine if they meet the purposes of the Settlement Break. As a consequence of this review it is proposed that the designation of the original Settlement Break land is reduced by 35%. The council is concerned that any further amendments to the Settlement Breaks would not make them fit for purpose. Sites that were not performing as Settlement Breaks have been included in the SHLAA and many of these are currently under development.

During the draft Plan consultation, residents were particularly concerned that the Plan had not identified sufficient brownfield land for development. The council has looked again at the supply and also prepared a Brownfield Register. Through the SHLAA, the city's housing supply has included all viable brownfield sites that are deemed appropriate for housing. However, there is a lack of viable brownfield land available in Sunderland. This is partially due to Sunderland's industrial past which has resulted in large sites which are heavily contaminated and therefore unviable to develop and in part due to Sunderland successfully delivering 90% of its housing on brownfield land between 1995 and 2015/16. The council is working proactively to bring development through other delivery mechanisms including Sunderland Homes and through development briefs for council owned sites, but viability is challenging and it is difficult to evidence that these sites will be delivered in the Plan period.

The council has also reassessed density levels and where appropriate increased the number of homes on sites, however this must be balanced with the need identified in the Strategic Housing Market Assessment (SHMA) which concludes that Sunderland needs more family homes (3-4 bedrooms) and bungalows. The council has also considered other local authorities planning for this need but this is not considered to be an option without Green Belt deletions in other areas.

Therefore, the Spatial Strategy identifies eleven potential Housing Release Sites which could accommodate approximately 1400 new homes during the Plan Period. These sites range in size from 20 homes to 400 homes and are distributed across the city in Washington, Sunderland North and the Coalfield.

Policies in the Plan will ensure that a balance of good quality housing types, sizes and tenures can be delivered in sustainable locations across the city. The approach will focus on existing housing stock and opportunities for renewal; new housing development and land availability to deliver new housing choice; identification of affordable housing requirements and tenure split; and provision for specific communities including student accommodation and the provision for Travelling Showpeople, Gypsies and Travellers.

Local Plans must identify a supply of sites which are deliverable to meet the needs for Gypsies, Travellers and Travelling Showpeople for the first five years of the Plan period, and broad locations for need after that. In order to understand the future need for Travelling Showpeople plots and Gypsy and Traveller pitches within the city over the plan period, the council has undertaken a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment Update (2017). The assessment concluded that provision should be made for 33 plots for Travelling Showpeople over the plan period, broken down into the following time periods:

	Total Need
Plot shortfall year 1-3 (2015/16-2017/18)	6
Plot requirements years 4-9 (2018/19- 2022/23)	9
Plot requirements years 10-18 (2023/24- 2032/33)	18
Total requirement plan period (2015/16-2032/33)	33

In order to accommodate this need, a city-wide search was undertaken to identify appropriate locations for both Travelling Showpeople and Gypsy and Travellers in-line with criteria set out within the Planning Policy for Travellers and Travelling Showpeople (DCLG 2015). Overall 117 city-wide sites were assessed. The assessment has identified two locations to accommodate the Travelling Showpeople on an area of open space to the rear of Pearson's Industrial Estate in Hetton-le-Hole and the council depot at Market Place Industrial Estate, which is due for closure within the next 2 years. These sites can accommodate a mix of plot sizes and can meet the short term needs of 15 plots. Broad locations for growth have also been identified in this area to accommodate the remaining 18 plots.

In terms of requirements for Gypsy and Travellers, the assessment indicated that within the city there have been a number of unauthorised encampments and people stopping off as part of a longer journey. As such the assessment indicates no requirement for a permanent site, however it does indicate a need for transit/stop-over provision within the city to accommodate 5 pitches. Following consultation on the Draft Plan, the council has worked with key stakeholders and an addendum to the Gypsy and Traveller Assessment has been undertaken, which suggests utilising the Council's Unauthorised Encampment Policy, which takes an acceptance approach to unauthorised encampments rather than allocating a site in the plan.

- We deliver a thriving economy and economic prosperity*** - The council is committed to bringing economic prosperity into the city in order to attract inward investment and help existing businesses thrive. Sustainable economic growth is essential to maintaining and enhancing the overall prosperity of residents in Sunderland. A healthy economy is a fundamental factor in shaping our society by improving the quality of life and prosperity of residents. The council's 2016 Employment Land Review (ELR)¹ and associated Post EU Referendum forecasting addendum (2017)² have been prepared to identify the need for general employment land over the plan period up to 2033. The ELR indicates that there will be a requirement for between 95 and 115 hectares of general employment land over the plan period to meet identified needs. This does not include the land required for the IAMP, which is in addition to the general employment needs identified through the ELR and is being brought forward separately through the IAMP Area Action Plan (AAP). The Plan identifies a number of existing employment sites which will continue to be safeguarded for employment use as Primary and Key Employment Areas.
- We encourage investment in our Urban Core and centres-*** The Urban Core and other town, district and local centres within Sunderland are an important aspect of the local economy, providing shops, services, and leisure and community facilities to serve our local communities. The Plan will ensure that our centres are healthy and sustainable places that bolster community resilience, and that their character is protected and enhanced through sensitive development and environmental improvements that create safe, attractive streets and spaces.
- We protect, conserve and enhance our environment*** - The Plan seeks a positive and proactive approach to the environment in Sunderland, with the emphasis on achieving quality places that are attractive and sustainable, and which contribute to quality of life, community wellbeing and local character. The Plan seeks to meet these strategic priorities and sets out policies relating to the built, natural and historic environment, and environmental amenity. It focuses on protecting and enhancing the Plan area's environmental assets, whilst allowing development in areas where potential environmental harm is minimal or can be adequately mitigated.
- We adapt and mitigate climate change*** - The Plan seeks to address and mitigate climate change by supporting the development of decentralised, renewable and low carbon energy; reducing the risk and impact of flooding and requiring new development to incorporate sustainable resource management.

¹ Sunderland Employment Land Review (9 March 2016)

² Employment Land Review Post EU Referendum Forecasting Analysis (20 February 2017)

- ***We promote sustainable travel and seek to improve local transport infrastructure*** –enhancing accessibility by sustainable transport modes to local services and centres, key facilities such as hospitals and schools, and to main employment sites is a key issue addressed by the Plan including supporting the development of new strategic road infrastructure and the expansion of the Metro system.
- ***We plan for healthy communities*** - A strategic aim of the council is to tackle unhealthy lifestyles including unhealthy eating and obesity. One of the ways in which planning can have the greatest impact on health, is the restriction of new hot food takeaways. This policy approach is one component in the wider Strategy for tackling unhealthy lifestyles and obesity across Sunderland.
- ***We plan for infrastructure*** – Sunderland’s future housing growth, economic development and environmental sustainability cannot be achieved without a wide array of physical and service infrastructure including mobility and connectivity, health and wellbeing, skills and education. The council will keep these documents under review to measure progress. It should be noted that the IDP principally identifies high level strategic infrastructure and does not include site specific infrastructure requirements, which will be dealt with through individual planning applications.

4.4 To support the Plan, the council is preparing a Planning Obligations Supplementary Planning Document (SPD). The purpose of this SPD is to provide developers, applicants and landowners with confidence that the council has considered the need for planning obligations and established an approach which is appropriate, fair and justified. The SPD will be consulted on alongside the Plan, to give the public the opportunity to have their say on what the SPD should contain.

4.5 The document seeks to provide detailed information and guidance on the calculation of developer contributions to provide essential infrastructure and to mitigate against the impacts of new developments. Contributions may be sought for affordable housing, education, equipped play space, ecology, public open space, highways and public transport, sport and recreation and any other site specific requirements. Following this consultation the draft document will be updated to address any issues raised and subject to further Cabinet approval for adoption

The next steps

4.6 Following Cabinet approval, the Plan will be consulted on for six weeks in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Regulation 19 Consultation

4.7 Regulation 19 requires the proposed submission Local Plan and supporting documents to be made available for consultation for a minimum of six weeks.

- 4.8 The six weeks consultation is the last opportunity for the public and stakeholders to influence the content of the Plan. The consultation (Regulation 19 stage) is anticipated to start on 15 June for 6 weeks and conclude on 27th July. This consultation is slightly different to previous rounds of consultation - although it will be run by the council, its purpose is to seek the public and stakeholders' views on whether the Plan and associated documents are sound (i.e. appropriate, based on robust evidence and consistent with government policy) and legally compliant. The representations received by the council will be analysed by officers, and reported to Cabinet and Council, but they will also be sent directly to the Planning Inspectorate, and the appointed Inspector will consider these representations during the examination in public.
- 4.9 The council will actively promote the consultation, including sending letters and emails to all those on the Local Plan consultation database, hosting ten events across the city at different times, promoting the consultation through the media including social media and preparing consultation material which will be available on the website. Full details of the consultation and engagement activities planned in support of the new Local Plan have been developed with the council's communications team and are attached in Appendix 5.
- 4.10 The Plan will be published on the council's website and residents and Stakeholders will be able to make comments on the document online, by email or by post. The website will also contain details of all the consultation activities which will also be publicised in the local press well in advance of the events. A Statement of Representation Procedure is included in Appendix 6 which details how representation can be made.
- 4.11 Following consultation, the council will consider all representations and prepare a Schedule of Representations. Cabinet and Full Council will then be asked to consider the representations made during the statutory consultation and to authorise submission of the Plan and supporting evidence to the Secretary for State under Section 20 of the Act for Examination in Public.

5. Reasons for the Decision

5.1 The decision is required to progress the Plan to the next stage (Regulation 19 statutory consultation) and the Planning Obligations Supplementary Planning Document to the second stage of the prescribed two stage consultation process. In addition, the Regulation 19 consultation on the Plan will ensure that it is progressed in accordance with the agreed timetable set out within the Local Development Scheme.

6. Alternative Options

6.1 There are no alternative options. Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that various bodies and stakeholders be notified that the council is publishing a local plan, and that they are invited to make representations.

- 6.2 Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that various bodies and stakeholders be notified that the Council is preparing a supplementary planning document and invited them to make representations.

7. Impact Analysis

- (a) **Equalities** – An Equality Impact Assessment has been completed at Draft Plan stage and updated to reflect the changes to the Regulation 19. A key area of possible impact on equalities relates to how the document is consulted upon. All consultations will be carried out in accordance with the council's adopted Statement of Community Involvement (Appendix 5).
- (b) **Sustainability** – By law, planning must promote sustainable development. This is the underlying objective of the Plan. To that effect the Plan policies have been tested against its own Sustainability Appraisal. This will be published for comment during the consultation.
- (c) **Reduction of Crime and Disorder – Community Cohesion / Social Inclusion** – The Plan contains policies that seek to promote crime reduction and social cohesion within new developments.

8. Other Relevant Considerations / Consultations

- (i) **Financial Implications** –The cost of the proposed consultations are estimated to be £37,504. These costs will be met from an earmarked reserve held to meet costs associated with completion of the Local Plan.
- (ii) **Risk Analysis** – The preparation of the Sunderland Local Plan has been subject to a risk assessment prepared by the council's Risk & Assurance team.
- (iii) **Legal Implications** – As referenced throughout the report, the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 have been followed and will continue to be adhered to in order to progress the Local Plan to adoption.
- (iv) **Policy Implications** – Until the Local Plan is adopted, the policies within the Sunderland Unitary Development Plan and Alteration Number 2 will remain the statutory land use policies for the city.

- (v) **Implications for Other Services** – The Plan policies reflect as appropriate other council and partners' strategies, plans and programmes. The consultation period will provide a further opportunity for interested parties to ensure that their strategies and plans have been accounted for in the Plan.
- (vi) **The Public / External Bodies** – It is a requirement of the planning system that the public as a whole are engaged in the development plan process, with minimum statutory requirements for consultation set out by Regulations. This consultation on the draft Plan will meet the requirements as set out in the council's Statement of Community Involvement. The Duty to Co-operate as introduced by the Localism Act 2011 places a legal duty to co-operate with neighbouring authorities and other public bodies and this is tested at examination.
- (vii) **Project Management Methodology** – The Project will be managed using the PRINCE2 methodology, which is the appropriate standard.
- (viii) **Procurement** – All procurement undertaken by the council within the development of the Plan will be conducted according to the council's procurement rules and applicable legislation.

10. List of Appendices

- Appendix 1 Consultation Statement
- Appendix 2 Regulation 19 draft of the Core Strategy and Development Plan (2015-33)
- Appendix 3 List of associated documents
- Appendix 4 Draft Planning Obligations SPD
- Appendix 5 Consultation Strategy
- Appendix 6 Statement of Representation Procedure