

CONSULTATION ON THE PUBLICATION DRAFT OF THE CORE STRATEGY AND DEVELOPMENT PLAN

Report of the Head of Planning and Regeneration

1. Purpose of the Report

- 1.1 To update on the outcomes of the consultation on the Publication Draft of the Core Strategy and Development Plan (hereafter referred to as the Plan). To advise Economic Prosperity Scrutiny Committee of the next stages in the Plan progress.

2. Background

- 2.1 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.
- 2.2 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. This part of the plan was adopted in November 2017.
- 2.3 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.
- 2.4 The council has been preparing the Plan since 2005 and has consulted on numerous iterations. 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 three rounds of consultation on the Plan.

- 2.5 The Cabinet, at its meeting held on 30th May 2018, gave approval to undertake consultation on the Publication draft of the Plan. Cabinet also referred the Report to this Committee for advice and consideration. This committee considered the Report on the 12th June and comments of this Committee were reported to the Cabinet on 20th June 2018.

3. Current Position

- 3.1 In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, consultation on the Publication Draft of the Plan took place between 15th June 2018 and 27th July (5pm). The purpose of this consultation was to seek representations on the Publication Draft of the Plan.

- 3.2 A comprehensive consultation exercise was undertaken in accordance with the Councils Statement of Community Involvement. This included;

- Publishing a series of posters at public service buildings such as doctors surgeries, libraries and community/children's centres to promote the consultation;
- Publishing the Plan and all associated documents onto the Councils website;
- Making hard copies of the Plan and associated documents available to view in the Civic Centre;
- Making copies of the Plan and Statement of Representation Procedure available in Council Libraries;
- Publishing a Statement of Representation Procedure and Fact.
- Utilising the council's social media accounts, Twitter and Facebook to make people aware of the consultation;
- Publishing a number of press releases in the local press;
- Distributing of emails and e-bulletins by Sunderland City Council Area Officers to local groups;
- Publishing a Core Strategy and Development Plan animation video on the council's website;
- Hosting Members briefing sessions;
- Hosting 11 drop-in events across the City; and
- Sending letters/emails to all contacts on the Local Plan Database.

- 3.3 In total, the Council received 8272 comments from 2151 individuals. Appendix A to the report includes a summary of the key issues raised.

Total Representations	8272
Total Consultees	2151
Total number of Reps unduly made	25

4. Next Steps

- 4.1 Officers have considered all of the representations made to the Plan and new evidence gathered and have proposed a number of minor modifications.

- 4.2 Legislation requires at this stage that all responses received during this consultation are logged and submitted to the Secretary of State, alongside a summary of the main issues raised.
- 4.3 All Development Plan Documents are subject to formal examination by the Planning Inspectorate. An examination in public is the final stage in the process of producing a Local Plan prior to adoption. Cabinet and Council will therefore be asked in November to;
- Approve for the purpose of submission to the Secretary of State the Submission Draft of the Core Strategy and Development Plan which incorporates minor modification;
 - Authorise formal submission of the Core Strategy and Development Plan and associated document to the Secretary of State pursuant to Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004;
 - Delegate authority to the Head of Planning and Regeneration in consultation with the Leader and Deputy Leader to make any further minor modifications to the Core Strategy and Development Plan and associated documentation for submission to the Secretary of State;
 - Delegate authority to the Head of Planning and Regeneration in consultation with the Leader and Deputy Leader to go out to consultation on any further modifications to the Core Strategy and Development Plan that may be necessary and recommended by the Planning Inspector during the examination; and
 - Delegate authority to the Head of Planning and Regeneration in consultation with the Leader and Deputy Leader to sign Statement of Common Grounds as part of the Duty to Cooperate.
- 4.4 Following Council approval, the Plan and associated documents will be submitted to the Secretary of State for an Examination in Public (EIP). The EIP will assess the Plan against four 'tests of soundness' set out in the NPPF. The Council must therefore submit a plan for examination which it considers 'sound' on the basis that it is:
- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
- 4.5 Throughout the examination process the Inspector will recommend modifications to the Plan. Once the Inspector issues their interim report, these modifications will be consulted on and the representations taken into consideration by the Planning Inspector. All representations received will be submitted to the Inspector for their consideration prior to the Inspector issuing their Final Report. Following this, the

Council will be asked to adopted the Plan as part of the Development Plan for Sunderland.

5. Recommendations

- 5.1 It is recommended that Economic Prosperity Committee note the outcomes of the statutory consultation on the Plan (Appendix A) and are advised that Cabinet and Full Council in November will be recommended to approve submission of the Plan to the Secretary of State.

Appendix A

In total, the Council received 8272 comments from 2151 individuals. Appendix A to the report includes a summary of the key issues raised.

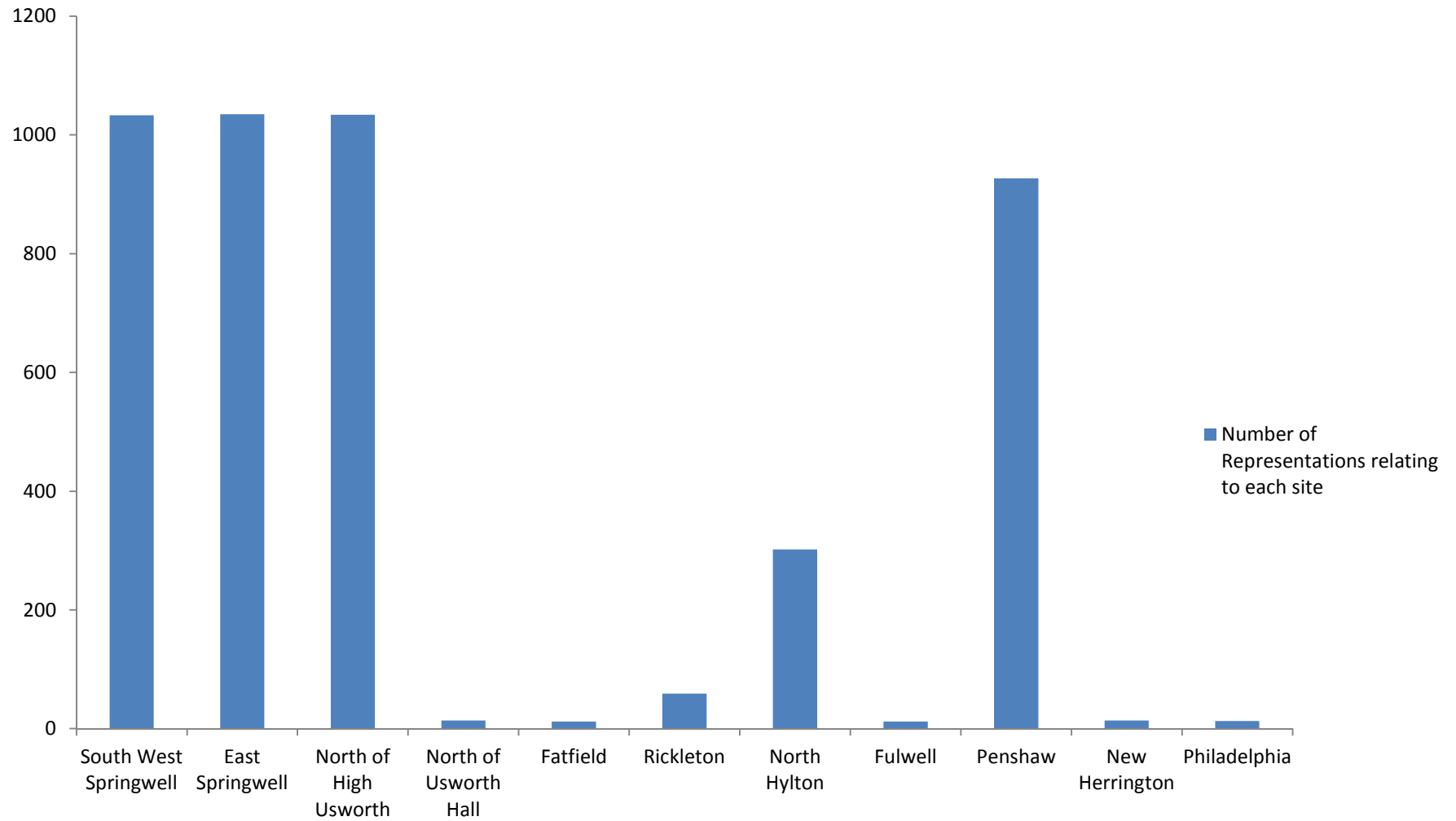
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The following table illustrates the number of representations against each policy.

Policy	No. Reps	Policy	No. Reps	Policy	No. Reps
SP1 Spatial Strategy	1083	EG1 Primary Employment Areas	3	NE9 Landscape Character	2
SP2 Urban Core	1	EG2 Key Employment Areas	8	NE10 Heritage Coast	2
SS1 The Vaux	5	EG5 Offices	1	NE11 Creating and Protecting Views	4
SP3 Washington	20	VC1 Main Town Centre uses and Retail Hierarchy	2	NE12 Agricultural Land	2
SS2 Washington HGAs	1097	VC2 Retail Impact Assessments	1	WWE1 Decentralised, Renewable and Low Carbon Energy	2
SS3 Safeguarded Land	1038	SP9 Comparison Retail	2	WWE2 Flood Risk and Coastal Management	5
SP4 North Sunderland	279	VC3 Primary Shopping Areas & Frontages	3	WWE3 Water Management	7
SS4 North Sunderland HGAs	298	VC4 Hot Food Takeaways	4	WWE4 Water Quality	2
SP5 South Sunderland	5	VC5 Protection and Delivery of Community Facilities and Local Services	2	WWE5 Disposal of Foul Water	2
SS5 The Port	1	VC6 Culture, Leisure and Tourism	3	WWE6 Waste Management	3
SP6 The Coalfield	8	BH1 Design Quality	13	WWE8 Safeguarding Waste Facilities	1

SS6 SSGA	14	BH2 Sustainable Design and Construction	8	WWE10 Energy from Waste	1
SS7 The Coalfield HGAs	943	BH5 Shop Fronts	1	SP10 Connectivity and Transport Network	79
HS1 Quality of Life and Amenity	6	BH6 Quality Communications	3	ST1 Urban Core Accessibility and Movement	1
SP7 Healthy and Safe Communities	9	BH7 Historic Environment	4	ST2 Local Road Network	1016
HS2 Noise-sensitive Development	1	BH8 Heritage Assets	7	ST3 Development and Transport	2
HS3 Contaminated Land	3	BH9 Archaeology and Recording of Heritage Assets	2	SP11 Mineral Extraction	4
SP8 Housing Supply and Delivery	23	NE1 Green Infrastructure	12	M1 Mineral Safeguarding Areas and Infrastructure	1
H1 Housing Mix	19	NE2 Biodiversity and Geodiversity	12	M2 Surface Coal Extraction	2
H2 Affordable Homes	15	NE3 Woodlands/Hedgerows and Trees	3	M3 Land Instability and Minerals Legacy	2
H3 Student Accommodation	2	NE4 Greenspace	11	ID1 Delivering Infrastructure	3
H4 Travelling Showpeople, Gypsies and Travellers	3	NE6 Green Belt	1307	ID2 Planning Obligation	6
H5 Existing Homes and Loss of Homes	1	NE7 Settlement Breaks	9		
H6 Homes in Multiple Occupation (HMOs)	2	NE8 Development in the Open Countryside	7		

Spatial Strategy



The majority of residents oppose the Spatial Strategy on the grounds that development should be prioritised in the existing urban areas rather than Green Belt. They expressed their concerns that development would have a significant impact on existing infrastructure including roads, schools and health infrastructure. Residents do not agree with the housing requirement in the Plan and suggest that the Council should use the standardised methodology and take into consideration the latest population projections.

The development industry and statutory bodies in general support the strategy; however they have expressed their concerns that the housing requirement should be increased and additional land identified in the Plan to accommodate additional growth.

A number of developers have suggested alternative sites for development in the Green Belt and alternative boundaries. Some developers have suggested that the Council strategy should be amended to release land in the Settlement Break and Open Countryside in the Coalfield area rather than focusing development in the Green Belt in Washington.

There is general support for the redevelopment of the Urban Core and for the protection of employment areas. However some developers have proposed land could be re-designated for housing instead of employment (as shown Appendix 1).

Health and Wellbeing

KFC object to the hot food takeaway policy and the development industry is challenging the need for Health Impact Assessment on major development.

Homes

Residents are concerned that empty properties aren't being brought back into use and would like to see more affordable homes across the city.

The development industry has challenged the Councils requirements for 15% affordable homes and 10% accessible homes. They also considered that it is unjustified to seek minimum space standards.

Employment and Retail

Residents support the Councils ambition to create job growth in Sunderland but consider the Plan Job figure to be too ambitious. Residents are concerned that the Plan is too reliant on the IAMP.

The development industry considers the Plan should be more ambitious for job growth. They have also suggested alternative sites for development.

Environment, Water, Waste

Residents have challenged a number of the policies including NE2 and NE6 as they consider the spatial strategy to be contradictory to the policies.

Developers have challenged;

- The need for net gains
- The standards for Green space
- The policy approach to Green Belt and the Open Countryside

Transport

Highways England will be undertaking modelling work on the Strategic Road Network.

Residents have challenged the need, justification and Alignment of the Central route through Elba Park.

Minerals

Minerals Product Association object to a number of policies in Minerals section.

Infrastructure and Delivery

Developers are challenging the policy requirements and the impact on viability.

Residents are concerned that development will significantly impact the current infrastructure provision particularly on education and health infrastructure.