

SOUTH SUNDERLAND
GROWTH AREA
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 a) 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 detail of the consultation Sunderland City Council has undertaken in the preparation of South Sunderland Growth Area (SSGA) Supplementary Planning Document (SPD).

What is the South Sunderland Growth Area (SSGA) Supplementary Planning Document

SPD’s 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 SSGA SPD provides further guidance how CSDP policy SS6 will be delivered. It will ensure development proposals for the area were brought forward in a comprehensive manner as the area was becoming subject to development pressure. The objective of the SSGA was to ensure the creation of a sustainable community, in a good quality built and natural environment, with access to local services that reflect the community’s needs and support its health and well-being.

SS6 South Sunderland Growth Area

Sites within SSGA include Chapelgarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope. These sites are allocated to create a new high quality, vibrant and distinctive neighbourhood. Development should deliver:

1. approximately 3000 new homes to be broadly distributed across the four sites as follows:
 - i. Chapelgarth – approximately 750 homes;
 - ii. Land North of Burdon Lane –approximately 1,000 homes;
 - iii. Cherry Knowle – approximately 800 homes; and
 - iv. South Ryhope – approximately 450 homes;
2. 10% affordable housing;
3. a neighbourhood centre within Land North of Burdon Lane to provide a focal point within the SSGA and complement nearby existing centres which will comprise:
 - i. a range of appropriate uses from the following use classes; A1, A3, A4, D1 and D2;
 - ii. a new 1.5 form entry primary school which will also serve as a community hub;
 - iii. wheeled Sports Area;
 - iv. formal play space;
 - v. Multi Use Games Area;
 - vi. 3G pitch;
 - vii. appropriate parking facilities and served by bus service;
4. extensions to two existing primary schools in close proximity to SSGA;
5. public open space;
6. allotments provided on-site or off-site via a financial contribution;
7. suitable ecological mitigation in line with HRA requirements;
8. cycleways and footpaths;
9. new and improved public transport services and infrastructure; and
10. contributions to support the completion of the Ryhope-Doxford Link Road by either direct delivery as part of development or via a financial contribution.

All development should be in accordance with the SSGA SPD.

Consultation on the SSGA SPD

The Council, in accordance with the Statement of Community Involvement has undertaken several rounds of consultations.

Stage 1 – Initial pre-consultation and engagement	July 2015
Stage 2 – Draft SPD	October 2017
Stage 3 – Final Draft Consultation	February 2020

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

At every stage, 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 Initial pre-consultation

Initial pre-consultation was undertaken with the local community in July 2015 to raise awareness of the Council's intentions for SSGA and to seek the public's views.

Two, 3hr, drop in sessions and a public meeting were organised and 5000 leaflets were sent to local households in the area advertising the events. Events were well attended with 125 people attending the Ryhope drop in session and 110 at the Doxford Park event. 60 residents also attended the public meeting, where officers gave a presentation and held a question and answer sessions. All comments received were taken into consideration when drafting the SPD.

A copy of the consultation leaflet can be found at Appendix 1.

Stage 2 Draft SPD

The feedback from this initial consultation informed the draft SPD. The draft SPD was consulted upon alongside CSDP and as such it was made publicly available for comment for 8 weeks between 7 August – 2 October 2017. The SPD was made available on the Council's website¹, on the Council's online consultation portal², at Sunderland Civic Centre, libraries (in Sunderland's City Library @ Museum & Winter Gardens, Washington Galleries and Houghton-le-Spring), as well as at the 30 public consultation drop-in exhibition events held around the city during August and September (Appendix 2).

Stakeholders were invited to make representations electronically via the Council's online consultation portal (<http://sunderland-consult.limehouse.co.uk/portal>), and in writing by email (planningpolicy@sunderland.gov.uk) or letter.

Stage 3 Final Draft SPD

In total 30 representations were submitted at Stage 2, including a petition containing 834 signatures. These representations were taken into consideration where possible in the preparation of the final draft SSGA SPD. The final draft of the SPD also took into considerations the modifications made to the CSDP during its examination in public. The main changes that were made to the 2017 version of the SPD relate to the following: -

- Updating site capacities to reflect the draft policy within the emerging CSDP.
- Updating the text in general to reflect the passage of time.
- Updating the text to incorporate points raised through the consultation where appropriate.

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

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

- Removal of references to extra care housing facilities and replacement with accommodation for older people.
- A move away from references to executive dwellings and more towards larger family dwellings.
- Inclusion of text around the requirement for Special Educational Needs (SEND) provision in primary schools.
- Making clearer the expected requirements of the Neighbourhood centre at Land North of Burdon Lane and the possible need to undertake a retail needs assessment.
- Clarifying that the alignment of the RDLR where it joins the B1286 is indicative within the SPD.
- Deletion of the requirement for a bus only link on the B1286 between Ruswarp Drive and Tunstall Village Green.
- Deletion of the requirement for a District Heating system due to viability issues.
- Updating the estimated costs of the infrastructure requirements and Habitat Regulations (HRA) mitigation measures.

A public consultation on the final Draft South Sunderland Growth Area SPD took place between Monday 24 February to Monday 30 March 2020.

Stakeholders were invited to make representations electronically via the Council's online consultation portal (<http://sunderland-consult.limehouse.co.uk/portal>), and in writing by email (planningpolicy@sunderland.gov.uk) or letter. In total 6 representations were received.

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

Stage 2 Draft SPD

Consultee	Summary of Representations	Council's Response
Bellway Homes	An alternative route for the section of the Ryhope Doxford Link Road (RDLR) running between Cherry Knowle and Eltham Road roundabout was put forward. The proposed alternative route involved moving the alignment further to the west to avoid sterilising land that could be brought forward for housing development in the short term and would result in significant landscape impacts in addition to those arising from the existing sections of the link road.	The City Council considered the proposed alignment put forward, however it was not considered achievable. The alignment as set out in the SPD has been designed to meet the optimal vertical and horizontal alignment based upon the topography of the site.
Councillor Marshall	Object to the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green.	The proposed bus only link has been removed from the SPD.
Councillor English	Object to the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green.	The proposed bus only link has been removed from the SPD.
Councillor Gibson	Object to the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green.	The proposed bus only link has been removed from the SPD.
Residents petition containing 834 signatures	Object to the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green.	The proposed bus only link has been removed from the SPD.
Mr Elkington	Disagree with the size of the developments.	<p>Two of the sites at SSGA are already allocated for housing, Chapelgarth and Cherry Knowle and 1 site is identified for employment, South Ryhope, which is no longer required for employment use.</p> <p>In accordance planning policy, the supply of new homes can sometimes be best achieved through planning large scale development rather than bringing forward small piecemeal sites, thus ensuring adequate infrastructure is provided and sustainable developments are brought forward. The quantum of development</p>

	<p>Questions if disabled badge holder access is an option as cannot use any other form of transport.</p> <p>Object to the stopping up of Burdon Lane as can only travel by car due to disability and it currently provides access to the countryside as well as to Hetton and Easington Lane.</p> <p>Object to the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green.</p> <p>Object to the closure or local access being applied to Hope Road.</p>	<p>for the overall area and individual sites has been set out though the Local Plan Policy SS6 and site allocations.</p> <p>This level of detail would not be set out with the SPD. Any disabled parking spaces within car parks throughout the SSGA will conform to the relevant standards and ratios.</p> <p>The construction of the planned remaining sections of the Ryhope Doxford link road will ensure connectivity remains to countryside areas as well as Hetton le Hole, Houghton le Spring and Easington Lane. This is in addition to other routes on the local road network which will remain accessible and available, and not significantly disadvantage residents with disabilities as well as other road users.</p> <p>The proposed bus only link has been removed from the SPD.</p> <p>The closure or introduction of local access only has never been put forward through the SSGA proposals.</p>
<p>Cushman and Wakefield on behalf of Homes and Communities Agency</p>	<p>Propose the release of a site within the Green Belt adjoining the Cherry Knowle site, so as to be brought forward for housing purposes.</p>	<p>The release of a green belt site would not be considered through the SPD. The appropriate mechanism for considering this would be via the Core Strategy and Development Plan.</p>
<p>Mr and Mrs Morrell</p>	<p>Object to the development of settlement break land on the grounds that brownfield land should be exhausted first.</p>	<p>Historically Sunderland has been very successful at developing previously developed land. In fact, between 1995 and 2019 82% of development in Sunderland was on previously developed land. The emphasis is to continue this trend and prioritise development on previously developed land and in sustainable locations with good transport links, however there is a lack previously developed sites available in the supply. The Council's latest SHLAA identifies only 41% of new homes will be delivered on brownfield land. This is because the supply of brownfield sites that is considered to be deliverable is considered to be relatively low. This is partially due to Sunderland historic use which has resulted in large sites which are</p>

	<p>Concerns over the proposed new road layout and the increase in traffic and noise this will facilitate.</p> <p>Support moving the proposed roundabout off the Ruswarp drive junction as will slightly distance the traffic.</p> <p>The addition of open space between Ruswarp drive estate and the new houses so included within new community, rather than faced with backs of properties is welcomed.</p> <p>Support the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green.</p> <p>Plan could be improved further by not bringing the new road and roundabout as far down as Burdon Road.</p> <p>Flooding the market with additional houses at a time of population decline will be detrimental to property prices in the area.</p>	<p>heavily contaminated, unviable and difficult to attract developers to.</p> <p>A transport model has been undertaken to inform the SPD. The model highlights sections of the existing road network and junctions where there may be implications as a consequence of development at SSGA. Where this is the case mitigation will be sought from developments through the use of S106s or S278 legal agreements. The model also reaffirms the need for the completion of the Ryhope Doxford Link Road (RDLR), which will be requested through the SPD.</p> <p>Alternative modes of transport are being promoted at SSGA, with requirements for cycle lanes, direct pedestrian routes, subsidised bus provision, these measures should assist in alleviating traffic levels in the area.</p> <p>Support noted</p> <p>Support noted</p> <p>The level of opposition to this bus only route has meant the removal of it from the proposals and the section of road to remain as is.</p> <p>The alignment of the RDLR within the SPD is indicative only at this stage as not all site constraints are known. The exact alignment will come forward through the submission of a planning application.</p> <p>One of the key reasons for this population loss is the lack of suitable housing in the right location. The City needs to deliver sites which</p>
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		<p>have high quality environments to encourage the development of larger family homes. Few such sites currently exist in the City.</p>
<p>Mr Hopkirk</p>	<p>Concerns over the detail of the Land North of Burdon lane site in relation to the location of SUDS not being indicated on the masterplan within the SPD.</p> <p>Privacy and amenity issues with regards overlooking from the new development into existing properties due to the proposed height of buildings.</p> <p>Points were made in relation to ensuring the SPD made reference to the existing residential properties/communities and integration with the new properties/ communities.</p> <p>Para 4.3 can a bullet be added that Land on the North of Burdon Lane site (western edge to the east of Lodgeside Meadows) Slopes north to south. Current housing is in a dip and house levels and positions will have to be carefully considered in order not to block view, light and a sense of open place that these communities currently enjoy. There is a real danger the SPD currently ignores this risk.</p> <p>Para 4.7 page 30 discusses utilities but fails to mention broadband, even though this is a very important requirement. The Core Development Strategy covers the Digital Network in Sunderland and states at para 3.77 that there are very few “cold spots” in Sunderland where homes or business are unable to access broadband at speeds greater than 10Mbps. The area covered by the Land North of Burdon Lane is such a cold spot in some places and therefore broadband speeds should be included as part of the SPD development priorities.</p>	<p>Any development on the Land North of Burdon Lane site will be required to submit a full drainage strategy and meet the standards set out by Sunderland Local Flood Authority. Survey work may include the provision of SUDs and could result in the proposed development deviating from the indicative Masterplan within the SPD, however the design principles within the SPD will still be sought.</p> <p>The indicative Masterplan proposes a 10m wide greenspace as a minimum, where new properties back onto existing properties. In addition any development which is proposed near existing residential properties will need to address Sunderland City Council residential amenity spacing standards (found within the Residential Design Guide SPD) which takes into account topography.</p> <p>These points have been taken on board where possible and the SPD updated to ensure reference to existing communities where appropriate.</p> <p>It was considered more appropriate to reflect this comment within Section 10 of the document, as such reference has been made within Section 10 in relation to the Urban Edge to reflect that careful consideration should be given to site topography.</p> <p>Telecommunications is referenced within Section 7 under principles and parameters, within the utilities section, where reference is made to adequate utility infrastructure being provided to serve each phase of the development. Local Plan Policy BH6 also sets out that development should include high quality digital infrastructure, as such it is considered unreasonable to be so specific for broadband speeds through the SPD.</p>

Para 4.9 page 32, under constraints there has not been sufficient consideration given to the risks of flooding caused by ground and surface water flow, especially on the western edge of the site and the fields to the south and east of Lodgeside Meadow. Can it be added in “Constraints” that any future development MUST not make matters any worse and that every opportunity presented during development to negate or minimise current flooding should be pursued. This is an example of where the focus on new development ignores existing development.

Para 5.2 page 36, table 2 SWOT. Insufficient consideration has been given when considering the rising topography on the western edge to the east of Burdon Road (it rises away from current houses in Lodgeside Meadow) meaning new development will severely impact on light, views, privacy and feeling of space and place so new house heights are a critical issue for that particular part of the development site.

Para 6.3, page 43. Insufficient merging into current community. You have included many laudable objectives but none of them take account of current development. They talk about a new community but what about the existing community that the new community is adjacent to?

Can an additional bullet point be added into the objectives *“To do all this without a negative impact upon current communities”*

Can an additional Key principal be added which ensures existing communities are not diminished by new developments?
Page 53, bullet points under Built Environment Guiding Principals and Requirements, the first bullet point is again deficient with regards to existing development. Can the words “existing development” be added after “exact location”

Page 54, should recognise the harm to existing houses in Lodgeside Meadows by building two or two and a half storey houses on the site immediately to the south.

Reference has been made to development proposals seeking to negate or minimise current flooding within the constraints section of para.4.9.

Reference to existing topography has been made within Section 10 of the SPD.

Additional wording has been included within objective 5 of para 6.3 to make reference to integrating with the existing community.

Additional wording has been included within objective 5 of para 6.3 to make reference to integrating with the existing community.

It was considered more appropriate to make reference to this within the key principles of this section, as such amendments have been made to the first bullet of the key principles of objective 2.

Reference has been made within the relevant section of the document to ensure existing topography is considered. In addition to this any planning application submitted will have to comply with

	<p>Concerns over the reference to values of the area being toward the low end within the Infrastructure Delivery Study 2016 and ignores the small area of executive houses to the western edge of Land North of Burdon Lane.</p> <p>Should include reference to executive dwellings being located near existing executive homes.</p> <p>Weak reference to self-build, Council yet to demonstrate anything remotely serious to enable self-build plots.</p> <p>Bus only link will have a negative impact upon the small shops in Silksworth as this route is the shortest and most direct route to the shops.</p> <p>Opportunities missed within the Design Code to merge the new development into the existing development, along with protection for existing houses from poor development.</p> <p>Risk to privacy of existing houses caused by inappropriate build heights of new development. This should be mentioned more explicitly in SPD.</p> <p>The guidance information for the Urban Edge takes no account of existing houses, house types or topography of the land.</p>	<p>the council's guidance for separation distances from existing properties in relation to windows, etc.</p> <p>The reference to character of the housing market in SSGA within the Infrastructure Delivery Study 2016 (IDS) is setting the scene and provides context and the overall document considers the infrastructure requirements of the SSGA. The lack of reference to the small area of executive houses to the western edge of LNBL would not have had an impact on the outcome of the IDS. It is the SPD itself which sets the parameters for development.</p> <p>Reference to executive dwellings is being replaced throughout the document with larger family dwellings as this is in line with the Local Plan. No further changes proposed.</p> <p>The reference to self-build is considered appropriate for the document. The Local Plan makes reference to self-build and encourages developers to consider including plots for self-build within schemes.</p> <p>The bus only link has been removed from the proposals.</p> <p>The document has been updated to ensure reference is made to existing communities where appropriate.</p> <p>Reference to existing site topography has been included within the SPD and the council's guidance for separation distances will be considered when planning applications are submitted.</p> <p>Reference to the existing topography has now been included within the SPD.</p>
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Historic England	Welcome reference to the heritage assets within the vicinity of, and within the SSGA.	Support noted
Mr McKeown	<p>Object to the bus only corridor proposed on the B1286 north of Ruswarp drive to Tunstall Village Green</p> <p>Construction traffic should be kept away from residential areas</p> <p>Better and safer segregation of road users</p> <p>Ensuring the positioning of drainage on roads allows for safe cycle use.</p>	<p>The proposed bus only link has been removed from the SPD.</p> <p>The detail in relation to construction traffic will be dealt with through individual planning applications rather than specified in the SPD.</p> <p>Objectives and principles of the SPD are to create developments which are well connected to the surrounding area and facilities by road, footpath, cycle route and public transport link and to actively encourage walking and cycling journeys through the provision of safe, attractive and direct routes to key destinations. This is reflected throughout the SPD, particularly within the indicative masterplans.</p> <p>The detail of drainage positioning on roads is not a matter that can be picked up through the SPD and would be dealt with through the detail within individual planning applications.</p>
Derek Stothard	Object to proposed bus only lane on Burdon Road, Silksworth - would lead to further congestion and risk to pupils travelling to/from Venerable Bede School. Not opposed to the development per se, nor to the new road linking Ruswarp Drive and Burdon Road to the new road, but urges the council to reconsider proposals for the bus only lane.	The proposed bus only link has been removed from the SPD.
Northumbrian Water	Recommend that sustainable water management forms an important part of the SPD and welcome consultation.	Comment noted.
Wilfred Meldrum	Proposed SSGA Burdon Road bus-only route is unnecessary, would create traffic problems. No need for more shops. Notes proposed new medical centre.	The proposed bus only link has been removed from the SPD. The neighbourhood centre is proposed due to the overall number of new residents that will be residing in the area and will be serving local needs.
Mr John Stoker	The current proposal must take into consideration the effects of Wildlife the Public's interest in Flora and Fauna of the proposed area, this is an area of green belt that needs to be protected. Further encroachment of housing could seriously affect the area.	The SPD has considered these issue and appropriate principles and parameters have been put in place. The SSGA is not within the Green Belt.

<p>Mr Philip Bonner</p>	<p>South Ryhope I am concerned with the development plans for the following reasons; Firstly, the Woodland View Care home, Sea View, Sunderland SR2 0GW. Some of these residents are severely disabled and in my view, need the peace and tranquillity offered by being in a semi-rural area. Secondly, the impact of development being so close to Ryhope Dean as to being detrimental to the wildlife that inhabit the wooded area. I have seen various animals that occupy the dean, including woodcocks and occasional birds of prey.</p>	<p>The South Ryhope development site has an outline planning permission in place, as such amenity issues with regards Woodland View would have been considered through this process along with impacts of the proposed development on the Dean.</p>
<p>Mrs Julie Rowe</p>	<p>Green belt land at Cherry Knowle and Burdon Lane - why does the building of houses have to extend onto green belt land surely the site at the site of the old Cherry Knowle hospital and grounds can be utilised without taking it into green belt areas. The Settlement break being used at Burdon Lane eventually merges the areas leaving very little green space in between. The Council are effectively turning small village communities into huge urban areas with no identity. Surely when the Settlement Break was introduced it was for a very valid reason - why the change now.</p> <p>Habitats Directive completed in 2014. This is outdated. A more up to date study needs to be done especially around the areas of Ryhope/Cherry Knowle Denes.</p> <p>Cherry Knowle/Ryhope - as you correctly state Sunderland is losing its population. In fact the City has the biggest loss of people in the country - partially (I think) because Sunderland has nothing to keep young people here. Poor job prospects, poor leisure facilities, run down city centre. So lets build big expensive houses that none of them can afford and put them on the sites with lovely surroundings and views - effectively spoiling these walks and views for the local people. I was told at the Consultation event that executive homes bring in executives to the area - however when the executives get here there are no upmarket shops or restaurants. Also in best case scenario will you really get thousands of executive families to fill the thousands of new homes!</p>	<p>The 2018 Settlement Break Review identified that provided adequate mitigation was in place development could take place within much of the South Sunderland Settlement Break. The SSGA has been the subject of a masterplan and SPD to ensure the area is development comprehensively, this involves ensuring a green corridor remains in place to the east of the Land North of Burdon Lane site linking up with the Cherry Knowle site to ensure separation between the existing communities and provide a network of green spaces for recreational use and wildlife. The SSGA is not within the Green Belt.</p> <p>The SSGA Habitats Regulation Assessment Appropriate Assessment was undertaken in 2016 and used to inform the draft SPD. Sites which have been pursued through the planning process and gained planning permission have been in accordance with the requirements of the Habitats Regulation Assessment.</p> <p>Comment noted.</p>

	<p>be two stations here, at the A183 and A690 junctions. It would then emerge into the SSGA, passing through the centre of Chapelgarth (station here), skirting the southern boundary of Hall Farm, bisecting the very centre of Nettles Lane (another station here), before heading straight for the A1018 junction (and another station here). It would then skirt the northern edge of South Ryhope before crossing the B1287 and joining up with the Durham Coast Line. There would then be new stations at Ryhope Village, Grangetown and Hendon. This would enable a number of different running patterns: Trains from Airport could pass clockwise (or potentially anticlockwise?) around the loop, terminating at the currently disused western platforms at Sunderland station. Trains from Airport could split into two - half the trains would go one way around the loop, half would go the other way, and both flows would join up again at Sunderland on the way back up, before heading back to Airport. Trains from Airport could pass either clockwise or anticlockwise around the loop, then head back up to East Boldon, then around the currently disused link line to Tyne Dock and on to South Shields, where they would terminate. They would then head back down to Sunderland, go the other way around the loop, then back to Airport. This would of course be in addition to South Shields existing Metro service. Additional benefits would be: Promoting regeneration in the Hendon area. Increasing the cachet of the new developments, and of the city as a whole. The Metro would serve a much greater proportion of Sunderland residents.</p>	
<p>Mr Andy Robson</p>	<p>I was not aware of these proposed sites, I had received no documentation as had a lot of others on my estate. No one was aware until we gave them the information, not one person in our street had received any notification, my comments relate to South Ryhope, Chapel Garth, Land at Burdon lane, Land North of Burdon Lane and Cherry knowles I oppose the proposals for these sites for the following reasons: Environment Even though your team have said this isn't green belt, its part of Ryhopes make up and will be devastating for wildlife in the denes and also surrounding areas. This also relates to Chapelgarth site, Land at Burdon Lane and Land North of Burdon Lane.</p> <p>I often walk up here and over the years, lots of wildlife has started to re appear and this will be massively compromised with the extra housing, extra population, traffic etc. Its steeped in history and really important to preserve these areas for future generations instead of making it a concrete jungle. If</p>	<p>The consultation process for the draft SPD was undertaken as part of the draft Local Plan consultation, as such it ran for 8 weeks between 7 August and 2 October 2017. Engagement undertaken was over and above the requirements, with all statutory consultation bodies being contacted, general consultation bodies and those who had previously expressed an interest in the pan. Over 1,200 letters and e-mails were also sent out. A number of events were held to engage with stakeholders, which included areas in close proximity to the SSGA.</p> <p>Consideration has been given to the environment when preparing the SPD and set out through the principles and parameters within the document.</p>

the land keeps disappearing, where will their be land left to grow crops, vegetables and produce?

City Centre - What I really also struggle with is , where you get the information that suggests all of these high council band properties will be filled by executive type people, bringing more money into Sunderland? Our city is a joke, there are no shops unless you want a charity shop or betting and fast food, we have absolutely nothing to attract people here. We live in Ryhope and if we travel 2 miles we are in Seaham with its beautiful sea front, marina, shopping centre and well tended public areas. Seaham is a little town yet is far superior and better governed than our city. I'm really dismayed at Sunderland council as they don't seem to listen to what we want, it appears to be corrupt people lining each others pockets. Why can Sunderland not attract better businesses by lowering city centre rents, offering deals for empty shops to be filled, even on a temporary basis? How are you proposing to attract people to live here with such a sparce city centre. Jobs - Where are the jobs for the people you think will buy these houses? I work in recruitment and its dire, especially for higher earners. We do not want to spoil the make up of the area by more houses and especially if these houses are going to either stand empty or sold to landlords that charge extortionate rents. Its not only about finding jobs for all of these people, its also the threat of losing our jobs in the area.

Infrastructure - For every house that is built, there is probably going to be more than 1 car per property, currently it is really busy using the A690 and A19 to travel to work(incidentally out of the area!) I cannot possibly see how the present road infrastructure will cope with this volume of extra traffic. It could have the opposite effect, rather than attract people, if the commute is going to be worse than it currently is, it makes no sense to move here. It could also stop people coming to Sunderland to shop, visit restaurants and the theatre. I realise there are plans to make Burdon Lane traffic free but this will only put more pressure on Tunstall village, Doxford international which is always horrendous. It will make my journey longer putting at least another half hour commute each way onto my day.

Housing - The housing that was built behind Tunstall bank est are an eyesore and it is locally known as "Toy Town". I live in Leechmere Grange in a 3 bed

Comments noted.

Alongside the SPD an Infrastructure Delivery Study was prepared, which has considered the overall impact on infrastructure and set out what is required for the area. The infrastructure requirements are reflected within the SPD and costings for provision are apportioned out to ensure when developments are brought forward the appropriate contribution is made towards infrastructure.

	<p>link. My concern is that new properties will also lower the value of my home, I appreciate you are predominately building higher council tax band properties however I still feel this has a major impact on my property, As above, I fail to see what you have to offer as a city to fill these properties. We need more social housing if anything, what about the land at Pennywell where all the houses were demolished?</p>	<p>All brownfield sites that are available city wide have been considered and contribute to the city's housing supply where possible, this includes the former Pennywell estate. Comment noted.</p>
<p>Tyne and Wear Archaeology Officer Newcastle City Council</p>	<p>Archaeological remains have been found at Cherry Knowles and Chapelgarth. Further archaeological work will be required. Extensive archaeological remains have been found at land north of Burdon Lane through geophysical survey and evaluation trenching. The significance of those remains is still to be determined. Archaeological work (desk based assessment, geophysical survey and evaluation trenching) is required as standard on all greenfield sites to ascertain if archaeological features are present. South Ryhope will therefore also need to be investigated.</p>	<p>Comment noted and additional text reflected within SPD.</p>
<p>Mr Mark Smith</p>	<p>Having read the proposals outlined in draft consultative documents no one should be left in any doubt into the almost entire disregard shown to the environmental sustainability, lack of oversight accountability and destruction of vast swathes of existing greenbelt. The very referencing of this policy I.e. South Sunderland GROWTH Area seems to indicate a need for unrestricted development of the greenfield area at a time of declining population growth in Sunderland and ample opportunities to develop the huge brownfield areas available for modern development.</p> <p>The documentation available clearly assume that it is a foregone conclusion that development and despoilation of the greenbelt will get the approval of council leaders when surely it is their job to ensure a brighter sustainable future for the residents of Sunderland? When vast areas of Sunderland are lying derelict and in need of reclamation and redevelopment why is this proposal even being presented? The documentation reveals a potential conflict of interest when oversight, policy approval and information sharing is taken into account, this situation must be addressed ASAP Their needs to be a vast improvement in the environmental sustainability aspects involved in any development before any approval is even considered as the existing reports etc are laughably poor, inconsistent with national environmental policy and do not reflect good governance standards. The documents available are already outdated I.e doctors surgery spaces available, archeological survey</p>	<p>A Sustainability Appraisal (SA) was undertaken for the previous draft of the SSGA SPD, which fulfilled the requirements of the SEA Directive and also ensured that the social and economic impacts of the SPD were fully understood. The SA was consulted upon as part of the previous draft of the SPD and no responses were received.</p> <p>The SPD has been updated to incorporate changes where necessary.</p>

	<p>results, flood plain assessments, traffic flow predictions etc etc and need urgent reassessment before any progression can be contemplated.</p>	
<p>Mrs Brenda Smith</p>	<p>I wish to object to the South Sunderland Growth area on the following grounds:- The proposals are not sustainable :- The reference in the Draft Corporate Strategy which states there will be no additional pressures on GP's is based on outdated information. Conishead Medical Centre at Ryhope is closing it's practice in November 2017 and this has placed additional pressures on the remaining practice at Southlands Medical Group, Ryhope Health Centre. Please find attached a recent comment by the Practice Manager at Southlands Medical Group regarding the GP crisis in Sunderland and closure of Conishead practice to support this objection. Copy attached.</p> <p>The destruction of the greenbelt and settlement breaks. There are sufficient brownfield sites within the City of Sunderland on which to build houses and these have already been identified by the council to be brought back into use. Sunderland's population is declining not increasing therefore there is no demand to develop significant numbers of housing. The destruction of the existing hedgerows and habitats will mean the loss of natural boundaries and barriers and disruption of the wildlife nearby e.g. pheasants, foxes, badgers, hedgehogs, flora and other fauna.</p> <p>The bus only lane to Burdon Road, Tunstall will lead to traffic using other routes to access the Silksworth and Tunstall areas e.g. routes adjacent to Lakeside Village, Silksworth Lane. The roundabout at Venerable Bede School is already a bottleneck during the school run hours and to increase the flow of traffic to this roundabout would exacerbate the traffic problem. The retail area indicated in the SSGA proposals would have a negative impact on the sustainability of the shopping centres at both Doxford Park and Ryhope. the stopping up of the country road at Burdon Road leading to/from Ryhope is detrimental to the accessibility, enjoyment and continued sustainability of the greenbelt at that location.</p> <p>The current interactive map which is integral to any decision making process is inaccurate and outdated i.e. it does not indicate the proposals for a bus only route on Burdon Road or does not show a roundabout proposed opposite Ruswarp Drive/Closeburn Square. It also omits the environmental screening</p>	<p>The City Council are currently liaising with the Clinical Commissioning Group with regards updated information on surgery capacities and are awaiting updated figures, as such any requirement for additional surgery provision may be requested through individual planning applications.</p> <p>One of the key reasons for this population loss is the lack of suitable housing in the right location. The City needs to deliver sites which have high quality environments to encourage the development of larger family homes. Few such sites currently exist in the City.</p> <p>A transport model has been undertaken to inform the SPD. The model highlights sections of the existing road network and junctions where there may be implications as a consequence of development at SSGA. Where this is the case mitigation will be sought from developments through the use of S106s or S278 legal agreements. The model also reaffirms the need for the completion of the Ryhope Doxford Link Road (RDLR), which will be requested through the SPD.</p> <p>Alternative modes of transport are being promoted at SSGA, with requirements for cycle lanes, direct pedestrian routes, subsidised bus provision, these measures should assist in alleviating traffic levels in the area.</p>

	<p>and noise mitigation which was outlined initially. Increase in noise and pollution levels from the proposed new Doxford Park Link Road which links up with Sunderland Radial Route (SRR) The traffic management estimates are based on a number of assumptions from the no.of car owners per household to the amount of traffic using this route joining from the SRR. Furthermore The SSGA refers to Northern Power carrying out further investigations at this time to establish the feasibility of moving the overhead electricity pylons before any decision can be reached regarding the exact location of the roundabout. If this is not a possible then what are the alternatives ? Any decision regarding the location of the Doxford Park Link Road should be deferred until it is clearer what the alternative proposals are.</p>	<p>The RDLR route as set out within the SPD is indicative only, the exact alignment is yet to be determined and will be subject to preliminary site investigation, which will be undertaken as part of any planning application.</p>
<p>Mr Douglas Stoker</p>	<p>Q3 : Noise pollution due to increased traffic as I own no 4 Ruswarp Drive and am aware of traffic noise now. The roundabout should be moved further away from the existing road or a noise barrier between existing properties and proposed development. Housing : As above.</p>	<p>The RDLR route as set out within the SPD is indicative only, the exact alignment is yet to be determined and will be subject to preliminary site investigation, which will be undertaken as part of any planning application. The SPD specifies that an area of green space will be created between existing residential areas and the RDLR.</p>
<p>Mr Paul Stanley</p>	<p>Land opposite Venerable Bede school. It is clear within the plan that the land currently grass on either side of the road is green space. I would like the consultation to consider this should be green space and settlement break. it is a clear divide between villages and important to the historic pasts of both villages that the land remains as green space.</p> <p>Burdon Lane access from Ryhope to Hallfarm should be improved and not removed as a highway. the original proposals were not clear that part of burdon lane was to be changed into a no vehicle access. The new road plan would still leave residents with a longer route and not direct. The route of burdon lane has historical significance to the area and access to the surrounding village burdon, hallfarm, Houghton. this should not be removed or at least access to the new road to be relooked at to allow access from the top of burdon Lane.</p>	<p>This area of greenspace is to remain as green space through the SSGA SPD. The SPD masterplan sets out a green corridor running to the east of the Land North of Burdon Lane site to link up with green spaces at Cherry Knowle and to the north, creating a green gap between the existing settlements.</p> <p>The construction of the planned remaining sections of the Ryhope Doxford link road will ensure connectivity remains. This is in addition to other routes on the local road network which will remain accessible and available.</p>
<p>Andrew Walker</p>	<p>The South Sunderland Growth Area Draft Supplementary Planning Document provides the detail required to address the potential difficulties faced by the scale of the developments proposed for this area. Much of what is included also aligns with the Nexus Planning Liaison Policy, including the 400m walking</p>	<p>Comments noted.</p>

	distance to bus stops as well as necessary road widths to accommodate full sized buses.	
Lead Adviser Natural England	<p>We consider that the SPD has incorporated the requirements of the SSGA HRA well. Within Figure 19, the term SANGS is used, whilst elsewhere it is referred to as SSAANGs. The figure should therefore be amended.</p> <p>Furthermore, page 87 refers to Country Parks (SSANGS). Furthermore, page 106 mentions a cross section of the barrier to prevent access into the protected Ryhope Dene; this is not provided.</p> <p>As mentioned above, monitoring should measure the effects of the SPD itself and not wider changes. Only referring to SSSI conditions as a way of monitoring is not sufficient. As the HRA includes a monitoring schedule, it might be useful to refer to this as well.</p>	<p>Figure 19 amended to reflect SSAANGs.</p> <p>All references to SANGs within the document have been replaced by SSAANGs. The detail of the cross section of the barrier has been dealt with through the approved planning application.</p> <p>The HRA monitoring schedule has been referenced within the SPD.</p>
Colin English	<p>I am putting in writing my formal disagreement regarding the proposal to make Burdon Road (B1286) a bus lane only. As you know I have already put in objections and comments regarding the SSGA in terms of infrastructure as well as amenities, as I believe the roads are already at full capacity. I would state that this road is of the three main arterial roads for both coming into Doxford and leaving Doxford. I would also add that this road is the primary arterial road for the city centre. The aforementioned is true for both residents and employees who both live and work in Doxford. As Doxford International has possibly the biggest concentration of employees (With the exception of Nissan)in that square mile, I believe it is beyond comprehension that you are considering the removal of Burdon Road to the car travelling public and thus increase pressure on both the existing roads within the ward as well as causing other issues in neighbouring wards. I acknowledge that you said that this was something you were only toying with, and that it would only be in place after the link road was implemented. However, I believe that this road should only be considered a bus lane AFTER the link road was in operation so that a full assessment could be done to analyse traffic flows. (Perhaps a year, so as to take into account seasonal trends of the both residents and employees) I believe it would be only after a year of actual traffic flows are analysed would we then even contemplate such a magnanimous decision.</p>	<p>The proposed bus only link has been removed from the SPD.</p>

<p>Mr Scott Robson</p>	<p>To begin, I was not aware of these proposed sites, I had received no documentation as had a lot of others on my estate. No one was aware until we gave them the information, not one person in our street had received any notification, my comments relate to South Ryhope, Chapel Garth, Land at Burdon lane, Land North of Burdon lane and Cherry Knowles</p> <p>I oppose the proposals for these sites for the following reasons: Enviroment Even though your team have said this isn't green belt, its part of Ryhopes make up and will be devastating for wildlife in the denes and also surrounding areas.This also relates to Chapelgarth site, Land at Burdon Lane and Land North of Burdon Lane. I often walk up here and over the years, lots of wildlife has started to re appear and this will be massively compromised with the extra housing, extra population, traffic etc. Its steeped in history and really important to preserve these areas for future generations instead of making it a concrete jungle. If the land keeps disappearing, where will their be land left to grow crops, vegetables and produce?</p> <p>City Centre - What I really also struggle with is , where you get the information that suggests all of these high council band properties will be filled by executive type people, bringing more money into Sunderland?Our city is a joke, there are no shops unless you want a charity shop or betting and fast food, we have absolutely nothing to attract people here. We live in Ryhope and if we travel 2 miles we are in Seaham with its beautiful sea front, marina, shopping centre and well tended public areas. Seaham is a little town yet is far superior and better governed than our city. Im really dismayed at Sunderland council as they dont seem to listen to what we want,it appears to be corrupt people lining each others pockets. Why can Sunderland not attract better businesses by lowering city centre rents, offering deals for empty shops to be filled, even on a temporary basis? How are you proposing to attract people to live here with such a sparce city centre. Jobs - Where are the jobs for the people you think will buy these houses? I work in recruitment and its dire, especially for higher earners.We do not want to spoil the make up of the area</p>	<p>The consultation process for the draft SPD was undertaken as part of the draft Local Plan consultation, as such it ran for 8 weeks between 7 August and 2 October 2017. Engagement undertaken was over and above the requirements, with all statutory consultation bodies being contacted, general consultation bodies and those who had previously expressed an interest in the pan. Over 1,200 letters and e-mails were also sent out. A number of events were held to engage with stakeholders, which included areas in close proximity to the SSGA.</p> <p>Consideration has been given to the environment when preparing the SPD and set out through the principles and parameters within the document.</p> <p>Comments noted.</p>
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	<p>by more houses and especially if these houses are going to either stand empty or sold to landlords that charge extortionate rents. Its not only about finding jobs for all of these people, its also the threat of losing our jobs in the area.</p> <p>Infrastructure - For every house that is built, there is probably going to be more than 1 car per property, currently it is really busy using the A690 and A19 to travel to work(incidentally out of the area!) I cannot possibly see how the present road infrastructure will cope with this volume of extra traffic. It could have the opposite effect, rather than attract people, if the commute is going to be worse than it currently is, it makes no sense to move here. It could also stop people coming to Sunderland to shop, visit restaurants and the theatre. I realise there are plans to make Burdon Lane traffic free but this will only put more pressure on Tunstall village, Doxford international which is always horrendous. It will make my journey longer putting at least another half hour commute each way onto my day.</p> <p>Housing - The housing that was built behind Tunstall bank est are an eyesore and it is locally known as Toy Town. I live in Leechmere Grange in a 3 bed link. My concern is that new properties will also lower the value of my home, I appreciate you are predominately building higher council tax band properties however I still feel this has a major impact on my property.</p> <p>As above, I fail to see what you have to offer as a city to fill these properties We need more social housing if anything, what about the land at Pennywell where all the houses were demolished?</p>	<p>Alongside the SPD an Infrastructure Delivery Study was prepared, which has considered the overall impact on infrastructure and set out what is required for the area. The infrastructure requirements are reflected within the SPD and costings for provision are apportioned out to ensure when developments are brought forward the appropriate contribution is made towards infrastructure.</p> <p>All brownfield sites that are available city wide have been considered and contribute to the city's housing supply where possible, this includes the former Pennywell estate.</p> <p>Comment noted.</p>
<p>Mrs Amber Harris</p>	<p>For several reasons, I would like to oppose the proposed developments. To begin with, I was not aware of these proposed sites. No documentation reached the houses in Leechmere. I understand this is due to a third party failing to fulfill their responsibility of handing out leaflets. This means the correct procedure for planning has not been adhered to as many residents are STILL not aware of the proposed developments. I believe this sort of malpractice is actually against the law. My comments relate to South Ryhope, Chapel Garth, Land at Burdon lane, Land North of Burdon lane and Cherry Knowles.</p>	<p>The consultation process for the draft SPD was undertaken as part of the draft Local Plan consultation, as such it ran for 8 weeks between 7 August and 2 October 2017. Engagement undertaken was over and above the requirements, with all statutory consultation bodies being contacted, general consultation bodies and those who had previously expressed an interest in the pan. Over 1,200 letters and e-mails were also sent out. A number of events were held to engage with stakeholders, which included areas in close proximity to the SSGA.</p>

I oppose the proposals for these sites for the following reasons: Environment Even though your team have said this isn't green belt, it is part of Ryhope's make up and will be devastating for wildlife in the denes and also surrounding areas. This also relates to Chapelgarth site, Land at Burdon Lane and Land North of Burdon Lane. I often walk up here and over the years, lots of wildlife has started to re appear and this will be massively compromised with the extra housing, extra population, traffic etc. It is steeped in history and it is really important to preserve these areas for future generations instead of making it a concrete jungle. If the land keeps disappearing, where will there be land left to grow crops, vegetables and produce? Not only this, the green land in Ryhope and the surrounding areas make it a pleasant place to live. I feel these developments will have a detrimental affect on the city for these reasons.

Jobs - Where are the jobs for the people you think will buy these houses? Recruitment and its dire, especially for higher earners. We do not want to spoil the makeup of the area by more houses and especially if these houses are going to either stand empty or sold to landlords that charge extortionate rents. Its not only about finding jobs for all of these people, its also the threat of losing our jobs in the area. For this reason, I have to live and work in Teesside. I do however, walk with my family who live in Ryhope every weekend along the beach and through the Denes. Until you have spent time in them, you can not possibly understand just how special and unspoiled they are. My great grandfather walk through them, as did my grandfather, my dad and my brother and I. You are however, robbing future generations from experiencing this truly special piece of nature.

Infrastructure - For every house that is built, there is probably going to be more than 1 car per property, currently it is really busy using the A690 and A19 to travel to work (incidentally out of the area!) I cannot possibly see how the present road infrastructure will cope with this volume of extra traffic. It could have the opposite effect, rather than attract people, if the commute is going to be worse than it currently is, it makes no sense to move here. It could also stop people coming to Sunderland to shop, visit restaurants and the theater. I realise there are plans to make Burdon Lane traffic free but this will

Consideration has been given to the environment when preparing the SPD and set out through the principles and parameters within the document.

Comments noted.

Alongside the SPD an Infrastructure Delivery Study was prepared, which has considered the overall impact on infrastructure and set out what is required for the area. The infrastructure requirements are reflected within the SPD and costings for provision are apportioned out to ensure when developments are brought forward the appropriate contribution is made towards infrastructure.

	<p>only put more pressure on Tunstall village, Doxford international which is always horrendous. It will make my journey longer putting at least another half hour commute each way onto my day.</p> <p>Housing - The housing that was built behind Tunstall bank est are an eyesore and it is locally known as Toy Town. My parents live in Leechmere Grange in a 3 bed link. My concern is that new properties will also lower the value of their home. I appreciate you are predominately building higher council tax band properties however I still feel this has a major impact on my property.</p> <p>As above, I fail to see what you have to offer as a city to fill these properties. We need more social housing if anything, what about the land at Pennywell where all the houses were demolished?</p>	<p>All brownfield sites that are available city wide have been considered and contribute to the city's housing supply where possible, this includes the former Pennywell estate.</p> <p>Comment noted.</p>
<p>Taylor Wimpey, Persimmon Homes and Story Homes Burdon Lane Consortium</p>	<p>Section 1.1 The Burdon Lane Consortium welcomes and supports the proposed new growth area known as South Sunderland Growth Area (SSGA) for a major residential development and supporting community facilities, which includes the Land North of Burdon Lane. This is a long standing commitment by Sunderland City Council. The Consortium agrees with the strategy to focus approximately 3,000 new homes in this area to meet 20% of the City's future housing need and, in particular, to provide significant numbers of much needed executive and larger family homes. The delivery of the SSGA, including Land North of Burdon Lane, will deliver significant and lasting economic, social and environmental benefits to both the local community and the City of Sunderland. It will make a significant contribution towards meeting Sunderlands housing requirement, widening the range and choice of new homes in the area, including providing a greater proportion of higher value housing whilst concurrently helping to retain and attract economically active, skilled residents as well as graduates who will generate significant local spending in the area.</p> <p>The high quality green infrastructure, including the South Sunderland Areas of Additional Natural Greenspace (SSAAGNs), will enhance the well-being of the community, whilst creating new wildlife habitats to compensate for the loss of existing habitats. The SSGA will also deliver significant economic benefits through the creation of direct and indirect jobs (both temporary during the construction period and permanent on occupation of the development), as</p>	<p>Support Noted.</p>

well as additional GVA generation over the build period, additional New Homes Bonus Payments to the Council and additional Council Tax revenues. Overall, the proposals will deliver a high quality, vibrant and distinctive neighbourhood which will be well integrated with surrounding communities.

Although the Consortium broadly supports the SSGA Supplementary Planning Document (SPD), it considers that the SPD is overly prescriptive and does not take into account issues of viability and deliverability. Flexibility is sought to enable the development to respond to changing market conditions, local context and developer/site requirements and to ensure consistency with the National Planning Policy Framework (NPPF) which is clear that design policies should avoid unnecessary prescription or detail (paragraph 59). Furthermore, the Consortium considers that the SPD does not assess the full financial burden of its requirements and, taken together, all the additional requirements will threaten development viability, contrary to paragraphs 153, 173 and 174 of the NPPF, which is clear that developments should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

Finally, the Consortium recognises that planning permission or minded-to-grant resolutions have been secured for the other four developments in the SSGA (namely Chapelgarth, Cherry Knowle, South Ryhope and Land at Burdon Lane) and hence many aspects of the SPD have not already been applied to these schemes, for example a contribution towards the District Heating System. This has set a precedent for the development of the Land North of Burdon Lane. The Consortium therefore asks that the Council adopt a consistent approach when considering the Land North of Burdon Lane development, rather than placing additional financial burdens on this scheme when compared to the neighbouring developments. The Consortium wishes to thank the Council for the opportunity to comment on the SPD and would like to work positively with the Council to bring forward the Land North of Burdon Lane.

Section 2.1 The Burdon Lane Consortium suggests that a sentence is included to explain that Figure 1 provides details of the SSGAs allocation on the adopted Sunderland Unitary Development Plan (UDP) Proposals Map from

A viability assessment has been undertaken that suggests there are no viability issues for any of the development sites, consequently all development proposals should be in accordance with the plan. The SSGA SPD has been updated to reflect the outcome of the Examination In public and the Inspector's report to ensure it aligns with Policy SS6. If viability issues do arise they will be considered in line with the NPPF and Local Plan viability policies.

With specific reference to the District Heating system, this requirement has been removed from the SPD.

Section 2 has been updated to reflect the current position with regards the status of the site allocations through the Core Strategy

1998 and that the emerging Core Strategy and Development Plan proposes to release this land for residential uses. At the moment, the purpose of Figure 1 is not described in the text. The boundary for Cherry Knowle in the SSGA is not the same as that in the adopted UDP and the Consortium suggests that the boundary is amended to ensure consistency. The Consortium agrees with the Land North of Burdon Lane text and has no comments to make.

Section 3.1 This section states the following: The Core Strategy identifies a series of Locations for Major Development (LMDs). Whilst not formally allocated through the Core Strategy, the LMDs will provide a bridge between the Core Strategy and the formal Allocations Development Plan Document. Four LMDs are proposed in South Sunderland which have collectively been grouped as the South Sunderland Growth Area. The Burdon Lane Consortium has concerns that the SPD implies that Locations for Major Development are not formally allocated through the Core Strategy and Development Plan (CSDP). The term Locations for Major Development is not a term used in the CSDP, instead Growth Area is used. Additionally, the draft CSDP clearly proposes to allocate this land, given the following: Policy SA2: South Sunderland Growth Area of the draft CSDP states: 227ha of land, between Ryhope and Doxford Park is allocated to create a new high quality, vibrant and distinctive neighbourhood. The draft CSDP 2015 "2033 Policies Map and Key Diagram 2017 Spatial Strategy Map clearly show the SSGA allocation under Policy SA2. It is therefore evident that the draft CSDP proposes that SSGA is allocated for residential-led development.

Section 3.3 This section includes two paragraphs on Buildings for Life. The second paragraph states that all schemes should aim to achieve Building for Life Diamond status. The Burdon Lane Consortium raises concern about this requirement on the following grounds: There is no requirement that the other recently approved developments in the SSGA have to achieve this status (namely Chapelgarth, Cherry Knowle, South Ryhope and Land at Burdon Lane). This is not a requirement of the draft CSDP. As such, none of the other housing sites across the City will have to achieve this. A consistent approach should be followed.

and Development Plan and reflects the current position with regards planning permissions and starts on site.

This section has been updated to reflect the current position with regards the status of the site allocations through the Core Strategy and Development Plan.

The SPD specifies that schemes should 'aim to achieve', it is not a requirement of the SPD to achieve these levels.

The Land North of Burdon Lane would be the only site that would have to achieve this status, which would be unreasonable. This site also has to deliver significant infrastructure, including the delivery of substantial highway works, a 1.5 form entry primary school, a neighbourhood centre, ecological mitigation and green infrastructure, as well as pay substantial contributions in relation to matters including transport improvements and biodiversity. The additional costs associated with achieving this status have not been considered in the Sunderland City Councils Whole Plan Viability Assessment (August 2017), contrary to the NPPF which requires local planning authorities to assess the likely cumulative impacts on developments of all existing and proposed local standards, supplementary planning documents and policies when added to nationally required standards (para. 174). Any requirement to deliver more onerous design and sustainability standards will be likely to result in viability and deliverability issues. Guidance keeps changing and the Design Councils own website recognises that the Building for Life 12 could have a lifespan of another 5 years. As such, this status is unlikely to be around for the lifetime of the SPD and ultimately the delivery of the SSGA.

Section 4.6 "Sustainability The Burdon Lane Consortium has serious concerns about the requirement for a district bio-mass/gas fired boiler plant for the following reasons: A District Heating System would require a significant heating demanding use at the outset to ensure it is feasible and viable. However, the proposed development on Land North of Burdon Lane would itself not generate sufficient heating demand to support such a scheme, particularly in the early years of development. The Councils Infrastructure Delivery Study (January 2016) costs the District Heating System at £11,350,000 or approximately £4,000 per dwelling, with this amount being split between the four large developments at the SSGA. However, the other schemes at Chapelgarth, Cherry Knowle and South Ryhope have now been approved and are not paying a contribution towards the District Heating System. It is not possible to retrospectively require that infrastructure for a District Heating System is put into these other schemes after they have been approved. This effectively means that the development on Land North of Burdon Lane would need to fund this system on its own. At a cost of over £11,000 per dwelling, this is nearly three times the amount suggested in the Councils own Infrastructure Delivery Study . This substantial cost would clearly

The reference to providing district heating and power on a community wide basis has been deleted from the SPD.

render the development unviable. Accordingly, a District Heating System would not be viable or deliverable and it would be inefficient to provide a heat source for the Land North of Burdon Lane development only. The Infrastructure Delivery Study states that The Council will be promoting district heating in the forthcoming SPD, assuming it does not affect the viability of sites (para. 10.3.6). However, the Councils Whole Plan Viability Assessment (August 2017) has not assessed the cost implications of delivering the District Heating System and energy centre. Indeed, no reference is made to such a system. This is contrary to the NPPF which states that: Supplementary planning documents should not be used to add unnecessarily to the financial burdens on development. (NPPF, para. 153) Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. (NPPF, para. 173) Local planning authorities] should assess the likely cumulative impacts on developments of all existing and proposed local standards, supplementary planning documents and policies when added to nationally required standards (NPPF, para. 174). 4. The District Heating System is not necessary to make the development acceptable in planning terms and is not fairly and reasonably related in scale and kind to the development. As such, the requirement for this system conflicts with Regulation 122 of the Community Infrastructure Levy Regulations 2010. 5. The issues surrounding energy efficiency and low carbon energy are now matters of Building Regulations.

Section 5.2 “Land North of Burdon Lane Table 2 identifies Ecological benefits such as priority species and habitats as a Strength in the SWOT analysis. However, the detailed ecological survey work undertaken by Burdon Lane Consortium has found that the Land North of Burdon Lane is of overall low ecological value, being used by breeding birds and small numbers of bats. The Consortium therefore suggests that this statement is removed given the absence of evidence that ecology is a strength.

Section 6.1 The Burdon Lane Consortium supports that recognition of the need to diversity the Citys housing stock and that SSGA is seen as a crucial

No changes proposed to the SPD.

References to executive homes have been removed throughout the SPD and replaced with larger family dwellings.

element in addressing the current housing imbalance through delivering executive homes. However, the Consortium considers that the references to higher value executive homes is too prescriptive and conflicts with Section 7.3 of the SPD which advises that the Council does not have a specific definition for executive dwellings.

The introduction to this chapter refers to the principles and parameter set out within the chapter. The Burdon Lane Consortium suggests that the following text is included: The principles and parameters should be considered with flexibility given that they could be influenced by the findings of detailed studies and site investigations, in particular archaeology.

Section 7.1 The SSAANGS text box refers to this area being retained and maintained in perpetuity (minimum of 75 years). However, 75 years is an excessively long time period and requirements could change. The Burdon Lane Consortium suggests that this text is amended as follows: SSAANGs should be retained and maintained in perpetuity (minimum of 75 years), whilst a scheme for their future maintenance will need to be agreed with the local planning authority.

The Consortium supports the recognition in the supporting text to Figure 19 that this is an indicative plan and that the exact shape and positioning of the SSAANG and the precise location of the new green links may be amended during the planning of each SSGA development.

Existing Corridors/Buffers. The Consortium requests that the first sentence is amended as follows to ensure flexibility in response to the quality and interest of the vegetation features: All existing woodland, hedgerows and other vegetation corridors will be retained and enhanced, where possible and practical and where this cannot be achieved compensation will be provided.

The Consortium has concerns about the size of the proposed buffers and considers that the standoff distances should be applied with flexibility to take into account the quality and interest of any ecological features. The following amendments are suggested: Buffers will be required around each of the

The principles and parameters of the SPD are in place to ensure the SSGA meets its full potential and the vision and objectives can be met and are considered flexible enough to deal with changes through detailed studies and site investigations.

The minimum 75 years reference is considered quite low in comparison with other authorities, as such no changes proposed to the SPD.

Comment noted.

It is considered that to insert the proposed text will weaken this aspect of the sentence and as such no changes proposed.

The proposed changes are considered to weaken the requirement as such no changes proposed.

corridor types- tree belts (25m), hedgerows(10m), copses and local designations (50-100m), National/European designations (buffer dependent on development proposal). Buffers will be required around important woodland, hedgerows and copses, as well as around local designations and National/European designations. The buffer size will depend on the quality and interest of the species/habitat and the proposed development. It is suggested that the following buffers are provided: Designated and/or ancient woodland - 25m buffer High quality hedgerows that are of ecological importance - 10m buffer Local designations - 50-100m buffer National/European Designations "the buffer width should vary depending upon the ecological value and function of the feature that is to be protected and the quality of the habitat within the buffer". These changes are suggested to ensure a fair and reasonable approach providing flexibility for delivery.

Figure 19 "Potential Location of SSAANGs Figure 19 refers to Interpretation Boards, with black asterisks used to mark their location across the SSGA. However, no explanation is provided in the text about this. It is understood that the other approved schemes in this area are not providing interpretation boards. The Consortium suggests that the Interpretation Boards are deleted from this figure, to ensure consistency with the other developments.

Play The supporting text to the Play text box refers to the play facilities being implemented by the developer with a commuted sum towards their ongoing maintenance. However, the Consortium suggest that the play facilities could also be maintained by a management company, in the same way that the SSAANGs would also be either managed by the council or a management company. The Consortium suggest the following amendment to ensure a consistent approach: Sufficient equipped childrens play spaces must be provided; therefore each of the 4 development sites should include an appropriate play facility, to be implemented by the developer with and is either maintained by a management company or a commuted sum is paid towards its ongoing maintenance.

Allotments There is a discrepancy between the draft SPD and the SSGA Infrastructure Delivery Study (IDS) regarding allotment provision. The draft advises that allotments should be provided on-site and where this is not

The SPD has been updated to include reference to the Interpretation boards, which are required. The other SSGA schemes have provided these boards and the requirement for them is to remain. The cost of 12 boards has been included within the initial costings for the SSGA.

The reference to commuted sum has been removed and replaced with 'maintained in perpetuity'.

The SPD provides the flexibility for allotments to be provided on-site by developers or off-site through a financial contribution, if off-

feasible appropriate off-site locations should be found in consultation with the councils allotment officer. However, the IDS does not refer to on-site provision and instead advises that contributions towards off-site provision will be sought. The Consortium also understands that the Chapelgarth and South Ryhope developments are paying a contribution towards off-site provision, whilst Cherry Knowle is providing allotments or community gardens on-site. In order to ensure consistency with the IDS and the other schemes, the Consortium suggest the following change to the text: Allotments should either be provided on-site and implemented by the developer or a commuted sum payment should be made towards their off-site provision. Where it is not feasible to provide on site, appropriate off-site locations should be found in consultation with the councils allotment officer.

Management & Maintenance of GI and SSAANG The Consortium is concerned that the SPD states that a management board should be established that includes residents and council representatives. The Consortium frequently use management companies to successfully maintain public open space within their developments; however, there is not normally a requirement to set up such a management board. The Consortium also recognise that this requirement is not included in the Chapelgarth S106 Agreement or is this referred to in the Committee Reports of the other developments. To ensure consistency, the Consortium suggest the following text is deleted: A management board should be established that includes residents and council representatives.

Section 7.2 "Built Environment Built Environment Guiding Principles and Requirements The Burdon Lane Consortium is committed to deliver a development to a good urban design standard; however, the Consortium is concerned about the wording under Objective 2 and within the Place-Making text box which requires that development proposals should strive for the highest standard in the design of buildings, public realm and landscaping and schemes to be built to the highest possible urban design standards. Their concerns are for the following reasons: The Council has not considered the cost for achieving the highest possible urban design standards in their Whole Plan Viability Assessment (August 2017). Rather, this assessment confirms that the Council is not seeking to impose or seek standards that are over and

site the location for allotments should be discussed in consultation with the council's allotment officer.

No changes proposed to the SPD.

Text has been amended within document to reflect high quality design in line with the Core Strategy and Development Plan.

above the national standards (para. 8.37). This Assessment recognises that environmental standards contained in the Building Regulations are increasing. As such, the Viability Assessment has used enhanced standards based on the BCIS costs for Building Regulations (Part L) 2010 + 1.5% (paragraphs 7.5 -7.8 and 10.9). Furthermore, the spreadsheets toward the end of the document (for example on page 389) do not include any additional build costs in relation to Design. It is therefore clear that the highest possible urban design standards have not been costed. There are no requirements for the other approved similar developments at the SSGA (Chapelgarth, Cherry Knowle, South Ryhope and Land at Burdon Lane) to achieve the highest possible urban design standards. The statement highest possible urban design standards is ambiguous and subjective. There are no nationally agreed standards in the National Planning Policy Framework or Planning Practice Guidance.

The Place-Making text box continues by stating that development proposals will be required to follow the principles of Building for Life 12. The supporting text also states that development proposals should seek to achieve Building for Life accreditation. However, the Consortium has concerns about the Building for Life accreditation. Please see the response to Section 3.3 of the SPD for details of these concerns. This text states that Building for Life 12 and Secured by Design are national development standards. However, the Consortium is concerned that this text gives the impression that they are statutory requirements; however, they are nationally recognised design tools.

The Consortium suggest that the wording beneath Objective 2, within the Place-Making text box and the supporting text to the Place-Making text box is amended as follows: Development proposals should strive for the highest standard in the design of deliver good quality buildings, public realm and landscaping. Development proposals within the SSGC will be required to deliver a scheme built to the highest possible a good urban design standard following the principles of Building for Life 12 and Secured by Design which delivers an accessible, adaptable and safe place, whilst respecting the surrounding built and landscape features within and neighbouring the site. Building for Life 12 and Secured by Design are national development standards nationally recognised design tools which promote the construction of high quality, well connected and safe communities. Building for Life 12

Text amended to reflect Building for Life and Secured by Design are nationally recognised design tools.

guides the better planning of new development through urban design standards which create safe environments that provide everything that should be expected within a new community. Development proposals should seek to achieve building for life accreditation, therefore providing a mark of a good place to live. The general Building for Life principles of creating a safe and accessible environment should be broadly accorded with, subject to viability, to provide a good place to live.

These amendments will ensure that development is not burdened by onerous and unnecessary requirements, which would be contrary to Regulation 122 of the CIL Regulations 2010; that the SSGA is deliverable, viable and accords with national planning policy; and that a consistent approach is sought for all developments in the SSGA.

Development Layout within SSGA The Consortium suggest the following amendments are made to the Development Layout within SSGA text box and the supporting text: Proposals will be required encouraged to: Form a perimeter block development layout which makes clear distinctions between public and private space. Provide a variety of block sizes All developments should front onto the public realm, natural features of the landscape, pedestrian/multi-user routes, open space and ecological buffers, wherever possible or practical . The most appropriate form of development will therefore be a perimeter block. A perimeter block The style of development should allows for a flexible form which can accommodate a range of buildings types and densities. The style of development will should also ensure maximum natural surveillance and activation onto the public realm through buildings fronting onto a public street whilst also ensuring security to the rear of properties. Proposals which provide rear gardens or blank/inactive elevations onto the above elements will not normally be considered acceptable. There may be instances where it is not possible or practical for development to always front onto these elements and hence some flexibility is sought.

Architectural Design The Consortium suggests the following amendments are made to the last bullet point in the Architectural Design text box and the supporting text: Proposals which feature blank and inactive elevations which

The existing text within this section is considered reasonable and no changes proposed.

No changes proposed to the SPD.

front onto areas of the public realm or areas with activity will not normally be considered acceptable by the council, as will those which offer a poor or weak relationship with the streetscene.

The use of perimeter block developments development form will create include instances of corner properties which face onto the public realm. It is essential that these properties are designed to provide an appropriate level of activation and detailing onto the streetscene. Not only will this increase natural surveillance but also maintain a continuity of frontage. The inclusion of a house type with dual aspect elevations would provide an adequate response.

Section 7.3 “Residential Development “Housing Mix and Choice Residential Development Guiding Principles and Requirements The Burdon Lane Consortium recognises that Table 6 provides an anticipated capacity of 995 dwellings for the Land North of Burdon Lane. The Consortium welcomes the recognition that the figures provided are indicative numbers and should be used as a guideline when considering the number of dwellings proposed on any of the SSGA sites and will not be used as a control total for development management purposes.

Executive Dwellings The Consortium supports the identified need to deliver executive dwellings at the SSGA. The Consortium also welcomes the fact that the Council has not provided a specific definition of executive dwellings, given that the plot size, number of bedrooms or amount of private amenity space for executive dwellings can vary.

Affordable Housing The Consortium broadly welcomes the recognition by the Council that 10% affordable housing should be provided at the SSGA, rather than 15% as required elsewhere. This is given that these developments have to fund a substantial amount of other social and environmental infrastructure. However, the Consortium suggests the inclusion of a mechanism to allow for instances where the delivery of affordable housing may harm the viability of a scheme, as provided for under draft Policy H4: Affordable Housing of the CSDP. The following additional text is therefore suggested: Where an applicant considers that the provision of 10% affordable housing would make

The capacities in Table 6 have been updated to reflect the Local Plan Policy SS6.

References to executive dwellings have been replaced throughout the document with larger family dwellings.

It is not considered appropriate to include reference to viability within the SPD, as this would then be repetitive for a number of sections of the SPD. Should viability issues arise these will be dealt with through the planning application. The tenure split is to remain at 75%/25% for the SPD in recognition that to introduce a different split now may impact on site viability. Notwithstanding the fact that

a scheme unviable, they must submit a full detailed viability assessment to justify the reduced affordable housing provision on the site. This change is suggested to provide flexibility to respond to the detailed site investigations and viability appraisals that are currently being undertaken by the Consortium. These assessments will be much more detailed than the Councils high level viability appraisal in relation to the SSGA sites, given they will be based on more detailed information about sales values, build costs and any abnormal costs. It is recognised that the Chapelgarth Section 106 Agreement includes such a mechanism and the Consortium is therefore seeking a consistent approach. The Consortium welcomes the statement that the preference is for affordable housing but that off-site provision will be accepted where it can be robustly justified. The Consortium considers it is important that flexibility is provided on the tenure split of 75% social rented and 25% intermediate, for viability reasons and also in case a registered provider cannot be secured for the social rented dwellings. The Consortium therefore suggest that the following change is made to the Affordable Housing text box: 10% of residential development should be affordable with a tenure split of 75% social rented and 25% intermediate, subject to viability.

The Consortium is concerned about the reference to pepper potting the affordable housing provision within the private housing area. The affordable housing provision will naturally be provided in different locations across the Land North of Burdon Lane, given there are three house builders on board. However, registered providers consider that pepper potting makes affordable housing difficult to manage and consequently this could make finding a registered provider difficult. The Consortium suggests that this requirement is removed from the SPD to ensure a deliverable scheme and that the following amendment is made to the text: All affordable housing must be integrated seamlessly into the layout and design of the residential areas, through pepper potting within private housing areas.

Housing Type The Consortium suggests the following change to the last sentence in the Housing Type text box: There will be variety in the housing types provided at SSGA to offer choice. Imaginative and high quality development both in terms of housing design and materials will be required. Developers will need to demonstrate how they have captured the

the SPD refers to 75%/25% split, the local plan refers to utilising the most up to date SHMA.

This part of the SPD has been amended to reflect the requirements of the Local plan, which refers to clusters, rather than pepper-potting.

spirit of innovation whilst moving ensured high quality and moved towards more sustainable ways of living within their proposals, subject to viability. The Consortium recognises that the Councils aim is for the SSGA to be a most sustainable development, however, viability issues should be a key consideration.

Developments must not be required to achieve such a high level of sustainability that it harms their viability otherwise there is a risk that they will not come forward. This reflects national policy which states that supplementary planning documents should not be used to add unnecessarily to financial burdens on development (NPPF, para. 153) and that careful attention should be paid to viability and costs and that the cumulative impacts on development of all existing and proposed local and national standards, supplementary planning documents and other policies must be assessed (NPPF, paragraph 173 and 174). This change ensures consistency with national policy.

The Consortium also requests that the following change is made to the supporting text to ensure a viable and deliverable scheme: This will help provide interest in the character and design of SSGA and should include executive housing with high specification and construction. Elsewhere imaginative the use of town houses, terraces and other forms of high quality but higher density housing types will prevail.

Section 7.4 “Thriving Communities” Social Infrastructure Whilst the Burdon Lane Consortium welcomes the Councils approach of providing new facilities in accessible locations, the following amendment is suggested to Objective 4: Provide new facilities including local centres, primary schools and open space where the greatest number of them have good and safe access to new and existing residents can access them easily and safely. This change is suggested to provide flexibility in case there is another accessible location that is the preferred location for new facilities for design/environmental/technical reasons but that does not provide access to the greatest number of new and existing residents.

It is not considered appropriate to include reference to viability within each section of the SPD.

No proposed changes. Objective 4 is considered appropriate as drafted to ensure new facilities are centrally located.

Art The Consortium recognises that the SPD is encouraging the inclusion of art. However, the development within the SSGA must be viable, in accordance with paragraphs 153, 173 and 174 of the NPPF. The following change is therefore suggested to the text box: The inclusion of art will be actively encouraged as part of the new development or the open landscape, subject to viability.

Healthcare This section advises that the NHS has no requirement for additional surgery provision within SSGA given there is sufficient capacity. However, the SPD goes on to state that: Although provision is not currently required, land has been identified in the form of a Neighbourhood Centre for such uses, should a need arise in the future. The council will continue to liaise with the NHS regarding Healthcare and surgery needs. The SSGA Infrastructure Delivery Study advises that as no additional healthcare facilities are required a financial contribution is not required (para. 5.4). The Consortium considers that it would be unreasonable for the Council to require land to be reserved for healthcare facilities indefinitely, given the absence of a need for further facilities. Accordingly, the Consortium suggests that the following amendment is made: Although provision is not currently required, land has been identified in the form of a Neighbourhood Centre for such uses , should a need arise in the future . The need for healthcare facilities will be reviewed at the time any planning application is submitted for developments in the SSGA.

Section 7.5 “Movement Sustainable Communities The Burdon Lane Consortium has concerns about the Building for Life accreditation. Please see their response to Section 3.3 and Section 7.2 of the SPD for details of these concerns. They therefore suggest the following amendment to the text: To ensure the creation of a well-connected and permeable network developers should demonstrate how the application of principles from Manual for Streets and Building for Life 12 have been broadly incorporated into development design proposals for residential streets, subject to viability.

Public Transport The Consortium broadly supports the need for bus routes to penetrate into the new development areas; however, the following revision is suggested: Discussions will be held with bus operators to agree the timing for

It is not considered appropriate to include reference to viability within each section of the SPD.

The healthcare section has been updated to reflect current discussions with the CCG, which sets out that any requirement for additional surgery provision may be requested through individual planning applications.

The SPD has also been amended to specify that health centres are appropriate uses for inclusion within the neighbourhood centre, should a need arise and the reference to ‘land has been identified’ has been removed.

The existing text refers to ‘demonstrate’, this is considered flexible enough to enable developers to undertake. No changes proposed to the SPD.

No changes proposed to SPD.

and the extent of the provision of public transport services within each area of the SSGA Nexus advocate the need for public transport services to be firmly established from the outset so as to help reduce car dependency.

This change is sought to provide flexibility regarding the timescales for delivering bus services given that a critical mass of population will need to be established to ensure a viable service and also to provide flexibility for developers to negotiate with all bus providers. This approach is consistent with the SSGA Infrastructure Delivery Study which refers to sufficient critical mass in terms of population and infrastructure to enable commercial bus service provision to be viable.

The Consortium is concerned that the requirement for all residential properties to be within 400m of a bus stop with a frequent service is an onerous requirement and is not a national requirement. The Consortium suggest the following change to provide greater flexibility: Residential properties should have good access to frequent bus services be within 400 metres of a bus stop with a frequent service to ensure the service represents an attractive proposition for commuters. The Consortium suggest that the following sentence is deleted because it could be difficult for the developers to ensure that the buses comply with the latest standards for accessibility and environmental performance, given that they will be provided by a third party. Indeed, the bus operators will have their own requirements to meet standards which will be secured by bus operators/the local authority. The bus service should meet the latest industry standards for accessibility and environmental performance.

Parking The Consortium is concerned about the reference to Building for Life for the reasons set out in their response to Section 3.3 and Section 7.2 of the SPD. The Consortium suggest that the text is amended to state: Parking must be well designed and integrated into the development and contribute to the overall quality of the public realm. Proposals should create an environment which is not dominated by car parking and follow the broad principles set out within the Residential Design Guide SPD (excluding spacing standards 10G), Manual for Streets and Building for Life¹², subject to viability.

The SPD specifies that residential properties **should** be within 400m, it does not specify it as a requirement. Deletion of the requirement for the bus service to meet the latest industry standards for accessibility and environmental performance, as outside the developer's control.

Existing text is considered flexible as states 'follow the principles'. It is not considered appropriate to include reference to viability within each section of the SPD.

The Consortium considers that the comment about integrated garages in the SPD is overly restrictive and conflicts with the NPPF which advises that design policies should avoid unnecessary prescription. The following amendment is suggested to the text: A variety of methods of car parking should be provided throughout the growth area, these should be dependent upon the character area in which they sit. Appropriate arrangements may include a combination of on-street parking within well-designed public realm spaces, in curtilage parking or within a courtyard. Developments should avoid the dominant use of integrated garages and areas of hard-standing for parked vehicles which front the street in order to create a high quality public realm, creating a safer pedestrian environment.

The Consortium is concerned that all new dwellings should be equipped to charge electric vehicles, given this is an additional financial burden above all the other SPD requirements, and also given that this has not been costed in the Councils Whole Plan Viability Assessment (August 2017). The following amendment is suggested by the Consortium: Electric vehicles and Ultra Low Emission Vehicles (ULEVs) are a more sustainable mode of transport ; their and their use within the SSGA should be encouraged through provision of dedicated parking for ULEVs. ensuring new dwellings are equipped to charge electric vehicles. Proposals that link residence with a commitment to use ULEVs or membership of car clubs will be especially encouraged. This change is required to ensure the SPD accords with the NPPF through taking into account development viability (para. 153, 173 and 174).

Burdon Lane The SPD states No access to be permitted off Burdon Lane. However, the text does not clarify when this route will be closed to vehicles. The Consortium suggests that the text is amended to state that this road is closed to vehicles once the Ryhope Doxford Link Road is completed and operational. This is to ensure that the developers are able to access their site in the interim. The Consortium suggest that the text is amended as follows: No access to be permitted off Burdon Lane. Burdon Lane is to be severed where the Ryhope Doxford Link Road (RDLR) crosses the lane at the Cherry Knowle site. The lane will no longer provide vehicular access until beyond Nettles Lane. Fig 21 details where the lane is to be severed. The access will be closed to vehicles once the RDLR is completed and operational. The severed

The wording of the supporting text 'should avoid' is not considered overly restrictive.

The SPD has been amended to reflect the requirements of the Local Plan, which states to 'make provision for the installation of home charging apparatus on major residential schemes'.

The SPD has been amended to reflect that no access will be permitted off Burdon Lane once the RDLR is complete and operational.

section will then become a multiuser route for pedestrians, cyclists and horse riders.

Burdon Road The Consortium is concerned about the restriction that a maximum of 100 dwellings should take access from Burdon Road. Firstly, this would prevent the use of the primary site access from Burdon Road via the proposed link road. Secondly, they suggest that a capacity assessment exercise is undertaken to calculate the maximum number of dwellings. This will ensure that the maximum number is justified by highways modelling work.

The Consortium suggest that the text is amended as follows: No access is to be taken from the section of Burdon Road south of Lodgeside Meadow only, other than to serve the South West corner of Land North of Burdon Lane. This should be a localised access with no through route . The maximum number of dwellings that can take access from the section of Burdon Road south of Lodgeside Meadow is to be determined by a capacity assessment exercise that will be agreed with the Local Planning Authority . and serve a maximum of 100 dwellings.

Route Hierarchy The Consortium considers that the requirement for the pedestrian only links to be a minimum of 3m wide seems excessively wide and queries whether this width also include cycle provision. The Consortium suggests that the text is amended to one of the following options: Pedestrian only links: Minimum 3m 2m (not attached to the highway) or Pedestrian and cycle only links: Minimum 3m (not attached to the highway).

Section 7.6 “Sustainable Development Renewable Energy/Energy Efficiency The Burdon Lane Consortium is concerned about the requirement for their development to connect to a central energy centre with district heating or alternative. Please see their response to Section 4.6 (Sustainability) of the SPD for details of their concerns. The following amendment is suggested to the Renewable Energy/Energy Efficiency text box: Development to connect to a central energy centre with district heating or alternative.

The text has been amended accordingly to make clear that the section of Burdon Road where access is restricted, is that south of Lodgeside Meadows. In addition to this additional wording has been included which states that this access point will serve a maximum of 100 dwellings, unless agreed otherwise with the LPA.

Text has been amended to the following:-

Primary Vehicle Route: 7.2 m (Plus 2m
Pedestrian Footpath or 3m shared pedestrian/ Cycle
route)

This element of the SPD has been deleted.

The Consortium broadly welcomes the orientation of properties within 30° of south; however, the following amendment is suggested to provide flexibility: The main glazed elevation should be orientated within 30° of south (solar orientation) with a correspondingly small proportion of glazing on the north elevation, wherever practical and viable. However, it is not essential for all buildings to be orientated due south and variations of around up to 30° can be accommodated whilst still benefiting from passive solar gains.

The following flexibility is sought in relation to green roofs and sourcing building materials: The inclusion of green roofs throughout the growth area will be encouraged, where viable, and looked favourable upon particularly in areas with issues with surface water flooding. Building materials should also be sustainable sustainably sourced and have a reduced environmental impact, whilst requiring low maintenance and are durable to the UK climate, wherever possible.

As set out in response to Section 4.6, the Consortium does not consider that the district heating system can be delivered or is viable. The Consortium therefore recommends that the following text is deleted as it is no longer relevant: The SSGA Renewable Energy Study (2013) undertaken to inform the SSGA SPD explored opportunities for the use of renewable energy sources and identified that a central energy centre with district heating potentially fired by a lead biomass boiler would be an appropriate option for SSGA - in meeting government targets towards zero carbon development and offering an energy cost saving. The council will further explore the opportunity of District Heating at SSGA. Initial studies suggest that an area of approximately 400m² will be required for the construction of an energy centre. The location of the centre will depend upon the requirements of the energy company and fuel used. The design of the structure to house the energy centre will need to be designed to a high standard using high quality materials and ensure the building is not dominant on the landscape whilst providing an appropriate design response to the locality.

The Burdon Lane Consortium welcomes the statement that the masterplan represents the councils interpretation of how the key components of the Principles and Parameters Chapter may be released in a spatial form across

No changes to existing text, current wording is considered flexible.

The existing text on green roofs is considered flexible and no changes are proposed. Amendment to text to include where possible in relation to sustainable sourced.

This element of the SPD has been deleted.

Figure 22 has been enlarged.

the area. This is given that final masterplans will be influenced and led by the market, as well as detailed site surveys and site investigations. This statement ensures a flexible approach. The Consortium notes that the key to Figure 22 is so small it is illegible to read.

The Consortium notes that the key to Figure 23 is so small it is illegible to read.

Section 9.1 "Purpose and Status of Code The Burdon Lane Consortium broadly welcomes the introductory statement but suggests that the following changes are made to ensure greater flexibility and accordance with the NPPF which is clear that design polices should avoid unnecessary prescription or detail.

This code aims to achieve a balance between a clear level of prescription to ensure ensuring high standards of design, and an appropriate degree of flexibility to allow designers freedom to bring forward innovative and imaginative proposals that improve upon the code and importantly, to accommodate changing needs, market conditions or government/local guidance over the duration of projects. Proposals should seek to generally accord with the code, where this is not achievable clear justification must be provided, detailing how the alternative design solution will not undermine key design objectives.

Section 9.2 "Movement and Streets Pedestrians and Cyclists The Burdon Lane Consortium consider that a perimeter block development is onerous, inflexible and overly prescriptive and conflicts with paragraph 59 of the NPPF which states that design policies should avoid unnecessary prescription. The layout and size of the development form will partly need to adapt to take into account the location of site constraints, including archaeology and ecological features, as well as the location of the SSAANGs and neighbourhood centre. Flexibility must be allowed for the layout of the development to vary to adapt to local site characteristics. The Consortium suggests the following amendment to the text: In order to ensure that walking and cycling are the natural option the masterplan has been developed to provide a high level of permeability. through the use of perimeter block development. Where

Figure 23 has been enlarged.

The existing text is considered flexible to allow justification to be provided when not achievable to accord with the code.

No changes proposed

development blocks do not form this style, pedestrian only routes or green links have been provided.

Recreational Routes The Burdon Lane Consortium recognises the Councils aim for the residents to walk/cycle through the masterplan area without needing to travel along a primary street or into the main urban environment. However, there could be various reasons why this is not possible or should be avoided, for example, ecological reasons. The following amendment is therefore suggested: It is the aim of the masterplan to create a semi-rural development where residents can walk/cycle through the entire area without needing to travel along a primary street or into the main urban environment. Should this not be possible in certain areas, a clear justification should be provided.

Public Transport Corridors The Consortium suggests the following revision for the reasons set out in their response to Section 7.5 Movement of the SPD. The location of the corridors will provide an accessible bus service within 400m of to all residents within the SSGA.

Ryhope Doxford Link Road The Consortium considers that the requirement for the landscape belt to be 15-20m is overly prescriptive and the following amendment is suggested: A landscape belt of approx. 15-20m is required between the RDLR and proposed development. Its width will vary depending on the local context and masterplan proposals.

Primary Streets, Secondary Streets, Green Streets and Shared Surface The Consortium is concerned that pages 78 “81 of the draft SPD which relate to Primary Streets, Secondary Streets, Green Streets and Shared Surface are far too onerous and prescriptive and conflict with the NPPF which states that design policies should avoid unnecessary prescription or detail (para. 59). These sections are clearly seeking to dictate the layout of the development and it should not be the purpose of an SPD to provide such restrictive requirements. To ensure compliance with national planning policy, the Consortium suggest that the following amendments are made to this text:

Primary Streets Primary access routes will accommodate a variety of functions including bus routes, frequent vehicle movement, multi-user routes and

No changes proposed to the SPD.

No changes proposed to the SPD.

The existing text is considered flexible and no changes proposed to SPD.

No changes proposed to the SPD.

pedestrian footpaths. The character of the highway will be urban in nature consisting of a wide avenue. In order to prevent parked vehicles blocking the highway and pedestrian routes a 2m wide channel of parallel parking bays interspersed with landscaping will be provided on both sides of the carriageway. A multi-user route will be provided on one side and will be wide enough to provide both pedestrian and cycle movement (3m). The route will be located between the parking/landscaping channel and residential properties front garden space. A standard public footpath will be provided on the alternative side of the carriageway.

Key dimensions: Wider feel to the highway 24-25m.

6.7m highway, allow for 2 buses to pass.

2m verge between highway and pavement, verge will include a combination of parallel on street parking and landscaping.

3m pedestrian and cycle shared paving to be provided on one side

2m pedestrian route provided on one side.

Front garden or Narrow front garden set back and boundary treatment.

Secondary Streets Providing the principal access off the primary street to residential properties, secondary streets will have a strong urban character and a supporting role to the primary street is helping to define the main vehicular routes. These streets are unlikely to carry large volumes of traffic or bus routes and consequently allows for an approach towards design which is less focussed on accommodating through movement. Properties will provide frontage and a strong building line onto the streets with direct pedestrian access to the street from the property. A design response which provides the back of properties onto public streets will not be considered appropriate.

Key Dimensions: Width 17 - 19.5m

5.5m highway

2m pedestrian footpath

Front garden or narrow front garden set back and boundary treatment (see set back and boundary treatment)

Green Streets - Streets facing onto or adjoining open spaces may take various different forms depending on the type of open space which the street fronts onto. These streets should be designed for low traffic flows enabling a mix of pedestrians and vehicles. In the main, these will be located on the urban

No changes proposed to the SPD.

“rural fringe where development bounds green space, SANGS, green links and natural heritage features. The routes should provide a high quality public realm where pedestrians have priority and vehicles do not dominate.

Properties will only be located on one side of the highway with green space on the other therefore the below requirements & dimensions are expected:

No level change between the footway and the vehicle path, however changes in surface materials may be sought.

Adequate parking facilities for properties to prevent poor parking behaviour dominating the streetscene.

4.5-5.5m carriageway.

4m minimum residential front garden.

It is anticipated that the green streets will comprise of either shared surfaces or Home Zones, these are detailed below.

Shared Surface This street type includes shared spaces designed for very low vehicle speeds which should be self-enforcing through good design. They provide access for small groups of homes either in courtyard form or short streets. Shared space streets should help define the building blocks and will be part of the permeable network of routes.

Within a cul-de-sac this type of street can be used to serve up to 10 dwellings. There are likely to be higher levels of pedestrian and cyclist activity (particularly from children) along these streets, and the design should ensure that these activities are as safe as possible. Even the most vulnerable pedestrians and cyclists should be able to share the whole street safely with vehicles.

Some designated pedestrian routes maybe provided but should not be designed as footways which have full height kerbs and therefore fully segregate vehicles from other street users. Where provided these routes should be free from car parking and adequately provide way finding methods which are suitable for blind and partially sighted people. The routes should be provided in a contrasting coloured material, with a 30mm kerb up stand with flush crossing points and tactile paving where required.

Key Dimensions:

Width “Varies

4.5-5.5m shared surface

No changes proposed to the SPD.

Set back of the property and boundary treatment will depend upon the character of the area and the surrounding features.

The Consortium also suggests that the diagrams on page 79 are removed.

Car Parking The Consortium suggest the following change is made to ensure sufficient off-street parking is provided and to reduce the number of parked cars on the streets:

All residential properties within the SSGA will be provided with at least one allocated car parking space. Executive dwellings will be provided with a minimum of two off street parking spaces.

It should also be clarified whether garages are counted as a space. The Consortium considers that the requirement for garages to be located behind the building line is overly restrictive and conflicts with the NPPF which advises that design policies should avoid unnecessary prescription. Indeed, several pictures in the SPD show garages flush with the front elevations of properties and not set back (on pages 55, 56, 78 and 80). As these pictures are included as examples of good design, it is considered that there is a conflict on this matter within the SPD. The following change is therefore suggested: Where garages are provided careful consideration should be given to the size, positioning and treatment of garages to ensure that they do. Garages must be located behind the building line and not dominate the streetscene.

Section 9.3 "Built Form The Burdon Lane Consortium generally agrees with the approach to include a variety of block sizes throughout the development to create interest and character. However, the Consortium is concerned with the requirement that development should consist of perimeter blocks and that development blocks should be between 35m - 110m in width and 60 "100m in length for the reasons set out in response to Section 9.2. These requirements are onerous and inflexible and conflict with paragraph 59 of the NPPF which states that design policies should avoid unnecessary prescription. The layout and size of development blocks will partly need to adapt to take into account the location of site constraints, including archaeology and ecological features,

No changes proposed to the SPD.

No changes proposed to the SPD.

as well as the location of the SSAANGs and neighbourhood centre. Flexibility must be allowed for the layout and size of blocks to vary.

The Consortium therefore suggest the following amendments: Creating permeable and legible housing layouts is a fundamental objective of the SPD , to ensure this chapter 7.2 requires developments to consist of perimeter blocks . This form of development Developments should consistently define the public and private realm, but vary in terms of enclosure, height and density depending upon the character of the area. The arrangement of dwellings within a block structure and their relationship to the street and to other building elements will be influenced by the plan form of the dwelling themselves. Development block form variety Including a variety of block sizes forms and scales of layout throughout the development is a good means of creating interest and character across the SSGA, it is advised that developments should provide a block width range of 35-110m and length range of 60-110m. Small development blocks provide good pedestrian permeability and are most appropriate in the higher density areas located around the local centre. Larger development blocks, at the upper end of the above ranges, will be more appropriate in the lower density executive style development areas of Chapelgarth. Thin development blocks, approximately 35-40m in width, are largely achievable in traditional layouts where private rear gardens back directly onto each other. Care should however, be taken to avoid numerous thin blocks in a row as this can result in little active frontage along side streets. Larger, square blocks can be achieved through the incorporation of short, direct cul-de-sac if the overall development is well connected into the surrounding area and has sufficient pedestrian. Further information and guidance on the development blocks form of the layout can be found in chapter five of the Residential Design Guide SPD.

Building Types and Frontages The Consortium also suggests the following change to avoid an overly prescriptive approach: The building types and frontage provided within developments will determine how well streets and spaces are animated and defined. To ensure the appropriate responses to the interface between the built form and public realm is created the below guidance will need to be should generally be followed.

No changes proposed to the SPD.

No changes proposed to the SPD.

Additionally, the Consortium suggests that the reference to increased vertical emphasis within the facade for landmark buildings and the reference to increasing the building height to 2.5 storey for corner turners (page 82) are removed to avoid an overly prescriptive approach.

The following text is therefore suggested for deletion: Landmark buildings will be used to define key gateways and provide points of reference to enhance legibility. The buildings should be defined through an alternative approach to architectural design, which makes the building stand out from the other house types. This should include the materials used, the pattern of fenestration, and increased vertical emphasis within the facade and/or an increase in the overall building height up to 3 storeys. The buildings themselves will not be as prominent as landmark buildings, but will help to provide focal points, an increase in the overall building height to 2.5 storeys will also aid legibility. Transition of Styles For the reasons set out earlier in this section, the Consortium suggests that the text is amended as follows to remove the reference to perimeter blocks: Changes in building styles, colours, proportions, scales and streets design should be avoided where character areas meet, on either side of a street or along a perimeter block. Design Options Front Gardens, Front Garden and Narrow Front Gardens.

The Consortium considers that the requirements of the SPD are too restrictive in relation to the depth of front gardens and height/type of boundaries. It is noted that there is a discrepancy between the height of boundary treatment referred to under the Design Options Front Gardens text of 450mm to 1000mm and the Front Garden text of 650mm to 1000mm. It is also not clear why the text is so prescriptive and requires front gardens to be provided when there is a photograph of the front of houses on the same page (page 84) which do not have any front gardens, instead a change of surface materials is used to delineate the difference between the front of the property and the street/pavement. It is recognised that this photograph relates to a Front Strip as discussed on page 85; however, the flexibility to provide a Font Strip is not provided for within the text that relates to front gardens.

It is suggested that the three sections on front gardens are combined and that the text is amended as follows to provide greater flexibility: A front garden

No changes proposed to the SPD.

No changes proposed to the SPD.

should normally be situated between the plot line and the building edge. The garden can be delineated by a boundary treatment of up to between 450mm and 1000mm. The front garden for larger plots should have a depth of 5-10 m. Planting along the property line is encouraged. Bay windows or porches may project into the garden. A boundary railing or wall of brick/stone or render may be between 650 - 1000 mm with planting on the plot boundary line to reinforce it.

The front garden should have a depth of between 5 -10m. Where the boundary treatment fencing interferes with a highway visibility splay, it may be necessary to reduce the height or demonstrate that the boundary treatment fencing is of an open design which permits adequate views to be gained through it. The plot line should be delineated by a railing or wall up to 1000mm high. The front garden should have a depth of between 1.5-4 m and should be planted with hedging. This The boundary height treatment should be no more than 600 mm in height in locations close to where children are likely to be playing or walking.

Side Boundaries The Consortium considers that the perimeter block approach and having stepped facing as shown on the side boundaries diagram overly prescriptive. The Consortium therefore suggest that the diagram is removed and that the following text is deleted: The inclusion of perimeter block development will lead to the predominance of back-to-back gardens and corner properties with side gardens bounding the public realm. Where gardens side onto the public realm a stepped approach should be sought with the provision of a brick and timber/railing combination (see illustration).

Section 9.4 Neighbourhood Centre/Commercial Parking The Burdon Lane Consortium is concerned about the requirement for the local centre to include a district heating central plan. Please see their response to Section 4.6 (Sustainability) of the SPD for details of their concerns.

The Consortium also suggests that flexibility should be provided to allow either a grass or 3G pitch to be provided, subject to viability. The following changes are suggested: The local centre will comprise of: Retail provision, Primary school, Wheeled Sports Area, Formal play space, Multi User Games

No changes proposed to the SPD.

No changes proposed to the SPD. The pitch provision is required to be 3G, as such no changes proposed to the SPD.

Area, Grass or 3G pitch, Parking facilities capable of serving all of the above and the SANG, to be served by bus service District heating central plant. The above provisions will be subject to viability and demand.

Multi-Functional Green Spaces The Consortium agrees with the need to retain hedgerows and woodlands, however, there may be cases where some are lost, for example should they be suffering from poor health. There may also be instances where it is not possible to use gaps in existing hedge rows for access. The following change is therefore suggested to the text to ensure flexibility: Existing hedge rows and woodlands will remain and form the basis of development proposals, wherever possible. Gaps in existing natural features such as hedge rows can be utilised to provide access and services, wherever possible.

Design of Green Spaces The Consortium notes that the key on Figure 24: Green Infrastructure is too small to read.

Public Art The Consortium suggests that the public art text is amended to include a reference to viability, in accordance with paragraphs 153, 173 and 174 of the NPPF, and that the word requirement is removed, given the provision of public art is not a statutory requirement: The natural environment should be a major source of ideas for place making and cultural development. Where there are opportunities or a requirement for public art, proposals should consider the integration of public art throughout the design process, where viable.

Section 10.1 - Introduction The Burdon Lane Consortium supports the statement that: The Indicative Masterplan is not prescriptive in limiting how the site must be developed, nor is it exhaustive in suggesting that this is the only way the site can be redeveloped. It is an interpretation of how the councils aspirations for the area can be accommodated within the physical constraints identified in this document. Other interpretations of how the site could be taken forward to meet the objectives of the masterplan may be appropriate, and the council will be open to discussions with any interested parties who wish to provide their own interpretation of the masterplan.

No changes proposed to the SPD.

Figure enlarged.

No changes proposed to the SPD.

The Consortium does consider that some of the design requirements set out within the SPD are overly prescriptive and trusts that the masterplan objectives will be applied with flexibility in accordance with this statement.

Section 10.2 "Site Wide Character Areas The Burdon Lane Consortium has concerns about some of the design criteria and considers that they are overly prescriptive. The following amendments are suggested to ensure accordance with paragraph 59 of the NPPF:

Ryhope Doxford Link Road The landscape belt will vary in width depending on the local context and masterplan proposals. ~~of approx. 15-20m~~ It will provide a pedestrian/cycle routes, low level native species planting and scattered tree planting.

Urban-Rural Edge Properties to generally have a ~~minimum 5m~~ front gardens which to include an area of landscaped amenity space and tree planting.

Due to the property types being executive a minimum of two parking spaces per property should be provided.

Urban ~~4m set back from front gardens~~

The inclusion of garages will be acceptable form of on plot parking however the garage must not dominate the street scene. ~~The inclusion of a high proportion of integrated garages will not be considered acceptable.~~

Section 10.4 "Land North of Burdon Lane The Burdon Lane Consortium suggests that the following text is included at the end of the introductory text:

Figure 32: Street Network and Figure 33: Green Infrastructure are illustrative masterplans, providing one example of how the development could come forward. However, the Council recognises that the final masterplan will be in formed by the findings of detailed site surveys and investigations, as well as the characteristics of the local area, and hence the principles and parameters provided in the SPD will be applied with flexibility.

No changes proposed to the SPD.

No amendments made to the SPD.

No changes proposed to the SPD.

This text is suggested to ensure a flexibility approach which responds to the findings of further work. Street Network. The Consortium suggests that the following changes are made to the text:

1. Access to this section to be provided from Burdon Lane, however, this will not provide private vehicle links into the rest of the LnoBL development , once the Link Road is completed and operational .
The maximum number of dwellings that can take access from the section of Burdon Road south of Lodgeside Meadow is to be determined by a capacity assessment exercise that will be agreed with the Local Planning Authority , and will serve up to 100 units

a) A bus only link will be provided through to the larger site. The Consortiums reasons are explained in their response to Section 7.5.

Green Infrastructure The Burdon Lane Consortium realises that the Council is seeking a minimum of 10m wide landscaping and amenity green space between the existing and new residential areas. However, this text conflicts with the Urban Edge text on page 92 of the draft SPD which refers to the proposed new properties backing onto existing areas.

Given this conflict, and to provide flexibility to respond to the local context, the following amendment is suggested: Landscaping and amenity green space ~~to~~ should be provided between existing residential areas and the new development , where appropriate , ~~a minimum of 10m will be provided.~~

Pedestrian and Cycle Recreational Network The Burdon Lane Consortium suggests that the following change is made to the text:

6. Burdon Lane to be stopped up and converted into a multi-user route , once the Link Road is completed and operational . At this point the green route running to the north of the hedge row will divert onto the multi-user route. The Consortiums reason is explained in their response to Section 7.5.

Built Form The Consortium suggests that text about public art (under point 7.b) is amended to include references to viability, in accordance with

Text amended to reflect that the access can serve up to 100 dwellings, unless agreed otherwise.

The urban edge text has been deleted and the requirement is for a minimum of 10m wide landscaping and amenity green space between existing and new residential areas.

Text amended to reflect that Burdon lane will not be stopped up until the RDLR is complete and operational.

No amendments proposed to text within SPD.

paragraphs 153, 173 and 174 of the NPPF: The use of public art will also be welcomed in these locations, subject to viability.

Section 11.2 The Burdon Lane Consortium notes that Table 7 provides an estimated 955 dwellings on Land North of Burdon Lane. As Table 6 in Section 7.3 of the SPD and the Councils Whole Plan Viability Assessment both relate to 995 dwellings. It is assumed that the figure should be 995 dwellings and it is suggested that the word approximately is used instead of estimated. The Consortium therefore suggests the following changes to ensure consistency:

The figure in Table 6 is amended to state an approximate yield of 995 dwellings.

The title of Table 7 is amended to state ~~Estimated~~ Approximate Development/Land Use Figures.

Paragraph 11.2 is amended to state The following provides a summary of ~~the estimated~~ approximate figures for development/land use at the four sub-areas.

Section 11.4 "Phasing The Burdon Lane Consortium queries the following statement that those site not allocated for residential should only come forward once the Core Strategy has been to examination and has been adopted. Firstly, there is no legal or planning policy basis to prevent sites coming forward until a development plan is adopted and hence this statement cannot be enforced by the Council.

Secondly, some of the sites that are not allocated for residential development have already been approved and hence this statement is contradicting the Councils approach on other sites. For example, South Ryhope, which has an employment allocation in the UDP, has a minded to grant resolution for a residential development. The Consortium therefore suggests that this text is removed from the SPD to ensure a legal compliance with planning legislation and consistency with the other SSGA developments. ~~Those sites not allocated for residential should only come forward once the Core Strategy has been to examination and has been adopted.~~

SPD has been updated throughout to reflect yields set out within the Local Plan.

No changes proposed.

No changes proposed.

This text has been updated to reflect the current position with regards the sites within SSGA.

Section 11.5 - Planning Obligations The Burdon Lane Consortium queries the Councils contribution of £70 per dwelling towards the cost of providing dedicated planning and development advice and support. It is not clear what this payment relates to and how it would differ from the pre-application, planning application or discharge of condition payments, or the proposed contribution towards staffing costs for implementing infrastructure (as referred to in Section 11.5). Furthermore, this payment is not referred to in the Planning Committee Reports for the other 4 developments at Chapelgarth, Cherry Knowle, South Ryhope and Land at Burdon Lane, neither is it assessed in the Councils Whole Plan Viability Assessment . The Consortium considers it is important that a consistent approach is followed for all developments in the SSGA. If the other developments have not made this payment, then it would be unreasonable for the Council to insist on such a payment for the Land North of Burdon Lane. Given the lack of clarity and to ensure a consistent approach, the Consortium suggests that the following text is removed from the SPD:

~~In order to ensure the comprehensive delivery of the South Sunderland Growth Area a small contribution of £70 per dwelling will be sought towards the cost of providing dedicated planning and development advice and support.~~

Page 111 of the SPD contains a table setting out the infrastructure requirements and associated costs. However, the Consortium is concerned about the viability implications of all these requirements. This is particularly given that a viability assessment has not been undertaken that takes into account all these costs, as well as the costs of achieving the highest standards of design and sustainability. This conflicts with paragraphs 153, 173 and 174 of the NPPF, for the reasons set out in response to Section 4.6.

The Consortium suggests that the following text is added below the table: The infrastructure requirements and associated costs are indicative figures, and will be subject to negotiation and scheme viability.

This text has been updated to reflect the current position with regards the sites within SSGA.

Reference to this has been deleted from the SPD.

No proposed changes to the text.

<p>Additionally, the Infrastructure Requirements table refers to the on-site provision of allotments. However, the Consortium suggests that off-site provision is also included in this table, for the reasons provided in response to Section 7.1. The Consortium therefore suggests that following change to the allotment text: Requirement Model suggests 15 plots per 1000 households, on an average size of between 250 “300 square metres. <u>The allotments can either be provided on-site by the developers or an off-site contribution is made.</u> Estimated Cost Unknown. To be implemented <u>on-site</u> by the developer or an off-site contribution of £85.50 per dwelling.</p> <p>The Infrastructure Requirements table also refers to public art and the Consortium suggest that the following change is made, in the interests of scheme viability: <u>To be provided by the developer, subject to viability.</u></p> <p>Section 11.6 “Infrastructure and Delivery The Burdon Lane Consortium welcomes the statement that an element of flexibility is retained in order that development can respond to changing circumstances over time.</p> <p>Section 11.8 “Long Term Maintenance/Management The Burdon Lane Consortium recognises that the second paragraph advises that the preference is for the greenspace/SSAANNs/GI corridors/play facilities/sport pitches are implemented by the developer and adopted/maintained by the Council. The third paragraph then provides the option of a third party to manage the greenspace only and does not refer to the other features/facilities. The Consortium suggests that the third paragraph is amended as follows to provide an option for a third party to manage everything:</p> <p>Should the developer prefer to appoint a third party to manage <u>these features/facilities</u> the greenspace, rather than the council, through S106s/conditions/legal agreements the developer must be able to provide Sunderland City Council with confidence that the green-space <u>these features/facilities</u> will be maintained in perpetuity to a standard <u>and timescale</u> agreed by the council.</p>	<p>The SPD has been amended with regards allotments, with the location to be agreed in consultation with the council’s allotments officer.</p> <p>No changes proposed to text.</p> <p>Support noted.</p> <p>No changes proposed to the SPD. The detail of third party managing features/facilities can be discussed/agreed via the planning application.</p> <p>No changes proposed to the SPD.</p>
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<p>The Consortium is also concerned that the SPD states that a management board should be established that includes residents and council representatives for the reasons set out in response to Section 7.1. The Consortium suggests that the following text is deleted: A management board should be established that includes residents and council representatives. Section 11.9 “Viability The Burdon Lane Consortium supports the flexible approach to viability and provision for viability appraisals to be submitted.</p> <p>Phasing/Delivery of SSAANGs The Burdon Lane Consortium is concerned about the requirement for the SSAANGs to be operational prior to the occupation of new residential development to ensure that the interests of the SPA are not damaged. The Consortium is fully committed to delivering the SSAANG; however, it would be unreasonable for the whole SSAANG area to be completed prior to the occupation of 1 dwelling. The Consortium suggests that a phasing scheme for the delivery of the SSAANG is agreed with the Councils ecologist and Natural England. The following amendment is therefore suggested:</p> <p>SSAANGS must be operational prior to the occupation of new residential development <u>A phasing scheme for the creation and operation of the SSAANGs must be agreed by the Council prior to the commencement of development</u> to ensure that the interests of the SPA are not damaged.</p> <p>Maintenance of SSAANGs This section refers to the SSAANGS being maintained in perpetuity (minimum of 75 years). However, 75 years is an excessively long time period and requirements could change. The Burdon Lane Consortium suggests that this text is amended as follows: SSAANGs must be maintained in perpetuity for a minimum of 75 years <u>for the long-term.</u> Requires SSAANGs to be maintained and useable for the <u>long-term</u> a minimum of 75 years .</p>	<p>If the SSAANG is not in place before occupation of new residential development then bad habitats in relation to accessing the coast may start to occur, resulting in damage to the SPA. As such no changes proposed to the SPD.</p> <p>Text not amended, retain as minimum of 75 years.</p>
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Consultee	Summary of Representations	Council's Response
<p>Burdon Lane Consortium</p>	<p>The cumulative effect of the additional requirements set out within the SPD will threaten development viability and could lead to significantly reduced delivery rates. Consider the SPD to be overly prescriptive and does not sufficiently take into account issues of viability and deliverability.</p> <p>The Council should note that the masterplan as currently presented at Figure 22 can and will not be delivered.</p> <p>Based on the lack of site-specific evidence upon which the SPD has been based the Consortium would suggest that the weight that can be placed on the SPD is limited.</p> <p>The Consortium agrees with the strategy to focus approximately 3,000 new homes in this area to meet 20% of the City's future housing need and, in particular, to provide significant numbers of much needed larger family homes.</p> <p>The consultee expresses concern regarding the need to deliver Building for Life Diamond level. The Consortium suggests that the following amendment is made:</p> <p><i>“All schemes should achieve ‘Building for Life Diamond’ status as exemplars giving developers and the council the opportunity to acknowledge and promote good design. Diamond status is available</i></p>	<p>The Council does not consider that the requirements of the SPD would unduly impact on the viability of the further development of the SSGA and a viability assessment was undertaken as part of the preparation of the SPD. The SSGA, at 11.9 (Viability), acknowledges that viability considerations will be taken into account where it is considered that this could affect the deliverability of the sites. Consequently, it is considered that this has been sufficiently addressed within the SPD.</p> <p>The Council considers that the masterplan as currently presented at figure 22 is deliverable and achievable.</p> <p>The SPD will be attributed full weight when it is adopted. Where required, the SPD has been based upon detailed evidence and an understanding of the site.</p> <p>Support noted.</p> <p>The SPD specifies that schemes should ‘aim to achieve’ Diamond level, it is not a requirement of the SPD to achieve these levels and flexibility is provided by the wording. Consequently, the Council has proposed no amendment.</p>

~~prior to build completion, offering developers the opportunity to market their development using Building for Life”.~~

“All schemes should promote good design and should create accessible and adaptable places in line with the requirements of the Local Plan”.

With regard to section 5.2, the consortium set out that the Land North of Burdon Lane is of overall low ecological value, being used by breeding birds and small numbers of bats. The Consortium therefore suggests that this statement is removed given the absence of evidence that ecology is a “strength”.

The Consultee welcomes the change in terminology to ‘larger family homes’ in place of ‘executive homes. In this context the reference in section 6.1 should be removed:

~~“higher value executive homes”~~

And it suggested to be replaced with:

“The area has the opportunity to introduce a much-needed mix of family housing including a supply of larger family homes within an attractive and unique setting.”

With regards to Chapter 7, the consultee requests the following change

“The principles and parameters should be considered with flexibility given that they could be influenced by the findings of detailed studies and site investigations, in particular archaeology.”

With regard to Chapter 7, Natural Heritage / SSAANGS, the consultee regards the 75 years requirement to be to excessive and suggest the following text;

~~“SSAANGs should be retained and maintained in perpetuity (minimum of 75 years),~~ whilst a scheme for their future maintenance will need to be agreed with the local planning authority.”

No changes proposed to the SPD. Ecology is considered a strength of the site by virtue of the priority species and habitats.

Support noted, the SPD has been amended to refer to larger family homes.

Given that the SPD is considered to provide planning guidance, the document is considered to have sufficient flexibility.

The minimum 75 years reference is considered quite low in comparison with other authorities. Consequently, no changes proposed to the SPD. This is consistent with the approach agreed on the already permitted schemes.

With regards to Existing Corridors, the consultee requests the following additions are made:

“All existing woodland, hedgerows and other vegetation corridors will be retained and enhanced, where possible and practical and where this cannot be achieved compensation or mitigation will be provided”. In addition, to this the consultee see no justification for the size of the buffers and standoff distances should be applied with flexibility”.

The consortium suggest the following text to be removed:

~~*“Buffers will be required around each of the corridor types – tree belts (25m), hedgerows(10m), copses and local designations (50-100m), National/European designations (buffer dependent on development proposal)”.*~~

And consider the following should be added:

“Buffers will be required around important woodland, hedgerows and copses, as well as around local designations and National /European designations. The buffer size will depend on the quality and interest of the species / habitat and the proposed development. It is suggested as a guide that the following buffers are provided:

Designated and / or ancient woodland - 25m buffer

High quality hedgerows that are of ecological importance - 10m buffer

Local designations - 50-100m buffer

National / European Designations – the buffer width should vary depending upon the ecological value and function of the feature that is to be protected and the quality of the habitat within the buffer”

It is considered that to insert the proposed text will weaken this aspect of the sentence and as such no changes proposed.

The proposed changes are considered to weaken the requirement and as such no changes proposed. The buffers have been based on the evidence base and are consistent with those implemented by permitted schemes within the SSGA.

With regards to allotments, the consultees set out that there is a discrepancy between this SPD and the SSGA Infrastructure Delivery Study (IDS) regarding allotment provision. They set out the following changes to

“Allotments should either be provided on-site and implemented by the developer or a commuted sum payment should be made towards their off-site provision.”

~~*“Where it is not feasible to provide on site, appropriate off site locations should be found in consultation with the council’s allotment officer.”*~~

With regards to the management and maintenance of GI and SSAANG, the consultant has expressed they are very concerned regarding the requirement for a ‘management board’ to be established and that this is onerous. In alignment with this view the consultee request the following to be deleted:

~~*“A management board should be established that includes residents and council representatives.”*~~

With regards to Section 7.2 Built Environment, the consultee suggests the following text changes:

~~*“Development proposals should strive for the highest standard in the design of deliver good quality buildings, public realm and landscaping”.*~~

~~*“Development proposals within the SSGA will be required to deliver schemes that achieve high quality standards of design following the principles of Building for Life 12 and Secured by Design which delivers an accessible, adaptable and safe place, whilst respecting the surrounding built and landscape features within and neighbouring the site”.*~~

The SPD has been amended to change the reference to allotment provision being provided on or off-site to ensure consistency with Policy SS6.

The Council considers the management board as an effective mechanism to secure the long-term future of the GI and SSAANG.

The SSGA no longer includes the requirement to strive for the highest standard in design.

~~“Building for Life 12 guides the better planning of new development through urban design standards which create safe environments that provide everything that should be expected within a new community. Development proposals should seek to achieve building for life accreditation, therefore providing a mark of a good place to live. The general Building for Life principles of creating a safe and accessible environment should be broadly accorded with, subject to viability, to provide a good place to live.”~~

With regards to ‘Development Layout within the SSGA, the consultees suggest the following changes:

“Proposals will be ~~required~~ encouraged to:

- *~~“Form a perimeter block development layout which makes clear distinctions between public and private space.”~~*
- *~~“Provide a variety of block sizes”~~*
- *“All developments should front onto the public realm, natural features of the landscape, pedestrian/multi-user routes, open space and ecological buffers, wherever possible or practical.”*

~~“The most appropriate form of development will therefore be a ‘perimeter block’.~~

“A ~~perimeter block~~ The style of development should allow for a flexible form which can accommodate a range of buildings types and densities. The style of development ~~will~~ should also ensure maximum natural surveillance and activation onto the public realm through buildings fronting onto a public street whilst also ensuring security to the rear of properties”.

Building for Life 12 is a nationally recognised scheme which seeks to deliver good quality design. It is therefore considered appropriate that proposals should be designed with these principles in mind. The wording encourages developers to seek accreditation but offers flexibility.

The proposed changes are considered to weaken the requirement as such no changes proposed. The wording seeks to deliver a high quality development.

“Proposals which provide rear gardens or blank/inactive elevations onto the above elements will not normally be considered acceptable.”

With regards the Architectural Design section the following amendments:

Proposals which feature blank and inactive elevations which front onto areas of the public realm or areas with activity will not normally be considered acceptable by the council, as will those which offer a poor or weak relationship with the streetscene.”

“The ~~use of perimeter block developments~~ development form will create include instances of corner properties which face onto the public realm. It is essential that these properties are designed to provide an appropriate level of activation and detailing onto the street scene. Not only will this increase natural surveillance but also maintain a continuity of frontage. The inclusion of a house type with dual aspect elevations would provide an adequate response.”

With regards to affordable housing the consultee has suggested the introduction of a mechanism to allow for instances where the delivery of affordable housing may impact upon development viability. In alignment with this the consultee has suggested the following text:

“Where an applicant considers that the provision of 10% affordable housing would make a scheme unviable, they must submit a full detailed viability assessment to justify the reduced affordable housing provision on the site.”

The consultees have suggested that the SPD is updated to reflect the NPPF (para 64) which requires at least 10 percent of homes to be affordable home ownership and suggest the following text:

The proposed changes are considered to weaken the requirement and as such no changes proposed. The wording seeks to deliver a high quality development.

A viability assessment was prepared as part of the evidence base for the SPD. Notwithstanding this, the SPD, at 11.9 (Viability), acknowledges that viability considerations will be taken into account where it is considered and agreed that viability is an issue. Consequently, it is considered that this has been sufficiently addressed within the SPD and no changes are necessary.

The proposed changes are considered to weaken the requirement as such no changes proposed. The 10% requirement has been subject to viability testing and is lower

“Subject to viability 10% of residential development should be affordable and in line with the NPPF should be affordable home ownership (Discount Market).”

With regards to housing types, the consultee suggests the following changes:

“There will be variety in the housing types provided at SSGA to offer choice. ~~Imaginative and~~ high-quality development both in terms of housing design and materials will be required. Developers will need to demonstrate how they have ~~captured the spirit of innovation whilst moving~~ ensured high quality and moved towards more sustainable ways of living within their proposals, subject to viability.”

The consultee also request the following change:

This will help provide interest in the character and design of SSGA and should include larger family dwellings with high specification and construction. Elsewhere ~~imaginative~~ the use of town houses, terraces and other forms of high quality but higher density housing types will prevail.

With regards, to section 7.4 Thriving Communities / Social Infrastructure

The consultee has set out the following suggested amendments:

Provide new facilities including neighbourhood centre, primary school and open space ~~where the greatest number of them have good and safe access to new and existing residents can access them easily and safely.~~

With regards to art the consultee suggests the following changes:

than the 15% requirement in the CSDP. The mix of affordable housing shall be negotiated on a site by site basis taking account of the latest housing market evidence and the requirements of the NPPF.

The proposed changes are considered to weaken the requirement and as such no changes are proposed.

The proposed changes are considered to weaken the requirement as such no changes proposed. The SPD seeks to achieve a sustainable development.

The proposed changes are considered to weaken the requirement and as such no changes proposed. The SPD seeks to deliver a good quality design.

“The inclusion of art will be actively encouraged as part of the new development or the open landscape, subject to viability.”

With section 7.5 Sustainable Communities, the consultee reiterates their concerns regarding the ‘building for life’ accreditation. The consultee set out the following wording suggestion:

“To ensure the creation of a well-connected and permeable network developers should demonstrate how the ~~application~~ of principles from Building for Life 12 have been broadly incorporated into development design proposals for residential streets, subject to viability”.

The consultee suggests the following text changes with regards to public transport:

Discussions will be held with bus operators to agree the timing for and the extent of the provision of public transport services within each area of the SSGA ~~“Nexus advocate the need for public transport services to be firmly established from the outset so as to help reduce car dependency”.~~

The consultee have also expressed concern regard the 400 metres from a bus stop requirement and therefore suggest the following changes:

“Residential properties should have good access to frequent bus services ~~be within 400 metres of a bus stop with a frequent service to ensure the service represents an attractive proposition for commuters.~~”

The consultee has set out the following changes regarding parking:

Parking must be well designed and integrated into the development and contribute to the overall quality of the public realm. Proposals should create an environment which is not dominated by car parking and

The wording provides sufficient flexibility and the SPD, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue.

The wording provides sufficient flexibility and the SPD, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue.

The thresholds set within the policy represent the Nexus standard and the SPD wording offers sufficient flexibility where this cannot be achieved.

The SSGA, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it an issue. Consequently, it is

follow the broad principles set out within the Residential Design Guide SPD (excluding spacing standards 10G) and Building for Life12, subject to viability and the willingness of the Highway Authority to adopt the finished scheme”.

With regards to integrating garages the consultees have the following comments:

A variety of methods of car parking should be provided throughout the growth area, these should be dependent upon the character area in which they sit. Appropriate arrangements may include a combination of on-street parking within well-designed public realm spaces, in curtilage parking or within a courtyard. Developments should avoid the dominant use of ~~integrated garages and areas of hard standing for parked vehicles which front the street in order to create a high-quality public realm, creating a safer pedestrian environment.~~”

The consultee has also expressed concern regarding the need for new dwellings should be equipped to charge electric charging vehicles stating this has not been costed in the Whole Plan Viability Assessment (2017). The consultee suggest the following changes:

Electric vehicles and Ultra Low Emission Vehicles (ULEVs) are a more sustainable mode of transport; ~~their~~ and their use within the SSGA should be encouraged through provision of dedicated parking for ULEVs. ~~ensuring new dwellings are equipped to charge electric vehicles. Proposals that link residence with a commitment to use ULEVs or membership of car clubs will be especially encouraged.~~”

With regard to the Ryhope Doxford Link Road the consultee has expressed extreme concern about the proposed alignment between Cherry Knowles and Land North of Burdon Lane. The consultee sets out that Figures 21,22,23,24,25 and 32 identify the proposed route. They

considered that this has been sufficiently addressed within the SPD and no changes are necessary.

The proposed changes are considered to weaken the requirement and as such no changes proposed. The SPD seeks to deliver a good quality design.

The SPD has already been amended to reflect the requirements of the Local Plan, which states to ‘make provision for the installation of home charging apparatus on major residential schemes’ Consequently, no changes are required.

The proposed alignment is indicative and is considered justified based on the evidence base. Alternative alignments will be considered on their merits as part of a planning application.

express disappointment that SPD has not been amended to reflect the proposed alternative route put forward by the consultee.

With regard to Burdon Road, the consultee is concerned that restriction of a maximum of 100 dwellings should take access from Burdon Road. The consultee sets out that there is no rationale for this restriction. The consortium suggest that the restriction, if justified should be on a sound highway basis through an assessment of safety and capacity. The consultee suggest the following text amendments:

“No access is to be taken from the section of Burdon Road south of Lodgeside Meadow only, other than to serve the South West corner of Land North of Burdon Lane. This should be a localised access with no through route. The maximum number of dwellings that can take access from the section of Burdon Road south of Lodgeside Meadow is to be determined by a safety and capacity assessment exercise that will be agreed with the Local Planning Authority. ~~and serve a maximum of 100 dwellings.~~”

With regard to Route Hierarchy, the consultee considers the requirement for pedestrian only links to be a minimum of 3 metres seem excessively wide and queries whether this width also include cycle provision. The consultee suggest the following:

Pedestrian only links: Minimum ~~3m~~ 2m (not attached to the highway) or

Pedestrian and cycle ~~only~~ links: Minimum 3m (not attached to the highway)

With regards to Sustainable Development, the consortium broadly welcomes the orientation of properties but suggest the following:

The restriction has been set a reasonable level to control the flow and capacity onto Burdon Road. The SPD makes it clear that this can be adjusted through agreement with the local highways authority.

The SPD has been amended to make it clear that the 3m relates to a pedestrian/cycle route.

The SSGA, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue. The wording seeks to

The main glazed elevation should be orientated within 30° of south ('solar orientation') with a correspondingly small proportion of glazing on the north elevation, wherever practical and viable.

"However, it is not essential for all buildings to be orientated due south and variations of around ~~up to 30°~~ can be accommodated whilst still benefiting from passive solar gains"

The consultees also request the following changes regarding green roofs and sourcing building materials:

"The inclusion of green roofs throughout the growth area will be encouraged, where viable, and looked favourable upon particularly in areas with issues with surface water flooding."

In addition, the consultee also make the following suggestion:

Building materials should also be ~~sustainable~~ sustainably sourced and have a reduced environmental impact, whilst requiring low maintenance and are durable to the UK climate, wherever possible.

With regard to chapter 8, concept masterplan, the consultee sets out that it is critical that the masterplan, provided at Figure 22 is updated to take into account the alignment of the link road which the consortium has put forward as well as reflect the other detailed constraints which the consortium has put forward as part of the Movement Design and Access Statement (MDAS).

As noted, the consultee suggest that the masterplan as set out in figure 22 cannot be delivered. Also, the consultee suggest that the weight that can be placed on the SPD is limited due to a claimed lack of supporting evidence.

deliver a sustainable development and it is considered that the wording offers sufficient flexibility.

The paragraph has been amended for clarity with regard to sustainability.

Figure 22 sets out a conceptual interpretation of how the SSGA area could be delivered based on the evidence gathered as part of the preparation of the SPD. It is not a comprehensive illustration of all elements and components of the scheme. The proposed alignment of the link road is indicative and alternative alignments will be considered on their merits as part of a planning application

The consultee claim Figure 22 is too small.

With regard to Chapter 9 – the Design Code, section 9.1 – Purpose and Status of Code the consultee consider Figure 23 is too small and is difficult to read. The consortium request the following changes:

This code aims to achieve a balance between ~~a clear level of prescription to ensure~~ ensuring high standards of design, and an appropriate degree of flexibility to allow designers freedom to bring forward innovative and imaginative proposals ~~that improve upon the code~~ and importantly, to accommodate changing needs, market conditions or government/local guidance over the duration of projects.

In addition, the consultee requests the following addition:

Proposals should seek to generally accord with the code, where this is not achievable clear justification must be provided, detailing how the alternative design solution will not undermine key design objectives.

With regard to Section 9.2 Movement and Streets, the consultee views the requirement for a perimeter block as onerous, inflexible and overly prescriptive and conflicts with paragraph 126 of the NPPF, which sets out that the level of detail and degree of prescription should be tailored to the circumstances. The consultee suggest the following amendments:

In order to ensure that walking and cycling are the natural option the masterplan has been developed to provide a high level of permeability. ~~through the use of perimeter block development. Where development~~

Acknowledged, the concept masterplan has been made bigger in the adopted version.

Acknowledged, the concept masterplan has been made bigger in the adopted version

The proposed changes are considered to weaken the requirement and as such no changes proposed. The SPD seeks to deliver a well-designed development.

It is not considered that the requirements conflict with the NPPF. Paragraph 126 sets out that SPDs (inter alia) should set out a framework for creating distinctive places, with a consistent and high-quality standard of design. It is considered that the level of detail contained within the SPD is reasonable and in alignment with NPPF Paragraph 126. Consequently, no changes are required.

The proposed changes are considered to weaken the requirement as such no changes proposed. It is considered that the SPD offers sufficient flexibility.

~~blocks do not form this style, pedestrian only routes or green links have been provided.~~

With regards to Recreational Routes, the consultee suggests that it may not be possible to purely to walk cycle on non-primary streets and make the following suggestions:

It is the aim of the masterplan to create a semi-rural development where residents can walk/cycle through the entire area without needing to travel along a primary street or into the main urban environment.
Should this not be possible in certain areas, a clear justification should be provided

With regards to Multi User Routes the consultee suggests the following changes:

Where possible, the routes will be a minimum of 3 m in width and contain a 1m verge on either side.

With regards to Public Transport Corridors the consultee suggests the following changes:

The location of the corridors will provide ~~an~~ accessible bus service ~~within 400m~~ of to all residents within the SSGA

In addition, the consultee also suggests that the requirement for public transport corridors to be a minimum of 6.7 metres wide should be removed as this is considered overly prescriptive.

Also, the consultee sets out that there is no justification for making the land in the south west (east of Burdon Road) as bus only route.

The proposed changes are considered to weaken the requirement and as such no changes proposed. It is considered that the SPD offers sufficient flexibility.

The Council considers that there is a clear need for a bus only route at this location for highway safety and consequently no changes are required.

The proposed changes are considered to weaken the requirement and as such no changes proposed. The existing text is considered flexible and no changes proposed to SPD.

The proposed changes are considered to weaken the requirement and as such no changes proposed.

With regard to the Ryhope Doxford Road, the consultee considers the requirement for a landscape belt to be 15 to 20 metres as overly prescriptive and suggest the following:

A landscape belt of approx. 15-20m is required between the RDLR and proposed development. Its width will vary depending on the local context and masterplan proposals.

With regard to the sections entitled Primary Streets, Secondary Streets, Green Streets and Shared Surfaces, the consultee sets out that page 78 to 81 of the draft SPD are too onerous. The consultee suggests the following text change:

~~In order to prevent parked vehicles blocking the highway and pedestrian routes a 2m wide channel of parallel parking bays interspersed with landscaping will be provided on both sides of the carriageway.~~

~~A multi-user route will be provided on one side and will be wide enough to provide both pedestrian and cycle movement (3m). The route will be located between the parking/landscaping channel and residential properties front garden space. A standard public footpath will be provided on the alternative side of the carriageway.~~

Key dimensions:

- ~~Wider feel to the highway 24-25m.~~*
- ~~6.7m highway, allow for 2 buses to pass.~~*
- ~~2m verge between highway and pavement, verge will include a combination of parallel on street parking and landscaping.~~*
- ~~3m pedestrian and cycle shared paving to be provided on one side~~*
- ~~2m pedestrian route provided on one side.~~*
- ~~Front garden or Narrow front garden set back and boundary treatment.~~*

The proposed changes are considered to weaken the requirement and as such no changes proposed.

The proposed changes are considered to weaken the requirement and as such no changes proposed.

In addition, with regard to secondary streets, the consultee recommends the following amendments:

Key Dimensions:

- ~~Width 17–19.5m~~
- ~~5.5m highway~~
- ~~2m pedestrian footpath~~
- ~~Front garden or narrow front garden set back and boundary treatment (see set back and boundary treatment)~~

Also with regard to Green Streets, the consultee suggest the following changes:

Key Dimensions:

- ~~Width—Varies~~
- ~~4.5–5.5m shared surface~~
- ~~Set back of the property and boundary treatment will depend upon the character of the area and the surrounding features.~~

The consultee also suggests that the diagrams on page 79 are removed.

With regard to car parking the consultee suggest the following to ensure sufficient off-street parking is provided:

All residential properties within the SSGA will be provided with at least one allocated car parking space. Executive dwellings will be provided with a minimum of two off street parking spaces.

The consultee also requests clarification regarding whether garages are considered a parking space.

The proposed changes are considered to weaken the requirement and as such no changes proposed.

It is considered that the illustrations set out in page 79 are appropriate and illustrate the guidance contained within the SPD.

The parking standards set out within the SPD are considered appropriate to ensure that the streetscene is not dominated by parked cars.

In addition, the consultee also sets out that the requirement for garages to be located behind the building line is overly restrictive and conflicts with the NPPF. The consultee states that pictures within the SPD show pictures of front elevations flush with front elevation and thus not setback (on pages 55,56 and 80). Consequently, the following text changes are suggested:

Where garages are provided careful consideration should be given to the size, positioning and treatment of garages to ensure that they do. ~~Garages must be located behind the building line and not dominate the streetscene.~~

With regards to Section 9.3 – Built Form, the consortium sets out concern regarding the requirement for perimeter blocks and that development blocks should be between 35 m – 110 metres in width and 60 – 110 metres in length. The consultee considers these issues as onerous and suggest the following amendments:

Creating permeable and legible housing layouts is a fundamental objective of the SPD, ~~to ensure this chapter 7.2 requires developments to consist of perimeter blocks. This form of development~~ Developments should ~~consistently~~ define the public and private realm, but vary in terms of enclosure, height and density depending upon the character of the area. The arrangement of dwellings ~~within a block structure~~ and their relationship to the street and to other building elements will be influenced by the plan form of the dwelling themselves.

Development ~~block form~~ variety including a variety of ~~block sizes~~ forms and scales of layout throughout the development is a good means of creating interest and character across the SSGA., ~~it is advised that developments should provide a block width range of 35-110m and length range of 60-110m.~~

Garages are generally not considered to be count towards a parking space.

The requirement is considered appropriate to aid the intended design. Consequently, no changes are required. The pictures are designed to demonstrate other features and therefore no changes are required.

The proposed changes are considered to weaken the requirement and as such no changes proposed. The SPD seeks to deliver a well-designed scheme and it is considered that the wording provides sufficient flexibility.

~~Small development blocks provide good pedestrian permeability and are most appropriate in the higher density areas located around the local centre. Larger development blocks, at the upper end of the above ranges, will be more appropriate in the lower density executive style development areas of Chapelgarth.~~

~~Thin development blocks, approximately 35-40m in width, are largely achievable in traditional layouts where private rear gardens back directly onto each other. Care should however, be taken to avoid numerous thin blocks in a row as this can result in little active frontage along side streets. Larger, square blocks can be achieved through the incorporation of short, direct cul-de-sac if the overall development is well connected into the surrounding area and has sufficient pedestrian.~~

~~Further information and guidance on the development blocks form of the layout can be found in chapter five of the Residential Design Guide SPD."~~

With regards to Building Types and Frontages the consultee considers this as overly perspective and suggests the following amendments:

~~The building types and frontage provided within developments will determine how well streets and spaces are animated and defined. To ensure the appropriate responses to the interface between the built form and public realm is created the below guidance ~~will need to be~~ should generally be followed.~~

In addition, the consultee suggests the reference to increased vertical emphasis with the façade for landmark buildings and the reference to increasing the building height to 2.5 storeys for corners (page 82) are

The proposed changes are considered to weaken the requirement and as such no changes proposed. The SPD seeks to deliver a well-designed scheme and it is considered that the wording provides sufficient flexibility

removed as this is considered overly prescriptive. In connections with this the consultee suggests the following amendments:

Landmark buildings will be used to define key gateways and provide points of reference to enhance legibility. The buildings should be defined through an alternative approach to architectural design, which makes the building stand out from the other house types. This should include the materials used, the pattern of fenestration, and ~~increased vertical emphasis within the facade~~ and/or an increase in the overall building height up to 3 storeys.

The buildings themselves will not be as prominent as landmark buildings, but will help to provide focal points, ~~an increase in the overall building height to 2.5 storeys will also aid legibility~~

With regards to the Transition of Styles the consultee recommends the following revision:

Changes in building styles, colours, proportions, scales and streets design should be avoided where character areas meet, on either side of a street ~~or along a perimeter block.~~

With regards to the Design Options Front Gardens, the consultee considers that the requirements of the SPD are too restrictive in relation to the depth of front gardens and the height as well as type of boundaries. The consultee suggests that the three sections on front gardens are combined and that the text is amended as follows:

A front garden should normally be situated between the plot line and the building edge. The garden can be delineated by a boundary treatment of up to between 450mm and 1000mm. ~~The front garden for larger plots should have a depth of 5-10 m.~~ Planting along the property line is encouraged.”

The proposed changes are considered to weaken the requirement and as such no changes proposed. The SPD seeks to deliver a well-designed scheme and it is considered that the wording provides sufficient flexibility

~~“Bay windows or porches may project into the garden. A boundary railing or wall of brick/stone or render may be between 650–1000 mm with planting on the plot boundary line to reinforce it. The front garden should have a depth of between 5–10m. Where the boundary treatment fencing interferes with a highway visibility splay, it may be necessary to reduce the height or demonstrate that the boundary treatment fencing is of an open design which permits adequate views to be gained through it.”~~

~~The plot line should be delineated by a railing or wall up to 1000mm high. The front garden should have a depth of between 1.5–4 m and should be planted with hedging. This The boundary height treatment should be no more than 600 mm in height in locations close to where children are likely to be playing or walking.~~

With regard to side boundaries, the consultee considers the perimeter block approach and having stepped facing as shown on the side boundaries diagram as overly prescriptive. The consultees suggest the following text is deleted:

~~The inclusion of perimeter block development will lead to the predominance of back to back gardens and corner properties with side gardens bounding the public realm. Where gardens side onto the public realm a stepped approach should be sought with the provision of a brick and timber/railing combination (see illustration).~~

With regard to section 9.4, facilities the consultees suggest that flexibility to be provided to allow either a grass or 3G pitch to be provided subject to viability. The consultee makes the following changed:

The neighbourhood centre will comprise of:

The proposed changes are considered to weaken the requirement and as such no changes proposed. The evidence indicates that 3G pitch is required.

It is considered that the wording already offers sufficient flexibility.

- Retail provision
- Primary school
- Wheeled Sports Area
- Formal play space
- Multi User Games Area
- Grass or 3G pitch
- Parking facilities capable of serving all of the above and the SSAANG
- To be served by bus service

The above provisions will be subject to viability, demand and where deemed suitable.

With regards to Multi-Functional Greenspace, the consultee suggests that in some cases hedgerows may not be able to be retained. The consultees suggests the following changes:

Existing hedge rows and woodlands will remain and form the basis of development proposals, wherever possible. Gaps in existing natural features such as hedge rows can be utilised to provide access and services, wherever possible

With regard to the Design of Green Spaces, the consultee sets out that

Existing hedge rows and woodlands will remain and form the basis of development proposals, wherever possible. Gaps in existing natural features such as hedge rows can be utilised to provide access and services, wherever possible.

The SSGA, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue. The wording already offers sufficient flexibility.

As set out, the masterplan is not prescriptive and consequently, the design requirements where justified will not be prescriptively applied.

The proposed changes are considered to weaken the requirement and as such no changes proposed. It is considered that the current wording offers sufficient flexibility.

With regards to the Design of Green Space, the consultees suggest Figure 24: Green Infrastructure is too small to read.

With regard to public art the consultee suggests that text is amended to include reference to viability in accordance with paragraph 57 of the NPPF and the word viability is removed, as follows:

“The natural environment should be a major source of ideas for place making and cultural development. Where there are opportunities ~~or a requirement~~ for public art, proposals should consider the integration of public art throughout the design process, where viable.

With regard to Chapter 10 ‘Indicative Masterplan’, the consultees support the statement regarding that the indicative masterplan is not prescriptive, however consider that some of the design requirements set out within the SPD are overly prescriptive

With regard to section 10.2 Site Wide Character Areas, the consortium has some concern about some of the design criteria and considers they are overly prescriptive. The consultee recommends the following changes:

The landscape belt will vary in width depending on the local context and masterplan proposals. ~~of approx. 15-20m~~ It will provide a pedestrian/cycle routes, low level native species planting and scattered tree planting.

Properties to generally have a ~~minimum 5m~~ front gardens which to include an area of landscaped amenity space and tree planting.

Due to the property types being large a minimum of two parking spaces per property should be provided.

Acknowledged, the concept masterplan has been made bigger in the adopted version.

This is not considered necessary as it is already acknowledged at the beginning of section 10 (within 10.1) that the masterplans are considered indicative.

The restrictions are in place to ensure highway safety is maintained. The SPD already makes clear that this restriction is subject to change through agreement with the local highways authority.

With regard to Section 10.4 – Land North of Burdon Lane the consultee suggests the following text is included:

Figure 32: Street Network and Figure 33: Green Infrastructure are illustrative masterplans, providing one example of how the development could come forward. However, the Council recognises that the final masterplan will be informed by the findings of detailed site surveys.

With regards to Street Network, the consultee suggests the following amendment:

Access to this section to be provided from Burdon Lane, however, this will not provide private vehicle links into the rest of the LnoBL development, once the Link Road is completed and operational. The maximum number of dwellings that can take access from the section of Burdon Road south of Lodgeside Meadow is to be determined by a capacity assessment exercise that will be agreed with the Local Planning Authority and will serve up to 100 units.

With regards to Green Infrastructure, the consultee considers that the requirement for a minimum 10-metre-wide landscaping and amenity green space between the existing and new residential areas conflicts with the ‘urban edge’, criteria which refers to the proposed new properties back onto existing areas. The consultants suggest the following changes:

Landscaping and amenity green space ~~to~~ should be provided between existing residential areas and the new development, where appropriate, a minimum of 10m will be provided.

The proposed changes are considered to weaken the requirement and as such no changes proposed.

The restriction has been set a reasonable level to control the flow and capacity onto Burdon Road. The SPD makes it clear that this can be adjusted through agreement with the local highways authority.

The proposed changes are considered to weaken the requirement and as such no changes proposed.

With regard to Build Form, the consultee suggests the following changes, to include references to viability:

The use of public art will also be welcomed in these locations, subject to viability

With regards to Chapter 11 'Delivering the Vision' the consultee sets that table 6, in section 7.3 of the SPD refers to 1,000 dwelling and this should be amended to the word 'approximately'. Consequently, the consultee suggests the following changes:

The figure in Table 6 is amended to state:

"an approximate yield of 1000 dwellings".

The title of Table 7 is amended to state "~~Estimated~~ Approximate Development / Land Use Figures"

Paragraph 11.2 is amended to state "*The following provides a summary of the ~~estimated~~ approximate figures for development/land use at the four sub-areas*".

With regards to Section 11.5 – Planning Obligations, the consultee set out concern about the viability implications of these requirements. The consultee suggests the following text changes:

The infrastructure requirements and associated costs are indicative figures, and will be subject to negotiation and scheme viability

In addition, the consultee suggests that the information related to public art should factor in viability issues. Consequently, the consultee suggest the following is added:

The SSGA, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue. Consequently, it is considered that this has been sufficiently addressed within the SPD and no changes are necessary.

Table 6 has been updated to indicate approximate yield and ensure consistency with Policy SS6.

The SPD already makes clear that these are estimated, which provides sufficient flexibility. No change required.

The SPD already makes clear that these are estimated, which provides sufficient flexibility. No change required.

The SSGA, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue. Consequently, it is considered that this has been sufficiently addressed within the SPD and no changes are necessary.

“To be provided by the developer, subject to viability”

With regards to Section 11.6 ‘Infrastructure and Delivery’, the consultee welcomes the statement that element of flexibility is set out.

With regards to Section 11.8 ‘Long Term Maintenance and Management, the consultee suggests that the third paragraph is amended to allow a ‘third party’ to manage open spaces. The consultee therefore suggests the following changes:

“Should the developer prefer to appoint a third party to manage these features / facilities ~~the greenspace~~, rather than the council, through S106s/conditions/legal agreements the developer must be able to provide Sunderland City Council with confidence that ~~the green space~~ these features / facilities will be maintained in ~~perpetuity~~ to a standard and timescale agreed by the council.

In addition, the consultee express their concern that the SPD sets out the need for a management board should be established which included residents and Council representatives. Consequently, they suggest the following text is deleted:

~~*“A management board should be established that includes residents and council representatives”*~~

The consultee supports the flexible approach to viability and provision for viability and provision for viability appraisals to be supported.

With regards to Appendix 4 (SSAANGS), the consultee objects to the requirement that the SPD and the SSAANGS should be set over no more than one or two sites. The consultee suggest that the delivery of

The SSGA, at 11.9 (Viability) acknowledges that viability considerations will be taken into account where it is considered and agreed that it is an issue. Consequently, it is considered that this has been sufficiently addressed within the SPD and no changes are necessary.

Support noted.

The Council considers that the guidance already allows for third party management of greenspace. It is not considered necessary to extend this to other forms of infrastructure.

The Council considers the management board as an effective mechanism to secure the long-term future of the Green infrastructure and South Sunderland Additional Areas of Greenspaces.

Support Noted.

SSANGGs through the development in the form of interconnected linear corridors and circular routes will make it more accessible and attractive to dog walkers than one larger area.

With regards to the Phasing and Delivery of SSAANGs, Appendix 4, the consultee expresses their concern with regards to SSANNGs being operation prior to the occupation of new residential development. The consortium set out that they are full committed to delivering the SSAANGs however, it they express it would be unreasonable to for the whole SSAANGs to be completed prior to the first dwelling. The consortium suggest that a phasing scheme of the SSAANG is agreed with the Council's ecologist and Natural England. Consequently, the following amendment is therefore suggested:

~~"SSAANGS must be operational prior to the occupation of new residential development~~ A phasing scheme for the creation and operation of the SSAANGs must be agreed by the Council prior to the commencement of development to ensure that the interests of the SPA are not damaged."

With regards to Maintenance of SSAANGs, Appendix 4, the consultee suggests the required 75 years to maintain the SSAANGs is excessively long time period and requirement could change. As a consequence, the consultee suggests the following:

~~"SSAANGs must be maintained in perpetuity for a minimum of 75 years~~ for the long-term."

~~"requires SSAANGs to be maintained and useable~~ for the long-term ~~& minimum of 5 years."~~

The SSAANGS are designed to provide a suitable alternative natural greenspace to mitigate potential recreational pressure on the coast. This approach has been agreed with Natural England and is consistent with the HRA. It is not considered appropriate to split the SSANGS into smaller sites as they will not provide an appropriate alternative.

The Council have agreed to a change to allow for SANGS to be delivered in a phased basis. This will be agreed with the Council and Natural England on a site by site basis.

The minimum 75 years reference is considered quite low in comparison with other authorities. This is also consistent with the agreement on already permitted SSGA schemes. Consequently, no changes are proposed to the SPD.

<p>Northumbrian Water</p>	<p>The consultee sets out that they are supportive of the approach taken within the document to sustainable water management.</p> <p>The consultee welcomes the assessment of the opportunities and constraints of the SSGA within the ‘Setting the Scene section’. The consultee welcomes the need to utilise SUDs and the need to ensure development does not have an adverse impact upon the Groundwater Source Protection Zone.</p> <p>The consultee supports the vision and objectives within the SPD.</p> <p>The consultee is supportive of the approach taken within Objective 6, to encourage consideration of sustainable drainage at the earliest stage of a development. SPD.</p> <p>With regard to the section entitled Water Management, the consultee agrees with the requirements for a flood risk assessment and the inclusion of SUDs in proposals within the SSGA and consider that the link again with green infrastructure is particularly beneficial.</p> <p>With regards to Utilities, the consultee agree that the capacity of utilities need be considered at the earliest opportunities.</p> <p>The consultee is supportive of the overall content of the SSGA.</p>	<p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p> <p>Support noted.</p>
<p>Highways England</p>	<p>With regards to Section 7.5 Movement. The consultee strongly supports any proposals and design and design principles that will reduce vehicle trips on the strategic road network.</p> <p>The consultee recommend the following change:</p> <p>Change: Highways Agency reference to ‘Highways England’.</p>	<p>Support noted.</p> <p>The Council has made the amendment specified.</p> <p>Comment Noted.</p>

The consultee sets out that the scope of improvement work (to the A19/A690) does not extend to alleviating the capacity constraints at other locations on the strategic road network. In addition, the scheme currently being implemented with funding from Highways England's Growth and Housing Fund, does not include all of the improvement identified as being required.

Comment Noted.

The consultee has expressed that should a capacity assessment on the strategic road network be required this should be undertaken in consultation with Highways England. Should such a capacity assessment indicate that mitigation is required to accommodate the impact of the proposed development, any mitigation scheme would need to be agreed with Highways England and Stage 1 Road Safety audit undertaken prior to submission of the planning application.

Comment Noted.

The Consultee also sets out that the development proposals in the SSGA will also have an impact at the A19/B1404 Seaton Lane junction. Setting out that there are existing capacity and safety issues at this junction and developments in this area may be required to undertake capacity assessments to determine whether a mitigation scheme at this location is required to accommodate development proposals.

Comment Noted.

The consultee supports the process of applicants engaging in pre application discussions. In addition, the consultee has expressed where developments that have outline consent in place, propose any significant change to the quantum of development, any capacity assessment should be undertaken in consultation with Highways England.

Comment Noted.

With regards to Section 12 (Submitting a Planning Application and Engagement With Development Management (Page 113) Planning Application Requirements), the consultee suggests that a Construction Traffic Management Plan should be submitted as part of an outline

	<p>application for a development proposal in the SSGA in order to mitigate the impact of a construction traffic on the strategic road network.</p>	
<p>The Coal Authority</p>	<p>The consultee provides the LPA with GIS data in respect to Development Risk and Surface Coal Resource Plans and the LPA should use this information to assess any sites being proposed to allocate. In respect to the SSGA we assume this has been assessed against the data provided.</p>	<p>Comment Noted. The Council has considered this through the allocations made in the CSDP.</p>
<p>Brenda Smith</p>	<p>With regard to Section 7.5 (Ryhope Doxford Link Route (Page 67) (Figure 21) (Strategic and Local Connections)), the consultee sets out that the exact positioning of the roundabout should be determined prior 'to any approval of the SSGA'</p> <p>With regard to Section 9 (Design Code – Ryhope Doxford Link Route), the consultee asks what measures will be put in place to provide a buffer zone and landscape belt to existing residential development (Ruswarp Drive) and that this should be resolved prior to the SSGA being adopted. This is set out in context to landscape belts and buffer zones being provided at The Ryhope Doxford Link Road and Ruswarp Drive.</p> <p>With regard to Section 10 (Indicative Masterplan Sub Area), Paragraph 10.4 Land North of Burdon Lane, the consultee sets out as an exact location of the roundabout has not yet been determined nor has its impact on existing residential areas. The consultee has asked what greenspace, landscaping and noise mitigation will be introduced for land near Ruswarp Drive and existing residential areas in the immediate vicinity to counter the positioning of a roundabout and highway.</p> <p>With regards to Flood Risk and Drainage (Page 31 and 32), the consultee asks what measures will be in place to ensure surface water</p>	<p>The alignment of the Ryhope Doxford Link Road is indicative and based on the evidence base for the SPD. Any alternative alignments will be treated on their merits as part of a planning application.</p> <p>The SPD sets out appropriate buffers.</p> <p>The alignment of the Ryhope Doxford Link Road is indicative and based on the evidence base for the SPD. Any alternative alignments will be treated on their merits as part of a planning application.</p>

	<p>run-off and the need for additional drainage for new developments do not comprising existing drainage and increased flood risk.</p> <p>The consultee welcomes the proposal for Accommodation for Older People.</p>	<p>A detailed Flood Risk Assessment will be required in support of a planning application and appropriate mitigation agreed with the Lead Local Flood Authority.</p> <p>Support noted.</p>
<p>M Smith</p>	<p>The consultee sets out with reference to Statutory Noise insulation and that duty to care has yet to be fulfilled. The consultee also sets out that independent noise survey not yet done, and developers survey submitted is incorrect.</p> <p>With regard to Draft SPD Paragraph 1.4, page 4 Sustainability Appraisal, the – SEA directive, the consultee sets out that requirement not yet fulfilled, prepared SA 2014 not updated and is inappropriate for current proposals.</p> <p>With regards, to paragraphs, 1.5 the consultee has expressed the view that the SPD does not show mitigation has been included adequately to rule out ‘LSE’</p> <p>With regards to paragraph 3.2, the SPD has not shown that the adverse effects of development have been mitigated sufficiently and further conservation requirements must be included.</p> <p>With regards to paragraph 3.5, the consultee sets out that the conclusion of the Settlement Break Review is incorrect with regard to separation between Ryhope/Silksworth/Doxford Park.</p> <p>The consultee states in relation to paragraph 4.4 Social Infrastructure, the Updated additional retail provision has not been included in proposal and states the accessibility survey is incorrect as the majority</p>	<p>The SPD sets out general design guidance. Detailed matters such as potential noise impacts will be addressed through the planning application, including a need for detailed assessments and identified mitigation where necessary.</p> <p>An SA Report was undertaken for the SPD. There have been no significant changes to the SPD since this was undertaken which have warranted further SA work.</p> <p>The LSE have been picked up through the HRA for the SPD.</p> <p>The mitigation has been picked up through the HRA and has been included in the SPD.</p> <p>The Settlement Break designation was removed as part of the adoption of the CSDP.</p> <p>The SPD requires new retail and service provision to meet identified needs which will ensure, alongside existing facilities, that dwellings are within a reasonable walking distance.</p>

of SSGA is outside of reasonable walking distance. The consultee suggests that additional facilities provided.

With regards to Paragraph 4.5, the consultee sets out that pedestrian walkways are inadequate along proposed routes. In addition, the consultee expresses the view that the public transport provision is inadequate.

In addition, the consultee states that the effects on increased traffic throughout on existing Tunstall Hope road are not addressed and the negative effects of the Burdon-Ryhope road closure have not been included in this draft proposal.

With regard to paragraph 4.8, the consultee sets out that the SUDs, in relation to the final position, capacities and capabilities have the potential to represent a significant pollution risk. In addition, the consultee sets out brown water/ sewage output still not adequacy assessed and capacity could exceed current provision.

With regards to archaeology, the consultee claims that the geophysical and on-site evaluation of this site of potentially historical importance has (March 23rd, 2020) not been done.

The consultee also states that 'the development' as outlined in these draft proposals cannot proceed without additional information.

The Council considers that guidance set out regarding pedestrian walkways and public transport are justified and appropriate.

A Transport Assessment has been undertaken to give consideration to the impacts. This has informed the SPD.

The siting and development of SuDS is an appropriate feature and is supported in national planning policy. The full details of proposed SuDs will be determined at the planning application stage in consultation with the Lead Local Flood Authority and Northumbrian Water.

Some high level information was undertaken as part of the preparation of the SPD. More detailed work will be undertaken as part of a planning application.

The SPD sets out general design guidance. Detailed matters will be addressed through the planning application process.

Appendix 1 – Leaflet/Letters

Stage 1 Initial pre-consultation

South Sunderland Growth Area Community Consultation

Sunderland City Council is proposing to draft a Masterplan to guide the development of a new housing growth area. The area, known as the South Sunderland Growth Area (SSGA) lies between Doxford Park and Ryhope, as can be seen on the plan below.



As part of the Masterplan preparation the City Council will be hosting two community consultation events to seek your views on what you would like to see in this area.

The first event will be for the whole of the SSGA area; the second will focus on the area identified on the plan as Land North of Burdon Lane.

South Sunderland Growth Area Community Consultation

The first event will be a drop-in-session with an exhibition and the second event will be in two parts - a drop-in session with an exhibition in the afternoon, followed by a discussion workshop in the early evening. Officers from the City Council will be attending both sessions and will be available to answer your questions and to talk through the emerging plans.

Community Consultation Events

Monday 13 July 2015

St Cuthbert's Church, Western Hill, Ryhope Road, Sunderland, SR2 0AA

Drop in session 15.30 - 20.00

Tuesday 14 July 2015

Virgin Health and Racquet Club, 3 Camberwell Way, Doxford Park
Sunderland, SR3 3XN

Drop in session 15.30 - 18.30

Meeting/workshop 18.30 - 20.00

What happens next?

Following the events the City Council will take on board the comments received and consider these when preparing the SSGA Masterplan. The draft Masterplan will then be consulted upon in Autumn 2015, for a period of six weeks, providing a further opportunity to comment on the proposals.

If you have any questions about these events please contact Linzi Milley

email: Implementation@sunderland.gov.uk

phone: 0191 561 2439



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

Date: 28 July 2017
Our ref:
Your ref:

Dear Resident

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

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

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

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

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

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

Have your say

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

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

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

Delivering services for a better future



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

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

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

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

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

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

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

Yours faithfully

Iain Fairlamb
Head of Planning and Regeneration

Addressee
Address line 1
Address line 2
Address line 3
Address line 4
Address line 5
Address line 6
Postcode

Date: 24 February 2020

Our ref: SPD

Your ref:

Dear Sir/Madam

SUPPLEMENTARY PLANNING DOCUMENTS AND CALL FOR SITES

I am writing to inform you that Sunderland City Council is consulting on four Supplementary Planning Documents (SPDs) as set out below:

- Draft South Sunderland Growth Area (SSGA) SPD
- Draft Planning Obligations SPD
- Homes in Multiple Occupation (HMO) SPD Scoping Report
- Biodiversity SPD Scoping Report

Consultation on the Draft SPDs will take place over a four week period, commencing on Monday 24 February and closing on Monday 23 March 2020.

During the consultation period, copies of the above SPDs will be made available for inspection at Sunderland Civic Centre from 8.30am to 5.00pm Monday to Friday, all Council libraries during normal office hours, as well as on the Council's website.

We would welcome any comments you may wish to make on these SPDs. Please complete a "Representation Form" and submit to the council in one of the following ways:

- The quickest and easiest way for you to respond is online at <http://sunderland-consult.limehouse.co.uk/portal>. You will need to register to make a representation. If you have already registered during a previous consultation, simply enter your username and password; or
- If you prefer, you can download the representation form from the Council's website: <https://www.sunderland.gov.uk/article/12733/Supplementary-Planning-Documents-SPDs;>
- or pick up a copy/copies from Civic Centre Reception and send it to us at:
 - Email: planningpolicy@sunderland.gov.uk; or
 - Post: Strategic Plans, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

- Representation forms can also be requested from the Strategic Plans team by telephoning (0191) 561 1577 or emailing: planningpolicy@sunderland.gov.uk.

If you wish to comment on more than one of the SPDs, please use a separate representation form for each SPD.

All comments should be received no later than 5pm on Monday 23 March 2020. The Council will not accept any representations received after that date

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.

The Council would also wish to inform you that it has commenced work on its Allocations and Designations Plan, which will identify site specific allocations and designations not covered by the adopted Core Strategy and Development Plan 2015-2033. If you have any sites which you wish to be considered for development, please submit these in writing to the Council including a red line plan identifying the site and an indication of what type of development you are promoting the site for.

If you have any queries regarding the consultation, please do not hesitate to contact us using the details above.

Yours faithfully

Catherine Auld

Assistant Director of Economic Regeneration

Appendix 2 – Events 2017

Wednesday 9 August	10am - 12noon	Springwell Village Hall, Fell Road, Springwell, Gateshead, NE9 7RP
	2pm - 4pm	Ryhope Community Centre, 2 Black Road, Sunderland, SR2 0RX
	6pm - 8pm	Fulwell Methodist Church, Dovedale Road, Sunderland, SR6 8LN
Thursday 10 August	10am - 12noon	Philadelphia Cricket Club, Bunker Hill, Houghton-Le-Spring, DH4 4JE
	2pm - 4pm	North East Business & Innovation Centre (BIC), Wearfield, Enterprise Park East, Sunderland, SR5 2TA
	6pm - 8pm	Harraton Community Association, Bonemill Lane, Washington, NE38 8BQ
Friday 11 August	10am - 12noon	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	2pm - 4pm	Barnwell Primary School, (Monument Centre), Whitefield Estate, Penshaw, Houghton, DH4 7RT
Monday 14 August	10am - 12noon	Holy Trinity Church, High Usworth, Washington, NE37 1NR
	2pm - 4pm	St Chad's Church Hall, East Herrington, Durham Road, Sunderland, SR3 3ND
	6pm - 8pm	Houghton Welfare Hall, Brinkburn Crescent, Houghton-Le-Spring, DH4 5AF
Tuesday 15 August	10am - 12noon	Raich Carter Centre, Commercial Road, Hendon, Sunderland, SR2 8PD
	2pm - 4pm	Customer Service Contact Centre, Fawcett Street, Sunderland, SR1 1RE
	6pm - 8pm	Washington Leisure Centre, Washington, NE38 7SS
Wednesday 16 August	6pm - 8pm	Doxford Park Community Centre, Mill Hill Road, Sunderland, SR3 2 ND
Monday 18 September	10am - 12noon	Raich Carter Centre, Commercial Road, Hendon, Sunderland, SR2 8PD
	2pm - 4pm	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	6pm - 8pm	Barnwell Primary School (Monument Centre), Whitefield Estate, Penshaw, Houghton, DH4 7RT
Tuesday 19 September	10am - 12noon	The Secret Garden, Doxford Park, Silksworth Road, Sunderland, SR3 2PD
	2pm - 4pm	Houghton Welfare Hall, Brinkburn Crescent, Houghton-Le-Spring, DH4 5AF
	6pm - 8pm	San Street Youth Project, Sans Street South, Sunderland, SR1 1HG
Wednesday 20 September	10am - 12noon	Fulwell Methodist Church, Dovedale Road, Sunderland, SR6 8LN
	2pm - 4pm	North East Business & Innovation Centre (BIC), Wearfield, Enterprise Park East, Sunderland, SR5 2TA
	6pm - 8pm	Springwell Village Hall, Fell Road, Springwell, Gateshead, NE9 7RP
Thursday 21 September	10am - 12noon	Philadelphia Cricket Club, Bunker Hill, Houghton-Le-Spring, DH4 4JE
	2pm - 4pm	Ryhope Community Centre, 2 Black Road, Sunderland, SR2 0RX
	6pm - 8pm	Washington Millennium Centre, The Oval, Washington, NE37 2QD
Friday 22 September	10am - 12noon	Hetton Centre, Welfare Road, Hetton-Le-Hole, DH5 9NE
	2pm - 4pm	Health & Racquet Club, 3 Camberwell Way, Sunderland, SR3 3XN
	6pm - 8pm	Lambton Street Youth Centre, 25 Falkland Road, Sunderland, SR4 6XA