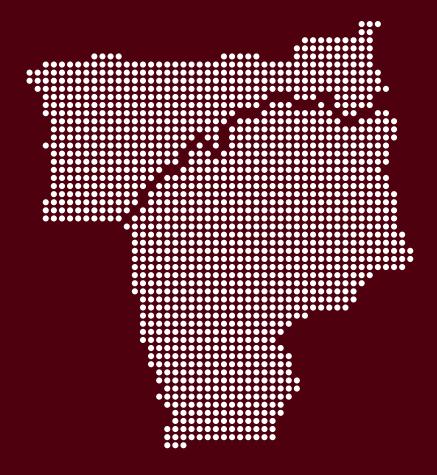
Five-Year Housing Land Supply

December 2024



Sunderland City Council

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1 Introduction

- 1.1 This document sets out Sunderland City Council's assessment of its housing land supply from 1 April 2024 to 31 March 2029.
- 1.2 The report sets out that the Council can demonstrate a 5.2 years supply of deliverable housing sites, using a five- year housing land supply from 24/25 to 28/29 against the five-year housing land supply requirement. Therefore, the presumption in favour of sustainable development will not apply.

Policy background

- 1.3 On 12 December 2024, the Government published a revised National Planning Policy Framework (NPPF) which includes the requirement for local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement, (Para 78).
- 1.4 Previously, under the 2023 NPPF, Sunderland City Council were not required to identify and update annually a supply of specific deliverable sites to provide a minimum of five years' worth of housing for decision making purposes, as the adopted plan was less than five years old (adopted January 2020) and it identified at least a five year supply of specific, deliverable sites at the time that the examination concluded.
- 1.5 Prior to this, Sunderland City Council had confirmed its five-year land supply position on an annual basis through the Annual Position Statement (APS) process since 2020. The 2024 APS document was prepared and consulted upon in spring/summer 2024, however, due to the fact that the Council had a confirmed housing supply position through its adopted plan, at that point in time and taking into consideration the proposed changes to the NPPF, it was decided not to submit an APS in the summer of 2024.
- 1.6 As set out earlier, in alignment with the latest NPPF, 'Local Planning Authorities (LPAs) should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old'¹, (Para 78 of the NPPF and Para 005 of the PPG).
- 1.7 This document is intended to serve as an interim document to cover the period from December 2024, until a new five-year supply position statement can be prepared with a base date of 1st April 2025.

The definition of deliverable

1.8 The <u>Glossary to the NPPF</u> sets out the definition of 'deliverable' for five year land supply purposes. It states that:

¹ Unless these strategic policies have been reviewed and found not to require updating.

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

- 1.9 For any sites with full planning permission and small sites with outline planning permission, the Government guidance is clear that these should be assessed as being deliverable unless there is specific evidence to the contrary.
- 1.10 For major sites (10 or more dwellings) with outline planning permission, those with permission in principle, plan allocations or identified on a brownfield register, these can be considered deliverable, subject to providing evidence to demonstrate this. The guidance set out within Planning Practice Guidance states that such evidence to demonstrate deliverability, may include:
 - current planning status for example, on larger scale sites with outline or hybrid permission, how much progress has been made towards approving reserved matters, or whether these link to a Planning Performance Agreement (PPA) that sets out the timescale for approval of reserved matters applications and discharge of conditions.
 - firm progress being made towards the submission of an application for example, a
 written agreement between the Local Planning Authority and the site developer(s)
 which confirms the developers' delivery intentions and anticipated start and buildout rates.
 - firm progress with site assessment work; or
 - clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.
- 1.11 The Government has confirmed in a Consent Order in East Northamptonshire Council v Secretary of State for Housing Communities and Local Government that the definition of "deliverable" in the NPPF is not a closed list. The Consent Order relevantly stated as follows:

"The Defendant has carefully considered the Inspector's decision and the Claimant's Statement of Facts and Grounds and Reply, and the evidence served in support. He concedes that he erred in his interpretation of the definition of deliverable within the glossary of the National Planning Policy Framework ("NPPF") as a 'closed list'. It is not. The proper interpretation of the definition is that any site which can be shown to be 'available now, offer a suitable location for development now, and be achievable with a

realistic prospect that housing will be delivered on the site within five years' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available."

1.12 Therefore, in principle, even where a site does not fall into the relevant categories of the NPPF definition, it can still be included in the five-year housing land supply if it satisfies the tests of availability, suitability, achievability, and has a realistic prospect of delivery within the next five years.

2 The Housing Requirement

Housing need

- 2.1 The first stage in the assessment of the housing land supply is the identification of the level of housing provision required. The housing requirement is that sufficient to provide a minimum of five years' worth of housing and the supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old, (unless these strategic policies have been reviewed and found not to require updating). (Para 78 of the NPPF and Para 005 of the PPG).
- 2.2 As the Core Strategy and Development Plan has been reviewed and found not to require updating (<u>CSDP Review</u>), the supply is set against the housing requirement of the adopted strategic policies within the adopted plan (745 dwellings per year).

Buffer

- 2.3 Paragraph 78 of the NPPF requires a buffer of 5% to be included to the supply to ensure choice and competition in the market for land. A 20% buffer is required if there has been significant under delivery of housing over the previous three years. This is measured against the Housing Delivery Test (HDT), where this indicates that delivery was below 85% of the LPA's housing requirement.
- 2.4 The 2023 HDT results were published in December 2024 and are the most up to date published figures. Table 1 below sets out the results of the 2023 HDT and shows a measurement of 184% for Sunderland, and as such, only a 5% buffer is to be applied to the five-year housing land supply.

Delivery Test		umber nes requ		ofhomes		ber of h Ielivere		of homes	ment	rence
	2020- 21	020- 2021- 2022- 1 22 23 In unpersonal page 1 22 22 23 In unpersonal page 1 22 22 22 22 22 22 22 22 22 22 22 22 2		number red	2020- 21	2021- 22	2022- 23	Total number of	HDT: measurement	HDT: Consequence
2023 Delivery Test	371	533	547	1451	703	974	999	2677	184%	None

Table 1 Housing Delivery Test (2023)

The housing requirement

2.5 Table 2 below shows the housing requirement for a five-year period.

Housing requirement	Adopted plan: 745 dwellings per year
A. Requirement	3,725
B. Buffer 5%	186
C. Requirement including buffer (A+B)	3,911

Table 2 The Housing requirement

3 Sources of Housing Supply

3.1 This section provides an explanation of the sources of land supply that contribute to the five-year housing land supply.

Sites with full planning permission/non-major sites with outline consent

3.2 Sites with full planning permission/non-major outline consent in place make up the majority of the supply. Of the 59 sites that contribute to the supply, 54² of these have full planning permission or have a non-major outline consent in place, providing a total of 3,250 dwellings³. Of these 54 sites, 39 are under construction. In line with the PPG these sites are considered deliverable.

Major sites with outline consent

- 3.3 One site within the supply (081- Chapelgarth), has outline consent in place which contributes 30 dwellings to the overall five-year land supply. The site is being developed over 6 phases by a number of developers and the first 5 phases have full consent in place and are under construction. The outline consent relates to phase 6 and from a total of 47 dwellings, 30 of these are considered deliverable in year 5, which is following the delivery of the dwellings that are subject to the full planning consent.
- 3.4 This remaining phase is still under the ownership of Siglion (who are a fully Sunderland City Council owned and operated vehicle), who have confirmed that they will be taking phase 6 to the market early 2025, with a view to starting on site at some point during 2026. It is considered that clear evidence has been provided to demonstrate part of phase 6 will be delivered within the next five-years.
- 3.5 Fullwell Quarries (175) is a greenfield site which has outline planning permission in place for up to 110 dwellings. The site is being delivered by Gentoo who have a very good track record of housing delivery within the city. Gentoo have confirmed that the reserved matters application is to be submitted in May 2025 and a start on site is anticipated in 26/27, with first units delivered in 27/28 at 30 dwellings per year. As such 60 dwellings will be delivered within the five-year period. It is considered that clear evidence has been provided to demonstrate part of this site will be delivered within the next five-years.

Allocated housing sites

- 3.6 Allocated housing sites comprise the strategic allocations within the adopted Core Strategy and Development Plan. Several of the plan allocations have progressed over recent years and as such have been included in the 'sites with full planning permission' category, or 'major sites with outline consent'. One site allocation which does not yet benefit from any planning consent is site 477e Poultry Farm site. This site, which is for 70 dwellings is included within the five-year supply as progression has been made towards its delivery.
- 3.7 The site forms part of a wider CSDP site allocation at South Sunderland Growth Area, which has been subject to Housing Infrastructure Funding (HIF) and as such new roads

² Site 081Chapelgarth has a number of dwellings which are categorised under full consent and a further phase which is categorised as 'major site with outline consent'. Site 107Chester Road has full consent in place for phase 1 and the remaining phases are categorised under 'Brownfield Land Register'.

³ Appendix 1 sets out the individual sites that make up the five-year land supply and Appendix 2 indicates the sites on maps.

and infrastructure have been put in place to help facilitate the delivery of new housing. The wider site allocation is the subject of a Supplementary Planning Document to aid delivery and as such a number of studies have been undertaken to inform this document. A developer is on board and the site has been subject to internal discussions. A request for a Screening Opinion as to whether an EIA is required to accompany a full application for major development was submitted December 2024 and it is anticipated that a full planning application is to be submitted early 2025. Following the grant of consent, full delivery is expected within the five-year time period. It is considered that clear evidence has been provided that housing completions will begin on site within five years.

Sites identified on the Brownfield Land Register

3.8 Within the NPPF Glossary, sites that are identified on a Brownfield Land Register can also be considered deliverable, and as such included within the five-year housing land supply provided there is clear evidence that housing completions will begin on site within five years. Four sites within the five-year land supply are on the Council's Brownfield Land Register: 078A – Farringdon Row, 467B- Former Thornbeck College, 107- Chester Road and 080A-Sheepfolds. These sites contribute 466 dwellings to the five-year supply.

3.9 078A Farringdon Row

A Council site which is located within a City Centre regeneration area. The site, which will deliver 165 dwellings is expected to fully deliver within the five-year period. The site has Cabinet approval to be disposed of, with private sector and external grant funding secured to deliver the site. The land sale is subject to planning approval and a planning application for full consent for 165 build to rent dwellings was submitted by agents representing the developer, PlaceFirst, in September 2024 and is currently pending consideration. The application is scheduled to be reported to Planning Committee in January 2025, with a recommendation for approval. As the units are build to rent tenure and the scheme includes a number of apartment blocks, the developer has confirmed the build out rate is expected to be three years, with development anticipated to commence in June 2025. The conditions of the external grant funding require that all remediation works are complete by March 2025. It is considered that clear evidence has been provided that the site will be completed within five years.

3.10 467B Former Thornbeck College

A deliverable brownfield site that is included within the Brownfield Land Register, and as such the use of the site for residential purposes is considered acceptable in principle. The site has a planning application currently pending for 51 dwellings and is to be delivered by McCarthy Stone. The planning application which is supported by a number of studies and site assessment work is expected to be reported to Planning Committee Spring 2025 and the agent has confirmed, subject to planning, a start on site is anticipated February 2026, with all works complete by April 2027. It is considered that clear evidence has been provided that the site will be delivered within five years.

3.11 107 Chester Road

A large regeneration site that is currently delivering 118 dwellings as part of phase 1. The whole site, which is a cleared site, is included within the Brownfield Land Register. Overall, the site will deliver 396 dwellings, with 85 dwellings from phase 1 already complete and the remaining 33 dwellings expected to be complete in year 1 (24/25). The developer has confirmed that it is their intention to start on site delivering the remaining phases in year 2, with the first dwellings delivered in year 3 (26/27). The developer has also confirmed that the planning application for the remaining phases is to be submitted early 2025. The future build out rate for the remaining phases has been confirmed by the developer at 30 dwellings per year, which will result in 90 dwellings being delivered within the five-year period. It is considered that for the remaining phases clear evidence has been provided that housing completions will begin on site within five years.

3.12 080A Sheepfolds

Part of a wider regeneration scheme which is all within the Brownfield Land Register, Sheepfolds Phase 1 will deliver up to 160 dwellings. This first phase has received £4.8m Brownfield Housing Fund which has a spend date of March 2026. Demolition of the existing industrial units has now been completed and an outline planning application for the wider site is to be submitted February 2025, with a reserved matters for phase 1 anticipated for submission September 2025. The programme for phase 1 has a start on site scheduled for March 2026, which is in line with funding requirements. It is expected that delivery of phase 1 will be complete in 2028, meaning that 160 dwellings will be delivered within the five-year period. These timescales are linked to the grant funding and the dwelling types within phase 1, which include apartment blocks, terraced townhouses and stacked maisonettes. Procurement for a developer is well underway with a number of expressions of interests received from potential developers. The preferred developer is to be identified in February 2025. It is considered that for phase 1 clear evidence has been provided that phase 1 of the site will be completed within five years.

Small sites

- 3.13 Small housing sites (4 units or less) contribute to the housing supply in the form of new build, change of uses and residential splits. These small sites are excluded from the five-year land supply as a site threshold of 0.25 hectares or 5 units or more is in place and therefore such sites are not identified as specific deliverable sites within the five-year supply schedule. As such, there is a need to calculate the estimated contribution that small sites make to the five-year housing supply. This allowance is based upon the average number of dwelling completions from small sites over a ten-year period, which is detailed within Table 3 below.
- 3.14 The approach to a small sites allowance is set out within the Strategic Housing Land Availability Assessment (SHLAA) methodology and as such has been through consultation/discussion as part of that process. The matter of a small site allowance and the approach to determining this was also examined at the CSDP examination. The Planning Inspector found that there was compelling evidence to justify a small sites windfall allowance of 50 units per annum as part of housing supply forecasting and determined that no double counting had occurred in the calculation of a small site

windfall allowance. This approach was also found to be realistic and reasonable in the Planning Inspector's Reports for all the council's confirmed APS's.

3.15 The small sites allowance has been kept under review and updated as part of the Council's APS process, with the latest figures provided below in Table 3. From the evidence below, it is noted that the long-term average has fallen to 34 dwellings per annum, this is primarily as a result of the number of losses increasing in 20/21, however this has dropped considerably in the past year. As such for the purposes of this five-year land supply, the number of dwellings to be taken forward as a small sites windfall allowance is 34 dwellings per annum. This data will be reviewed and updated as part of demonstrating future five-year land supply positions.

Financial Year	Total Gains	Total Losses	Net Gain
2014/15	57	3	54
2015/16	44	4	40
2016/17	48	0	48
2017/18	63	5	58
2018/19	56	5	51
2019/20	43	15	28
2020/21	42	34	8
2021/22	55	37	18
2022/23	56	43	13
2023/24	40	19	21
Average 2014/15-2023/24	50	16	34
Average annual dwellings from small sites		34	

Table 3 Net Housing Delivery from Small Sites 2014/15-2023/24

Demolitions

- 3.16 The approach the Council has taken with regards to demolitions is to discount any known demolitions for the first five years from the housing supply, as demolitions for the next five years are largely known through discussions with Gentoo (the city's largest registered provider) and other key stakeholders. This approach was also found to be appropriate and justified in the Planning Inspector's Reports for all of the Council's confirmed APS's.
- 3.17 Table 4 below shows demolitions within the city since the start of the plan period (2015/16-2023/24).

Year	Number of Demolitions
2015/16	-24
2016/17	-38
2017/18	-153
2018/19	-41
2019/20	-6
2020/21	-12
2021/22	0
2022/23	-13
2023/24	-4

Table 4 Sunderland demolitions 2015/16-2023/24

3.18 Through discussions with Gentoo and other key stakeholders it has been identified that there are no planned demolitions within the next five years (2024-2029). The Council has therefore not included any demolitions within this five-year land supply.

4 Engagement with developers/agents/landowners

- 4.1 Government guidance indicates that authorities should involve those with an interest in site delivery, in assessing the deliverability of sites and set out up-to-date robust evidence to support assessments of deliverability. As such the Council utilised a site proforma that was sent to agents, developers and landowners of housing sites that were considered to be deliverable to gain an understanding of site forecasts and to provide any relevant evidence to assist in demonstrating a sites deliverability.
- 4.2 Responses have been used to both assess deliverability of the site and to phase dwelling completions.
- 4.3 The Council considers the information on delivery provided by agents, developers and landowners as the most robust source and uses this as a starting point for considering what might reasonably be delivered within the five-year period. Where necessary, the Council adjust the projected delivery to take account of any overly optimistic views, ensuring that the figures relied on by the Council within the five-year period are as realistic as possible.
- 4.4 In cases where no response was received, the Council has assessed the deliverability of the site using its knowledge of the developer and past delivery rates, its knowledge of any specific site issues and the type of dwellings to be delivered, as well as likely lead in times and build out rates for the different types of sites.
- 4.5 As part of the 2024 APS preparation (which was not progressed, as set out in paragraph 1.5), a number of responses were received to the data gathering exercise undertaken in March/April 2024 and the consultation on the drat APS in May/June 2024. The information received at that time has been considered when preparing this five-year land supply position statement.
- 4.6 In response to the consultation on the draft APS in May/June 2024 detailed representations to several sites included within the five-year land supply were submitted by Spawforths on behalf of Barratt David Wilson Homes. In addition to this, as part of a separate consultation exercise for the new International Advanced Manufacturing Park Area Action Plan (IAMP AAP) which took place during summer 2024, Spawforths submitted a further representation on behalf of Barratt David Wilson Homes, which again reviewed the five-year land supply position for the Sunderland area.
- 4.7 A full response to the representations received by Spawforths and other interested parties has been provided at Appendix 3 of this document, including any changes that have been made to the five-year land supply where appropriate.

5 The Housing Land Supply

Annual Housing Requirement	745 dwellings net
Five Year Housing Requirement for period 2024/25 - 2028/29	3725
Buffer (5% of requirement)	186
Total requirement	3911
Dwellings from sites with full planning permission/non major sites with outline consent	3250
Dwellings from major sites with outline consent	90
Dwellings from allocated housing sites	70
Dwellings from sites identified on the Brownfield Land Register	466
Dwellings from small sites	170
Demolitions	0
Total Supply	4046
Five-year supply performance against housing requirement (years)	5.2 years

Table 5 The housing land supply 2024/25-2028/29

- 5.1 Sunderland City Council can demonstrate a 5.2 years' supply of deliverable housing sites, using a five- year housing land supply from 24/25 to 28/29 against a five-year housing land supply requirement. Therefore, the presumption in favour of sustainable development will not apply.
- 5.2 This five-year land supply statement sets out the five-year housing land supply position with a base-date of 1 April 2024. As set out at paragraph 1.7, this is intended to serve as an interim document to cover the period from December 2024, until a new five-year supply position statement can be prepared with a base date of 1 April 2025.

Appendix 1 Five-year land supply schedule of sites

SHLAA Ref No	Site Name	Present Planning Status	Developer	Total number of net units	Category	Completions 2018/19	Completions 2019/20	Completions 2020/21	Completions 2021/22	Completions 2022/23	Completion 23/24	Completions prior to 1st	Completions 2024/25	Completions 2025/26	Completions 2026/27	Completions 27/28	Completions 28/29	Completions post 5 year period
477e	Land North of Burdon Lane (Poultry farmer site)	Allocated CSDP Site	Private	70	Allocated CSDP Site	0	0	0	0	0	0	0	0	0	0	30	40	0
078A	Farringdon Row	Full application pending	Place First	165	Brownfield Land Register	0	0	0	0	0	0	0	0	0	0	100	65	0
080A	Sheepfolds Phase 1	Brownfield Register	SCC	160	Brownfield Land Register	0	0	0	0	0	0	0	0	0	30	65	65	0
467B	Former Thornbeck College	Full application pending	McCarthy Stone	51	Brownfield Land Register	0	0	0	0	0	0	0	0	0	0	51	0	0
63	Vaux Brewery (site of), Gill Bridge Avenue	Permitted – Under Construction	Siglion	133	Detailed Consent	0	0	0	0	0	0	0	0	16	41	76	0	0
66	Former Site Of Coutts And Findlater Ltd Hudson Road	Permitted - Under construction	MCC Homes	16	Detailed Consent	0	0	0	0	0	0	0	16	0	0	0	0	0
79	Hylton Lane/Blaydon Ave, Hylton Lane	Permitted – under construction	Gentoo Group	71	Detailed Consent	0	0	0	0	0	0	0	71	0	0	0	0	0
98	Ayton Village Primary School, Dunlin Drive, Ayton	Permitted – Under Construction	Vistry Group	56	Detailed Consent	0	0	0	38	14	1	53	3	0	0	0	0	0
104	Former Carley Hill School	Permitted - under construction	Gentoo	115	Detailed consent	0	0	0	0	0	0	0	30	32	53	0	0	0
128	Black Boy Road land at (Site A)	Permitted – under construction	Persimmon	141	Detailed Consent	0	0	0	0	31	50	81	32	28	0	0	0	0

SHLAA Ref No	Site Name	Present Planning Status	Developer	Total number of net units	Category	Completions 2018/19	Completions 2019/20	Completions 2020/21	Completions 2021/22	Completions 2022/23	Completion 23/24	Completions prior to 1st	Completions 2024/25	Completions 2025/26	Completions 2026/27	Completions 27/28	Completions 28/29	Completions post 5 year period
138	Land at North Road	Permitted – under construction	Persimmon	300	Detailed Consent	0	29	40	38	41	23	171	13	20	25	25	25	21
163	Amberley and Harrogate street	Permitted- Not started	Thirteen Group	96	Detailed consent	0	0	0	0	0	0	0	0	40	56	0	0	0
172	Former Forest Estate	Permitted- Not started	Bellway	139	Detailed Consent	0	0	0	0	0	0	0	0	25	40	40	30	4
177	Former Usworth Comprehensive School	Permitted - not started	Taylor Wimpey	190	Detailed Consent	0	0	0	0	0	0	0	0	0	35	35	35	85
197	Land to the east of former Broomhill Estate	Permitted – Under Construction	Gentoo	99	Detailed Consent	0	0	0	20	34	18	72	27	0	0	0	0	0
258	Albany Park	Permitted – under construction	Karbon Homes	72	Detailed Consent	0	0	0	0	10	47	57	15	0	0	0	0	0
328	Hetton Downs Phase 2	Permitted – under construction	Gleeson Homes Ltd	101	Detailed Consent	0	0	18	28	46	8	100	1	0	0	0	0	0
342	Land at Mill Hill, Silksworth Road	Permitted – Under Construction	Persimmon	250	Detailed Consent	0	0	2	51	87	58	198	40	12	0	0	0	0
413	Seaburn Amusements, Whitburn Road	Permitted – Under Construction	Avant Homes/Siglion	82	Detailed Consent	0	0	0	40	39	0	79	3	0	0	0	0	0
421	Quarry House Lane, East Rainton	Permitted - Under Construction	Wynyard Homes	33	Detailed Consent	0	0	0	0	2	8	10	13	10	0	0	0	0
494	Land At Chapel Street/Edward Street, Hetton	Permitted - not started	Janice Fleming	6	Detailed Consent	0	0	0	0	0	0	0	0	6	0	0	0	0
504	Doxford Park Phase 6	Permitted – under construction	Gentoo	100	Detailed Consent	0	0	0	7	22	23	52	48	0	0	0	0	0

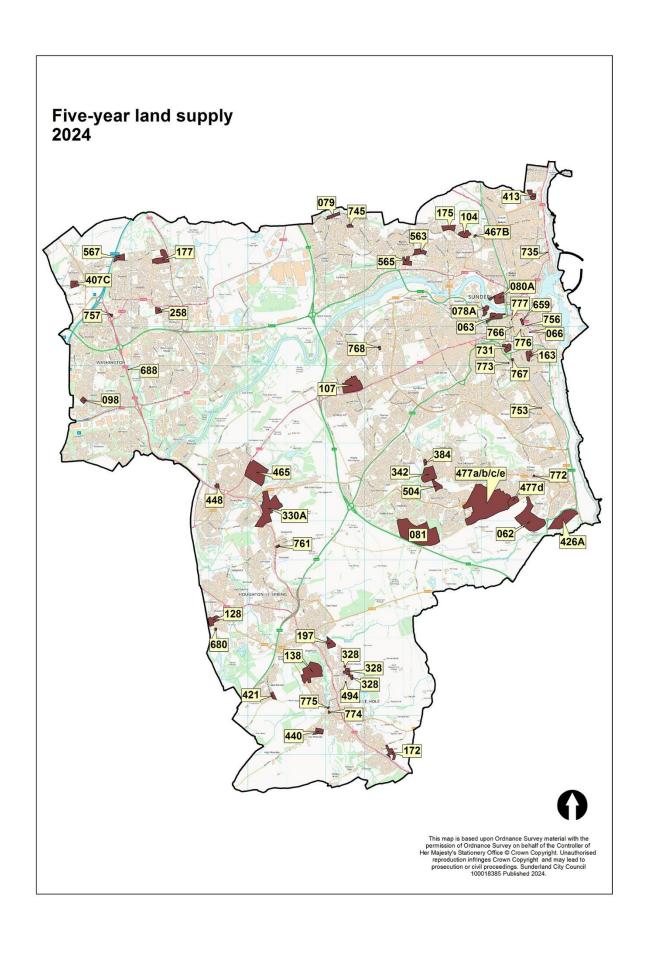
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563	Hylton Skills Campus, North Hylton Road	Permitted – Under Construction	Karbon Homes	105	Detailed Consent	0	0	0	9	60	35	104	1	0	0	0	0	0
565	Pheonix Tower Business Park, Castletown Way	Permitted – Under Construction	Avant Homes	114	Detailed Consent	0	0	1	16	25	70	112	2	0	0	0	0	0
567	Land To The North Of Stone Cellar Road Usworth	Permitted- Not started	Taylor Wimpey	49	Detailed Consent	0	0	0	0	0	0	0	0	29	20	0	0	0
659	Nile and Villiers	Permitted- Not started	Siglion	75	Detailed Consent	0	0	0	0	0	0	0	0	40	35	0	0	0
680	Land Opposite the Mews, Redburn Row	Permitted - Under Construction	Johnson Homes	5	Detailed consent	0	0	0	0	0	0	0	5	0	0	0	0	0
735	1 Roker Terrace and Side House, St Georges Terrace	Permitted – under construction	Bejhan Kameli	6	Detailed Consent	0	0	0	0	0	0	0	6	0	0	0	0	0
745	Land at Keighley avenue	Permitted – under construction	Gentoo Group	41	Detailed Consent	0	0	0	0	0	39	39	2	0	0	0	0	0
753	Former Garage, Westholme Terrace	Permitted – Not started	Cundall	8	Detailed Consent	0	0	0	0	0	0	0	0	8	0	0	0	0
756	34 Villiers Street	Permitted – under construction	NMBC Properties Ltd	7	Detailed Consent	0	0	0	0	0	0	0	7	0	0	0	0	0
757	Parsons House, 20 Parsons Road	Permitted – Under Construction	JT Consultancy Ltd	40	Detailed Consent	0	0	0	0	0	0	0	40	0	0	0	0	0
761	Former Adey Gardens Care Home	Permitted - Under Construction	Holyhead Homes	23	Detailed Consent	0	0	0	10	10	2	22	1	0	0	0	0	0

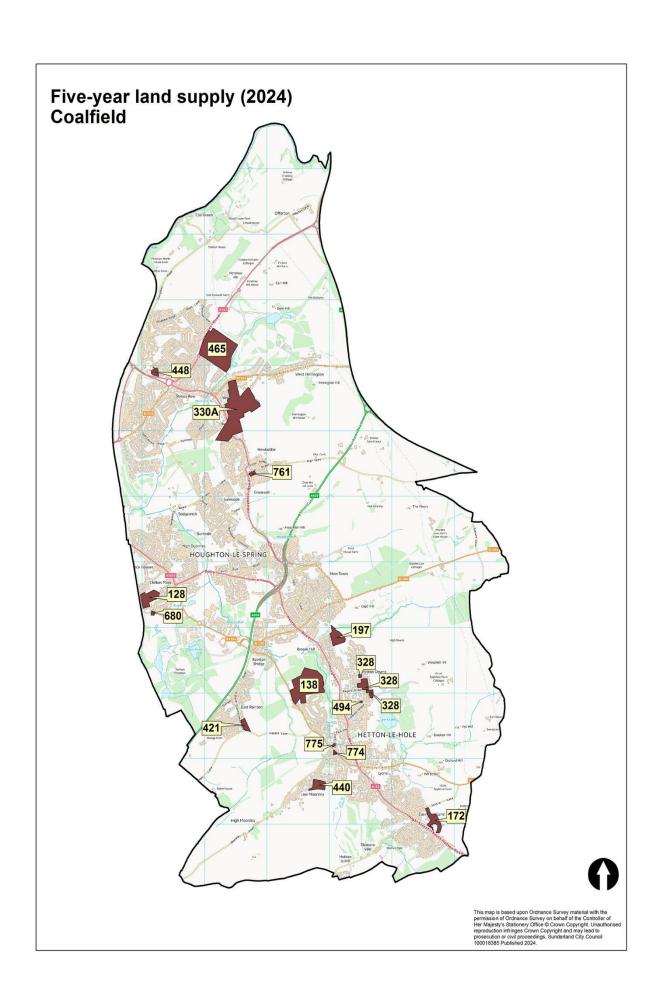
SHLAA Ref No	Site Name	Present Planning Status	Developer	Total number of net units	Category	Completions 2018/19	Completions 2019/20	Completions 2020/21	Completions 2021/22	Completions 2022/23	Completion 23/24	Completions prior to 1st	Completions 2024/25	Completions 2025/26	Completions 2026/27	Completions 27/28	Completions 28/29	Completions post 5 year period
768	Princess Of Wales Centre Hylton Road	Permitted - under construction	MCC Homes	19	Detailed Consent	0	0	0	0	0	0	0	19	0	0	0	0	0
772	Saint Cuthberts Methodist Church	Permitted - not started	SCC	6	Detailed consent	0	0	0	0	0	0	0	0	6	0	0	0	0
773	6 - 7 The Cloisters	Permitted - not started	Rok Architecture (agent)	9	Detailed consent	0	0	0	0	0	0	0	0	0	0	9	0	0
062	Ryhope and Cherry Knowle Hospital	Permitted – under construction	Barratt/Homes England	800	Detailed Consent	4	84	75	53	44	32	292	12	0	0	0	0	496
330A	Philadelphia Complex	Permitted – Under Construction	Persimmon	465	Detailed Consent	0	4	9	0	24	49	86	50	54	60	60	60	95
407c	Land north east of Mount Lane, Springwell Village	Permitted – Under construction	Hellens /Esh	75	Detailed Consent	0	0	0	0	23	43	66	9	0	0	0	0	0
426A	Willow Farm land to south, Ryhope (North)	Permitted – Under construction	Persimmon	450	Detailed consent	0	0	0	0	0	36	36	40	40	50	50	50	184
465	Land adjacent to Herrington Country Park	Permitted - under construction	Taylor Wimpey	440	Detailed Consent	0	0	0	0	0	9	9	35	36	36	35	35	254
477c1/c2/c3	Land North of Burdon Lane	Permitted – under construction	Barratts/David Wilson	218	Detailed Consent	0	0	0	0	0	14	14	16	24	24	30	30	80
477d	Burdon Lane	Permitted – under construction	Bellway	60	Detailed Consent	0	0	0	0	0	43	43	17	0	0	0	0	0
688	Derwent House	Permitted – under construction	JT Consultancy Limited	48	Detailed Consent	0	0	0	0	0	0	0	48	0	0	0	0	0
440	Cragdale Gardens	Permitted- under construction	Gentoo	86	Detailed consent	0	0	0	0	0	0	0	0	86	0	0	0	0
448	Penshaw House	Permitted - Under Construction	Vistry Group/Gentoo	72	Detailed Consent	0	0	0	0	0	0	0	72	0	0	0	0	0

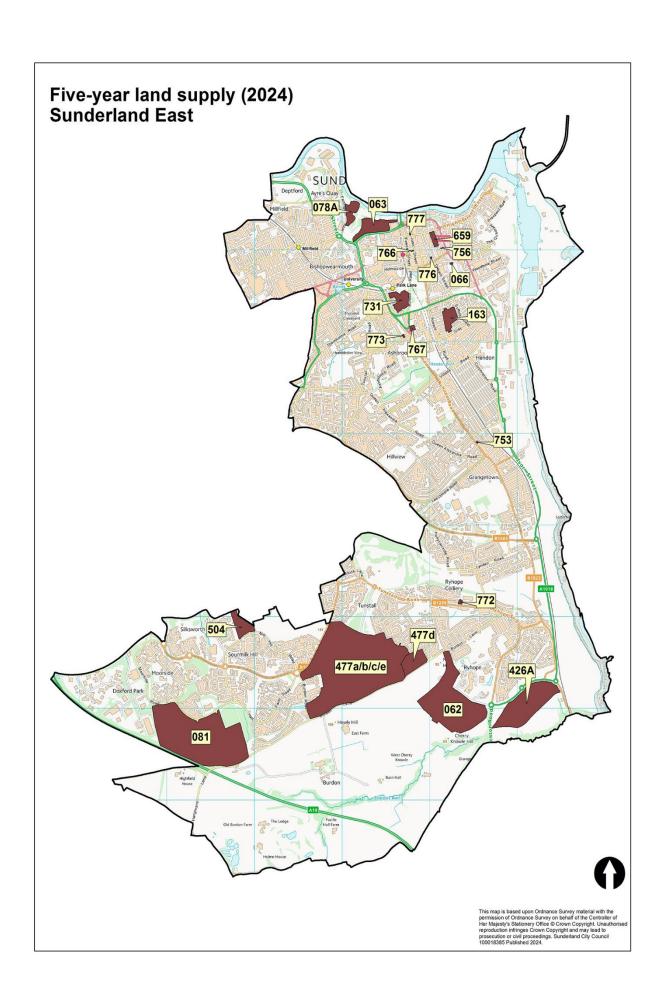
SHLAA Ref No	Site Name	Present Planning Status	Developer	Total number of net units	Category	Completions 2018/19	Completions 2019/20	Completions 2020/21	Completions 2021/22	Completions 2022/23	Completion 23/24	Completions prior to 1st	Completions 2024/25	Completions 2025/26	Completions 2026/27	Completions 27/28	Completions 28/29	Completions post 5 year period
731	Civic Centre	Permitted - under constrcution	Vistry Group	265	Detailed consent	0	0	0	0	0	0	0	64	30	30	30	30	81
766	55 John Street	Permitted- under construction	Sundridge Properties Ltd (Cummings Architects)	5	Detailed Consent	0	0	0	0	0	0	0	5	0	0	0	0	0
767	Clifton Hall, Douro Terrace	Permitted - Not started	Vardy Foundation	9	Detailed consent	0	0	0	0	0	0	0	0	9	0	0	0	0
477b1/b2/b3	Land north of Burdon Lane	Permitted – under construction	Story Homes	138	Detailed consent	0	0	0	0	0	0	0	36	36	36	30	0	0
477a1-a6	Land north of Burdon Lane	Permitted – under construction	Taylor Wimpey	590	Detailed Consent (236 units) Outline consent (354 units)	0	0	0	0	0	37	37	30	30	30	30	30	403
107	Phases 1-6, Chester Road	Permitted – under construction	Gentoo	396	Detailed Consent/ Brownfield Land Register	0	0	0	23	31	31	85	33	0	30	30	30	188
081	Chapelgarth site	Permitted – under construction	Siglion/Millers/Story Homes/Duchy	750	Detailed Consent/Outline Consent	5	33	48	64	99	65	314	81	107	91	55	65	37
384	The Cavalier	Permitted - Not Started	Private	19	Detailed Consent	0	0	0	0	0	0	0	0	19	0	0	0	0
777	110-112 High Street West	Permitted - Not Started	Private	14	Detailed Consent	0	0	0	0	0	0	0	0	14	0	0	0	0
776	Somerford Buildings, Norfolk Street	Permitted- not started	Nulite Properties Ltd	11	Detailed Consent	0	0	0	0	0	0	0	0	11	0	0	0	0
774	The Fox and Hounds, North Road	Permitted - Outline	Ethical Partnership (agent)	5	Outline consent	0	0	0	0	0	0	0	0	0	5	0	0	0
775	Bog Row School	Permitted (Outline) – Not started	Ethical Partnership (agent)	7	Outline consent	0	0	0	0	0	0	0	0	0	7	0	0	0

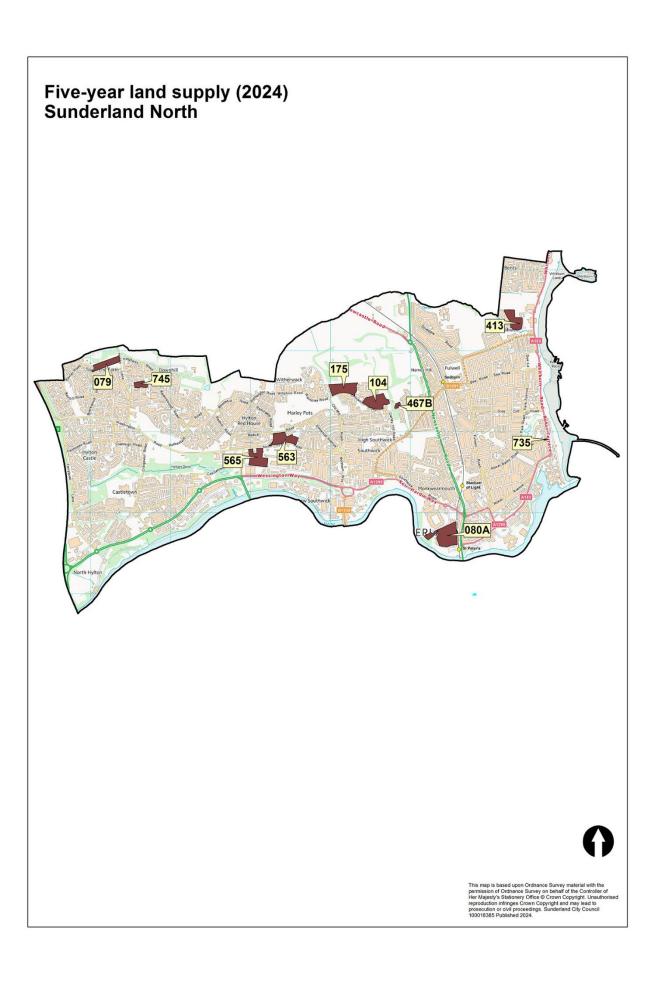
SHLAA Ref No	Site Name	Present Planning Status	Developer	Total number of net units	Category	Completions 2018/19	Completions 2019/20	Completions 2020/21	Completions 2021/22	Completions 2022/23	Completion 23/24	Completions prior to 1st Anril 2024	Completions 2024/25	Completions 2025/26	Completions 2026/27	Completions 27/28	Completions 28/29	Completions post 5 year period
175	Land at Fulwell Quarries	Permitted - Outline	Gentoo	110	Outline consent	0	0	0	0	0	0	0	0	0	0	30	30	50

Appendix 2 Site maps

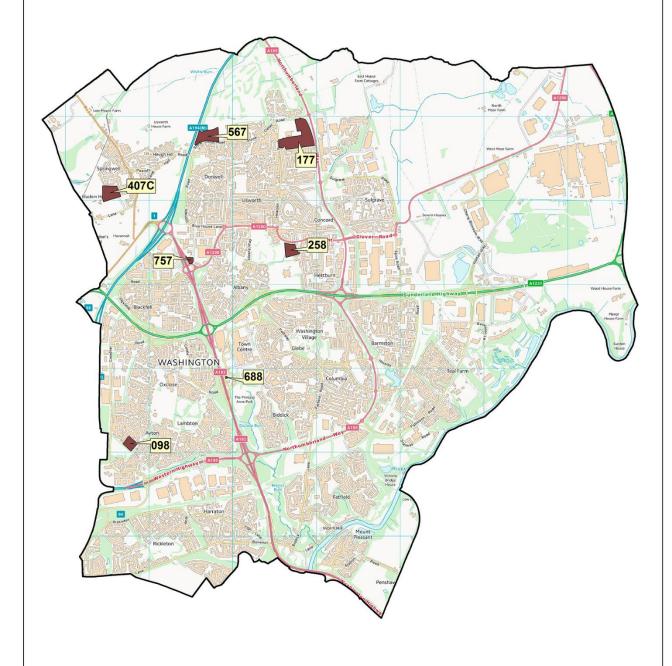








Five-year land supply (2024) Washington





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Five-year land supply (2024) Sunderland West 768 107 Plains Farm Hastings Hill 91 Newport Hill Middle Herrington 384 342

Appendix 3 Summary of responses

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
1	Northumberland	N/A	No comments from their planning policy team on	No action required.
	Council		the draft APS.	
2	Historic England	N/A	No comments from their team on the draft APS.	No action required.
3	Place First	078A	The developer provided updated projections for the	The Council have considered the revised
			site and indicated that the proposed development	projections and information submitted and
			will commence in June 2025 and will be completed	discussed the site with the Council's Residential
			within the 5-year period.	Development Team. Delivery of the site has been
				updated in line with the developer's projections.
4	National Highways	N/A	National Highways have identified some	The comments have been forwarded onto the
			differences between the uncertainty log previously	Council's Transportation Development Team for
			provided to National Highways and the APS.	action. No actions are required for the APS/5YHLS.
			However, overall, they are satisfied that the APS is	
			acceptable.	
			National Highways also provided broader	
			comments which were not relevant to the APS.	
5	Coal Authority	N/A	No specific comments to make on the Annual	No action required.
			Position Statement as such, however were pleased	
			to see that within each site assessment review, that	
			sites which area within Coal Authority areas are	
			clearly identified.	
6	Taylor Wimpey (TW)	N/A	TW provided comment on the broader assumptions	The Council have applied a 5% buffer to the 5YHLS
			made by the APS, including removal of the buffer	in line with the 2024 NPPF. However, in relation to
			and discounting oversupply from future housing	oversupply, this has not been taken into account
			delivery requirements. It was considered that	when setting out the housing requirement.
			following the dissolution of Parliament on May 30 th	
			2024 (as a result of the General Election being	
			called) the position on the removal of the buffer	

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			might be reversed and cannot be considered 100% definite. Alongside this, the Council's reliance on the	
			Written Ministerial Statement (WMS) from December 2023 was challenged. TW argued that this statement did not provide sufficient clarity to confirm that the government intended to allow for the discounting of oversupply from future housing delivery requirements, and due to the fact that in the 6 months since the WMS was produced, there has been no further clarity on this point, that the WMS should not be afforded any weight. Therefore, the Council should not be discounting their	
			previous over-delivery from the future housing delivery target. TW had no site-specific comments to make on the draft APS.	
7	Hamilton Willis (HW)	N/A	HW object to the draft APS. This is in part due to assumptions made by the Council regarding oversupply and removal of the buffer from the housing target, and also due to the inclusion of certain sites in the 5YHLS.	The Council have applied a 5% buffer to the 5YHLS in line with the 2024 NPPF. However, in relation to oversupply, this has not been taken into account when setting out the housing requirement.
			HW support the housing requirement of 3,725 for the period 2024/25- 2028/29. The Council's reliance on the Written Ministerial	
			Statement (WMS) from December 2023 was challenged. HW argued that this statement did not provide sufficient clarity to confirm that the	

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			government intended to allow for the discounting of oversupply from future housing delivery requirements, and due to the fact that in the 6 months since the WMS was produced, there has been no further clarity on this point, that the WMS should not be allowed any weight. Regarding the buffer, HW set out that the position should be kept under review during the examination of the APS, to reflect any changes brought about as a result of the dissolution of Parliament on May 30 th 2024 (as a result of the General Election being called).	
	Hamilton Willis	063 – Vaux Brewery	HW queries the delivery of the site and the Council's current projections. HW raised the point that the site has been identified for a fifth year in a row without any completions having materialised, therefore provides evidence that delivery of the units in the next five-year period is questionable.	Construction on the residential element of the Vaux Brewery site started in 2022, however due to the initial contractor going into administration the works were stalled early 2023. A new developer has now restarted the works and the development is well underway with first completions expected in 2025/26.
	Hamilton Willis	079 – Hylton Lane/Blaydon Lane	HW raised the point that the site has been identified for a fifth year in a row without any completions having materialised, therefore provides evidence that delivery of the units in the next five-year period is questionable. They also query the delivery of units being tied to funding, as this point has been raised in previous iterations of the APS.	The Council has received confirmation from the developer that unit delivery was delayed against initial programme due to delays with mains power to site. However, this is now resolved and all units are under construction and the trajectory is up to date.

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
	Hamilton Willis	463A – Land North of Usworth Hall	HW raised the point that the site has been identified for a fifth year in a row without any completions having materialised, therefore provides evidence that delivery of the units in the next five-year period is questionable.	Following further correspondence with the house builder for this site, the Council have taken the decision to remove the site from the 5YHLS at this time.
	Hamilton Willis	45 – Land at Egerton Street 293B – Coalbank Farm Somerford Buildings – 776	HW queried the inclusion of these three sites, which do not fall under category A or B. They contend that the three new sites do meet the definition of deliverable as set out in the NPPF and in the National Planning Practice Guidance.	The definition of deliverable is not a closed list (see para 1.11-1.12 of the 5YHLS document), where a site does not fall into the relevant categories of the NPPF definition, it can still be included in the five-year housing land supply if it satisfies the tests of availability, suitability, achievability, and has a realistic prospect of delivery within the five years. Site 45 is not included within the 5YHLS at this point in time. Site 776 gained full planning approval July 2024 and is included within the 5YHLS.
8	Nexus	N/A	Nexus generally welcomed the renewal of the APS and 5YHLS. As a consultee and partner, Nexus wishes to be proactive in working with the Local Planning Authority and developers to ensure that new developments in Sunderland encourage sustainable and accessible travel via public transport or active travel modes.	No action required.
	Nexus	293B – Coalbank Farm	Nexus raised concerns that not all areas of the site will be within a 400-metre walk to a bus stop and a more bespoke solution or further consultation may	The Council acknowledge the comments made by Nexus, however this is a site specific constraint which does not impact upon the delivery of the site in 5YHLS and which would be considered as part of

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			be required to ensure all dwellings at this site are	the planning application process. Notwithstanding
			accessible by public transport.	the above, the site no longer forms part of the
				5YHLS. No action required.
	Nexus	45 – Land at	At present, the closest bus stops to the proposed	The Council acknowledge the comments made by
		Egerton Street	development site are without shelter provision.	Nexus, however this is a site specific constraint
			Nexus would welcome engagement to explore the	which does not impact upon the delivery of the site
			feasibility of improving bus stop provision at this	in 5YHLS and which would be considered as part of
			site as part of this application.	the planning application process. Notwithstanding
				the above, the site no longer forms part of the
	Nexus	567 – Land to the	Novue recommended improvements to nedestrian	5YHLS. No action required.
	inexus	North of Stone	Nexus recommended improvements to pedestrian infrastructure to enhance the accessibility of	The Council acknowledge the comments made by Nexus, however this is a site specific constraint
		Cellar Road	existing bus stops.	which does not impact upon the delivery of the site
		Oction Hoda	CAISTING DUG STOPS.	in 5YHLS. The site has full planning consent. No
				action required.
9	Barratt David Wilson (BDW) Homes	N/A	BDW agreed with the baseline position for the 5YHLS requirement of 3,725 and the fact that a buffer had not been applied.	The Council have applied a 5% buffer to the 5YHLS in line with the 2024 NPPF. However, in relation to oversupply, this has not been taken into account when setting out the housing requirement.
			However, they did not agree with discounting the oversupply from the housing requirement and referenced recent appeal decisions, the lack of guidance and updates to the PPG and lack of weight to be given to the Written Ministerial Statement. BDW also referenced the CSDP, stating Policy SP8 specifies 'exceeding the minimum target' and as such reducing the requirement down would not be consistent with this or the Government's aim of boosting housing supply.	

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			With regards to the supply of sites, BDW argue that the deliverable supply needs to reflect the picture of supply as of 1 st April 2024, no additional sites after this date should be included or taken into account.	The Council have included sites within the supply that are considered to be available, suitable and achievable within the five-year period.
			BDW also disagreed with some of the assumptions put forward regarding delivery rates.	The Council utilise the assumptions as set out in the SHLAA as a starting point. Information from individual developers is taken on board where provided, however this is sense checked to ensure it is realistic and deliverable.
			BDW disagree with the Council utilising its own completions data for consistency across sites, and believes they have identified several sites that should be removed, despite the Council not having received this completions data to date.	To ensure consistency across all sites, the Council utilise the completion data it receives from a number of sources. In certain instances this can result in a lag from when the property was complete to recording it as complete, however taking a consistent approach ensures completeness.
			BDW recommend the Council reduce the small sites windfall allowance. Alongside this, BDW recommend the inclusion of a 10% nonimplementation rate for smaller sites.	The Council consider the approach to small sites, using a 10-year average is reasonable to give an indication of future supply. This approach was considered acceptable by the Planning Inspector for the CSDP and also by the Planning Inspectors for all of the Council's previously approved APS's. It is not considered that a non-implementation rate should be included as the data utilises past completions for small sites and is monitored and adjusted accordingly on an annual basis.

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			BDW recommend a small allowance of demolitions	
			to be included.	The approach the Council take with regards demolitions to discount any known demolitions for the first five years is considered reasonable and is
				consistent with the approach agreed by the Planning Inspector for the CSDP and also by the
			BDW also dispute the inclusion of a number of sites in the 5YHLS, resulting in a loss of 832 dwellings	Planning Inspectors' who have reviewed the Council's previously approved APS documents.
				See below
	BDW	062 – Cherry Knowle	BDW argue there is not sufficient information on the Homes England portion of the site, and therefore it should be removed from the 5YHLS in entirety (140 dwellings).	This element of the site has been removed from the 5YHLS at this point in time.
	BDW	107 – Phases 1-6 Chester Road	BDW wish to alter the trajectory slightly for this site, resulting in 3 dwellings being pushed from the	The Council have received confirmation from the developer of the site in relation to delivery rates
			5YHLS.	which has resulted in an adjustment to the delivery
				of the remaining phases and a number of units
				removed from the 5YHLS. These changes are
				considered reasonable and deliverable.
	BDW	745 – Land at	BDW state that this site is complete, therefore the	The Council have consistently used the same
		Keighley Avenue	final 2 units should be removed from the supply.	process and sources for recording completion data, this method will be retained.
	BDW	328 – Hetton	BDW state that this site is complete, therefore the	The Council have consistently used the same
		Downs Phase 2	final unit should be removed from the supply.	process and sources for recording completion
			,	data, this method will be retained.
	BDW	407c – Land north	BDW state that the number of units remaining on	The Council have consistently used the same
		east of Mount	this site should be amended.	process and sources for recording completion
		Lane		data, this method will be retained.
	BDW	761 – Former Adey	BDW state that this site is complete, therefore the	The Council have consistently used the same
		Gardens Care	final unit should be removed from the supply.	process and sources for recording completion
		Home		data, this method will be retained.

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
	BDW	757 – Parsons	BDW state that this site is complete, therefore the	The Council have consistently used the same
		House	units should be removed from the supply (40 units).	process and sources for recording completion
				data, this method will be retained.
	BDW	763 – Ivy Leaf Club	BDW state that there is no evidence that the site	This site has been removed from the 5YHLS at this
			will deliver, and the permission is due to expire and	point in time.
			so all units should be removed from the supply (13	
			units).	
	BDW	753 – Former	BDW don't agree with the inclusion of this site, as	The site is included within the 2023 Brownfield
		Garage,	there has been a lapsed permission, and a new	Land Register. The site details have been updated
		Westholme	permission was agreed post 1st April 2024 therefore	to reflect the full consent gained post April 2024.
		Terrace	shouldn't be included in this year's APS (8 units).	
	BDW	330a –	BDW dispute the trajectory put forward for this site,	The Council have received confirmation from the
		Philadelphia	and propose a delivery rate of 43 dwellings	developer of the site in relation to delivery rates and
		Complex	annually, resulting in 69 dwellings being removed	these are considered reasonable and deliverable.
			from the 5YHLS.	
	BDW	426A – Willow	BDW dispute the trajectory put forward for this site,	The Council have received confirmation from the
		Farm Land to	and propose a delivery rate of 43 dwellings	developer of the site in relation to delivery rates and
		South	annually, resulting in 21 dwellings being removed	these are considered reasonable and deliverable.
			from the 5YHLS.	
	BDW	081 – Chapelgarth	BDW dispute the trajectory put forward for the	The Council have received confirmation from the
			phases of this site, and propose alternative delivery	developer of the site in relation to delivery rates and
			rates for the phases, resulting in 100 dwellings	these are considered reasonable and deliverable.
			being removed from the 5YHLS. BDW also dispute	The outline element, phase 6, is for a total of 47
			the outline element of the site being in year 5.	units, with 30 of these projected for year 5. The
				landowner has confirmed that this remaining phase
	BBW	4004	DDW	is to be marketed early 2025.
	BDW	463A – Land North	BDW state that there is no evidence that the site	This site has been removed from the 5YHLS at this
		of Usworth Hall	will deliver and so all units should be removed from	point in time.
	DDW	475	the supply (127 units).	The development of the state of
	BDW	175 – Land at	BDW argue that the proposed level of delivery does	The developer has confirmed that the reserved
		Fulwell Quarries	not allow sufficient time for submission,	matters application is to be submitted in May 2025,
			determination, pre commencement	

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			works/discharge of conditions, and initial site	with a view to starting on site in 26/27 and first units
			works. BDW suggest that the delivery should be	delivered in 27/28.
			revised to move first year of delivery into year 4.	
	BDW	172 – Former	BDW argue that the trajectory for this site should be	The site is included within the 2023 Brownfield
		Forest Estate	amended to allow for the fact that there is no	Land Register. A planning application was
			certainty regarding when a permission will be	submitted December 2023, with full consent
			forthcoming. This will result in 35 dwellings being	granted in October 2024. Works have started on
			removed from the 5YHLS.	site.
	BDW	776 – Somerford	BDW argue that as a non-categorised site, there	This site has planning consent in place and as such
		Buildings	isn't sufficient justification to include this site in the	is considered deliverable and has been retained
			5YHLS, resulting in all 11 units being removed.	within the 5YHLS.
	BDW	45 – Egerton	BDW argue that as a non-categorised site, there	This site has been removed from the 5YHLS at this
		Street	isn't sufficient justification to include this site in the	point in time.
			5YHLS, resulting in all 22 units being removed.	
	BDW	775 – Bog Row	BDW argue that as a non-categorised site, there	This site has outline planning consent in place and
		School	isn't sufficient justification to include this site in the	as such is considered deliverable and has been
			5YHLS, resulting in all 7 units being removed.	retained within the 5YHLS.
	BDW	773 – 6-7 The	BDW argue that there isn't sufficient evidence to	The agent has confirmed the property is up for sale.
		Cloisters	support delivery of the site, since the scheme has	As such, it is considered that as the property
			paused, resulting in all 9 units being removed.	benefits from full planning consent within a good
				market area it can deliver within the five-year
				period.
	BDW	338 – Land at	BDW argue that there isn't sufficient evidence to	This site has been removed from the 5YHLS at this
		Ennerdale	support delivery of the site, resulting in all 40 units	point in time.
			being removed.	
	BDW	293B – Coalbank	BDW argue that there isn't sufficient evidence to	This site has been removed from the 5YHLS at this
		Farm	support delivery of the site during the 5 year period,	point in time.
			resulting in all 60 units being removed.	
	BDW	477e – Poultry	BDW refer to site 477c as being the poultry farmer	The site forms part of a wider CSDP site allocation
		Farmer Site	site, however the correct reference for this site is	at South Sunderland Growth Area, which has been
			477e. BDW argue that there isn't sufficient	subject to Housing Infrastructure Funding (HIF) and
				as such new roads and infrastructure have been

No.	Consultee	Site Information	Summary of Stage 2 Representation	Council Response
			evidence to support delivery of the site during the 5	put in place to help facilitate the delivery of new
			year period, resulting in all 70 units being removed.	housing. A developer is on board and the site has
				been subject to internal discussions. A request for
				a Screening Opinion as to whether an EIA is
				required to accompany a full application for major
				development was submitted December 2024 and it
				is anticipated that a full planning application is to
				be submitted early 2025. The site has been retained
				within the 5YHLS.