

Strategic Plans
Civic Centre
Burdon Road
Sunderland
SR2 7DN

SENT BY EMAIL
planningpolicy@sunderland.gov.uk
23/10/2019

Dear Sir / Madam,

CORE STRATEGY AND DEVELOPMENT PLAN: MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Core Strategy and Development Plan Main Modifications.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

MM3: Policy SP1

The HBF support the amendment to include 'net' and 'net additional', this is considered to add clarity to the policy.

MM14: Policy SP8

The HBF support the amendment to include 'net', this is considered to add clarity to the policy.

The HBF also support the inclusion of a reference to the Housing Implementation Strategy.

MM15: Policy H1

The HBF do not consider MM15 is sound, the HBF continue to consider that the Council has not provided sufficient evidence to demonstrate that the policy is needed, and therefore it is not considered to be consistent with national policy. The HBF continue to consider that part (iv) of the policy should be deleted.

If the policy, is to be retained the HBF acknowledge the addition of a transition period, and the recognition within the justification that for some schemes this requirement may not be viable.

MM16: Policy H2

The HBF do not consider MM16 to be sound, we continue to have concerns in relation to the viability of the requirements of this policy. The inclusion of the final sentence in relation to viability is acknowledged, however, it still is not entirely clear whether this actually provides any flexibility to the requirement or whether it would help to deliver any more homes.

The HBF do support the addition of text to paragraph 6.18 which states that other evidence will be considered in relation to the housing mix.

MM21: Policy BH1

The HBF do not consider that amendment MM21 is sound, the HBF continue to consider that the Council do not have sufficient evidence to introduce this policy in relation to the NDSS and that it should be deleted.

If the policy, is to be retained the HBF support the addition of a transition period to part 14 of the policy.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the publication of the Inspector's report and the adoption of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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