

Hearing Statement – Matter 4

Sunderland Core Strategy and Development Plan

On behalf of Barratt David Wilson Homes (North
East)(East of Washington: Washington Meadows)

April 2019



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Barratt David Wilson Homes (North East)(BDW) in respect of:
- Matter 4: Housing Land Supply
- I.2. BDW has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with BDW's comments upon the submission version of the Sunderland Core Strategy and Development Plan, dated July 2018.
- I.4. BDW has also expressed a desire to attend and participate in Matter 4 of the Examination in Public.

2. Matter 4 – Housing Land Supply

Issue – This matter considers how the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will be able to maintain a five-year housing land supply (HLS).

Components of Housing Supply

1.1) Will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2019)?

- 2.1. BDW consider that the up to date housing land supply position should be identified in the Plan. This is a requirement of national guidance and all plans need to have a five year housing land supply at the point of adoption.
- 2.2. BDW also consider that the housing land supply should cover the 15 year period following the point of adoption i.e. up to 2035 if the plan is adopted in 2020. This approach would reflect the Framework, which states that Plans should have sufficient housing supply to cover a period of 15 years from adoption.

1.2) Will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan (Table 22 of the Compliance Statement refers)?

- 2.3. BDW consider that a table similar to that in the Compliance Statement (SD66) should be included in the Plan and clearly demonstrate the Council's approach to housing delivery over the plan period. Table 22 currently shows:

Source	Dwelling Numbers	
	2015/16 – 2017/18	2018/19 – 2032/33
Completions	2,479	
SHLAA units under construction		1,070
Outline Planning Permission		1,214
Full Planning Permission		1,232
Small Sites		750
Demolitions		-221
Strategic Sites		2,486
Other SHLAA Sites		4,223
Housing Growth Areas		1,330
Dwellings	2,479	12,084
Total Dwellings		14,563

- 2.4. However, BDW consider that the table needs to be explicit about the anticipated housing supply position and therefore should also set out the housing requirement, an appropriate housing buffer of circa 20% and incorporate a lapse rate for sites with planning permission. This would then clearly show over the plan period where the sources of housing supply were anticipated to be from and how the Council will achieve the housing requirement.

1.3) Is the small sites allowance of 50 dpa justified by compelling evidence?

- 2.5. BDW maintain their original objections and would welcome clarification of the specific types of development included in the Council’s windfall allowance. The Framework and PPG are clear in terms of a windfall allowance that robust and credible evidence should be provided and that any allowance is realistic in terms of future delivery.
- 2.6. It should also be noted that windfalls will not continue at the same rate when there is an adopted Local Plan. Non-plan windfalls will fall away as a result of the plan-led system. **BDW would encourage the Council to produce the necessary evidence and justification and reconsider the inclusion of a small site windfall allowance.**

1.4) Is the flexibility factor of 8.5% sufficient to ensure that the housing requirement will be met over the Plan period?

- 2.7. BDW questions whether the current flexibility factor is sufficient given the potential for non-delivery and under delivery of sites, particularly from the large pool of SHLAA sites. BDW is concerned that the Council has stated in EX1.008 that they have assessed the potential for a lapse rate and that this has been allowed for within the 8.5% flexibility factor. BDW would like to understand this analysis, which is unclear and not accordance with Best Practice. Furthermore, as highlighted throughout the Hearing Statements BDW has concerns over the timescales for delivery of strategic sites and major infrastructure and considers that further flexibility is required within the Plan to ensure it meets the housing requirement and needs.
- 2.8. The principle of a buffer is supported by the Local Plan Expert Group report which recommends a 20 per cent buffer of reserve sites be provided to ensure that the plan can maintain a five year supply and respond flexibly and rapidly to change. **BDW therefore suggests that a higher buffer be considered.**

1.5) Is the allowance for demolitions of 20 units per year justified?

- 2.9. BDW is supportive of the Council's recognition that a demolition allowance should be included in the analysis of housing supply. However, the SHLAA shows that demolitions have been assumed to be at 20 dwellings per year. However, as stated in previous submissions the demolition rate has been historically much higher with the SHLAA showing losses of over 2-300 homes in recent years. Furthermore, the Council's Housing Strategy 2017-22 states on page 14 that a large amount of renewal has occurred but future renewal is planned, for example in Glebe, Hetton Downs, Pennywell and further phases at Doxford Park. BDW therefore consider there is scope for the demolition rate to be higher.

	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17
Demolitions	-566	-527	-216	-343	-278	-202	-3	0	-24	-37

- 2.10. Even in recent years, although lower then when some stock clearances were occurring, it has been well above 20 dwellings per year. **BDW therefore consider the evidence does not justify the demolition figure.**

The Housing Trajectory and HIS

2.1) Is the data that supports the Housing Trajectory (Figure 34) based on realistic assumptions?

- 2.11. BDW has previously raised concerns on assumptions on delivery on SHLAA sites and issues on some of the proposed allocations. BDW considers that the evidence which supports the Council's approach is deficient and the over reliance on the SHLAA sites is not justified and further flexibility should be incorporated into the Plan.
- 2.12. BDW has raised a number of concerns with assumptions on sites, particularly those shown as commitments, which are raised again, as the Council is adopting an overly optimistic approach to assumptions on sites within the first five years in particular.
- 2.13. It is noteworthy that in response to comments in the Publication Plan on the deliverability of certain sites the Council agreed that some were not deliverable, stating that they would be removed from the SHLAA supply. However, there has been no change to the SHLAA supply figures or flexibility factor to account for this change. **BDW is therefore concerned that the supply figures have not been updated or are accurate.**

The table in Appendix I highlights some concerns with SHLAA sites identified within the first five years and BDW's view on potential delivery timescales. In terms of the SHLAA, if the sites in Appendix I were amended in accordance with BDW's comments the

implications are a reduction of circa 1,214 dwellings in the five year supply, which does not include Urban Sunderland:

Area	Discount from 5YLS
Coalfields	- 497
Sunderland North	-203
Sunderland South	-412
Washington	-102
Total	-1,214 homes

- 2.14. BDW is also concerned about some of the Housing Growth Areas, which is discussed in more detail in the relevant area specific Hearing Statements. However, with some sites with no developer interest and others with significant constraints to resolve and land discussions which need to be resolved prior to commencement of development some of these sites will not commence as anticipated by the Council.
- 2.15. BDW considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and build rates which seem high on some sites. Furthermore, BDW considers that the main risks to the delivery of the housing requirement is slippages in the delivery of some allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan and the high reliance on urban SHLAA sites. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 20-25 outlets operating across the City for every year of the Plan and BDW do not believe the Plan can deliver this
- 2.16. BDW consider that further flexibility is therefore needed within the Plan.

2.2) Will the HIS (when available) demonstrate that a five-year supply can be maintained through the plan period?

- 2.17. BDW consider that in accordance with national guidance, the plan upon adoption must demonstrate a robust five year housing land supply and that the housing requirement can be achieved over the plan period. This can be within a Housing Implementation Strategy, but it is not imperative. BDW consider, however, what is important and is set out within the plan and justified by evidence is how the Council will achieve a five year housing land supply upon adoption and deliver the requirement over the plan period. **At present BDW do not consider the plan or the evidence demonstrate this.**

Five Year Housing Land Supply

3.1) Is the use of a 5% buffer to calculate the housing land supply position appropriate?

- 2.18. BDW is concerned that a 5% buffer is insufficient and does not accord with the relevant national guidance. The Plan was submitted prior to 24 January 2019 and therefore under the transitional arrangements is to be examined against the 2012 Framework. This states that in authorities where there has been a record of persistent under delivery the buffer should be increased to 20%. Furthermore, as stated in earlier representations the LPEG report recommends that a 20% buffer should be incorporated into all Local Plans.
- 2.19. The Council's recent housing completions show an inconsistent approach to housing delivery. The SHMA 2017 states that housing completions have been impacted considerably by demolitions, regeneration and renewal (para 5.23). Nonetheless, housing need and the need to deliver housing to match that need is ever increasing. BDW is concerned that there is not a single table demonstrating the complete picture of housing delivery in Sunderland over recent years. The table below is a joined approach of data from the Council and the data from CLG housing delivery returns (Table 253a). With the uncertainty over delivery of housing in Sunderland BDW therefore considers that a 20% buffer should be utilised.

Year	Completions (net)	Housing Requirement	Difference
2009/10	384	700	-320
2010/11	371	700	-10

2011/12	195	940	-510
2012/13	249	940	-610
2013/14	521	940	-430
2014/15	907	940	-30
2015/16	889	745	-45
2016/17	590 (CLG Figure)	745	-155
2017/18	690 (CLG Figure)	745	-55
TOTAL			-2,599

2.20. Therefore, given concerns with assumptions and evidence on site delivery, dependency on sites delivering from 2021/22 onwards and uncertainty over the accurate recording of completions, BDW consider that greater flexibility in the plan is required and further sites allocated.

3.2) Is the inclusion of 250 units from small sites justified taking into account the need to avoid double counting?

2.21. As stated earlier in response to Question 1.3, BDW accepts that windfall sites form part of the housing land supply. The Framework states a windfall allowance can be included within the Local Plan; however this must be based upon robust and compelling evidence that such sites have come forward in the past and will continue to come forward. That evidence must therefore be published to justify such an approach.

2.22. BDW consider that delivery from windfalls will reduce in future years compared to past trends due to the effect of having an up to date plan with allocations and a more rigorous and up to date Strategic Housing Land Availability Assessment (SHLAA).

2.23. BDW is particularly concerned that the Council is identifying 250 dwellings over the first five years of the Plan from windfalls, which is effectively 50 per year from Year 1. To achieve this some of these sites would already benefit from planning permission in order to deliver housing in the first year of the Plan. Therefore BDW considers that there is an element of double counting occurring. If there is sufficient evidence to include a windfall allowance within the five year supply, this should be reduced accordingly to allow for

example for the preparation and submission of a planning application, the grant of planning permission, Section 106 negotiations, discharge of condition, legal discussions and so on. BDW consider if a site is identified now, it could take circa 2 years and therefore will not deliver housing until Year 3, which is a pragmatic approach to removing any potential double counting.

- 2.24. Furthermore, BDW considers the Council appear to not be allocating sufficient housing sites to meet its objectively assessed housing need. To deliver the ambitions of the Plan and economic growth and to provide certainty on delivery sites accommodating the full housing requirement should be identified in the Plan period. BDW accepts within such an approach there will be a certain level of windfall development, but not as high as being currently suggested in the Plan. Without a full and encompassing approach there is danger that the economic growth and regeneration ambitions of the Council will be missed.

3.3) Generally, are the assumptions about the delivery from commitments and allocations realistic taking into account past completions?

- 2.25. BDW is concerned with the reliance on SHLAA sites and has previously provided comments to the SHLAA Working Group in terms of delivery rates, lead-in times and marketing of sites. The 2018 SHLAA update identifies sites with the potential capacity for 10,225 dwellings. BDW recognise through the SHLAA Working Group that the Council has already recognised the constraints for some site hence they have been removed from the supply,
- 2.26. Nevertheless, as stated earlier in response to 2.1 BDW continues to have concerns over the consideration of delivery for sites and associated assumptions and therefore the robustness of the five year housing land supply.

3.4) Are lead in times and build out rates realistic?

- 2.27. BDW is concerned that the Council's assumptions towards delivery are overly ambitious, particularly in terms of delivery rates on sites, timescales and lead-in times but nevertheless

it shows that the Council will jump from not achieving its requirement in 2018/19 to significant jump in 2019/20 to a large spike in 2022/23 which then tails off over the plan period. This should be reviewed and further evidence provided given concerns.

- 2.28. BDW considers the Council should be more realistic on the potential delivery on sites, particularly on sites which have not commenced preparations of securing the relevant planning permission and developer interest and build rates which seem high on some sites. Furthermore, BDW considers that the main risks to the delivery of the housing requirement is slippages in the delivery of some allocations, longer lead-in times, reduced housing capacity on sites, sites no longer coming forward as result of viability from policy obligations set out in the Local Plan and the high reliance on urban SHLAA sites. The Council therefore need a wider choice of sites across a number of different areas and market areas to gain traction and increase build rates. To achieve the housing requirement the Council need at least 20-25 outlets operating across the City for every year of the Plan and BDW do not believe the Plan can deliver this.
- 2.29. As stated in earlier representations BDW consider the sites with no planning permission should not be providing completions until 2021/22 as there is significant work and preparations to commence on site, including time to prepare and submit the planning application, gain planning permission, discharge conditions, legal agreements, site preparations, and commence house building. This process can take around 2 years and as stated earlier would have significant implications for the five year housing land supply.
- 2.30. BDW would be happy to work through the specific sites in detail with the Council to seek to reach agreement on the SHLAA. Interestingly, in line with the general direction of travel for this Local Plan the new NPPF (February 2019) defines the term Deliverable in the glossary stating that sites can only be considered deliverable where they have detailed planning permission. If they have outline planning permission or are allocated in a plan a major site can only be considered deliverable if there is clear evidence that housing completions will begin on site within five years. The level of evidence to be considered deliverable has therefore been tightened.
- 2.31. **BDW do not consider that the evidence at present justifies the approach** and suggests that some of the SHLAA sites and proposed allocations be pushed further back in the plan period. Therefore, BDW consider that the plan needs to incorporate greater flexibility and that more housing sites and a greater choice of housing sites should be

provided in order to achieve the objectively assessed housing need. If the list of sites identified in the Plan cannot come forward in the early years then other sites that can be delivered should be identified.

3.5) Will there be a five year supply of deliverable housing sites on adoption of the LP?

- 2.32. Similar to previous responses, BDW is concerned that on the current evidence base for the delivery of sites that the Council may not have a robust five year housing land supply upon adoption of the plan.
- 2.33. BDW considers that the assumption on small sites should be reduced to remove any potential double counting, that the level of demolitions should be increased and that the assumptions on delivery of sites should be rationalised, particularly in relation to sites with no planning permission or developer interest.
- 2.34. From BDW's statement and analysis there are question marks over the potential delivery of 1,214 dwellings in the SHLAA, there is double counting on 100 dwellings in the small sites, demolitions should be higher and there is no over-provision of housing from 2015-18. Therefore there is potentially no five year housing land supply.
- 2.35. **BDW consider that further evidence is required to demonstrate the robustness of the five year housing land supply and that further sites may need to be identified to achieve the requirement and meet the housing need.**

The wording of the Policy SP8

4.1) Will Policy SP8 as worded be effective in ensuring the delivery of at least 745 dpa?

- 2.36. BDW consider similarly to response Policy SPI that Policy SP8 does not reflect the twin ambitions for economic and housing growth. BDW support the policy's approach for seeking to "exceed the minimum target of 745 additional dwellings per year", but consider

that through the approach towards allocations and policy implementation that the Plan is set up to just about meet the target and potentially not meet it at all. The Plan therefore appears to be internally inconsistent as drafted.

- 2.37. The proposed flexibility in the plan is only a small surplus of circa 114 dwellings and BDW demonstrated earlier that the proposed buffer is insufficient, there are delivery concerns with the SHLAA sites and the housing requirement should be higher.
- 2.38. It is concerning that paragraph 6.7 and the trajectory includes a windfall allowance of 50 dwellings per annum when SHLAA analysis shows a trend on small sites of circa 20 dwellings per year. The approach towards the figure of 50 dwellings per annum is not therefore justified. The 2012 Framework explains in para 48 that if windfalls are to be relied upon that an assessment be undertaken of whether windfalls will continue to provide a reliable source of supply in the future. In determining future windfall supply it is important to consider the likelihood of continued delivery from different elements of the supply, such as small sites, changes of use and permitted development. This assessment should be made in the context of a new plan with new allocations and the more comprehensive assessment included within the SHLAA.
- 2.39. BDW consider that delivery from windfalls will reduce in future years compared to past trends due to the effect of having an up to date plan with allocations and a more rigorous and up to date SHLAA. This is reflected in paragraph 6.7 which states that no windfall allowance has been identified in the SHLAA as sites are rarely identified in the city that the SHLAA has not assessed.
- 2.40. BDW welcomes in paragraph 6.9 a monitoring and review process if the housing requirement is not achieved. BDW consider that further clarity be provided in terms of “sustained under-performance against the requirement” and what will trigger a “review of the plan”.
- 2.41. In terms of considering new sites, BDW would suggest that prior to a full review of a plan that consideration be given to releasing safeguarded sites. This would add flexibility to the Plan; give greater certainty in delivery of the housing requirement and future proof the Plan.
- 2.42. If BDW’s concerns are fully reflected in Figure 34 the Council is unlikely to achieve its housing requirement. Figure 34 as the Council has drafted is overly ambitious in terms of

delivery rates on sites, timescales and lead-in times but nevertheless it shows that the Council will jump from not achieving its requirement in 2018/19 to significant jump in 2019/20 to a large spike in 2022/23 which then tails off over the plan period. **This should be reviewed and further evidence provided given concerns.**

- 2.43. More housing sites and a greater choice of housing sites should be provided in order to achieve the objectively assessed housing need. If the list of sites identified in the Plan cannot come forward in the early years then other sites that can be delivered should be identified.

4.2) Should the policy refer to measures that would be implemented in the event of under-delivery against the minimum target or does the Housing Delivery Test contained within the 2019 Framework provide sufficient safeguards in this respect?

- 2.44. BDW is concerned that the proposed Local Plan does not include safeguards which reflect the updated national guidance and therefore it has not been “future proofed”. The Housing Delivery Test only looks back three years and does not look forward to future supply or ensure the housing requirement will be achieved.
- 2.45. BDW supports the proposed Modification to paragraph 6.9 which refers to the consideration for the release of safeguarded land if there is a shortfall in housing delivery.
- 2.46. However, BDW considers that an opportunity has been missed to enshrine an approach within the Plan which fully reflects the Framework and Housing Delivery Test approach or ensure the delivery of the housing requirement over the plan period. A positive approach to utilising the safeguarded sites creates a cogent approach to the smooth delivery of housing over the plan period, in accordance with Plan, Monitor and Manage.
- 2.47. BDW consider that the Plan should be amended to state that *If the Council is unable to demonstrate a five year supply of deliverable housing land with appropriate buffer in accordance with the Housing Delivery Test, the Council will produce an Action Plan to address this shortfall in delivery, which will include proactive measures that trigger the need to bring forward the east of Washington safeguarded land site for immediate development.*

- 2.48. Such an approach would reflect the Framework and the positive approach to planning and incorporate planned flexibility into the Core Strategy.

Proposed Change

- 2.49. To overcome the objection and address soundness matters, the following changes are proposed:

- Include greater flexibility in the Plan.
- Allocate the safeguarded site at Washington Meadows.
- Allocate at least the first phase of housing at Washington Meadows.

Appendix I: BDW's Comments on SHLAA Sites

Site Name	Site No	SHLAA Status as per Council	Total capacity	SCC No in 5 years	BDW's Comment	BDW's No's in 5 years
Site of former Broomhill Estate	112	Permitted – not started	128	128	This is a Gentoo application. Approved 18 August 2017. Lots of remediation needed on site. Condition 6 remediation was submitted by Gentoo on 5 July 2018, determination date was 27 September 2018. Application is still not determined, as of 11.04.19. A large amount of remediation is needed prior to start on site.	80
Land at North Road	138	Permitted – not started	300	110	Not started. Permission Homes approval. Application was approved on 8 April 2019. No conditions currently submitted for discharge. Condition 3 states that no more than 69 houses can be occupied prior to the roundabout access being fully constructed.	90
Black Boy Road land at (Site A)	128	Application pending	140	80	Outline application approved 30 January 2019. NEBDL and Story Homes approval.	70
Land at Lambton Lane	194	Application pending	139	40	No planning permission. No evidence of application submitted online.	0
Land to the east of former Broomhill Estate	197	Application pending	99	30	No planning permission. Application is for 99 houses. Application being made by Gentoo. Application received 16 January 2018. Determination deadline was 17 April 2018. Possible issues with S106.	0
Hetton Downs Phase 2	328	Application pending – outline granted	112	112	Outline planning permission only. Council comment's - Delivery of phase 2 in first 5 years is subject to submission and determination of a detailed planning application, which is expected to be determined mid 2018. No application currently submitted.	0
Philadelphia Complex	330A	Permitted outline	500	120	Outline planning permission only. Mr Geoff Woodcock approval. Delivery reliant on delivery of a road	70
Ennerdale Street, Low Moorsley, Land at	388	Permitted outline	40	40	Outline planning permission only. No further submissions evident online.	0

Site Name	Site No	SHLAA Status as per Council	Total capacity	SCC No in 5 years	BDW's Comment	BDW's No's in 5 years
Land north of Blackthorn Way, Sedgeleth Industrial Estate	468	Application pending	138	120	Outline planning permission, but only for 20 houses. M D Engineering approval. This was approved on 20 March 2019. Remediation is needed and reserved matters approval.	0
West of Redburn Row	654	Application pending	27	27	No planning permission. No application online.	0
Former Cheadle Centre, Caithness Road	693	Application pending	19	19	School site, now redundant. There is likely to be viability issues in remediating the site for residential development, in light of the fact revenues are very low in the area – a 3 bed semi-detached house 0.2 miles away, is only £90,000 - £100 persqft. Karbon Homes approval.	0
Hylton Skills campus, north Hylton Road	563	No planning status	100	40	This site appears to be still in use – existing use will have high value. Council comment's - Viability Assessment Typology indicates that this typology of site is unlikely to be viable due to associated costs of development on brownfield land. No application submitted, no developer on board.	0
Whitburn Road	154A	Application pending	64	64	Siglion have delivery issues – it is unlikely the site will come forward.	0
Southwick Primary School, Clarence Street	091	No planning status	40	40	No planning permission. There is no evidence there is a developer on board or site is being brought forward by anyone at the minute.	0
Seaburn Amusements, Whitburn Road	413	Permitted (Outline) – Not started	279	90	Outline planning permission only. Council comment's - subject to submitting reserved matters and the implementation of appropriate mitigation measures the site could deliver from year 3 onwards. No RM submitted to date. Siglion have delivery issues – it is unlikely the site will come forward. Significant work needed to bring site forward. Conditions relating to contamination, remediation were submitted on 20 September 2018. Not yet determined.	60
Land at Redcar Road/Rawdon Road	537	Permitted – Not started	10	10	Not started – suspect viability issues with number of houses and revenues in the area – 3 bedroom detached house, 0.05 miles away, is only £94,995 - £95sqft.	0

Site Name	Site No	SHLAA Status as per Council	Total capacity	SCC No in 5 years	BDW's Comment	BDW's No's in 5 years
Doxford Park phase 6	504	Application pending	113	83	Council comment's – Site subject to implementation of mitigation measures and grant of planning permission. Planning application programmed to be submitted Feb/March 2018 as such site is expected to start to deliver units back end of 1-5. No planning permission so should be removed from 5YLS. Application submitted by Gentoo Homes. Application submitted on 13 March 2018. Determination deadline is 9 July 2018. As of 16.04.19, application is not yet determined. Application has been recommended for approval. Delivery reliant on RDLR.	0
Ryhope and Cherry Knowle Hospital	062	Application pending	800	150	Council comment's - Council have amended delivery to 50 completions per year. Only 304 houses have full planning approval. The rest is only outline. Condition 22 currently restricts the delivery of Cherry Knowle to 40 occupations prior to improvement of the Seaton Lane junction. In order to bring forward the full scheme the RDLR is required, as are improvements to the Seaton Lane junction. The RDLR is dependent on HIF funding.	120
Chapelgarth site	081	Permitted – not started	750	120	Siglon are having delivery issues. Outline planning only for the 750 houses. No reserved matters submitted yet. Delivery reliant on RDLR, A19 and A690.	0
Former Groves Site, Woodbine Terrace, Pallion	085	Application pending	700	20	Outline planning permission only not to be included in 5YLS. Council comment's - Also requires the implementation of suitable mitigation measures to address site issues and constraints. Application was submitted on 18 December 2017. Target determined was 19 March 2018. As of 16.04.19, the application is not yet determined. Application was submitted by O&H Properties.	20
Land at Mill Hill, Silksworth Road	342	Permitted (Outline) – Not started	250	90	Outline planning permission only. Application submitted by Persimmon Homes. Delivery reliant on RDLR, A19 and A690.	0
Willow Farm land to south, Ryhope (North)	426A	Permitted (Outline) – Not started	450	450	Outline planning permission only. Delivery reliant on RDLR, A19 and A690.	0

Site Name	Site No	SHLAA Status as per Council	Total capacity	SCC No in 5 years	BDW's Comment	BDW's No's in 5 years
Land north of Burdon Lane	477	No planning status	955	45	Council comment's - A planning application has been submitted (invalid) by Persimmon Homes for part of the site, as such site moved forward into the back end of years.	45
Former Eagle Public House, Portsmouth Road	054	Permitted not started	9	9	There is ownership/access issues. Application approved 11 May 2009. Permission is now extant.	0
Ayton Village Primary School, Dunlin Drive, Ayton	098	No planning status	40	40	Council comment's – Planning application was anticipated to be submitted in 2018. No application submitted.	0
Former Usworth Comprehensive School	177	No planning status	200	200	Council comment's – Site is anticipated to go to the market with a Development Brief in 2018. It is anticipated that planning permission will be submitted towards the end of 2018. No planning application submitted, no planning permission so should be removed from 5YLS. No application submitted.	0
Former Junglerama, Victoria Road	312	Permitted – not started	12	12	Council comment's – The site is expected to deliver the 12 consented units within 0-5 years. Not started. Permission soon expires. Permission was approved 28 November 2016. Approval for Jon Tweddell Planning Limited.	0