

Whitburn Neighbourhood Forum Response to the Reg 16 Comments

Introduction

Our Neighbourhood Plan has been prepared in a positive fashion and we have consulted widely within the community and with relevant stakeholders. We have designed the plan to be both aspirational and deliverable. It has been prepared with the assistance of a professional planning consultant and our evidence base is supported by Aecom, planning consultants to Locality.

We are aware that our plan should be in general conformity with the local plan. An emerging Local Plan- Pre-Publication Draft was issued for consultation by South Tyneside Council on 18th August 2019 and all our planning preparation has sought to align itself to this emerging plan. The emerging Local Plan- Pre-Publication Draft (2019) was withdrawn by South Tyneside Council in March 2021 after the Council received 18,898 comments (representations) in response to the consultation. A significant number of these comments, including ours, did not support this draft local plan.

The Forum have regarded the 2019 draft plan (Even after it was withdrawn) as evidence of an emerging local plan, but we now appreciate that our references to it as an emerging local plan are factually incorrect. We also note that several Reg 18 comments to our draft plan refer to the 'emerging local plan'. We concur with the comments of the council and now understand that we can no longer accord the withdrawn local plan substantive weight to inform our draft neighbourhood plan.

Since the withdrawal of the pre submission draft local plan South Tyneside Council no longer have current development site allocation proposals and regularly are putting out 'calls for sites' which is confusing but generates a lot of interest from developers and landowners who are looking to profit from selling agricultural land (all of which is currently green belt in the Whitburn area) for housing purposes.

Our plan has been in the making for almost 5 years and has been subject to delays due to the pandemic and due to our aim to ensure our evidence base was subject to appropriate professional technical scrutiny so it could be deemed as being robust. We do not have the time to wait for the Local Plan preparation process to now catch up as we are reaching the end of our period of designation. (Jan 2022)

Summary

Almost all the residents of Whitburn community that have commented (as per Reg 16) are very supportive of the draft plan and have praised the level of consultation by the Forum. We acknowledge the passion of one resident, Bob Latimer and admire his long-standing campaigning to tackle the problem of sewage pollution. We share his concerns and note his reservations about the sewage policy. We have submitted a sewage policy that accords with the technical appraisal of our proposed sewage (and air quality policy) evidence bases as produced by Aecom (Consultants arranged by Locality) We had proposed a more stringent sewage policy but accepted their advice to constrain the policy and amalgamate the more strategic aims we had proposed into a Community Action Plan.

The statutory consultees have largely been supportive of our draft plan. The Environment Agency (EA) has asked for reference to the Water Framework Directive and the 25-year plan in the recently passed Environment Act. This suggestion is appreciated and will be acted upon as it can be used to strengthen the evidence base for our sewage policy. The EA have reviewed all the documents and have not challenged the evidence base that has been published to support our sewage policy and informs our Community Action Plan to Stop Sewage Pollution at Whitburn. This is recognised as a measure of support from the regulator who shares our aim to improve the environment.

It is noteworthy that Northumbrian Water, as a statutory consultee, have failed to comment in person on this draft neighbourhood plan at either the Reg 14 or Reg 16 consultation stages.

The developers present by far and away the largest and most critical representations to our draft plan and their comments challenge our basic conditions statement. The developers represent local landowners, and their stated aim is to realise the best value from the sale of development sites. Several developers have maintained a dialogue with the Whitburn Forum, but none have demonstrated any level of consultation with the wider Whitburn community

There is no name attributed to the South Tyneside council comments, but they are unfamiliar with Whitburn as they make reference to brownfield sites in the Whitburn neighbourhood area. There are no brownfield sites in Whitburn. The person from the council providing comments also appears to be unaware of the many discussions the Forum has had with the council regarding sewage pollution. STC have been provided with regular updates about our concerns with sewage pollution in the WNF area which they assured us would be shared with the relevant officers.

STC have also been provided with a legal opinion that indicates their ability to challenge assertions made by NWL when they have been provided with evidence that sufficient sewage treatment capacity does not exist. Development can only be sustainable if the infrastructure is in place to cope with it.

To define the role of the local planning authority the following is of note. It has been recognised by the courts that the most appropriate juncture to ensure sewage treatment capacity exists is at the planning stage.

Case law is quite explicit in the role of the planning authority:

Barratt Homes Limited v Dwr Cymru Cyfyngedig (Welsh Water) [2009] UKSC13 [5]

The Supreme Court noted that, since the building of a development requires planning permission under the Town and Country Planning Act 1990, planning authorities are able to make planning permission conditional upon the public water authority first taking steps to ensure that the public sewer can accommodate any increased flow. Therefore, an assessment of the sewage capacity must be made before a planning application is agreed.

Responses by the Whitburn Neighbourhood Forum committee to the representations made on the Submission Whitburn Neighbourhood Plan

Please note for ease of reading, the supportive comments that require no response have been moved to the bottom of the table.

Ref	Name/ Organis ation	Comments Made	WNF response
007	Kevin Johnson	<p>I have the following comments;</p> <p>WNP 5 Non-Designated Heritage Assets Whilst High Croft Allotments is covered in WNP10 the original limestone walls are not specifically mentioned. These along with other stone walls in the Conservation Area and throughout the area of the Plan (e.g. farmers fields and cemetery) are not given any specific status. If there was a policy for them then perhaps their sympathetic maintenance and where required alteration, could be encouraged? The old walls of the area contribute greatly to the overall character.</p> <p>WNP 15 Air Quality I was interested to read the figures for the Jolly Sailor junction. I live near the junction of Cleadon Lane and Central Avenue where in certain weather conditions one can smell a build up of exhaust emissions on the road next to the school which sits in a hollow. I would be very interested to know what level of pollution is occurring here and what effect more traffic might have?</p>	<p>WNP 5 Non-Designated Heritage Assets Limestone walls are mentioned as a positive aspect of character in the Whitburn heritage character assessment, with a specific mention to protect boundary walls. WNP Walls are also mentioned in the Whitburn Design Guidelines. WNP2: Whitburn Design Guidelines refers to this.</p> <p>WNP 15 Air Quality There is only one air quality monitor in all of Whitburn, which is not ideally situated. The Forum intend to continue to pursue this concern. Noted – WNP15 encourages development within 200 metres of the A183 and B1299 to undertake an air quality assessment, which would look at traffic impacts from development</p>
008	Environm ent Agency	<p>Thank you for consulting us on your Neighbourhood Plan. The Environment Agency is a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We received your documents in the planning team on 11 October 2021.</p> <p>Environment Agency's Position We have reviewed the documents and looked again in detail at the neighbourhood area. Our previous comments are still relevant and so</p>	

	<p>these are included below. In addition, we have the following comments to make about biodiversity.</p> <p>Biodiversity Comments While there are very few watercourses in the area, considering these where present as important 'green-blue' corridors and areas to consider for enhancement and restoration would be a positive inclusion in the plan and important for biodiversity gains. In reference to section 5.80, it is stated in the plan that 'Environment Agency consents would need to be applied for if new outfalls to ordinary watercourses are proposed. The Environment Agency will likely require consultation and possibly permits applied for if new outfalls to main rivers are proposed.' It may be useful to know that the Local Lead Flood Authority would be the main authority for construction on an ordinary watercourse, however any discharge permits would need to be applied for to the Environment Agency.</p> <p>Our Previous Comments We have previously submitted the following comments which are still relevant to this submission. We welcome the overall vision in the plan and specifically the policies on net gain and the inclusion of the green objective which is consistent with both the Government's 25 Year Plan for the Environment and the Water Framework Directive (WFD). The WFD seeks to improve water quality in all our waterbodies. It sets a target for all waterbodies to achieve 'good ecological status'. In this regard, specific reference to the 25 Year Plan and the WFD would be useful to put the environmental polices into context for Whitburn. These were our comments previously, and this submission version does not reference either. We do not offer detailed bespoke advice on policy but advise you ensure conformity with the local plan and refer to guidance within our proforma guidance.</p>	<p>Biodiversity Comments During our research we have not identified any significant watercourses in our neighbourhood area.</p> <p>WNP7 centres on restoring, maintaining, and enhancing green infrastructure, with a definition included: 'network of multi-functional green and blue spaces', which is in line with the NPPF. This therefore includes enhancing green and blue infrastructure.</p> <p>Our Previous Comments The 25 Year Environment Plan is referenced in the para 5.53, within the green infrastructure section. As mentioned, this also includes blue infrastructure.</p> <p>We would support adding reference to the WFD.</p>
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010	George F. White	<p>We welcome the opportunity to be involved in the Whitburn Neighbourhood Plan. We value the exercise in establishing local policies to ensure high quality sustainable developments are delivered in the Neighbourhood Plan area. We look forward to working collaboratively with the Neighbourhood Forum as the Neighbourhood Plan progresses.</p> <p>Consistency with local planning policy The current development plan is The South Tyneside Local Development Framework which was adopted in 2007. The LDF was adopted prior to the National Planning Policy Framework (NPPF) being originally published in 2012 (subsequently updated) and is therefore not consistent with national planning policy. Due to the adopted plan not being consistent with national planning policy, it is vitally important that consideration is given to the emerging local plan as set out in the Planning Practice Guidance. There are numerous references to the Neighbourhood Plan working alongside the emerging South Tyneside Local Plan “to ensure consistency in policy making throughout the process.” (paragraph 2.4). The neighbourhood plan acknowledges the housing target set in the emerging local plan for Whitburn but chooses to disregard meeting the housing target resulting in a Neighbourhood Plan which is not compliant with the emerging local plan, contrary to national planning policy.</p>	<p>We understand that this firm of consultants aims are to realise the best value from sale of development sites.</p> <p>Consistency with local planning policy For the purposes of meeting the Basic Conditions as set out in legislation, it is only necessary to ensure that the Whitburn Neighbourhood Plan (WNP) has regard to policies in the current Development Plan.</p> <p>When writing the WNP, the Local Plan was at the regulation 18 stage and when developing the plan, we have taken the emerging Local Plan into account as well to ensure consistency. However, the Local Plan was in its early stages of development and did not carry weight. Moreover, the Council is currently working towards a new draft Regulation 18 pre-publication Local Plan following public consultation in 2019 and a review of Spatial Options: https://www.southtyneside.gov.uk/article/36012/Emerging-</p>

	<p>The National Planning Practice Guidance (PPG) was published in 2014 to add further context to the National Planning Policy Framework and it is intended that the two documents are read together. The PPG is set out with different topic areas and is updated regularly.</p> <p>Although a draft neighbourhood plan is not required to be tested against the policies in an emerging local plan the PPG confirms that the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. The PPG provides an example of up to date housing needs evidence that would be relevant to housing supply policy in a neighbourhood plan.</p> <p>“Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in;</p> <ul style="list-style-type: none"> • The emerging neighbourhood plan • The emerging local plan (or spatial development strategy) • The adopted development plan” <p>The Neighbourhood Plan should be consistent with emerging local plan policies and the evidence that underpins the local plan, particularly when it supersedes the date of background reports that have been undertaken to inform the formulation of the Neighbourhood Plan.</p> <p>Housing</p> <p>A Housing Needs Assessment was undertaken in February 2018 for the Neighbourhood Plan area. The assessment was based on background evidence that has been superseded, the implementation of the standard method for calculating local housing need and the overall housing requirement for the Borough being set out in the South Tyneside Draft Local Plan (at least 7,000 new homes) and for the Whitburn Neighbourhood Plan Area (397 new homes).</p> <p>South Tyneside has one housing market area and the housing need figure for the Whitburn Neighbourhood Plan Area reflects the overall strategy for the pattern and scale of development across the Borough. It is important</p>	<p><u>Local-Plan</u>. This new draft has not been consulted upon yet and its details are as of yet unknown. Therefore, it would be impossible to take the emerging Local Plan into account at this stage.</p> <p>Housing</p> <p>Please see comments above on Local Plan.</p> <p>In addition, there is no obligation for a Neighbourhood Plan to deliver the housing requirement set by a Local Plan.</p> <p>Lastly, as part of the now withdrawn regulation 18 Local Plan, a housing figure was given, but this was not achievable due to the amount of green belt surrounding Whitburn. For this reason, the Forum has not allocated land for housing. There have been 158 planned new housing developments in</p>
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	<p>to note that the current LDF is based on an urban/regeneration strategy and focused new housing development in South Shields, Hebburn and Jarrow. Due to significant levels of housing delivery over the past 15 years in such settlements, there is an even greater need for new housing growth to be delivered in settlements where housing delivery has been limited to small windfall sites in the urban area as opposed to planned housing growth.</p> <p>Whilst the Neighbourhood Plan does not appear to set a housing target for Whitburn, the references to only supporting housing on brownfield sites in policy NWP1:Housing are contrary to the emerging local plan which will require Green Belt releases in Whitburn to meet housing needs. The policy should be amended to state;</p> <p>“Housing proposals on brownfield sites and housing allocations in an adopted South Tyneside Local Plan will be supported where they comply with policies elsewhere in the development plan.”</p> <p>If the Neighbourhood Plan is unwilling to allocate housing sites to meet the housing need from the emerging local plan, the supporting text should acknowledge that housing proposals on sites allocated in a subsequent local plan will be supported in principle.</p> <p>Housing Mix</p> <p>Whilst housing mix has been considered at the Neighbourhood Plan level, it is important to recognise that South Tyneside is one housing market area and that the Borough’s needs must be met across the local plan area. The views of existing residents have been considered, however, the needs of prospective residents relocating to Whitburn does not appear to have been taken into account. We acknowledge the perceived need for small-medium sized family homes and smaller dwellings for first time buyers and older people in Whitburn but suggest that PolicyNWP1:Housing acknowledges the wider housing mix that must be met across South Tyneside. We suggest the following amended wording;</p> <p>“New housing proposals will be supported that provide a mix of housing to meet housing needs in the South Tyneside and the Neighbourhood Plan</p>	<p>Whitburn in the 10 years since the Census in 2011 in a population of 5,270. With the number of dwellings in the census of 2376 that equates to an increase of 6.6%. These are NOT small windfall sites.</p> <p>Housing Mix</p> <p>WNP1 is based on the Housing Needs Assessment. This shows that Whitburn has a unique existing housing mix that differs from the rest of the local authority, as well as very specific housing needs that is derived from it. For instance, housing in Whitburn is more costly than in South Shields, causing many issues for existing residents who are looking for affordable housing within Whitburn.</p> <p>Additionally, Neighbourhood Planning is aimed at planning for development that meets the community’s need (as described in the PPG on Neighbourhood Planning), which is</p>
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	<p>Area. Housing proposals should include a range of family homes of different sizes and smaller dwellings for first time buyers and older people.”</p> <p>Affordable Housing The local plan considers all of the infrastructure requirements that need to be borne by new development in the form of viability assessments and infrastructure delivery plans. It also considers in detail affordable housing requirements for the Borough. Local plans are able to set different thresholds for different localities and we believe it is for the local plan to set the level of affordable housing not a Neighbourhood Plan. The Neighbourhood Plan setting an affordable housing target would not be consistent with affordable housing targets in the current and emerging local plan and should be omitted. The Neighbourhood Forum are required to seek changes to the emerging affordable housing policy in the local plan should such an approach be justified rather than setting different levels of provision in the Neighbourhood Plan.</p> <p>Sustainable Design and Construction The supporting text acknowledges that the measures included within Policy WNP3 cannot insist on such measures and that the changing Building Regulations will set minimum requirements for new housing proposals. Many new technologies are still in the design phase and successful incorporation into new development must be considered on a case by case</p>	<p>the community based within the Neighbourhood Area boundaries, not across the whole of South Tyneside.</p> <p>Affordable Housing Neighbourhood Plans can set targets for affordable housing for the Neighbourhood Area. The target for affordable housing is based on the housing needs assessment, as explained in para 5.11 of the WNP. Affordability is a known issue in Whitburn, justifying the need for a policy.</p> <p>The current LDF sets a target of 25% of affordable housing in urban fringe areas (which includes Whitburn) for sites with more than 5 houses. The withdrawn regulation 18 Local Plan included 18%. The WNP sets a figure of 20%. This is to reflect potential viability issues with the current figure of 25% (however, noting that a recent development at the Whitburn firing range was able to deliver 25% affordable housing). It also reflects the local issues with housing in Whitburn as explained in para 5.11 of the WNP, requiring a figure higher than 18% in order to deliver the higher element of affordable housing demonstrated as being needed for Whitburn. The Housing Needs Assessment provides further evidence of the need.</p> <p>Sustainable Design and Construction WNP3 clearly states that development should seek to meet high levels of sustainable design and construction, and that significant weight will be given to proposals that include certain elements of sustainability. It does not say that it must deliver this.</p>
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	<p>basis. Factors that need to be taken into account include; scale of the site, adjacent land uses, proximity to high users of energy/heat and access to sustainable transport. As such, different technologies will be better suited to particular sites and not all of the criteria listed in the policy are likely to be achievable for all proposed development sites.</p> <p>The policy wording should be made clearer that the requirements are aspirational as set out in the supporting text.</p> <p>POLICY WNP13: Sewage and Drainage Infrastructure</p> <p>It is the role of the Lead Local Flood Authority (LLFA) and the Environment Agency to consider whether proposed foul and surface water proposals are acceptable or not in accordance with the infrastructure protocol, which states that the designer should consider the following in order of preference before finalising a surface water drainage strategy for a development;</p> <ul style="list-style-type: none"> a) Discharge to a SuDS device, b) Discharge to a watercourse, or where this is not reasonably practicable, c) Discharge to a public sewer network. <p>This protocol is set out in Policy NE6: Flood Risk and Water Management in the Draft South Tyneside Local Plan. The LLFA, Northumbrian Water and Environment Agency have been consulted on the South Tyneside Local Plan and by developers promoting sites in Whitburn. They have confirmed</p>	<p>National policy states that design policies should be developed with local communities so they reflect local aspirations. Moreover, it states that the planning system should support the transition to a low carbon future.</p> <p>Many technologies have been successfully applied in the UK and within the region. Measures such as energy efficiency, solar panels, SuDs, walking and cycling routes and electric car charging are not emerging technologies but widely implemented.</p> <p>It also is in line with the forthcoming Future Homes Standard, which includes taking steps towards achieving a meaningful reduction in carbon emissions until 2025 (when new homes will be carbon zero), including a 2021 interim uplift. The government's response to the consultation is available here. There are also plans announced by government that all new homes should have EV charging points from 2022.</p> <p>POLICY WNP13: Sewage and Drainage Infrastructure</p> <p>The commenter is ill informed as to the rationale for a sewage policy and produces no evidence that rebuts the evidence base that has been technically appraised and supports the sewage policy.</p> <p>The sewage policy is well evidenced and supported by Locality through the recently commissioned technical appraisal of the supporting evidence base by the approved consultants at Aecom.</p> <p>The consultation exercise for the now withdrawn 2019 local plan with respect to sewage treatment capacity has been superseded by the consultation afforded to the LLFA,</p>
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	<p>in principle that there is the capacity for housing development in the Neighbourhood Plan Area and have not objected to draft housing allocations in Whitburn.</p> <p>Policy WNP13 is not consistent with the current and emerging local plan policy or the infrastructure protocol by seeking to remove the ability for surface water drainage to be discharged into the sewer system. Whilst it is acknowledged that such an option should only be considered once all other options have been exhausted, it is allowed subject to detailed assessments being undertaken.</p> <p>The alleged capacity issues at the waste-water treatment works are not referenced in the emerging local plan and upgrades have not been requested to facilitate new housing developments. There appears to be a difference of opinion between the local community and the local planning authority, the lead local flood authority and the Environment Agency. To ensure consistency with the emerging local plan policy and the infrastructure protocol used by the LLFA and Environment Agency, we suggest that the policy re-affirms the hierarchy for drainage as set out by the LLFA.</p>	<p>Northumbrian Water and Environment Agency with respect to this Neighbourhood Plan.</p> <p>None of the aforementioned agencies who are experienced in this area have objected to the sewage policy.</p> <p>No evidence has been produced by any of these agencies or any of the developers promoting sites in Whitburn that rebuts the evidence provided by the forum and definitively, by way of rigorous analysis, demonstrates that there is sufficient sewage treatment capacity in the neighbourhood area.</p> <p>The Whitburn sewage system remains in breach of the Urban Waste Water Treatment Regulations 1994.</p> <p>The objective pursued by the Urban Waste Water Treatment Regulations goes beyond the mere protection of aquatic ecosystems and seeks to conserve man, fauna, flora, soil, water, air and landscapes from any significant adverse effects of the accelerated growth of algae and higher forms of plant life that results from discharges of urban waste water. Failure to treat urban waste water cannot be accepted under usual climatic and seasonal conditions, as otherwise the Urban Waste Water Treatment Regulations would be rendered meaningless.</p> <p>The capacity issues are well evidenced and have been provided to the planning authorities several times.</p> <p>The local planning authority, the lead local flood authority and the Environment Agency have been consulted extensively on the issue of sewage treatment insufficiencies. The overwhelming evidence of a lack of sewage treatment capacity is studiously ignored by the relevant local authorities.</p> <p>There is no emerging local plan. It is anticipated that the next iteration of the local plan will be forced to address this issue</p>
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	<p>Policy WNP14: Transport Infrastructure The Neighbourhood Plan acknowledges the need to assess the transportation impacts as a result of development and identifies three additional links to support sustainable modes. Policy WNP14 and supporting sustainable modes is welcomed in principle however one scheme (Bullet point 2 ‘Providing a cycleway to connect Whitburn to Cleadon through Moor Lane and Cleadon Lane’) extends beyond the boundary of Neighbourhood Plan area. As a result, there may other matters beyond the boundary of the Neighbourhood Plan that need to be considered. It is suggested that the wording of bullet point two in Policy WNP14 is revisited to ensure the policy is aligned with the Neighbourhood Plan area.</p> <p>Air Quality National planning policy requires local authorities to meet national air quality objectives. Where this is not likely to be achieved, Air Quality Management Area’s are designated with action plans setting out steps for how air quality can be improved. There are no designated Air Quality Management Areas in the Whitburn Neighbourhood Plan area, suggesting that air quality current meets national objectives in the village. The PPG states that where air quality is an issue, the local planning and environmental health departments will inform the neighbourhood plan area on how this might affect potential policies and proposals being considered. We are not aware that any such request has been made by the local authority. To ensure consistency with the emerging local plan policy we would suggest that the policy removes the reference to all development being at least ‘air quality neutral’ to replicate the wording of the local plan policy;</p>	<p>A petition to Stop Sewage Pollution at Whitburn has garnered support from over 1,000 local residents (20% of the total population). Public opinion, when justified, is considered to be a material planning consideration.</p> <p>Policy WNP14: Transport Infrastructure Noted on the boundary. However, most of Moor Lane falls within the area, whilst active travel between Whitburn and Cleadon should be promoted. A cycleway that only extends to the boundary will not be effective. This scheme does not extend beyond the boundary but reaches the boundary where the East Boldon NP provides The commenter is speculating and fails to identify any other matters beyond the boundary of the NP the next leg of the cycle way.</p> <p>Air Quality The lack of an AQMA in Whitburn cannot be used to adduce that air quality in the village currently meets national objectives. Nor is it specified that air quality is only an issue if an AQMA has been designated. WNP 15 does not include reference to air quality neutrality – this was amended after the previous draft, to take into account comments from the evidence base and policy development report (in supporting documents).</p> <p>Concerns have been raised with STC about Air Quality and the inadequate means of testing air quality that are currently employed in Whitburn. Evidence has been provided of the</p>
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		<p>“Proposals will be supported where they can demonstrate that the development does not lead to further deterioration of air quality.”</p> <p>Monitoring The Neighbourhood Plan acknowledges that it may be necessary to review the Neighbourhood Plan considering any policy shifts in the emerging South Tyneside Local Plan. However, it is stated that the plan has been developed in partnership with South Tyneside Council and that it is anticipated that the emerging Local Plan will be well aligned with the Neighbourhood Plan.</p> <p>As set out in this response, there are a number of areas where the Draft Neighbourhood Plan conflicts with national policy and emerging local plan policies particularly regarding meeting housing needs and more onerous policies covering drainage and air quality. As set out in the PPG, it is vitally important that the Neighbourhood Plan discusses policy conflicts with the Local Planning Authority to ensure the Neighbourhood Plan does not become out of date when the new local plan is adopted.</p> <p>Summary The comments contained within this response are aimed to assist in the drafting of the Neighbourhood plan to ensure consistency with national planning policy and the latest evidence that has been undertaken to inform the emerging South Tyneside Local Plan.</p> <p>We can provide further information or clarification on any of the matters raised in this response if required and look forward to working collaboratively with the Neighbourhood Forum as the Neighbourhood Plan progresses.</p>	<p>high volumes of traffic through the village. Research also shows a causal link between traffic volumes and poor air quality, whilst it has been established that there is no safe limit of fine particles. This clearly shows that air quality is indeed an issue for Whitburn.</p> <p>Monitoring The basic conditions report explains how the WNP aligns with local and national policy. Please also note that the emerging draft Local Plan is now being redeveloped and it is unknown what policies it might contain, which is why we will review the NP when appropriate.</p>
013	Barton Willmore OBO Church Commissioners	<p>On behalf of our Client, the Church Commissioners, we write in response to the Submission Draft Whitburn Neighbourhood Plan which is currently out for consultation until 19th November 2021.</p> <p>1. Background Our Client has land interests within South Tyneside and are actively engaged in the preparation of the Local Plan for the area. As part of the</p>	<p>1. Background The Regulation 18 draft of the South Tyneside Local Plan (August 2019) has been withdrawn and a ‘call for sites’ has</p>

	<p>emerging local plan for South Tyneside, our Client is promoting land north of Shearwater and east of Mill Lane which is a draft allocation in the Regulation 18 draft of the South Tyneside Local Plan (August 2019). The Regulation 19 draft is anticipated for consultation early 2022.</p> <p>As a major landowner in South Tyneside, the Church Commissioners are keen to engage with the Whitburn Forum Committee on the preparation of their Neighbourhood Plan to ensure that it meets the basic conditions and is capable of being ‘made’ and becoming part of the development plan for South Tyneside. In preparation of this response, our Client has had regard to the Basic Conditions Statement dated August 2021.</p> <p>2. Policy WNP1: Housing</p> <p>Our Client is aware that at its Regulation 18 consultation stage, South Tyneside’s emerging local plan (policy H9) proposed a requirement of 18% of new homes to be affordable. The submission draft Neighbourhood Plan sets a target for 20%.</p> <p>It is our Client’s understanding that South Tyneside Council have commissioned CP Viability to undertake the Local Plan Viability testing for their emerging plan. Our Client raises concerns regarding the affordable housing targets set out within Policy WNP1 and in this regard Basic Condition 1 regarding the general conformity of the Neighbourhood Plan with strategic local planning policy.</p> <p>3. Policy WP2: Whitburn Design Guidelines</p> <p>Our Client acknowledges the role of key views into and from Whitburn village. There are two key views identified in proximity of their their land north of Shearwater and east of Mill Lane. Whilst it is understood that</p>	<p>been made so the landowner cannot claim that their land is a draft allocation site.</p> <p>Notwithstanding this the Forum are happy to engage with all potential stakeholders.</p> <p>2. Policy WNP1: Housing</p> <p>The affordable housing target is based on the housing needs assessment and extensive community consultation, showing that affordability is an issue in Whitburn.</p> <p>The current LDF sets a target of 25% of affordable housing in urban fringe areas (which includes Whitburn) for sites with more than 5 houses. The withdrawn regulation 18 Local Plan included 18%. The WNP sets a figure of 20%. This is to reflect potential viability issues with the current figure of 25% (however, noting that a recent development at the Whitburn firing range was able to deliver 25% affordable housing). It also reflects the local issues with housing in Whitburn as explained in para 5.11 of the WNP, requiring a figure higher than 18% in order to deliver the higher element of affordable housing demonstrated as being needed for Whitburn. The Housing Needs Assessment provides further evidence of the need.</p> <p>3. Policy WP2: Whitburn Design Guidelines</p> <p>The supporting document ‘Whitburn’s most valued views ‘ explains why residents value these views, such as the openness of the views towards the coast. The WNP does not</p>
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	<p>these views were identified as being most valued by residents during community consultation, further justification regarding the importance and what is 'valued' about these views is required. Our Client is concerned that these views are being identified in an attempt to prevent development coming forward on this site, should exceptional circumstances be demonstrated for the release of this land from the Green Belt as part of the emerging local plan.</p> <p>Basic condition 3 requires general conformity with strategic local policy. Whilst the local plan is still emerging, this needs to be considered carefully by the Examiner. The Regulation 18 draft of the South Tyneside Local Plan proposed this site as a draft allocation H3.75. Currently, our Client believes the emerging Neighbourhood Plan fails basic condition 3.</p> <p>4. Policy WP3: Sustainable Design</p> <p>Our Client acknowledged the intention for new development and alterations to meet high levels of sustainable design and construction. However it is unclear how this policy will be applied in practice. The policy affords 'significant weight' to the incorporation of elements a) – to f). However, our Client has concerns that some of the requirements set out will not be feasible on each specific development. For example the incorporation of on-site energy from renewable sources such as solar PV and air / ground source pumps or community energy generation schemes may not be feasible. Our Client proposes that 'where feasible' or similar wording should be applied to all of the criterion not just for electric charging points.</p> <p>Paragraph 5.23 sets out that all new housing needs to be carbon neutral and designed to be energy efficient enough to emit no carbon dioxide. This paragraph of the supporting text sets a significantly high bar for new</p>	<p>prohibit development in these areas, but the proposal must demonstrate how it has regard to any relevant views.</p> <p>The identification of these views are part of the evidence that promotes the right for communities to shape the way their local area is developed through the use of Neighbourhood Development Plans.</p> <p>The draft of the South Tyneside Local plan has been withdrawn. There are no current draft allocations of development sites so there can be no conflict with basic condition 3.</p> <p>4. Policy WP3: Sustainable Design</p> <p>WNP3 does not require development to incorporate these elements, so no reference to feasibility is needed This policy is in line with national policy, which states that design policies should be developed with local communities so they reflect local aspirations. Moreover, it states that the planning system should support the transition to a low carbon future.</p> <p>National policy states that design policies should be developed with local communities so they reflect local aspirations. Moreover, it states that the planning system should support the transition to a low carbon future.</p> <p>Many technologies have been successfully applied in the UK and within the region. Measures such as energy efficiency, solar panels, SuDs, walking and cycling routes and electric car</p>
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	<p>development. Whilst our Client agrees with the principle of this, they question the ambiguity, practicality and viability of this paragraph in the context of national policy and therefore suggests it fails Basic Condition 1.</p> <p>5. Policy WN7: Green Infrastructure Enhancement and Connectivity Our Client acknowledges that the vast majority of the unbuilt area of Whitburn is identified as a green infrastructure enhancement and connectivity area. It is unclear how this policy would be applied should a development site come forward within an area identified for green infrastructure enhancement and connectivity. Our Client does raise concerns regarding the policy wording which suggests that the Green Belt surrounding Whitburn Village has the potential for expansion and improvement. Basic condition 1 requires the appropriate regard to national policy and advice. Any expansion of the Green Belt needs to be subject to exceptional circumstances and the provision of NPPF paragraph 139 to be met. Our Client suggests that the current wording fails Basic Condition 3.</p> <p>6. Policy WNP14: Transport Infrastructure Our Client supports the recognition of the importance of the cycleway along Mill Lane.</p> <p>7. Conclusion and Summary As a major landowner in South Tyneside, the Church Commissioners are keen to engage with the Whitburn Forum Committee on the preparation of their Neighbourhood Plan to ensure that it meets the basic conditions and is capable of being 'made' and becoming part of the development plan for South Tyneside.</p>	<p>charging are not emerging technologies but widely implemented.</p> <p>It also is in line with the forthcoming Future Homes Standard (government's response to the consultation available here) and plans announced by government that all new homes should have EV charging points from 2022.</p> <p>5. Policy WN7: Green Infrastructure Enhancement and Connectivity The policy and supporting text explains clearly that development is expected to incorporate GI and what the requirements are for GI. WNP7 lists assets with the potential for expansion and improvement. As green belt is a strategic matter for a local plan, the WNP is not aiming to change the green belt boundary. Moreover, expansion does not have to mean in area, it can also mean in importance / functions of GI.</p>
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		We trust that our Client's comments will be duly considered. We would like to express our interest in being part of the examination of the Neighbourhood Plan.	
014	Story Homes	<p>The following representations have been made by Story Homes in relation to the Whitburn Neighbourhood Plan Submission version ('the Neighbourhood Plan').</p> <p>These representations are made in the context of Story Homes' land interests within Whitburn; Land at Lizard Lane and Land at Cleadon Lane, both of which are shown in the attached Location Plans (Appendix 1). Land at Cleadon Lane benefits from a draft allocation (Reference H3.72) through the emerging South Tyneside Local Plan and extends to approximately 3.9 hectares. The additional site of interest, Land at Lizard Lane, does not benefit from a draft allocation but is being actively promoted through the emerging Local Plan, it extends to approximately 10.65 hectares.</p> <p>Story Homes have previously been involved in the preparation of the Whitburn Neighbourhood Plan and have submitted representations to the Pre-Submission Version Neighbourhood Plan consultation held in December 2020. Story Homes are committed to active engagement in the plan-making process wherever it is suitable and relevant to do so. It is noted that involvement at this stage is of importance given the emerging South Tyneside Local Plan, currently at Pre-Publication Version. As such, this Neighbourhood Plan should be made in accordance with said emerging Local Plan and should not be made prematurely.</p> <p>Story Homes is generally supportive of the proposals set out in the Submission draft Neighbourhood Plan and acknowledge the changes made to the Neighbourhood Plan following the previous consultation. However, we have some concerns relating to the content of the Neighbourhood Plan and supporting documents. These representations seek to clearly outline said concerns and recommendations to align the Neighbourhood Plan with adopted national policy. Story Homes would also like to ensure that the Neighbourhood Plan is produced in an appropriate manner which aligns with the emerging South Tyneside Local Plan given the stage the plan preparation is at (Pre-Publication draft).</p>	<p>The NP needs to conform with current local planning policy, which is the LDF. The 2019 draft local plan was withdrawn and previous draft allocations no longer exist.</p> <p>We have held discussions with Story homes so we are confident in our responses to their comments.</p> <p>Our NP has been five years in the making and there is no intention to suspend its production for the Local Plan to come to fruition.</p> <p>We have not had sight of the current pre-publication draft of the South Tyneside Local Plan. The 2019 iteration was withdrawn.</p> <p>Our Basic Conditions Statement asserts that our draft plan meets all the basic condition.</p>

	<p>It should be noted that for a Neighbourhood Plan to be put to a referendum, and subsequently made, it needs to meet all of the basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990, this is then applied to Neighbourhood Plans through section 38(a) of the Planning and Compulsory Purchase Act 2004. These basic conditions are set out below: a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order, b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order, c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order, d) the making of the order contributes to the achievement of sustainable development, e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area), f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p> <p>Story Homes has produced these representations to provide continued support to the Whitburn Neighbourhood Forum and the production of the emerging Neighbourhood Plan. Story Homes is involved in a number of Neighbourhood Plans across its three operational Regions and recognises that they are helpful tools for communities looking to shape their surroundings.</p> <p>The below text provides additional commentary for the policies included within the emerging Neighbourhood Plan which would align it more closely with both the basic conditions tests set out above, the National Planning Policy Framework (NPPF 2021) and also the emerging and adopted South Tyneside Local Plan.</p> <p>Policy WNP1: Housing</p>	<p>Policy WNP1: Housing</p>
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	<p>Story Homes continues to provide support to the Neighbourhood Forum in their request to see future housing come forward in a scale and mix which is reflective of need in the settlement. It is noted that the same Housing Needs Assessment, dated February 2018, is being referenced in the Submission Version and the pre-Submission Version Neighbourhood Plan. The Neighbourhood Plan Forum had previously commissioned this document which continues to form part of the evidence base of the emerging Neighbourhood Plan. Story Homes reiterates the same point made in the Pre-Submission Consultation, that should the Neighbourhood Plan Forum wish to create its own evidence base this should be based on up-to-date data.</p> <p>The emerging South Tyneside Local Plan uses the Strategic Housing Market Assessment (SHMA) to form the basis for any indicative housing mixes. Whilst Story Homes acknowledge that the most recent SHMA which underpins the South Tyneside Pre-Publication Version Local Plan is dated 2015 and could be considered out-of-date. It nonetheless provides a robust and consistent basis for a housing mix policy to be provided. Story Homes considers that Policy WNP1 should align with the most recent SHMA as opposed to the Whitburn Housing Needs Assessment. Story Homes encourage alignment with the South Tyneside SHMA as opposed to the Neighbourhood Plans Housing Needs Assessment given that the former represents the needs of the wider Borough and is not limited to Whitburn alone. The South Tyneside SHMA takes into account in-migration across South Tyneside settlements, whereas the Neighbourhood Plan evidence base allows for only the needs of the current residents within the settlement. Story Homes consider the Councils evidence base to be more robust and realistic.</p> <p>Story Homes continues to provide support to the Neighbourhood Plan Forum in its intention to bring forward affordable housing. However, notices that the Neighbourhood Plan is continuing to advocate for a provision of affordable housing which is higher than the emerging South Tyneside Local Plan provision. There needs to be consistency between the figures cited in both documents.</p>	<p>The Housing Needs Assessment (developed by AECOM) includes data and conclusions of the SHMA 2015. It acknowledges that the SHMA 2015 offers the most considered and up-to-date source of evidence available as regards to housing need at district level; as such, it has been accorded substantial weight. As the SHMA is quite out of date, the NP group has commissioned a more up to date assessment for our area. Therefore, the Housing Needs Assessment is more up to date than the SHMA.</p> <p>The Basic Conditions require us to have regard to existing strategic policy. There is no requirement for consistency with an emerging Plan that has, at the present time, no material weight in planning terms. Moreover, the regulation 18 draft is currently in development and details are unknown.</p> <p>Neighbourhood plans are aimed at planning development to meet the need for the community, which is why neighbourhood-level needs have been taken into account in the Housing Needs Assessment, supplemented with additional evidence from community consultation.</p>
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	<p>The emerging South Tyneside Local Plan calls for 18% of new homes on schemes of 11 or more homes to be brought forward as affordable, whereas the Whitburn Neighbourhood Plan calls for 20% of new homes on schemes of 10 or more dwellings. Story Homes asks that the Neighbourhood Plan provides clear evidence as to the increase in affordable provision which differs from the emerging Local Plan, this will need to include viability evidence to ensure that the delivery of homes in the Borough is not stifled.</p> <p>Finally, Story Homes would like to draw the Neighbourhood Forums attention to the recently adopted East Boldon Neighbourhoods Plan (adopted 28th October 2021). In the Examiners report (dated 21st July 2021) the Independent Examiner ('Examiner') notes that the Neighbourhood Plan group has assessed the housing need for the settlement noting a figure of 12 dwellings per annum. In addition, the Neighbourhood Plan Group has aligned the settlement boundary with that of the Green Belt boundary, which effectively shrink-wraps the settlement. Thus limiting the amount of development which can come forward in a sustainable manner to meet the 12 dpa housing requirement identified. Within the Examiners Report, the Examiner has called for an amendment to be made to Policy EB13: The Delivery of New Housing to ensure residential development is not limited:</p> <p>"Recommendation 15: Revise Policy EB13 as follows: Delete the second part of the policy "All new development proposals..... impacting on the development." Revise the third part of the policy to read: "Where appropriate and relevant to the site, a masterplan should be prepared as part of the development proposals and should include details of:" Revise criterion g) to read: The provision of adequate vehicle and cycle parking provision taking account of the guidance set out in the Annex to the East Boldon Design Code;" Revise criterion k) to read: "key considerations should include...." Add a new paragraph to the justification: "There may be limited opportunities for housing development in the Green Belt and Policy EB2</p>	
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	<p>makes it clear that any such development will be considered against national policy on Green Belts.”</p> <p>Add a new paragraph to the justification after paragraph 8.6: “Developers of new and replacement housing are encouraged to consult the East Boldon Neighbourhood Forum, the local community and other key stakeholders prior to submitting their proposals to the local authority for planning permission.””¹</p> <p>Story Homes note that whilst Whitburn Neighbourhood Plan Forum have not included an explicit housing requirement for the settlement, they have made reference to the emerging South Tyneside Local Plan which disaggregates 397 dwellings across the Local Plan Period. Like the East Boldon Neighbourhood Plan, the settlement boundary to Whitburn has also followed the existing Green Belt boundary making it difficult for future development to come forward in a sustainable manner.</p> <p>Story Homes would like to encourage the Neighbourhood Plan Forum to consider the addition of text similar to that shown in bold above. This would alleviate any concerns that the Neighbourhood Plan is unduly restrictive in its approach to future housing requirement which could ultimately undermine the delivery of housing through the emerging South Tyneside Neighbourhood Plan.</p> <p>Story Homes seeks to ensure that the neighbourhood Plan is clearly evidenced, justified and consistent with the emerging South Tyneside Local Plan, this may undermine the Neighbourhood Plans ability to conform to the basic condition test e).</p> <p>Basic Conditions Test:</p> <p>Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area): The Whitburn Neighbourhoods Plan, as written, could undermine the effectiveness of the emerging South Tyneside Local Plan with respect to housing mix and its approach to</p>	<p>settlement boundary to Whitburn</p> <p>The WNP does not include a settlement boundary. The Basic Conditions require us to have regard to existing strategic policy. There is no requirement for consistency with an emerging Plan that has, at the present time, no material weight in planning terms. The regulation 18 Local Plan is still in development and its details are unknown.</p> <p>Any planning application will have to follow national policy on Green Belt. The WNP does not need to repeat or duplicate national policy.</p> <p>Basic Conditions Test:</p> <p>The Basic Conditions require us to have regard to existing strategic policy. There is no requirement for consistency with an emerging Plan that has, at the present time, no material weight in planning terms. The regulation 18 Local Plan is still in development and its details are unknown.</p>
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	<p>affordable housing. This may impact upon delivery within both Whitburn and the wider borough. Recommendation: In order to ensure that the Whitburn Neighbourhood Plan can continue to referendum, and aligns with the basic conditions, the Plan should be updated to reflect and align with the approach taken in the emerging South Tyneside Local Plan evidence base. Regard can still be made to the Neighbourhood Plans Housing Need Assessment; however, Story Homes would encourage the Neighborhood Plan to update this document to reflect current need. The Neighbourhood Plan should have regard to clear evidence in order to be considered robust and effective. Story Homes would also encourage the Neighbourhood Plan Forum to consider the comments and amendments made to the East Boldon Neighbourhood Plan in order to avoid the unduly restriction of future housing in the settlement when considered against the tightly drawn settlement boundary.</p> <p>WNP2: Whitburn Design Guidelines Story Homes has not previously made comments regarding Policy WNP2, however, has noticed that locations and directions of Key Views have been added to the Policies Map and reference to these has been made in Policy WNP3. Story Homes notes that Key Views have been identified at the boundary of its asset on Lizard Lane (please see location plans at Appendix 1). Whilst Story Homes agrees with the provision and enhancement of landscape characteristics, especially those linked to assets of heritage value, the evidence underpinning the Key Views identified does not seem to be robust. In addition, there seems to be limited indication of how this policy will be monitored and enforced given that the Key Views identified are not subject to any designation or protection. The Key View locations are underpinned by a document entitled 'Whitburn's most valued views – survey results June 2020'. This indicates that the locations of said Key Views are based upon anecdotal evidence.</p>	<p>The WNP is based on up-to-date evidence which is aimed at the neighbourhood level. It has also taken existing local policies and local assessments into account where appropriate. The most recent local evidence has been used to inform the WNP – please see the list of evidence documents used in the Neighbourhood Plan, which includes local evidence.</p> <p>Updating the Housing needs Assessment is not feasible, whilst also noting it is more in date than the 2015 SHMA.</p> <p>WNP2: Whitburn Design Guidelines There is no reference to views in WNP3. This is part of WNP2 – design.</p> <p>The survey cannot be defined as anecdotal evidence – anecdotal evidence would be 'we have heard someone say that...'. The survey is underpinned by a sound quantitative methodology to make it valid and reliable as an evidence base -the methodology is clearly explained in the supporting document on the survey. Views and the setting of Whitburn are key issues for the people of Whitburn and its inclusion is evidenced. They are not specific designations, as there is no such designation in (neighbourhood) planning, and WNP3 does not restrict development, but it should demonstrate how in its design it has had regard to maintaining key views.</p>
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	<p>Story Homes considers that the Key View locations should be removed as they are not justified or evidenced.</p> <p>Basic Conditions Test: Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development</p> <p>The Whitburn Neighbourhood Plan, as written, could undermine the delivery of housing within the settlement due to unduly restrictive landscape-based policy.</p> <p>Recommendation: Story Homes recommend that the Neighbourhood Plan Forum remove references to Key Views as they are not clearly evidenced or justified. The inclusion of reference to the Key Views undermines both the effectiveness of Policy WNP3 and the Policies Map.</p> <p>Policy WNP3: Sustainable Design and Construction</p> <p>Story Homes supports the Neighbourhood Forum in the inclusion of this policy and understands the importance of sustainability from inception of a scheme to construction on-site. Story Homes acknowledges that the Neighbourhood Forum has revised the policy wording within WNP3 and appreciates that additional clarity has been provided.</p> <p>Story Homes recognises the up-coming changes in Building Regulations Part L and the implications this will have for heat sources, building materials and overall practices, and is working to integrate new practices ahead of its adoption.</p> <p>Recommendation: Story Homes supports the amendment to Policy WNP3.</p> <p>Policy WNP4: Whitburn Conservation Area</p> <p>Story Homes notes the importance of respecting the character of the Whitburn Conservation Area. One of the distinct character areas, Moor Lane and Cleadon Lane, bounds the draft allocated site Land North of Cleadon Lane (H3.72) which is under Story Homes' control. The need to</p>	<p>Policy WNP3: Sustainable Design and Construction Noted</p> <p>Policy WNP4: Whitburn Conservation Area Please note there is no draft allocation; this could be revised in the new regulation 18 local plan.</p> <p>The NPPF states the importance of retaining existing trees in para 131 and 174. In line with the mitigation hierarchy, loss</p>
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	<p>preserve and enhance the character or appearance of the Whitburn Conservation Area is noted in the supporting allocation text, which is confirmed through Policy WNP4. Story Homes supports this policy and will reflect this in the design and character of the future scheme at Cleadon Lane.</p> <p>Story Homes notes that the policy wording surrounding the loss of protected and/or trees of significance has been strengthened. Whilst Story Homes agrees with the sentiment behind this addition, it should be noted that if the Neighbourhood Forum are seeking the delivery of two additional trees in the place of one lost tree, this should be supported by viability evidence.</p> <p>Basic Conditions Test:</p> <p>Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development The inclusion of additional policy requirements to allow for the replacement of significant or protected trees at the ratio 2:1 could lead to viability issues within a scheme and limit sustainable development. This could negatively affect development in the Borough. Recommendation: Story Homes would encourage the Neighbourhood Plan Forum to consider the viability implications of including policy which seeks the replacement of protected and significant trees at a ratio of 2:1. Should the Neighbourhood Plan Forum fail to adequately address this point; Story Homes would ask that this be removed from Policy WNP4.</p> <p>Policy WNP6: Biodiversity and Geodiversity</p> <p>Story Homes have not previously provided comments on Policy WNP6. Story Homes acknowledge that the Neighbourhood Plan Forum are seeking to ensure the protection and enhancement of geodiversity and biodiversity within the settlement. However, the introduction of a percentage associated with Biodiversity Net Gain causes concern.</p>	<p>should first of all be avoided. If that is not possible, suitable mitigation is required. A tree planted to replace a tree removed due to development will take decades to achieve the biodiversity and amenity value of what has been lost, which is why one tree should be replaced by two to make up for loss. A requirement for two trees is therefore in line with national environmental policies, and most recently, could contribute to a biodiversity net gain. Moreover, the NPPF requires new development to have tree-lined streets.</p> <p>Planting additional trees is therefore not expected to be a significant burden on the developer.</p> <p>Policy WNP6: Biodiversity and Geodiversity</p> <p>The Environment Act 2021 mandates a minimum of 10% net gain. Any local plans will be expected to align with this, however, that current NPPF also includes a policy on net gain. Policy 179b states that a plan should ‘identify and pursue opportunities for securing measurable net gains for Biodiversity’. PPG on natural environment explains more on net gain, whilst net gain is also part of the national design guide.</p>
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	<p>Whilst the 10% net gain, aligns with the Environment Bill which has recently been passed, Story Homes would once again encourage the Neighbourhood Plan to align with the emerging South Tyneside Local Plan. The amount of net gain to be pursued in the emerging South Tyneside Plan may align with the Neighbourhood Plans assumptions in the upcoming Pre-Publication version. However, the emerging Local Plan will provide a detailed framework for this percentage to be achieved. The Neighbourhood Plan currently lacks the detail associated with Biodiversity Net Gain such as the metric used for calculation or the ways in which it can be achieved both on and off-site.</p> <p>Story Homes would encourage the Neighbourhood Plan to align with the emerging South Tyneside Local Plan to ensure the detail is consistent and effective. Given that Net Gain will be a consideration within decision-making it may be preferable to exclude this portion of Policy WNP6 and allow it to be dealt with through the emerging South Tyneside Local Plan. Story Homes would encourage the Neighbourhood Plan Forum to align with the Environmental Bills transitional arrangements in the first instance.</p> <p>Basic Conditions Test:</p> <p>Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area): The Whitburn Neighbourhoods Plan, as written, could undermine the effectiveness of the emerging South Tyneside Local Plan with respect to Biodiversity Net Gain. This may impact upon the protection and enhancement of geodiversity and biodiversity within the Borough. Recommendation:</p> <p>In order to ensure that the Whitburn Neighbourhood Plan can continue to referendum, and aligns with the basic conditions, the Plan should be updated to reflect and align with the emerging South Tyneside Local Plan. Regard can still be made to Biodiversity Net Gain, however, Story Homes would encourage the Neighbourhood Plan to either reflect the emerging South Tyneside Local Plan or remove the percentage requirement altogether in order to make the Neighbourhood Plan effective. At the very</p>	<p>Note that ‘measurable’ will mean the use of a metric will be required. The PPG on the natural environment explains how to use a metric already, with the metric recently having been updated – there is no lack of detail here. The only lack of detail if the 10% were to be removed from the policy is how much net gain a development should achieve. In terms of providing certainty to developers, it would be more prudent to include a specific percentage aligning with the <u>minimum</u> required level.</p> <p>A recent study also showed that two thirds of draft local plans were already including a 10% net gain. It seems prudent in terms of future proofing the neighbourhood plan to include the 10% now as well.</p> <p>The WNP is not expected to comply with the emerging local plan. Especially since it is yet to go through a new regulation 18 consultation.</p> <p>There are no transitional arrangements in the Act – there are powers to specify the detail of BNG in secondary legislation, following public consultation. However, the 10% BNG has already been set in primary legislation.</p>
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	<p>least Story Homes would encourage the Neighbourhood Forum to echo the Environment Bills Transitional arrangements.</p> <p>WNP7: Green infrastructure Enhancement and Connectivity Likewise with the comments made surrounding WNP6, Story Homes supports the Neighbourhood Forum in its endeavour to maintain and enhance connectivity to green infrastructure. However, Story Homes is concerned with the inclusion of Part b) in this policy. Whilst the sentiment behind this part of the policy is acknowledged, it is unreasonable for the Neighbourhood Plan to mandate that a wildlife corridor be created in every new development within Whitburn. The creation or enhancement of such infrastructure needs to be supported by clear evidence of need in order to ensure the habitats created are useable and suitable. Story Homes would also encourage the Neighbourhood Forum to consider the implications of this policy wording with respect to viability. Additional policy burden, such as this, may affect the deliverability for residential development in the settlement. Story Homes would encourage the Neighbourhood Forum to remove reference to Part b) or should the Neighbourhood Forum wish to produce evidence that this can be delivered, Story Homes would seek the amendment of the policy to include the wording ‘where practicable’. Basic Conditions Test: Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development The inclusion of a policy requirement for the creation or enhancement of wildlife corridors in any new development will affect the delivery of sustainable development through overly restrictive policy. Recommendation: Story Homes recommends that part b) of Policy WNP6 be removed in order to ensure that sustainable forms of development can come forward in Whitburn. Should the Neighbourhood Forum wish to retain the policy wording, Story Homes would encourage this to be evidence-led with</p>	<p>WNP7: Green infrastructure Enhancement and Connectivity Part b) aligns with the NPPF. The policy is on GI, which is recognised in the NPPF to deliver benefits to nature. It is therefore expected that GI can help to establish wildlife corridors, which are defined in the NNPF as ‘an area of habitat connecting wildlife populations’. GI is a critical component contributing to the environment pillar of sustainable development. The policy aims to ensure GI is multifunctional and connected, as supported by NPPF para 179a. The evidence also shows that there are important wildlife habitats in the neighbourhood area, such as designated sites on international, national and local levels, as well as extensive GI and strategic wildlife corridors, thereby showing the local need to ensure connectivity.</p>
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	<p>respect to the ecological need in the area but also the impact upon viability.</p> <p>WNP8: Local Landscapes and Seascapes Story Homes reiterates the points made in relation to WNP2, the inclusion of Key Views within the Submission Version Neighbourhood Plan is not justified or evidenced. The Key View locations are underpinned by a document entitled ‘Whitburn’s most valued views – survey results June 2020’. This indicates that the locations of said Key Views are based upon anecdotal evidence. Story Homes considers that the Key View locations should be removed as they are not justified or evidenced. Whilst Story Homes understand the reasoning for Policy WNP8 in its protection of locally important views, it emphasises that this must be evidence base led as opposed to anecdotally informed. The effectiveness of the policy is constrained by the lack of detail surrounding the ways in which these Key Views are to be protected. There is also a lack of detail surrounding the monitoring provision for this policy. Without this, it is difficult to understand how Policy WNP8 will be upheld and long-lasting. Basic Conditions Test: Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development The Whitburn Neighbourhood Plan, as written, could undermine the delivery of housing within the settlement due to unduly restrictive landscape-based policy. Recommendation: Story Homes recommend that the Neighbourhood Plan Forum remove references to Key Views as they are not clearly evidenced or justified. The inclusion of reference to the Key Views undermines both the effectiveness of Policy WNP3 and the Policies Map.</p>	<p>WNP8: Local Landscapes and Seascapes Please see above for justification of including key views (comments on WNP2). The policy refers to far-reaching views as identified in the Heritage Character Assessment and Design guidelines (both conducted by AECOM). The local authority’s landscape character study also refers to views in the Whitburn area.</p> <p>Policy WNP14: Transportation Infrastructure The evidence base includes information on the transport routes in Whitburn. It is clear that there is existing cycle and</p>
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	<p>Policy WNP14: Transportation Infrastructure</p> <p>Story Homes acknowledges that the Neighbourhood Forum has made amendments to Policy WNP14 and has removed reference to the use of Community Infrastructure Levy. Story Homes appreciates that this has now been removed and clarity has been improved.</p> <p>Story Homes notes that the policy now includes a section of text which requires all new major residential schemes to ensure pedestrian and cycle access to Whitburn village centre. Story Homes agree with the sentiment behind this policy and consider that the sustainability of a site is an important credential. However, Story Homes would encourage the Neighbourhood Plan Forum to improve the clarity of said passage. As read, it intimates that a direct route for both pedestrians and cyclists must be delivered to the village centre. Given that Whitburn’s patten of development is organic in nature, meaning the settlement boundary is irregular in places, it is not always achievable to deliver direct access into the village centre.</p> <p>Story Homes would encourage the Neighbourhood Plan Forum to consider other means of improving accessibility such as linkages to existing pedestrian and cyclist infrastructure. So as to avoid complex or overly onerous access arrangements from future development.</p> <p>Story Homes would suggest that the policy wording be amended to allow for flexibility in application of the policy.</p> <p>Basic Conditions Test:</p> <p>Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development</p> <p>The Whitburn Neighbourhood Plan, as written, could undermine the delivery of sustainable development in the name of delivering direct pedestrian and cyclist access to the village centre.</p> <p>Recommendation:</p> <p>Story Homes suggests that the Neighbourhood Forum amend the wording of Policy WNP14 to allow for a pragmatic and sensible application of the guidance. .</p>	<p>pedestrian access to the centre from the infrastructure identified. WNP14 requires development to enable realistic forms of transport to allow access to the centre – in line with NPPF para 92 to encourage the active and continual use of public areas. Accessibility is an important issue in the NPPF, where new residents should be able to easily access local services, which would also support the local centre. It is clear that the NP aims to achieve the opposite from what the respondent suggests – that the policy would create complex access.</p>
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		<p>Conclusion</p> <p>Story Homes appreciates the opportunity to provide further representations to the Whitburn Submission draft Neighbourhood Plan. Our representations note that whilst Story Homes are generally supportive of the principles set out in the Neighbourhood Plan and are welcoming of the amendments made to the Neighbourhood Plan, there remain some concerns over the content of said Plan.</p> <p>Above all else, Story Homes considers that the Neighbourhood Plan, in its current form, does not align with the emerging South Tyneside Local Plan and as such cannot be considered in accordance. As a result, the Neighbourhood Plan fails to meet the basic conditions set out paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990, this is then applied to Neighbourhood Plans through section 38(a) of the Planning and Compulsory Purchase Act 2004. Throughout our representations, recommendations have been made which, if implemented, should align the Neighbourhood Plan more closely with these basic conditions. Story Homes welcomes the opportunity to make comments on the Whitburn Neighbourhood Plan and looks forward to engaging further with the Neighbourhood Forum.</p>	
017	Bob Latimer	<p>On reading what a Neighbourhood Plan was intended to achieve I joined the Whitburn Neighbourhood Forum. I am a retired engineer living 50m from the sea and I thought I would like to help future generations who live in Whitburn to have a clean environment unlike the situation now. Being aware that housing developments were being added to the Whitburn sewerage network without the damage this was causing being assessed, I believed the statements such as those below, and felt if I joined the Forum this would allow me to give something back to the place I was born.</p> <p>“Neighbourhood planning is a right for communities to shape the way their local area is developed through the use of Neighbourhood Development Plans”</p> <p>“The neighbourhood plan will set a vision for the future. It can be detailed, or general, depending on what local people want”</p>	<p>Mr Bob Latimer has provided invaluable support to the Forum in creating a sewage policy. His passion and long term campaigning on the issue of sewage pollution is both appreciated and admired.</p> <p>Using his support and knowledge we created what we considered to be a robust, evidence based, sewage policy. To ensure our policy was sound, we commissioned Aecom to undertake a detailed technical appraisal of the policy and its evidence base. Aecom produced recommendations which, although they were not binding, we accepted.</p> <p>We agree entirely with Bob that the sewage situation is a scandal and that the local authorities are not doing enough</p>

	<p>I am not against further houses being built in Whitburn but with the Local Plan being from 2012 along with all the land surrounding Whitburn being green belt it is very difficult, if not impossible, with no up to date Local Plan being in place, to have a shared vision to shape the development and growth of the local area.</p> <p>While areas in the green belt have been put forward as potential development sites, nothing in the Neighbourhood Plan indicates which sites will be used and for what type of housing. It is common knowledge that a developer wants to build high value housing on the Charley Hurley and Marsden School site, but is this the type of development that is needed. Is this really what is called: -</p> <p>“Neighbourhood planning provides for communities to set out a positive vision for how they want their community to develop over the next 10 years”</p> <p>Surely that vision has to be that people born in Whitburn can get married and continue to live in Whitburn and bring up their children, the next generation, in houses that are affordable. Alongside this the type of housing should be provided to allow older people to downsize. I know that this was a major requirement suggested by local consultation.</p> <p>What I have found with this neighbourhood plan process is that although land has been allocated for potential development with no Local Plan in place, then how could a neighbourhood plan be valid? To agree to this neighbourhood plan is like signing a blank check and giving it to a stranger, something I think none of us would do.</p> <p>I believe that a major factor in assessing new development is the lack of infrastructure capacity and the Neighbourhood Plan has not been allowed to contain stringent policies about this. Although I must praise the efforts of the Whitburn Forum, Steve Lavelle in particular, in drawing up this neighbourhood plan it cannot, and should not be accepted, as Policy WNP13 is like signing a blank check and worse.</p> <p>“Planning proposals will not be supported unless it can be shown by ‘rigorous analysis’ that there is sufficient capacity in the local sewerage system and that any new connections will not increase the risk of system</p>	<p>to remedy the situation. We also agreed with Aecom that a NP should be considered as only one of the tools to be used to further the campaign to Stop Sewage Pollution</p> <p>We have also considered that if we were to disagree with the conclusions of Aecom which were subsequently backed up by Locality then there would be a risk that our original policy would fail examination.</p> <p>Bob’s comments are diametrically opposed to the comments put forward by developers, landowners and the local authority in their responses to this Reg 16 consultation regarding the sewage policy</p> <p>The difference is that Bob provides evidence whereas the other consultees do not.</p> <p>It is important to note that the EA does not challenge our sewage policy evidence base. This is predictable as they supplied the majority of the evidence.</p> <p>It is also important to note that the Reg 16 consultation exercise, as conducted by the Local Authority, has failed to elicit a response from Northumbrian Water, a statutory consultee.</p> <p>We would be delighted to be in a position to respond to any comments from this water company who have been determined by the European Court of Justice to continue to flout the Urban Waste Water Treatment Regulations since the court judgement in 2012. They do so with impunity. We have followed the recommendations of Aecom and consolidated the information about sewage policy that is deemed to be outside the remit of a NP into a community action plan.</p>
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	<p>back up/flooding or cause any adverse impact to the neighbourhood area environment”</p> <p>There can be no more rigorous analysis than that produced by Steve Lavelle, his investigations, reports and analysis show that the capacity of the local sewage system was exceeded years ago and the evidence overwhelmingly supports that view.</p> <p>It is rather ironic where the Policy WNF refers to ‘rigorous analysis’ when it was found by ‘rigorous analysis’ during a Public Inquiry that the Whitburn system was found not fit for purpose and a new permit was issued that is not being complied with although it is still valid today. It is further rather ironic that the South Tyneside Local Plan goes back to 2012, this was the same year that the European Court of Justice found following ‘rigorous analysis’ that the Whitburn system was not complying with the Urban Waste Water Treatment Directive and this judgement EC Case C -301/10 still stands today.</p> <p>The sewage policy is one of the most important policies in any plan and for that reason the current rather inadequate policy should be withdrawn and rewritten: -</p> <p>“Planning proposals will not be supported unless it can be shown by ‘rigorous testing’ that there is sufficient capacity in the local sewerage system”</p> <p>The Whitburn sewerage goes beyond the boundaries of Whitburn South Tyneside. I am old enough to remember before the boundary changes that South Bents was part of Whitburn now part of Sunderland. The situation is that the sewage from South Bents is still connected to the Whitburn South Tyneside. The sewage flows from South Bents flow to the north to Whitburn PS and then are pumped to the south. In 2018 a development at South Bents of 62 houses was added to the Whitburn system and as a result of incapacity in the sewerage system a direct connection was made via manhole 5609 from the South Bents foul sewer to the storm interceptor which discharges to sea on many occasions.</p>	<p>The Forum will continue to support Bob in his campaign to Stop Sewage Pollution at Whitburn.</p>
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	<p>AECOM say they stand by their EBPD yet I see no mention of these inadequacies in their advice or their evidence to the Forum that has allowed this plan to go forward.</p> <p>The Whitburn system is still subject to an ECJ judgement Ms Liz Parkes Deputy Director Climate Change & Business Services at The Environment Agency on the 30 July stated: -</p> <p>“You have raised a number of concerns about the operator’s compliance with the conditions of the permit. We are working with Northumbrian Water to regularise that situation and we will continue to engage with the community through the Whitburn Forum and encourage the operator to do the same. In relation to the adequacy of the permit, we are awaiting the judgement of the ECJ, and we will review and if necessary update the permit as a consequence of that judgement. We are not in a position to comment on exchanges between the European Commission and DEFRA”</p> <p>The European Commission replied to this statement on the 2nd November: -</p> <p>“That is very puzzling that they refer to waiting for a judgement from the European Court. I am really not sure what they mean. Our power to refer the UK to Court and request fines under the Treaty (Article 260 of the Treaty on the Functioning of the European Union) no longer applies to the UK so we are limited in our powers. The case remains open so we will continue to discuss but I would suggest that you raise this with the new Office of Environmental Protection (OEP). I would be curious what they say – they have been set up to replace the Commission in its environmental enforcement powers”</p> <p>This illustrates that ‘rigorous analysis’ by the Environment Agency is totally inadequate and in denial of the problem now, and it will be worse for future development overseen by the OEP. It is the duty of the local Council to independently ensure capacity in all infrastructure for new development and this should be an integral requirement of our Neighbourhood Plan.</p> <p>I have found the following comments made by a water company in relation to another plan, these comments express my views precisely and for that reason I include them in my objection: -</p>	
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	<p>“Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external flooding and pollution of land and water courses and/or low water pressure”</p> <p>“A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: ‘Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure for waste management, water supply and wastewater”</p> <p>“Paragraph 28 relates to non-strategic policies and states ‘Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure’</p> <p>Paragraph 26 of the revised NPPF goes on to state: Effective and on-going joint working between strategic policy-making authorities and relevant bodies (such as Whitburn Forum) is integral to the production of a positively prepared and justified strategy. In particular joint working should help to determine where additional infrastructure is necessary....</p> <p>In the absence of a Local Plan, I believe it is essential that the Neighbourhood Plan is allowed to be detailed and precise in setting out a Sewage Policy which can be adopted into the new Local Plan and which is independently verified to make our people and our environment safer than they are now. If this is not included – then the question has to be asked why not?</p> <p>If the assessment of this Neighbourhood Plan is to go before the Councillors I would like to ask if I could attend and speak to the Councillors.</p> <p>NOTE: Please also see Appendix 3</p>	
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019	South Tyneside Council	<p>Before commenting on the Plan, the Council would like to take this opportunity to commend the hard work that has clearly been undertaken on the part of the Forum to produce the document. One over-arching question / comment relates to what the plan defines as 'development' are there any scale parameters to this and the policies applicable? - a householder extension is very different to a major development.</p> <p><u>Chapter 2</u> Paragraphs 2.4 and 2.5 are not up to date and are therefore factually incorrect. The Council is preparing a new Regulation 18 pre-publication Local Plan.</p> <p><u>Chapter 4</u> There is no reference within the objectives and few within the Policies as to how this NP would contribute to addressing climate change through mitigation or adaptation. This is in conflict with the NPPF.</p> <p>Housing: It is unclear whether the objective refers to number of homes required or type and mix of homes.</p>	<p>Thank you for recognising our hard work.</p> <p>Development is used in the Plan in a way that aligns with planning legislation and policy (1990 TCPA). Major housing development is defined in WNP para 5.16.</p> <p><u>Chapter 2</u> Agreed. The Forum only became aware that STC was preparing a new Regulation 18 pre-publication Local Plan after the WNP submission. The Local Authority did not inform us of this directly or in time to amend the Neighbourhood Plan.</p> <p><u>Chapter 4</u> Addressing climate change through mitigation or adaptation is a theme that is woven throughout the NP and is specifically mentioned in:</p> <ul style="list-style-type: none"> - the main body of text (2.9 – 2.11) (context) - the vision (resilience, which is adaptation) - the objective on natural environment and GI (embedding cc adaptation and mitigation in policy) - the supporting text for WNP3, which is aimed at sustainable design to mitigate cc, whilst SuDs can help with adaptation - in the introductory text on Biodiversity, Green Infrastructure and landscape (combatting cc) - in the policy text for WNP7 on GI (how I can help with cc adaptation and mitigation). <p>Housing:</p>
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	<p>Whitburn Community: Amending 'Whitburn Village Centre' to 'Whitburn Local Centre' would ensure consistency with the development plan.</p> <p>Infrastructure: Northumbrian Water Ltd cannot refuse connections – necessary infrastructure identified by point of connection application to NWL.</p> <p><u>Chapter 5 Planning Policies</u> Housing Para 5.4 If the supply of brownfield land is limited then the objectives of securing more affordable homes and homes for older people could be at risk of not being met unless any assessment of the potential supply from brownfield sites has been undertaken and specific brownfield sites are identified within this Plan.</p> <p>Para 5.5 – 5.7 There is no obligation for the NP to contain policies on housing need nor is there an obligation to justify why there is no such policy.</p>	<p>The type of need is expressed in the relevant policy – the objective does not need this specificity as it is worked out in evidence (housing needs assessment) and policies.</p> <p>Whitburn Community: Noted</p> <p>Infrastructure: This statement is unclear. It should read- Once planning permission has been granted - Northumbrian Water Ltd cannot refuse connections. This would rightly put the onus on the planning authority to ensure sewage treatment capacity does exist before they grant planning permission (in line with the NPPF)</p> <p><u>Chapter 5 Planning Policies</u> Housing Para 5.4 Neighbourhood Plans do not need to seek land for allocation. In case a brownfield site becomes available for development and an application is made, it is prudent to refer to brownfield in the Plan. Please also refer to the NPPF, which includes reference to a sustainable development pattern by using brownfield land first. It is the local authority's responsibility to keep a register of brownfield land. Para 5.5 – 5.7 These sections do not claim this. It lays out the key issues that residents find important in relation to housing, as identified in consultation. This is the reason why a Housing Needs Assessment was undertaken.</p>
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	<p>Para 5.9 How would you define smaller schemes – WNP1 does not distinguish between larger and smaller schemes – only to housing proposals on brownfield sites. What if suitable larger brownfield sites become available which can happen?</p> <p>Para 5.16 NWL cannot refuse connections – correct use of drainage hierarchy will be applied but not always possible to avoid discharging to sewer network.</p> <p>Policy WNP1 If no assessment is undertaken to determine whether there is brownfield capacity it is questionable as to whether the WNP1 can be delivered with regards to the identified need for the mix of homes and affordable homes required given that no sites are specifically identified. It then remains unclear as the degree to which the Policy can then be monitored. Affordable housing: The use of the word “must” will effect proposals in terms of their viability. As with affordable, the policy states ‘all new homes must be built to meet Lifetime Homes Standards’. It is questioned whether this would impact viability.</p>	<p>Para 5.9 Note that the section states that the community is supportive of smaller schemes AND schemes on brownfield sites. This means they support development on brownfield sites, not that they only support small development on brownfield sites. If a large development on a large brownfield site is proposed, this would fall under WNP1. There is no definition of smaller schemes required as it is not included in the policy.</p> <p>Para 5.16 The onus is on the planning authority to ensure sewage treatment capacity does exist before they grant planning permission (in line with the NPPF). As there are concerns that applications have been approved without the right evidence, while there is ample evidence on sewage discharges in the Whitburn area, WNP13 aims to address this.</p> <p>The local authority can and should refuse planning permission when presented with prima facie evidence that sewage treatment capacity is insufficient to accommodate the proposed development (See our legal opinion and the assessment made by Aecom on the matter)</p> <p>Policy WNP1 It is clear from WNP1 policy text that ‘identified housing needs’ refers to housing mix and type. Any development should provide a mix. The WNP does not contain allocations, but it sets the policy which any planning application should comply with. Monitoring would assess approved planning applications in line with this policy (i.e. providing this mix). It is illogical to suggest that a housing policy should only apply to specific allocations.</p>
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	<p>The final paragraph refers to major housing developments, ‘major’ should be defined.</p> <p><u>WNP2 Built Environment and Whitburn Village</u> Parts of this policy might not be relevant or achievable on small scale developments, such as house extensions.</p> <p><u>WNP3 Sustainable Design</u> Criterion (a): this could cause overheating of a room requiring manual or mechanical ventilation. Criterion (b): this refers to building regulations rather than planning requirements, it is unclear how this would be assessed through a planning application. Criterion (d): could use (where practicable) added to reflect hierarchy of preference as not always achievable. Reference to scale of development also a factor in delivery of SuDs / hierarchy. Reduction of impacts on the local drainage network would have to be in accordance with drainage hierarchy - ie where practicable. It is not always possible to avoid discharging to local sewer network. Criterion (e/f): Clarity is required as to the number of cycle parking and electric vehicle charging points that would be required by the type of development and how would these differ from the current standards already in place at the Borough wide level. Note the Council is in the</p>	<p>Affordable housing policy is in line with local policy on affordable housing. The Lifetime Home Standard can ensure that a house is adaptable to various needs at minimal cost, which is a key issue in Whitburn, where there is a relatively large proportion of elderly people. ‘Major development’ is defined in section 5.16</p> <p><u>WNP2 Built Environment and Whitburn Village</u> The policy is called ‘Whitburn Design guidelines’. There is a duty to demonstrate for extensions as well how it incorporates high quality and sustainable design. Others might not be applicable to extensions, but this would be easily understandable from an application. The policy should not be limited to for instance major development, as minor development needs to consider design and points a-g.</p> <p><u>WNP3 Sustainable Design</u></p> <ul style="list-style-type: none"> a) There is no requirement to override other considerations b) Noted d) rewording it that way would not be in line with NPPF para 169 e/f) Noted. We cannot include parking standards that are still in development.
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	<p>process of updating its own parking standards. Criterion e refers to ‘larger developments’, it is unclear what the threshold is for this. Is it referring to major applications?</p> <p><u>WNP4 Whitburn Conservation Area</u> In the final limb, it would be necessary to outline those circumstances, where the loss of trees might be acceptable and the mitigation that would be sought. It is considered that the reference to the planting of two trees to replace each tree lost may be too prescriptive and not always achievable. I.e. what if there is a scenario where there would not be sufficient space for two trees, would a heavier standard tree to be planted not be an acceptable option. A tree afforded protection by virtue of being in the conservation area may have very little or no amenity due to age, condition or health.</p> <p><u>Para 5.25</u> It is a false assumption to assume the Trust would never bring forward proposals that conflict with WNP5.</p> <p><u>WNP7 Green Infrastructure Enhancement and Connectivity</u> It might not be feasible (practicable/viable) for some sites to ‘link’ with existing green infrastructure depending on where the application site is and/or what the nature of the major development is. The policy refers to native tree and hedge planting, whilst this is desirable at present it may be necessary to consider planting tree species suitable for the potential climatic changes over the coming decades. “Major development” should be defined.</p>	<p><u>WNP4 Whitburn Conservation Area</u> Unavoidable refers to the mitigation hierarchy: avoid, mitigate and as a last resort compensate. To avoid loss of biodiversity in the short term, two trees are required to replace one, while in the long term this would attribute to net gain. The South Tyneside GI strategy and the conservation area management plan, as well as the Whitburn heritage character assessment, all point to trees being part of the character of the Whitburn Conservation Area, showing the significance of trees. Attributing amenity to a tree is a subjective measure, whilst its natural capital value should not be forgotten as well.</p> <p><u>Para 5.25</u> It does not say that the National Trust would not bring forward proposals in conflict with WNP5. It refers to NT protecting the listed buildings in Whitburn – the National Trust aims to ‘preserve and protect historic places and spaces’. The statement is therefore correct.</p> <p><u>WNP7 Green Infrastructure Enhancement and Connectivity</u> Please refer to the evidence document on GI that shows the GI assets, which Whitburn has many of. GI refers to natural capital assets. The policy requires to link to GI adjacent or nearest to the site, which is entirely feasible – note that GI does not require access – this is just one function, so for instance planting trees that provide a link to existing trees near the development site would be</p>
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	<p><u>WNP8 Local Landscapes and Seascapes</u> There is no reference to Policy WNP8 on the policies map so criterion b, c, d, e and f are unclear. It therefore makes it impossible for both the applicant and the Local Planning Authority to assess proposals on this basis.</p> <p><u>WNP9 Local Green Spaces</u> The policy allocates Green Belt as Local Green Space. It is noted that the Planning practice Guidance states ‘If land is already protected by Green Belt policy, or in London, policy on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space’ (Paragraph: 010 Reference ID: 37-010-20140306).</p> <p><u>WNP11 Community Facilities</u> The supporting text does explain process if the use existing use is no longer viable/needed however we would highlight that there will be inevitably be future arguments on this point with any future planning applications, from those that don’t agree with process to determine undertaken / disagree with price marketed etc</p> <p><u>WNP13 Sewerage and Drainage Infrastructure</u> NWL cannot refuse connections and an point of connection application is likely to be the extent of the rigorous analysis the developer will carry out to identify sufficient capacity (should the discharge hierarchy point to a</p>	<p>suitable GI, depending on the site’s circumstances. It is not possible to be prescriptive as it is unknown what kind of proposals might come forward within the Plan’s timeframe.</p> <p>The WNP’s timeframe is until 2036, it is unrealistic to assume that there would be a great shift in species as a result of climate change within this timeframe. Major development is defined earlier in the WNP.</p> <p><u>WNP8 Local Landscapes and Seascapes</u> B,c,d,and e locations are described in the policy – it is entirely clear where these are, although if require, we can add it to the policies map as well.</p> <p><u>WNP9 Local Green Spaces</u> No, the policy clearly includes 7 local green spaces to be afforded the same protection as green belt. This refers to footnote 7 in the NPPF, where the presumption in favour f sustainable development does not apply to land designated as green belt and local green space. It therefore explains the level of protection to the local green spaces designated.</p> <p><u>WNP11 Community Facilities</u> Noted. The applicant will need to demonstrate why the use is no longer required, which needs to be sufficiently evidenced.</p> <p><u>WNP13 Sewerage and Drainage Infrastructure</u> The planning authority has a duty to ensure sewage treatment capacity (a material planning consideration)</p>
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	<p>NWL connection), we would expect the risk of system backup/flooding to be captured and mitigated within their Flood Risk Assessment/drainage strategy.</p> <p>In terms of the Policy Explanation, Northumbrian Water Ltd confirm that they have invested in the upgrading the sewer network (following the ruling from the Court of Justice of the European Union in 2012) within the Whitburn and Roker area and maintain there are no capacity issues within its network. Capacity continues to be monitored through its Drainage and Wastewater Management Plans and monitoring confirms that it is operating in compliance with the discharge permits issued for the Whitburn Storm Interceptor system has been determined by the Environment Agency. It should also be noted that should there be capacity issues, NWL cannot refuse connections to the existing network and is obligated to upgrade the network and treatment facilities at its own expense to ensure it continues to comply with the measures set down by the Environment Agency and Ofwat.</p> <p>With respect to paragraph 4 of the policy, it would be very difficult to disallow any surface water into the sewer system. There is an automatic right to discharge surface water into the public sewerage network.</p>	<p>exists before they grant planning permission. This has been explained in the legal opinion provided to South Tyneside Council. The consideration of granting planning permission has been recognised by the Supreme Court as the appropriate juncture when rigorous analysis is required. The evidence that sewage treatment capacity is insufficient in our neighbourhood area is overwhelming and has also been provided to South Tyneside council many times previously. In the absence of an independent Water Cycle study, it is not appropriate to accept bland, unevidenced assurances from the water company that capacity exists which is not backed up with the rigorous analysis that is requested in this NP. The rigorous analysis, either procured from the water company, or by way of a Water cycle study. The Flood Risk Assessment/drainage strategy you allude to ignores the massive volumes of sewage that is discharged into water bodies annually.</p> <p>Since 1989 over 500,000 tonnes of sewage has been discharged every year at Whitburn.</p> <p>The completed 'upgrade' has led to an increase in volumes of sewage in the three years since the work was completed compared with the previous 22 years</p> <p>The investment made by Northumbrian Water has proved to be inadequate. They were found to be non compliant with the Urban Waste Water Directive in 2012 and as recently as 2020 they have been confirmed by the European commission to still be non compliant. They are breaking environmental law with impunity. No UK authorities are challenging them in any meaningful way and they continue to pollute for profit</p> <p>Northumbrian Water may maintain there are no capacity issues but they fail to provide the data to evidence this</p>
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			<p>claim. South Tyneside Council have repeatedly been provided from various sources with evidence that the capacity does not exist.</p> <p>The Environment Agency have issued Northumbrian Water with an EPR compliance assessment report (Report ID: O/0743939) in May 2021 that confirms that Northumbrian Water is not operating in compliance with the discharge permits issued for the Whitburn Storm Interceptor system. Agreed - The problem is there are capacity issues and NWL are failing in their duty under the Water Act to upgrade their infrastructure to ensure they have sufficient capacity to properly drain their area.</p> <p>The compliance assessment report (Report ID: O/0743939) demonstrates that NWL is not complying with the measures set down in the permit issued by the Secretary of State for the environment and regulated by the environment agency.</p> <p>The policy does not disallow any surface water into the sewer system. It reads Proposals which allow surface water drainage into the combined sewer system will only be supported if the developer can demonstrate that the proposal is unable to make proper provision for surface water drainage to ground, watercourses or surface water sewers. It is perfectly reasonable to put the onus on developers to demonstrate that the proposal is unable to make proper provision for surface water drainage to ground, watercourses or surface water sewers.</p> <p>It is telling that Northumbrian Water as a statutory consultee have failed to comment in person on this draft neighbourhood plan.</p>
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	<p><u>WNP14 Transport Infrastructure</u> Question thresholds for TA / TP's – not all 'major's would need both. The policy states, 'Where required, these measures will be secured through a legal agreement' –however this would always be necessary / appropriate.</p> <p>"major development" should be defined.</p> <p><u>WNP15 Air Quality</u> It is currently unclear what evidence the policy and supporting text is based on.</p> <p>The Tyneside validation publication sets out specific triggers with regards to when an air quality assessment is needed, but this policy might be effectively needing them for all development.</p> <p>The potential for contaminated land will be addressed through the planning application but it may be worth having a paragraph within the plan which details this as well as the use of the YAPLAG guidance (Yorkshire and Lincolnshire Pollution Advisory Group) This is the guidance</p>	<p>It is not deemed appropriate that the local authority should speak on behalf of a consultee who has not engaged with this Reg 16 consultation exercise. This is especially pertinent in light of the copious amounts of evidence that the local authority has previously been supplied with on this matter that conflicts with the narrative that the local authority now puts forward on behalf of the absent consultee</p> <p><u>WNP14 Transport Infrastructure</u> Para 113 of the NPPF states what developments would require a travel plan, and that the application should also then be supported by a transport assessment.</p> <p>Major development has been defined earlier in the WNP</p> <p><u>WNP15 Air Quality</u> The evidence is explained in the supporting text and in the supporting document non air quality. It is also based on data or evidence provided by South Tyneside Council.</p> <p>The Tyneside validation publication triggers would not be suitable for Whitburn as they are not stringent enough and would cause an unassessed increase in traffic levels on roads with high traffic volumes in Whitburn. Air Quality is an issue in Whitburn that needs to be better addressed at the neighbourhood level.</p> <p>Noted on soils and we would support adding this – we would welcome the Council to support us in understanding whether this would be a neighbourhood issue (i.e. is there contaminated land in the neighbourhood area).</p>
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		which we would recommend developers look at when assessing land and the potential for any contamination.	
020	Doris Bowles	<p>I think the Neighbourhood Plan does not have enough details about what and where new building should be encouraged according to what local people said at the meetings etc.</p> <p>I am told that any building here must be on green belt land and that only the Council can decide on this, so what is the point of our neighbourhood plan?</p> <p>People like my family who want to live in Whitburn , cannot afford the new houses being built, and which will be built according to Story Homes for example. Older people’s homes like my own are not being properly used for local people.</p> <p>I do not think there is enough capacity for more traffic, or for the Doctors Surgery , or the schools or even the sewage systems for more houses so I expected the Forum’s Plan to have much more power to control this, or at least to be able to suggest suitable house sites with new capacity for the above. I think the plan must be enlarged, not restricted by adviser’s rules, or by the planners.</p>	<p>The WNP encourages the use of brownfield land for housing.</p> <p>The WNP sets rules for new development, to ensure it meets the needs of the community</p> <p>The WNP also sets rules for housing mix, affordable housing and adaptable homes (Lifetime Homes Standard).</p> <p>The WNP includes policies on community facilities, transport, sewerage and air quality. The WNP does not allocate sites for housing due to a lack of available brownfield sites and the presence of Green Belt land.</p>
001	Jules Brown	As a member of the Whitburn forum, I endorse the report’s contents and recommend it’s acceptance to direct the Council in formulating their Local Plan.	Noted with thanks
002	Natural England	<p>Thank you for your consultation on the above dated 11 October 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England supports the inclusion of policies WNP6 (Biodiversity and Geodiversity) and WNP7 (Green Infrastructure Enhancement and</p>	Noted with thanks

		<p>Connectivity), and does not have any other specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>NOTE: Please also see Appendix 1</p>	
003	Belinda Gibbs	<p>Hi. I think these proposals are very adequate. I agree with them. The forum has done a great job and put a lot of thought into this. It's very important to our community that these plans are beneficial to us.</p>	Noted with thanks
004	Historic England	<p>Thank you for consulting Historic England on the publication draft of the above neighbourhood plan. We are the public body that advises on England's historic environment.</p> <p>Historic England made a number of comments in relation to the pre-submission draft plan in our letter of 21 January 2021. We are pleased that these have largely been taken into account and we have no further comments to make.</p> <p>Thank you once again for the opportunity to comment. Please contact me should you require any clarification.</p>	Noted with thanks
005	Cllr Stan Wildhirt	<p>I support the Whitburn Forum Neighbourhood Plan.</p> <p>I share their concern about inadequate Sewage treatment from existing development and particularly adding to the quantity of untreated sewage flowing into The Sea at Whitburn and Marsden from any proposed new development, not only from the Whitburn area but also surrounding areas which share the same system of disposal.</p>	Noted with thanks
006	STEP (South Tyneside Environmental Protection)	<p>I am writing on behalf of South Tyneside Environmental Protection (STEP) campaign group to express our support for Whitburn Forum's neighbourhood plan.</p>	Noted with thanks

		<p>We are pleased to note that this plan has taken into consideration climate change, air quality and sewage pollution and has provided evidence to support these draft policies.</p> <p>STEP is deeply concerned about the level of sewage pollution in South Tyneside, so we are delighted to find a well written policy, backed up with evidence from years of research, in Whitburn's neighbourhood plan. Their Community Action plan to protect the wider area from sewage pollution which is blighting our local waterways is commendable.</p> <p>We hope these sound policies will inform South Tyneside Council's emerging local plan to protect South Tyneside from the effects of climate change, air quality and sewage pollution both now and in the future.</p>	
009	Sandra Larke-Walsh	<p>My name is Sandra M Larke-Walsh and I am writing in support of the neighbourhood plan produced and submitted to you by the Whitburn Neighbourhood Forum.</p> <p>A great deal of work went into this project. The village was consulted at every stage. Whitburn is under serious threat from many arenas (pollution, traffic density, un-checked development). It is vital that the needs of the village are understood before any future development is pushed through.</p> <p>The traffic and associated parking issues in the village are at a critical state. I live at 17 Lizard Ln, SR6 7AH and see the impact of increased traffic and unchecked speeding everyday. Neighbours have lost dear pets because of inconsiderate speeding. My driveway is regularly blocked by cars visiting the area.</p> <p>I have been heartened to see the level of commitment from the neighbourhood forum. Whitburn is a vibrant community and deserves to be considered as something worth preserving. The plan is the first step in encouraging that to happen.</p>	Noted with thanks

011	Avison Young OBO National Grid	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p>	Noted with thanks
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012	Coal Authority	<p>Thank you for your notification received on the 11th October 2021 in respect of the above consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features at surface and shallow depth, in the form of 6 mine entries. Any development proposals within areas where these features are present would need to take account of the risks they pose to surface stability and public safety.</p> <p>It is noted however, that the Neighbourhood Plan does not propose to allocate any sites for future development. On this basis we have no specific comments to make.</p> <p>Please do not hesitate to contact me should you wish to discuss this further.</p>	Noted with thanks
015	Robert Crooks	<p>I see that the Whitburn Neighbourhood Forum have submitted the draft Neighbourhood Plan to the council.</p>	Noted with thanks

		<p>The amount of work that has gone into this plan is enormous so I would like to say thankyou to the Forum for their hard work.</p> <p>The plan gives a full picture of the village of Whitburn and of the needs of its population. I covered some of these areas in my letter to the planning dept. on 9.10.2019 when the intention of the planning dept. seemed to be to develop Whitburn's green field sites into housing estates. I received no confirmation that you hade received my letter even though it was asked for, so whether my letter was read or thrown away I do not know.</p> <p>I can only hope that the planning dept. takes notice of the Draft Neighbourhood Plan from the Forum.</p> <p>I request to be notified of the Councils decision under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.</p>	
016	East Boldon Neighbourhood Forum	<p>East Boldon Forum welcomes the publication of the Whitburn Neighbourhood Plan Submission Draft as it brings forward a second neighbourhood plan in the Borough for examination.</p> <p>East Boldon and Whitburn have many connections and similarities. Many students from East Boldon travel to Whitburn for secondary education and many East Boldon residents visit the coast line at Whitburn. Both villages sit within the Tyne and Wear Green Belt, which protects their special characters and both villages have Conservation Areas at their centre. Both villages have experienced development pressures in recent years, which was illustrated by the 2019 draft Local Plan proposing a housing requirement of 397 new homes for the Whitburn Neighbourhood Plan area.</p> <ul style="list-style-type: none"> • East Boldon Forum endorses the vision set out in Section 4 of the document. • East Boldon Neighbourhood Forum also supports the Whitburn Neighbourhood Plan in its aim of supporting new housing where it meets identified local needs, supporting the use of brownfield sites and the conversion of existing buildings. <p>The plan places emphasis on policies relating to Biodiversity and Geo-diversity, Green Infrastructure and Connectivity, Local Landscapes and Seascapes and Local Green Spaces. All of these complement the Green Belt</p>	Noted with thanks

		<p>and strengthen the protection of the rural and coastal setting of the village.</p> <p>The Plan places particular importance on the discharge of sewage and its impact on the foreshore of the Whitburn coastline and the bathing waters at Marsden.</p> <p>East Boldon Forum notes the evidence provided to support the Sewage and Drainage Infrastructure Policy and the evidence provided in the Community Action Plan - Reducing Sewage Pollution at Whitburn. East Boldon Forum notes that the evidence base shows spills from two Combined Sewer Outflows (CSOs) within our Neighbourhood Forum Area. It is believed that these spills would flow into Tiled Burn, a tributary of the River Don.</p> <ul style="list-style-type: none"> • East Boldon Forum shares the concern of Whitburn Forum about sewage pollution within South Tyneside and has formulated a Community Action to work with others to encourage greater transparency and understanding of these issues. <p>It is noted that Policy WNP 14 supports providing a cycleway to connect Whitburn to Cleadon through Moor Lane and Cleadon Lane.</p> <ul style="list-style-type: none"> • East Boldon Forum supports this proposal as it will provide greater linkage to the cycleways within our Neighbourhood Area. 	
018	Lynne Jones	<p>Thank you for the opportunity to comment on the plan.</p> <p>Firstly, I must congratulate the Whitburn Neighbourhood Forum on the comprehensive nature of the plan and the extensive consultation and hard work that has clearly gone into it. Frankly, Whitburn Neighbourhood Plan is a spectacular document covering all the key areas of residents concerns and I sincerely hope South Tyneside Council take its contents to heart when preparing the Local Plan for the area.</p> <p>I am in full support of all of the Neighbourhood Plan. My support is strongest for the Plan's proposals for:</p> <ol style="list-style-type: none"> 1. WNP1 Housing. 	Noted with thanks

	<p>a. 5.7 Like most of the community, I am strongly opposed to land being removed from the Green Belt. Protections for Green Belt designated land have kept Britain a 'green and pleasant land' ever since the end of the Second World War and these protections should be respected.</p> <p>b. I would question the requirement for 397 new homes in Whitburn. The UK birth rate is at an all time low so where is the need coming from? Agree more affordable housing is needed and fewer executive homes, but I believe protections are needed to ensure such affordable homes are bought by South Tyneside residents. The last thing Whitburn needs is to have the same problems as Cornwall have where affordable homes are bought as second homes to be let out as Air BnB or holiday homes.</p> <p>2. WNP2. b) reflects, respects and reinforces local architecture and local distinctiveness, including through the use of sustainable modern design where appropriate; and c) respects surrounding buildings in terms of scale, height, form, materials and massing; This is very important. I note that these guidelines have already been ignored by South Tyneside council in allowing the development of a large dwelling on a small plot of land at the entrance to the Shearwater estate. The dwelling is completely out of proportion to all the houses on both the Shearwater and Whiterocks estate. It has already blocked out the seascape view shown on the Policies map from Mill Lane out to sea across LGS4 and LGS3. This is a disappointing current development by South Tyneside council so I would strongly support WNP2.</p> <p>3. WNP6 and 7. Strong support from me for this policy. This is a stunning coastline with specific endangered biodiversity and must be protected at all costs.</p> <p>4. WNP8. I would strongly agree with this policy and the comment at 5.55 that the community greatly values the rural and coastal character of the area and want to ensure that Whitburn remains a village with its own unique identity within the local authority and wider region.</p> <p>5. WNP13. Strong support from me here. It is appalling to think that half a million tons of sewage a year is being dumped into the North Sea right on our coast. It may be beyond South Tyneside's council's remit to</p>	
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	<p>enforce this but surely Northumbrian Water must be shamed into improving their infrastructure. It's clear that all the private water companies in the UK are happy to borrow money to pay dividends to their shareholders rather than spend it on improving infrastructure. Pressure needs to be brought to bear on the national government to act on this. Its 2021 – disgusting!</p> <p>6. WNP14 . Traffic and cycleways. The pandemic brought into focus the lack of pedestrian routes and well maintained cycleways in the area. I would strongly support all the measures suggested. Something must be done about the traffic on the A183, although I know there are no easy solutions. On a warm sunny day in summer traffic backs up from Whitburn centre past the Coast Road garage on Mill Lane.</p> <p>7. Finally, I would lend my wholehearted support to the 5 suggested Community Projects in Section 7.</p> <p>In short, this plan is well thought out and certainly reflects my concerns as a resident of Whitburn.</p>	
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