

Our Ref	Respondent	Representative	Chapter	Policy	Para/ Criterion	Support / Object	Submitted Comments
ST2171	Anneliese Hutchinson	Gateshead Metropolitan Borough Council	00 Local Plan			comment	<p>Thank you for providing us with the opportunity to comment on South Tyneside Council's Pre-Publication Draft Local Plan (the Plan). As neighbouring local authorities, cooperation on cross-boundary issues can positively influence sustainable patterns of development in Gateshead and South Tyneside.</p> <p>Gateshead Council would like to note our broad support for the emerging Plan and the spatial strategy it sets out. We are pleased that collaborative working between officers (as set out in the Duty to Cooperate Position Statement and relevant Statement of Common Ground accompanying the Plan) continues to support effective plan-making and implementation in both local authority areas.</p> <p>Summary</p> <p>Cooperation between local planning authorities on strategic cross-boundary issues is integral in preparing and implementing robust and sustainable Local Plan documents. Cooperation between Gateshead Council and South Tyneside Council to date has been of mutual benefit to the Councils and we are committed to ongoing collaborative working. In this respect, Gateshead Council would welcome further engagement with South Tyneside Council to consider detailed evidence of cross-boundary issues as it becomes available.</p>
ST2119	Kath Lawless	Newcastle City Council	00 Local Plan			Support	<p>Thank you for providing Newcastle City Council the opportunity to submit representations on the South Tyneside Local Plan. As we continue to implement the Gateshead and Newcastle Core Strategy and Urban Core Plan, and await the Inspector's Report on the Newcastle Development Allocations Plan, the South Tyneside Local Plan (STLP) Pre-Publication Draft will be of strategic relevance to us as a neighbouring authority.</p> <p>The STLP Duty to Cooperate Position Statement acknowledges the flow of South Tyneside residents who travel to work in Newcastle, creating an important functional relationship between the two councils. Opportunities for strategic infrastructure improvements are key to this relationship and can help to improve the vibrancy of our Urban Core. We therefore welcome proposals in Policy IN7 for sustainable public transport improvements, including the safeguarding of land for potential Metro and rail line extensions, and collaborative working with regional partners to improve bus services.</p>

ST2405	Graham Black	Durham County Council	00 Local Plan			Support	<p>South Tyneside Local Plan, Publication Draft for Regulation 18 Consultation, September 2019.</p> <p>Durham County Council welcomes the opportunity to comment on Northumberland's Local Plan Publication Draft.</p> <p>It is not considered that its provisions will give rise to an unacceptable adverse impact upon County Durham's environment or the amenity of its local communities. The council has considered the potential impacts of the draft plan upon County Durham's strategic interests and these are summarised below.</p>
ST1930	Gary Baker	Sunderland City Council	00 Local Plan			Support	<p>South Tyneside Draft Local Plan (Regulation 18) Consultation</p> <p>I refer to your consultation on the South Tyneside Local Plan (Regulation 18) (hereafter referred to as the Plan). Sunderland City Council (SCC) welcomes the opportunity to engage on the preparation of the Plan. SCC generally supports the aims and direction of the Plan and its embedded strategic objectives. Our comments are set out below in theme order.</p> <p>Future Engagement</p> <p>SCC appreciates the opportunity to comment on the proposed South Tyneside Local Plan and looks forward to further constructive discussions regarding the matters raised through this representation.</p>
ST1919	Andrew Rose	Barratt David Wilson Homes (North East)	00 Local Plan			Comment	<p>Spawforths have been instructed by Barratt David Wilson Homes (North East) to submit representations to the South Tyneside Local Plan – Pre-Publication Draft (Reg. 18) for their site at Cleadon Lane Industrial Estate.</p> <p>1.2. BDW consider that an up to date Local Plan is important for growth in the borough. BDW welcomes the opportunity to contribute to the emerging Local Plan for South Tyneside and is keen to further the role of South Tyneside within the North East Region as a whole.</p> <p>1.3. BDW would like to make comments on the following topics and sections in the Draft Plan:</p> <ul style="list-style-type: none"> • Policy H3 • Policy RG5 • Policy H5 • Policy H9 • Policy H10 • Policy H11 <p>1.4. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is made sound.</p> <p>1.5. BDW welcomes the opportunity for further engagement and the</p>

						<p>opportunity to appear at the Examination in Public.</p> <p>1.6. We trust that you will confirm that these representations are duly made and will give due consideration to these comments.</p> <p>1.7. Please do not hesitate to contact us to discuss any issues raised in this Representation further.</p> <p>National Planning Policy Context and Tests of Soundness</p> <p>2.1. The Government's core objectives as established through the 2018 National Planning Policy Framework (the 2019 Framework) are sustainable development and growth. Paragraph 11 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The 2019 Framework sets out to boost significantly the supply of homes and that a sufficient amount and variety of land can come forward where it is needed. In terms of building a strong and competitive economy the 2019 Framework states that planning should help create the conditions in which businesses can invest, expand and adapt. The key focus throughout the 2019 Framework is to create the conditions for sustainable economic growth and deliver a wide choice of high quality homes.</p> <p>2.2. In relation to Local Plan formulation, paragraphs 15 to 37 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.</p> <p>2.3. In relation to the examination of Local Plans, paragraph 35 of the Framework sets out the tests of soundness and establishes that:</p> <p>The Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p> <p>Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development</p> <p>Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p>
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							Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework. 2.4. This document therefore considers the content of the Pre-Publication Draft consultation document on behalf of BDW in light of this planning policy context.
ST2004	Lee Woolston		00 Local Plan			Comment	I fully support the aims of the Keep Boldon Green pressure group who have written to you separately on this matter. The repeated failure of council officers to directly address the concerns of this group regarding extension of the consultation deadline and elaboration on the technical appendices of the Draft Plan is quite frankly appalling and unprofessional. The strength of feeling I hope you have picked up on in this message I felt not only by me but by many of my friends, neighbours and acquaintances in the Boldons. The council is doing a very shoddy job of serving it's communities, particularly in the Boldons, should it continue to pursue this course of action.
ST2016	Mr Robert Crooks		00 Local Plan	consultation		comment	I am also concerned about the amount the local population has been informed about the Draft Local Plan. I have seen no notices around local estates, the route I usually take into the village seemed to have no notices. It was only walking into the village by a different route that I found a notice and was able to attend the last planning dept. meeting in the local library.
ST2067	Cllr James Sewell		00 Local Plan	New Issue		comment	Green belt area Off Monkton Village on site of Former Luke's Lane Primary School This land should be retained for recreational purposes by holding it for a potential extension to the Monkton Stadium to incorporate it into those sports facilities.
ST2095	Yasmin Otterson		00 Local Plan	Consultation		Comment	Finally, I would like to tell you that by then end of the lifetime of the Local Plan I will be 29 years old. It would seem that you have not spoken to the young people of South Tyneside about the details in this Local Plan. This could have been done through the schools in the Borough. We are the future generation and we should have been consulted. Thank you for reading my views and opinions. You will notice I have received a lot of help with this response as the grownups in my life have spent a long time concerning themselves about this plan. I hope you realise we are lucky to live in an area with large amounts of Green Belt and you realise that if you do go ahead to build on it you will change all of our lives in a very bad way.
ST2118	Miller Homes	Mark ketley	00 Local Plan			comment	1.1 Miller Homes is an award-winning property developer which has been building homes across the UK since 1934. Over the last 80 years the company has built more than 100,000 aspirational new homes including many sites in

						<p>South Tyneside. Renowned for building high specification properties of excellent quality, Miller Homes is committed to the highest standards of design, sustainability and contributing to the communities in which it builds whilst also recognising its responsibilities to the environment.</p> <p>1.2 These representations to the South Tyneside Local Plan Pre-Publication Draft consultation under Reg 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 are submitted to assist the Council in preparing a robust, sound and legally compliant development plan. They also seek to promote Miller Homes' land interest at the former Boldon Camp to the south of East Boldon as an additional site allocation in the emerging Plan.</p> <p>1.3 Whilst general commentary is provided in relation to the overall vision and strategic objectives of the Local Plan, the specific case being made for the inclusion of the land at the former Boldon Camp as an allocated housing site relates to draft Policies H1 and H3.</p> <p>1.4 Miller Homes land interest in this case is the subject of a detailed Vision Document prepared and submitted alongside these representations at Appendix A. This identifies the location of the land and sets out the vision for the site underpinned by detailed environmental and technical appraisals prepared by a highly experienced multi-disciplinary project team.</p> <p>1.5 Miller Homes believe there is a compelling justification for allocation of this site for housing in the emerging South Tyneside Local Plan to ensure the delivery of much needed housing growth in an attractive and strong market area and in a location that is close to a wide range of employment opportunities and is well connected to strategic road infrastructure and public transport links.</p> <p>1.6 There are no technical or environmental constraints that would prevent development on the site from coming forward, and the constraints and design opportunities identified through an analysis of technical appraisals have informed the preparation of an initial masterplan for the site included at Appendix B. This is explained in full in the accompanying Vision Document at Appendix A and demonstrates how the site could deliver up to 120 aspirational new homes within an exclusive residential development.</p> <p>1.7 Miller Homes are committed to ensuring that the correct provision of housing is provided throughout the Plan period, and in the right locations, to meet the social and economic needs of the Borough. The representations below set out a number of concerns in these respects in relation to the Pre-Publication Draft version of the Local Plan which should be addressed before it progresses to the examination stage.</p>
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						<p>Planning consultation: South Tyneside Local Plan, Pre-Publication Draft. (Regulation 18) consultation and accompanying Sustainability Appraisal Thank you for your consultation on the above dated 15 August 2019 which was received by Natural England on the same date.</p> <p>Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012</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 welcomes the strategic emphasis and overarching aims of the draft publication plan in seeking enhance and conserve the natural environment. Policies that have been included in the document seek to ensure the conservation, protection and enhancement of the borough's biodiversity and geological resources and reserve local, national and international priority species and habitats.</p>
ST2174	Aisling Parrish		00 Local Plan		comment	<p>Thank you for consulting Historic England on the pre-publication draft and Sustainability Appraisal for South Tyneside Local Plan. At present, we unfortunately do not have the capacity to offer comments on the stage, but please continue to consult us at subsequent stages.</p>
ST2175	Richard Swann		00 Local Plan		support	<p>PRE-PUBLICATION DRAFT (REGULATION 18) SOUTH TYNESIDE LOCAL PLAN (AUGUST 2019) REPRESENTATIONS</p> <p>On behalf of Minel Leisure Ltd (our client) we write with regards to submitting representations to South Tyneside Council as part of the Regulation 18 consultation on the Pre-Publication Draft South Tyneside Local Plan (PPSTLP) which is currently out for public consultation until 11th October 2019.</p> <p>This representation is made with specific regard to land at Whitburn Lodge, Whitburn (the Site). The PPSTLP proposes to remove land in this location from the Green Belt and allocate the sites for housing under Policy H3. Our client is the landowner of site allocation reference H3.73. The site is adjacent to two further site allocations- references H3.74 and H3.75. Together they form a land parcel of approximately 3.9 hectares and 122 homes.</p> <p>The sites are located immediately north of Shearwater, and east of Mill Lane. Whitburn is a village located near to the South Tyneside Coast, and lies south of Marsden Quarry, and north of the conurbation of Sunderland.</p> <p>The sites are within the existing Green Belt, however the Council have considered, as part of the emerging PPSTLP, that exceptional circumstances</p>

						<p>exist to review Green Belt boundaries to enable sustainable development to meet the needs of the Authority.</p> <p>As set out in these representations, our client considers that their site, along with proposed adjacent allocations, provide a sustainable extension to the existing settlement pattern of Whitburn.</p> <p>The Soundness of The Plan</p> <p>The revised National Planning Policy Framework (“the Framework”), published February 2019, sets out in paragraph 35 that local planning authorities should submit a plan for examination which it considers to be “sound”; namely that it is:</p> <ul style="list-style-type: none">▪ Positively prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed needs, is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated for where it is practical to do so and is consistent with achieving sustainable development.▪ Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;▪ Effective: the plan should be deliverable over its period and based on effective joint working on cross -boundary strategic matters; and▪ Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. <p>Our client is keen to ensure that the PPSTLP is prepared in a robust, comprehensive and sound basis which complies with the policies of the Framework and has taken heed of the information contained in the Planning Practice Guidance (‘PPG’).</p> <p>As drafted, our client supports the conclusions of the Authority that there are exceptional circumstances evidenced to propose amending its Green Belt boundary in order to allocate enough housing sites to meet its need. We therefore support the principle of the allocation of the site at Whitburn Lodge in the PPSTLP, however we consider that the evidence base should be modified to take into account the situation on the ground as well as the development of this site and adjacent sites and the positive impact this will have on the Green Belt. Detailed comments on this can be found below. Amendments are also required to Policy H3 in order to ensure the allocation of the site is sound.</p>
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ST2177	Mark Ketley	Barratt David Wilson Homes & Taylor Wimpey	00 Local Plan		comment	<p>1.0 Introduction</p> <p>1.1 These representations to the South Tyneside Local Plan Pre-Publication Draft consultation under Reg 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 are submitted to assist the Council in preparing a robust, sound and legally compliant development plan. They also seek to promote a joint land interest between Barratt David Wilson Homes (BDW) and Taylor Wimpey (TW) to the east of Luke’s Lane, Hebburn as an additional housing site allocation in the emerging Plan.</p> <p>1.2 Whilst general commentary is provided in relation to the overall vision and strategic objectives of the Local Plan, the specific case being made for the inclusion of the land east of Luke’s Lane as an allocated housing site relates to draft Policies H1 and H3.</p> <p>1.3 It is considered that there is a compelling justification for allocation of this site for housing in the emerging South Tyneside Local Plan to ensure the delivery of much needed housing growth in an attractive and strong market area and in a location that is close to a wide range of employment opportunities and is well connected to strategic road infrastructure and public transport links.</p> <p>1.4 There are no technical or environmental constraints that would prevent development on the site from coming forward and the site could deliver around 130 aspirational new homes.</p> <p>1.5 BDW and TW are committed to ensuring that the correct provision of housing is provided throughout the Plan period, and in the right locations, to meet the social and economic needs of the Borough. The representations below set out a number of concerns in these respects in relation to the Pre-Publication Draft version of the Local Plan.</p> <p>1.6 The most up-to-date version of the National Planning Policy Framework (NPPF) published in February 2019, and the associated Planning Practice Guidance (PPG), form the basis of the current national planning policy regime and it is against these policy and guidance documents that the soundness of the South Tyneside Local Plan will be assessed with paragraph 35 of the NPPF in particular stating that Local Plans will be found sound if they are:</p> <p>a) Positively Prepared - providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified - an appropriate strategy, taking into account the reasonable</p>
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ST2178	Neil Robinson		00 Local Plan	Consultation		objection	<p>WHY AM I OBJECTING?Low Simonside has not been consulted on the Local Plan, consultations were held in the following locations, none of which are easily accessible to the locals of Low Simonside;</p>
ST2185	James Seabury		00 Local Plan			comment	<p>1.BACKGROUND</p> <p>1.1 The Banks Group is a family owned, County Durham based company which has successfully operated for the last 40 years across coal mining, renewable energy generation and property development. We employ nearly 400 skilled people across Northern England and Southern Scotland. “Development with Care” is our guiding philosophy across all of our businesses and we work incredibly hard to ensure that communities in the areas where we have projects enjoy a positive experience through community engagement, responsible operating and community support. This approach is embedded within our culture and has been a key component of our long term planning success rate of over 85%.</p> <p>1.2 Within the Group, Banks Property Ltd (BPL) has a long track record in property development with a current portfolio of approved or allocated sites capable of delivering some 6,700 residential units. BPL will typically identify suitable sites, assemble land ownership interests, prepare coherent and sustainable proposals in consultation with the local community and negotiate a package of benefits with the local authority. Following the grant of planning permission, the company will normally procure the construction of essential site infrastructure in the forms of roads and sustainable drainage in readiness for a house building company to finalise the layout and house types and then build out the site. Larger sites are usually sub-divided between house building outlets which is a good way of accelerating housing delivery.</p> <p>1.3 Banks Property have been promoting land at Wellands Farm (also referred to as Lizard Lane) for a number of years through the SHLAA process to demonstrate how the site could be developed for housing development</p>

							and also to confirm that the site is available, suitable and deliverable. We have also previously submitted viability responses to the Council to inform the Local Plan and Community Infrastructure Levy (CIL) evidence base on a plan wide basis and also site specific viability information regarding land at Wellands Farm.
ST2187	Executive Members	Whitburn Neighbourhood Forum	00 Local Plan			Objection	<p>Response to the Emerging Local Plan – Pre-Publication Draft</p> <p>We, the Whitburn Neighbourhood Forum (WNF) have a number of concerns with the Emerging Local Plan – Pre-Publication Draft that was issued for consultation on the 18th August 2019.</p> <p>This report includes our concerns on a variety of topics and forms our response to the consultation on the draft plan. Firstly, we discuss our concerns on the way the community has been made aware of the plan. Then we discuss the conflicts between the draft Local Plan and the Neighbourhood Plan for Whitburn, which is currently in development. The Forum has consulted the Whitburn community in order to form this response. This included a forum meeting, as well as a survey. The responses to this are included in this chapter.</p> <p>Other sections cover various elements of the draft plan, including housing, infrastructure, natural environment and landscape / green belt. We have also included our views on the supporting documents that were submitted with the draft Local Plan.</p> <p>Lastly, a conclusion is drawn that summarises our concerns with the draft Local Plan.</p> <p>1. WHITBURN COMMUNITY CONSULTATION</p> <p>1.1. Local Plan consultation</p> <p>According to the National Planning Policy Framework (NPPF), paragraph 16, plans should: ‘be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees’.</p> <p>Whitburn Neighbourhood Forum is formed by the Whitburn community, but is also a designated neighbourhood forum and therefore a statutory consultee for planning purposes (as confirmed in a communication from the Ministry of Housing, Communities and Local Government).</p> <p>The Forum has met with the local planning authority on a variety of occasions, during which the Forum shared evidence developed for the Forum and neighbourhood plan, the output from consultation events with the community and draft neighbourhood plan policies. Evidence for instance included a housing needs assessment for the neighbourhood area. The Forum</p>

						<p>also requested updates on the development of the Plan's contents to inform our evidence development and plan-making process, however, no information on any policies or allocations relating to Whitburn were provided until the documents were published for the cabinet.</p> <p>Therefore, the plan makers have failed to engage the Forum effectively and proportionately and have refused to let the plan be shaped by the needs of the Whitburn community, nor has any evidence on the neighbourhood level been taken into account.</p> <p>1.2. Statement of Community Consultation</p> <p>In March 2016 South Tyneside Council produced a document called the Strategic Land Review which looked at all available land in the borough, including areas of green belt. Information about this document was widely circulated, with a copy delivered to each household in South Tyneside, inviting comments. Over 4,000 responses to these proposals were made across South Tyneside. Communication by the council was by all accounts successful.</p> <p>The Draft Local Plan was published on the South Tyneside website on 31st July 2019. The council approved the draft plan on 7th August. A consultation period started 18th August and closes on the 11th October 2019.</p> <p>According to the Statement of Community Involvement on the council's website:</p> <p>We will keep you informed through a variety of methods including: letters and e-mails, our website www.southtyneside.info our 'Local Plan' newsletter, the council's 'South Tyneside' magazine and through notices in the local newspaper.</p> <p>There is a marked difference in the way that South Tyneside Council have sought the views of the local community with respect to The Draft Local Plan as compared with the Strategic Land Review. There are details of the consultation period regarding The Draft Local Plan on the Council web site and drop in sessions have been arranged throughout the borough, managed by council staff. The South Tyneside Council did not deliver notices outlining The Draft Local Plan, inviting comments and advertising the drop-in sessions. At a Forum meeting held on the 20th September many residents were totally unaware of the plan other than advertising by the forum and were not aware of the drop in sessions being held in the village.</p> <p>We, the Forum believe that the council have not demonstrated an adequate and robust communication strategy seeking the views of the local community</p>
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						<p>with respect to the Draft Local Plan and more consultation is required before the Local Plan is agreed</p> <p>1.3 Consultation for the Neighbourhood Plan</p> <p>As part of creating the Neighbourhood Plan the Forum has been involved in a number of consultation exercises with the community.</p> <p>We had a series of workshops to elicit feedback of what the villagers liked and disliked about Whitburn. The community were asked to answer 5 questions:</p> <ol style="list-style-type: none">1. What do you like about Whitburn and want to keep?2. What do you dislike about Whitburn and want to change or improve?3. What does Whitburn not have that you would like it to have?4. What do you think the neighbourhood plan should address?5. Any other comments? <p>A high percentage of the comments referred to housing and green belt. The general feedback was that:</p> <ul style="list-style-type: none">● Developers were more interested in profit margins than local demand, building large executive style housing rather than affordable housing.● Development should be modelled on local need, including affordable housing and accommodation more suitable for the elderly e.g. bungalows.● Priority should be given to local families for social housing <p>The following table represents the percentage of comments relating to either greenbelt (retain) or development (must be based on need) considered sufficiently in the draft Local Plan. In fact, the draft Local Plan goes against the Neighbourhood Plan that is currently in development, which is based on extensive community consultation and the development of independent evidence.</p> <p>Based on these key issues, as well as further consultation events, a vision and objectives for the Whitburn area were developed:</p> <p>Vision</p> <p>Whitburn village will continue as a sustainable and well-supported, thriving community. It will conserve and enhance its unique character as a coastal village set within a rural environment with rich heritage and natural assets.</p> <p>Objectives</p> <ol style="list-style-type: none">1. Ensure that development is in keeping with and takes full account of any impacts on the local character, heritage, environment and setting of the village2. Ensure that development is of a high standard of design and meets the
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						<p>needs of residents of all ages, abilities, and economic means</p> <ol style="list-style-type: none">3. Preserve Whitburn’s rural setting and protect and enhance local landscape4. Retain and enhance Whitburn’s heritage assets5. Protect and enhance biodiversity and geodiversity6. Preserve and enhance local green spaces7. Support local businesses and improve the vitality and diversity of local shops8. Ensure sufficient facilities for residents of all ages, including educational, health, community and leisure facilities9. Promote safe streets, enhance sustainable transport links and reduce congestion <p>This vision and these objectives show what matters to the community in Whitburn. Residents value the unique character of the village and want to ensure that any future development meets the needs of the community. Yet impacts on those topics included in the vision and the objectives have not been met.</p> <p>5.2 Site allocation topic paper</p> <p>Appendix 1 wrongly states that the sites in Whitburn have been assessed as having a positive impact in the sustainability assessment. The sites were assessed as having a neutral effect, which is in fact described in the SA as: ‘the option could have a positive or negative effect against the objective however the effects are uncertain or unknown at this stage’. The SA or Plan makes no further attempts to make these impacts more certain.</p> <p>At the same time, there are sites discounted outside of Whitburn that are also assessed as having a neutral effect. There is a short description of why sites with a neutral effect are discounted, however, this is not replicated in the SA. These sites would surely have been assessed as having a negative effect in the SA. Why are the sites which have the same score in Whitburn taken out without further explanation? The SA is supposed to be the main evidence base that assesses negative effects from Plans and their allocations, yet South Tyneside Council has arbitrarily developed its own evidence that goes against the SA. It has decided that some impacts have more of an impact than the SA concluded, whilst not applying this to other sites. This means that the Council has given its own weighting to SA criteria, which means that either the SA is wrong, or the final selection of sites to be allocated is wrong. There should be more transparency in how sites were selected, including what sites were rated neutral or positive in the SA versus those selected for allocation in the topic paper. Currently, the assessment of</p>
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						<p>sites to be taken out of green belt is not based on evidence and the Plan is not sound.</p> <p>As effects are unknown and there is potential for the sites to have a negative effect on sustainability, the Plan does not promote sustainable development. Further evidence is required to ensure that development will not have a negative effect. As the Plan allocates these sites, these effects should be known at the Plan stage, instead of at the project stage, when it could turn out that adverse effects cannot be mitigated. The sites should be considered individually, but also cumulatively, to ensure all effects are taken into account.</p> <p>The site allocation topic paper contains further inaccuracies. The appendix containing the sites allocated for development at Wellands Lane and Cleadon Lane wrongly state that the sites will not have a likely significant effect on N2K sites. Any development this close to the Northumbria Coast SPA (6km) will have a likely significant effect, which is also reiterated in the Habitats Regulations Assessment.</p> <p>5.3 Green Belt review</p> <p>The green belt review is not valid. Purpose 5 only contains four categories from A – D, whilst the others contain 5 categories. This means that this purpose will be of less weight and will contribute to a more positive outcome overall for all sites. Mark C should be split in two, as there is a vast difference between impacts on sites that are developed versus sites that are adjacent to the urban area, but still undeveloped.</p> <p>The assessment is subjective and not linked to landscape assessments and GI assessments, whilst it is clear that landscape and GI contribute to the quality of green belt.</p> <p>5.4 Habitats Regulations Assessment</p> <p>The HRA is not fit for purpose. An HRA is supposed to inform a Local Plan and ensure that any impacts on European sites are avoided, mitigated or as a last resort compensated. As the HRA states: ‘at the screening stage of HRA, there is the opportunity to identify changes to the plan that could be made to avoid risks to European sites’. Figure 3 also shows that a stage 1 HRA is supposed to consider changes that might avoid or reduce effects. Yet it does not consider this at all.</p> <p>The HRA explains that the closer development is to a protected site, the larger the impact. This is based on evidence collected by South Tyneside Council on visitors to the protected sites, which showed that someone who lives within 1km from the coast will visit the coast 40 times more often than</p>
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						<p>those 7km away. Yet the assessment does not take this into account at all at a later stage; it only considers the average increase in the level of visits. Data on the number of visits relating to the distance a visitor lives from the coast should be visualised and taken into account in the HRA to show a disproportionate impact from development in Whitburn on protected sites. The HRA makes a prediction based on the Strategic Land Review (which makes the HRA out of date) and concludes an 8% increase of visitors, however, no attempt is made to estimate the total number of increased visits to the coast. It should be clear exactly what the impacts will be from development, in particular from development in Whitburn, to understand whether sites should be allocated, and if any proposed mitigation is likely to be effective.</p> <p>Moreover, the particular sensitivity of sites within 400m is considered briefly. It can be expected that as these sites are within the distance that dog walkers will make their daily walks (as the data from the visitor survey shows), the number of visits from sites close to the coast will be even higher and could be up to twice daily. Yet again, the HRA does not consider this.</p> <p>Visits to the coast are also linked to accessibility. The Whitburn coast is easily accessible, with the coastal park offering easy access to the SAC and regular places where visitors can go down to the SPA. The rocky foreshore, where the protected birds reside, are accessible from various beaches. As the HRA explains, local disturbance data 'highlighted that the greatest frequency of disturbance events related to walkers and their dogs at the coast. The surveys highlight that areas of interface where sandy beaches used for recreation meet the rocky foreshore are particularly prone to this kind of disturbance'. The popularity of the coast at Whitburn coincides with the habitat that is suitable for protected features at the SAC and SPA, meaning that disturbance to these features is even more likely.</p> <p>The HRA discusses impacts from sites within or at 400 meter distance from protected sites. The HRA concludes that: 'for the above housing sites there currently is not enough information to rule out adverse effects on site integrity at plan level'. This includes the sites at the Lodge and the two sites north of Shearwater. However, no attempt is made to consider whether these effects can be avoided or mitigated, yet, the draft Local Plan has already allocated these sites and included them into housing figures for the borough, without any alternatives. The HRA should have provided the evidence required on site allocations, instead of allocating first and then</p>
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						<p>assessing impacts at a later stage. Impacts should be considered at the earliest stage possible to allow for avoidance and mitigation.</p> <p>In addition, the HRA discusses the merit of a 400m exclusion zone, which various local authorities in the region have already established. Yet this is not considered at all in the draft Local Plan. The HRA also makes no effort to discuss the option of avoiding impacts by placing development farther away from the coast.</p> <p>All this means that no appropriate mitigation can be developed and there is no way to ascertain that the interim mitigation scheme is sufficient. The precautionary approach should be applied here to conclude that adverse impacts will occur.</p> <p>The HRA discusses that 'Durham Coast SAC is sensitive to air pollution and the supplementary advice for this site highlights that critical loads/levels are being breached'. The HRA lacks any consideration of how an increase in traffic could have impacts on protected sites and therefore is unable to apply any assessment to site allocations (which should have fed into the SA). As the critical levels and loads are being breached already, there should be an assessment of how any increase in traffic along the road in proximity to the protected site could have impacts on the designated features.</p> <p>Lastly, the HRA highlights the potential for 'water pollution primarily through the increased demand on the existing sewage treatment network leading to increased chemical nutrients in waste water. Coastal discharge from wastewater treatment works is also highlighted as a risk within the Regulation 33 advice package for the Northumbria Coast SPA. (...) It is understood however that there have been some localised issues such as the pollution incidents at Whitburn Pumping Station'. Again, the HRA makes no attempt to consider these potential impacts in detail and it cannot inform the draft Local Plan on whether the proposed housing development might have impacts on protected sites.</p> <p>As the European Commission is currently requesting further information on discharges from these works, whilst noting the high number of spills even after remedial works being undertaken, uncertainty remains whether an increase in housing could have adverse impacts on protected sites. According to the precautionary principle, it should therefore be presumed that adverse impacts will occur, until further certainty is provided on the functioning of the combined sewerage overflow and impacts on designated sites.</p> <p>The HRA is therefore inadequate – it does not provide any assessment of the impacts of the site allocations on N2K sites at this stage – it postpones any</p>
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						<p>assessment to later stages which means that the potential for avoidance and mitigation is significantly reduced. Furthermore, the draft Plan and SA do not include any assessment of impacts on designated sites, nor does the Plan follow the avoid-mitigate-compensate hierarchy as included in the NPPF.</p> <p>5.5 Policies map The policies map is difficult to read due to many overlapping designations. An interactive map should be developed that is accessible online, to allow residents to understand their local area and impacts upon this as a result of the Plan. Other local authorities in the region have already developed such an interactive map.</p> <p>5.6 Strategic Housing Market Assessment (SHMA) The SHMA is out of date as the latest version was updated in 2015.</p> <p>5.7 Transport assessment The transport study should be updated as it is out of date (2010).</p> <p>6.5 Final conclusion The Forum concludes that the draft Plan will have severe impacts on the village of Whitburn and its setting, as well as on the local community. We therefore OBJECT to the draft Local Plan. Evidence to support the Plan should be improved, impact assessments should be carried out accurately and site allocations and quantum of development in Whitburn should be significantly reduced.</p>
ST2191	Una Goodman	Resident	00 Local Plan			<p>Objection</p> <p>The Council exist to serve the residents who pay local taxes and that is in the hope that the quality of life in S.Tyneside is at the very least maintained or for the level of tax we pay, improved. Solve the existing problems, put in place the vital infrastructure or local councillors for this area will have to explain in detail why they are failing us. East Boldon already gets the shabbiest deal compared to other areas of S.Tyneside.</p>
ST2198	Cllr Hetherington	Councillor	00 Local Plan			<p>Support</p> <p>Good morning, After viewing the proposals for my ward, I am satisfied with the proposals and pleased that the current green spaces are being retained.</p>
ST2223	Roy Wilburn	Resident	00 Local Plan			<p>Objection</p> <p>With reference to my name and address above, I confirm that I endorse the document 'Formal objection in compliance with the deadline dated 31/07/2106 to 'Plan your Borough' following the Strategic Land review' with my consent.</p> <p>My signature should be treated as though I have submitted the above document as my individual response to the 'Plan your Borough' request for my views.</p> <p>Despite the standardised form and as agreed with Planners and the Council,</p>

							<p>this response should not be treated as one single response. The community of Boldon has worked collectively to produce a single and comprehensive document that we have agreed will count as an individual objection. In view of the short amount of time that I have had to respond to the Strategic Land Review, I reserve the right to submit additional information in the coming months as I see fit.</p> <p>My response should be read in conjunction with my individual response attached to this form.</p> <p>I respectfully request that you personally acknowledge my formal objection and respond to me in writing regarding the collective document and my individual comments.</p> <p>I also request that you keep me personally updated with any progress.</p>
ST2223	Roy Wilburn	Resident	00 Local Plan			Comment	<p>12.The Boldons are a sought after area to live in but with these proposals if given the go- a-head might just reverse the trend and inconsequence council will not benefit as much as was perhaps perceived in monetary terms. Just for once listen to what people are saying and not to the individual who has been brought in to replicate what transpired in North Tyne and ruin a perfectly good area that can be enjoyed by its residents.</p>
ST2236	Gleann Nicolas	Resident	00 Local Plan			Comment	<p>Is remarkable since the village association of Whitburn has receded away from people’s voice to councils. Now the local plan is regeneration. As much as possible the words of honest folk regarding the green belt and recreational activities is not the vote of the publics will and community. To stop people from seeing the green belt and coming together with heritage. South Tyneside Council is killing off the spirit of community and moving forward in the wrong. The neighbourhood forum isn't something on side as it's chairmen is seated among in regeneration (engineers) personal anyhow this is privatised outfit funded by yours and way of thinking. Of course, this type of exposure opens up talk designed to bring back the dead between community to activist roles however I've seen past as far more advanced projects, I know how and what is the likelihood. Does nothing towards minorities voice been heard. Only someone fairly stupid is going to say anything in particular the interception works currently on view in papers. If the council is looking for a fight like something communist over Ukraine, I'll give you the best warrior poet in the village can muster we have been prepared to publish the dealings behind the onslaught from mislead council estate from 80's to date.</p>
ST2242	Helen Jones	Resident	00 Local Plan			Objection	<p>With reference to my name and address above, I confirm that I endorse the document ‘Formal objection in compliance with the deadline dated 31/07/2106 to ‘Plan your Borough’ following the Strategic Land review’ with</p>

						<p>my consent.</p> <p>My signature should be treated as though I have submitted the above document as my individual response to the 'Plan your Borough' request for my views.</p> <p>Despite the standardised form and as agreed with Planners and the Council, this response should not be treated as one single response. The community of Boldon has worked collectively to produce a single and comprehensive document that we have agreed will count as an individual objection.</p> <p>In view of the short amount of time that I have had to respond to the Strategic Land Review, I reserve the right to submit additional information in the coming months as I see fit.</p> <p>My response should be read in conjunction with my individual response attached to this form.</p> <p>I respectfully request that you personally acknowledge my formal objection and respond to me in writing regarding the collective document and my individual comments.</p> <p>I also request that you keep me personally updated with any progress.</p>
ST2272	Byron Longstaff	Resident	00 Local Plan		Objection	<p>With reference to my name and address above, I confirm that I endorse the document 'Formal objection in compliance with the deadline dated 31/07/2106 to 'Plan your Borough' following the Strategic Land review' with my consent.</p> <p>My signature should be treated as though I have submitted the above document as my individual response to the 'Plan your Borough' request for my views.</p> <p>Despite the standardised form and as agreed with Planners and the Council, this response should not be treated as one single response. The community of Boldon has worked collectively to produce a single and comprehensive document that we have agreed will count as an individual objection.</p> <p>In view of the short amount of time that I have had to respond to the Strategic Land Review, I reserve the right to submit additional information in the coming months as I see fit.</p> <p>My response should be read in conjunction with my individual response attached to this form.</p> <p>I respectfully request that you personally acknowledge my formal objection and respond to me in writing regarding the collective document and my individual comments.</p> <p>I also request that you keep me personally updated with any progress.</p>

ST2284	Nicky Butler		00 Local Plan			objection	<p>Please find attached two documents containing my objections to and comments on the South Tyneside Local Plan- Pre Publication Draft.</p> <p>I object to the location sites proposed for housing, and the number of homes planned in East Boldon compared with the rest of the borough, the unsuitability of some of the sites for housing, and the loss of green belt, and the lack of consideration for wildlife, habitats and flora and fauna considering the recently publicised drop in numbers of hedgehogs, amphibians and wildlife in general, especially considering the loss of the same at the A19 junction and IAMP development.</p> <p>Site boundaries and boundaries of features such as wildlife corridors have been inaccurately drawn, and the plan sent to householders was barely readable, even to someone used to reading maps and plans.</p>
ST2285	Gillan Gibson		00 Local Plan			Comment	<p>CPRE Durham.</p> <p>Covers the “historic” county of Durham which includes South Tyneside</p> <p>Comment on:</p> <p>The South Tyneside Local Plan Pre-Publication Draft (Regulation 18) – August 2019 Consultation, 19th August to 11th October 2019</p> <p>GENERAL COMMENT</p> <ol style="list-style-type: none"> 1. This document is welcome as a further stage in the progress of South Tyneside’s Local Plan. 2. The Housing target of 350 per annum is nearly a third above rates of delivery in the past three years. We question whether this is realistic. It should be reviewed regularly and if delivery does not match it, the target should be reduced with sites currently in the Green Belt being removed first from the list of development sites in the plan. This follows practice in local authorities such as Leeds. 3. The following comment relates to particular parts of the document:
ST2293	Janine Gray		00 Local Plan			objection	<p>I wish to make an objection to your draft local plan.</p> <p>I live in in East Boldon. Your plan is to increase the population of East Boldon by around 40% by building on greenfield sites which seems grossly disproportionate. Having attended one of the consultation events i was told that the impact, in terms of traffic, increased demand on services such as schools, GP surgeries etc had not yet been assessed and that in all likelihood the plan would be approved without any linked plans for increased infrastructure. This is unacceptable</p> <p>We were also told that there were not sufficient brownfield sites available for development in South Tyneside and therefore you have no option but to</p>

							<p>develop greenfield sites. I'm led to believe that there is very little evidence of a proper review of brownfield sites. I believe you should provide further justification of why brownfield sites cannot be developed before developing greenfield sites</p> <p>Loss of greenfield will have a direct impact on flooding which is already problematic (in evidence all over the area after the recent rain). One cause of flooding is increased building/paving over land that would have been soaking up/draining excess water. Surely building in the scale you propose will have a detrimental affect on water drainage which is already problematic?</p>
ST2351	Kevin Ayre	Resident	00 Local Plan	H03.03		Objection	I am strongly opposed to the proposed development allocated with in Boldon of South Tyneside for the following reasons which are in support of the Keep Boldon Green campaign (previously reported upon in July 2016).
ST2494	Church Commissioners	Richard Swan	00 Local Plan			Comment	<p>1. The Soundness of The Plan</p> <p>The revised National Planning Policy Framework ("the Framework"), published February 2019, sets out in paragraph 35 that local planning authorities should submit a plan for examination which it considers to be "sound"; namely that it is:</p> <p>§ Positively prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed needs, is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated for where it is practical to do so and is consistent with achieving sustainable development.</p> <p>§ Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>§ Effective: the plan should be deliverable over its period and based on effective joint working on cross -boundary strategic matters; and</p> <p>§ Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p>
ST2494	Church Commissioners	Richard Swan	00 Local Plan			Comment	<p>1. The Soundness of The Plan</p> <p>The revised National Planning Policy Framework ("the Framework"), published February 2019, sets out in paragraph 35 that local planning authorities should submit a plan for examination which it considers to be "sound"; namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed needs, is informed by agreements with other authorities so that unmet need from neighbouring areas is

							<p>accommodated for where it is practical to do so and is consistent with achieving sustainable development.</p> <ul style="list-style-type: none"> • Justified: the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; • Effective: the plan should be deliverable over its period and based on effective joint working on cross -boundary strategic matters; and • Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
ST2504	Samuel Fisher	Chris Martin	00 Local Plan			Comment	<p>Introduction</p> <p>1.1 These representations have been prepared by Pegasus Group on behalf of our Client, Gleeson Regeneration Limited, in relation to the Pre-Publication draft of South Tyneside Council’s Local Plan.</p> <p>1.2 The Local Plan seeks to provide a framework for South Tyneside’s growth up to 2036. Once adopted, it will replace the existing suite of documents which currently make up the development plan for the Borough. Upon adoption it will therefore act as the starting point for making decisions for future development proposals.</p> <p>1.3 This consultation seeks comments from the general public, landowners and key stakeholders. As a housebuilder active in the area, our Client is keen to ensure that the Local Plan is prepared in a robust, comprehensive and sound way which complies with the policies of the National Planning Policy Framework (NPPF) and has cognisance of the content of the accompanying Planning Practice Guidance (PPG).</p> <p>1.4 The NPPF in paragraph 35 highlights that local planning authorities should submit a plan for examination which it considers is “sound”; namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

							1.5 Our comments on the Local Plan have been framed with references to these tests.
ST2505	Martyn Earle	Chris Martin	00 Local Plan			Comment	<p>1.0 Introduction</p> <p>1.1 These representations have been prepared by Pegasus Group on behalf of our Client, Bellway Homes Limited, in relation to the Pre-Publication draft of South Tyneside Council’s Local Plan. As well as providing general comments on the Local Plan, the representations also consider our Client’s land interest in the Borough.</p> <p>1.2 The Local Plan seeks to provide a framework for South Tyneside’s growth up to 2036. Once adopted, it will replace the existing suite of documents which currently make up the development plan for the Borough. Upon adoption it will therefore act as the starting point for making decisions for future development proposals.</p> <p>1.3 This consultation seeks comments from the general public, landowners and key stakeholders. As a major housebuilder in the Borough, our Client is keen to ensure that the Local Plan is prepared in a robust, comprehensive and sound way which complies with the policies of the National Planning Policy Framework (NPPF) and has cognisance of the content of the accompanying Planning Practice Guidance (PPG).</p> <p>1.4 The NPPF in paragraph 35 highlights that local planning authorities should submit a plan for examination which it considers is “sound”; namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. <p>Our comments on the Local Plan have been framed with references to these tests.</p>

ST2506	Mark Gabrele	Chris Martin	00 Local Plan		Comment	<p>1.0 Introduction</p> <p>1.1 These representations have been prepared by Pegasus Group on behalf of our Client, Bellway Homes Limited (North East), in relation to the Pre-Publication draft of South Tyneside Council’s Local Plan. As well as providing general comments on the Local Plan, the representations also consider our Client’s land interest in the Borough.</p> <p>1.2 The Local Plan seeks to provide a framework for South Tyneside’s growth up to 2036. Once adopted, it will replace the existing suite of documents which currently make up the development plan for the Borough. Upon adoption it will therefore act as the starting point for making decisions for future development proposals.</p> <p>1.3 This consultation seeks comments from the general public, landowners and key stakeholders. As a major housebuilder in the Borough, our Client is keen to ensure that the Local Plan is prepared in a robust, comprehensive and sound way which complies with the policies of the National Planning Policy Framework (NPPF) and has cognisance of the content of the accompanying Planning Practice Guidance (PPG).</p> <p>1.4 The NPPF in paragraph 35 highlights that local planning authorities should submit a plan for examination which it considers is “sound”; namely that it is:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; • Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; • Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework. <p>Our comments on the Local Plan have been framed with references to these tests.</p> <p>3.1 Overview</p> <p>3.1.1 Overall our Client supports the preparation of a new Local Plan for South Tyneside as it believes that if prepared in a sound and robust manner, an up to date development plan for the Borough will provide certainty for development going forward and will help promote sustainable growth.</p>
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							3.1.2 Nevertheless, our Client believes some areas of the Local Plan require amending so that it can be regarded as sound going forward. We detail these below.
ST2514	Dave McGuire		00 Local Plan			Comment	<p>I refer to the above document and your recent consultation with Sport England. Thank you for seeking our views on this matter.</p> <p>The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how they should be applied. It provides a framework guiding the preparation of development plan documents, associated evidence base and supplementary planning documents (Planning Policy). It is also a material consideration which should be taken into account when determining applications for planning permission (Development Management). Supporting this core objective, the NPPF states how the planning system should plan positively to achieve healthy places and provide the social, recreational and cultural facilities and services the community needs. This includes:</p> <ul style="list-style-type: none"> • enabling and supporting healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling (paragraph 91c); • planning positively for provision and use of shared spaces, community facilities (including sports venues and open space) and other local services (paragraph 92a); • taking into account and supporting the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community (paragraph 92b); and • guarding against unnecessary loss of valued facilities and services (paragraph 92c). <p>The importance of promoting healthy communities is a key focus of the NPPF in achieving sustainable development. The NPPF states that the overarching social objective of the planning system is: “to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.” (paragraph 8).</p> <p>The NPPF also states that: “access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health</p>

						<p>and wellbeing of communities” (paragraph 96). In providing specific detail on planning positively for open space, sport and recreational provision, the NPPF is clear that:</p> <ul style="list-style-type: none"> • planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreational facilities and opportunities for new provision (paragraph 96); • information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate (paragraph 96); • existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless one of three specific circumstances are met (paragraph 97); • planning policies and decisions should protect and enhance public rights of way and access including, providing better facilities for users (paragraph 98); and • land of particular recreational value to a local community can be designated as a Local Green Space affording it greater protection (paragraph 101). <p>It is against the backdrop of these overarching planning principles that Sport England reviews and comments on Local Plans.</p>
ST2530	Church Commissioners	Richard Swan	00 Local Plan	H03.74	Support	<p>Our client supports the site allocation for both site H3.74 and H3.75 in Policy H3 of the PPSTLP. Our client agrees that these sites are suitable, available and achievable to bring residential development forward phased in the short term. However, our client would object to the separate allocations of the site which is under one ownership. We would seek for the allocations to be merged together to reflect the land ownership, which it appears the council have acknowledged with site H3.74 identified as 1.8ha, approximately, the size of both allocations combined. The two site allocations, to become one allocation, are a logical extension of the existing settlement with defensible boundaries to the north of the site marked by Whitburn Coastal Park, the A183 Mill Lane to the west of the site and Shearwater to the south. The allocations boundaries, including the Whitburn Lodge, would be more effective and in line with national policy if they reflected land ownership. It is of importance to make the Council aware of the aforementioned inaccuracy with the site areas and number of homes allocated in the PPSTLP. The PPSTLP states that site H3.74, Land to North of Shearwater, is 1.8ha in size to provide 57 homes. However, this fails to reflect the size of the site noted in the Sustainability Appraisal and the Strategic Land Review, stated at an area of 1.27ha. As such, the PPSTLP is incorrect and needs rectifying. The</p>

						<p>site area of H3.75 is also erroneous. The site area is in fact 0.61ha, stated in the Strategic Land Review and the Sustainability Appraisal and not 1.27ha, as the PPSTLP states. This would be rectified by allocating our Client's land as one single site north of Shearwater.</p> <p>Our client is in agreement that the land is highly suitable and achievable for residential development. The land does not have constraints in terms of flooding or heritage impacts. Additionally, our client agrees that whilst the sites are Grade 3a agricultural land, the size of the both sites "provide a minimal amount of the borough's total supply", therefore the loss of the land would have very limited impact and the benefits of delivering housing in the borough to meet local housing need over the plan period would outweigh the very minimal impact. The screening of the site and its small scale also ensure that the development of the site would have a low impact on the surrounding landscape, simply mirroring the built residential form to the south of the site. The land is also highly accessible, as noted in the Site Allocations Topic Paper Appendix 1. Bus services stop approximately 150m south of the site, on Mill Lane, providing services to Sunderland, South Shields, Hebburn and Brockley Whins. The site is also highly accessible for pedestrian and cycle routes. Our client agrees with the Site Allocations Topic Paper Appendix 1 which highlights the proximity of areas of recreational open space to the site, promoting physical activity and health and wellbeing. The village centre of Whitburn is also to the south of the site, where local amenities including shops and a primary school are located.</p> <p>Our client would argue that the development of the site would have a low impact on the purpose of the Green Belt, with the site infilling the built form to the south of the site along Shearwater and Whitburn Lodge to the north. The infill would not encroach on to the countryside, nor would it result in the unrestricted sprawl of the built-up area and would preserve the existing special and separate character of the Urban Fringe village. The proposed landscaping to the site, with open space left to the east of the site, along the boundary with Whitburn Coastal Park and additional planting proposed along the west and south boundaries will serve to preserve the adjacent Green Belt. This landscaping would also ensure to preserve the surrounding landscape of Whitburn Coastal Area and the coastal park. Overall, our client would argue that the development of the site would have a limited impact on the green belt in terms of the NPPF definition.</p> <p>Our client has had an ecological appraisal undertaken for the assessment of the site. This concludes that the development of the site could provide</p>
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						<p>opportunities to extend and enhance the features of nature conservation, associated with marginal habitats such as the shrub and tree line. As such, developing the site for residential dwellings could harness these opportunities. The Strategic Land Review conducted for the site highlights this opportunity for mitigation “through design and environmental enhancements. Thorough consideration would be given to the adjacent nature reserve and European protected sites in the development of the site. To conclude, our client supports the allocation of sites H3.74 and H3.75 for housing in Policy H3 but strongly recommends the Council revises its allocations to refer to the site as one single allocation. Our client would argue that the site is fully suitable for residential development. The site allocation has defensible boundaries marked by the built for to the south and the north west of the site, the A183 Mill Lane to the west of the site and Whitburn Coastal Park to the east. The proposed landscaping to the site will serve to preserve the surrounding green belt and create a buffer between this and the housing development on site. Any ecological impacts can be mitigated to ensure the short-term delivery of the site to meet housing delivery across the borough.</p> <p>It is considered that the Council’s conclusions in relation to Land north of Shearwater, Whitburn are generally supported by our client through the allocation of the site in Policy H3 (Sites H3.74 and H3.75). However, our client would request that the Council amends its proposed allocation to follow land ownership boundaries, and allocates our client’s land as a single allocation. Our Client is committed to working alongside the Council in delivering the site and would welcome the opportunity to discuss in more detail how the site can be delivered during the plan period.</p>
ST2530	Church Commissioners	Richard Swan	00 Local Plan	H03.75	Support	<p>Our client has had an ecological appraisal undertaken for the assessment of the site. This concludes that the development of the site could provide opportunities to extend and enhance the features of nature conservation, associated with marginal habitats such as the shrub and tree line. As such, developing the site for residential dwellings could harness these opportunities. The Strategic Land Review conducted for the site highlights this opportunity for mitigation “through design and environmental enhancements. Thorough consideration would be given to the adjacent nature reserve and European protected sites in the development of the site. To conclude, our client supports the allocation of sites H3.74 and H3.75 for housing in Policy H3 but strongly recommends the Council revises its allocations to refer to the site as one single allocation. Our client would argue</p>

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ST2088	Joe Miller		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan
ST2089	Rebecca Bentley		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan
ST2090	James Otterson		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan
ST2091	Amy Whittington		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan
ST2092	Isla McCully		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan
ST2093	Isobel Emery		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan

ST2094	Georgia Slight		00 Local Plan			Objection	For all the above reasons I object to the Emerging Local Plan
ST2463	Shirley Ford		00 Local Plan			Objection	I also wish to agree with the points made by the Keep Boldon Green group that the Draft Local Plan is not positively prepared, it is not justified nor effective and it is in direct contravention of National Policy.
ST2203	Dorothy Tweddell		Miscellaneous		Consultation	Objection	1. Receiving this leaflet on 6 September and seeing on form that we could have commented on Monday 2 September 2 p.m. - 8.30 p.m. at Cambrian Street Jarrow NE22 3QN and Wednesday 4 September 2 p.m. - 8.30 p.m. Lukes Lane Community Centre, Lukes Lane, Hebburn NE31 2BA, and Thursday 5 September 2 p.m. - 8.30 p.m. Hedworthfield Community Centre, Cornhill, Jarrow, NE32 4QD is at least remiss for us receiving this nearly 5 days after we should have received said leaflet and commented in our area. We now have to travel to the East Boldon "Scout Hut" on 7 September to receive any information about your Draft Local Plan Consultation. Why would you make it so difficult when you could have had your leaflets delivered at a more reasonable time
ST2209	Delia McNally		Miscellaneous		Consultation	Objection	I am a concerned resident, member of Cleadon and East Boldon Ward Labour Party and member of East Boldon Neighbourhood Forum. I would like to explain my concerns about the Draft Local Plan published at the start of the South Tyneside School Holiday period. To publish at the start of the school holidays when many of the Forum members including the Executive committee were unavailable to respond is unfair. An application was made for an extension to the consultation period on these grounds and we discovered yesterday the application was refused. I believe this to be unfair. East Boldon Neighbourhoods Forum is a constituted body and as such should be recognised by our Council when making important decisions that will affect the Forum area. Forum Executive members met regularly with planners and had no inkling of the scale of development proposed in the Draft Local Plan.
ST2221	Andy Moore		Miscellaneous		Consultation	Objection	I have just found out through word of mouth about the proposed building of houses next to Fellgate Estate. Firstly I would like to comment that the proposal has not been communicated well, no one I have spoken to seems to know about it. Or the plans in any detail. I feel let down and disappointed by this lack of consultation.

ST2331	Samantha McDonald		Miscellaneous		Consultation	Objection	Firstly, I think it is disgraceful that the residents of Whitburn have not been formally told of these plans other than a publication on the website and an article in the Shields Gazette. As a unique coastal village, with residents who want to keep it that way, I think the least the council could have done was a direct mail out to all residents to give them a fair chance of opposing such plans. Leaflets were sent out prior to housing where the Old Rifle Range was, so why not inform us of such a huge development plan this time?
ST2553	Phillip Balmer		Miscellaneous		Consultation	Comment	On the issue of the rushed nature of the publication of the Draft Local Plan, I would like to make a final objection to the cynical nature of the methods used by the team that drew up the plan. To publish a plan in the middle of the summer holidays, when many residents are not at home, to publish a plan with so many pages as to be inaccessible to ordinary residents and to deny an extension of the time before the response deadline, is inexcusable and shows scant respect for residents whom, I sincerely hope, will be able to overturn this plan, with its raft of high-sounding policies and inconsistent implementation. I look forward to your acknowledgement of this letter and your response.
ST2193	Ian Beattie		Miscellaneous		Consultation	Comment	THE CONSULTATION PERIOD SHOULD BE EXTENDED TO ENABLE FULL AND MEANINGFUL FEEDBACK. The Council has not provided a full and comprehensive set of data to support their Plan. I therefore do not accept the deadline imposed and reserve the right to continue to submit comments, objections and questions beyond that arbitrary deadline. Please answer the questions I have asked.
ST2014	David Williams		Miscellaneous			Comment	2. I understand from the Cleadon Action group (Peter Cranshaw and associates) that they have prepared detailed objections to many aspects of the draft plan, particularly where it concerns the greenbelt around Cleadon Village as well as giving useful and relevant information not previously available to me. I have read documents produced by this group, and I fully support what they have been writing, so I shall not repeat all this here. My submission is essentially all my own work and opinion on a few important aspects.
ST2393	Mr William Wilkinson		Miscellaneous			Comment	6. If you do pass the plans for the development to go ahead, what is the next step. Do they have to be approved by a Governmental department? I am not a planner and therefore do not have any knowledge of the required procedures.

ST2408	Dr Jonathan Richardson		Miscellaneous		Playing Pitch Strategy	<p>Support</p> <p>I am a resident of East Boldon, Chair of South Shields and Westoe RFC Juniors, a father of two boys who play for South Shields and Westoe RFC, and a Psychiatrist by profession. I have the following comments to make about the Draft Local Plan in three areas: Playing Pitch Strategy, Development within the East Boldon Neighbourhood Forum area and wider Boldon area, and the development of playing fields in West Boldon. Firstly, I wish to register my support for all the Rugby recommendations laid out in the South Tyneside Playing Pitch Strategy February 2019: Page 22 https://www.southtyneside.gov.uk/media/41714/South-Tyneside-Playing-Pitch-Strategy-2019/pdf/South_Tyneside_Playing_Pitch_Strategy__2019.pdf with particular support for the recommendations “Existing quantity of rugby union pitches to be protected (unless adequately re-provided elsewhere in accordance with Sport England’s Playing Fields Policy Exception E4)”; “Seek to maximise use of the World Rugby Compliant 3G pitch at the Harton Academy, particularly for training to help address overplay” and most importantly “Should South Shields Westoe RFC not relocate to Temple Memorial Park, as part of South Shields & Westoe Club, then the alternative sites will need to be investigated given the current and future shortfalls on the site”</p> <p>South Shields and Westoe Rugby Football Club Juniors section currently fields teams from the ages of U7s to U18s and has to utilise venues across the borough and region for both training and matches due to the lack of adequate facilities at the current club at Wood Terrace; these include Harton School, Mortimer School, Temple Park, Harton Welfare and as far as Blaydon Rugby Football Club.</p> <p>We are unable to use the Rugby compliant 3G pitch at Harton School as it has been block-booked by a football team for 3 years and this has caused significant disruption to the junior section’s training programme in all age groups.</p> <p>We have teams visiting Westoe from all over the North East and quite frankly the current club is not fit for purpose; it undermines the efforts to attract tourists to South Shields for other leisure pursuits, and therefore undermines the South Shields 365 strategy, the Local Plan’s Spatial Vision and Strategic Objectives and Policy ED6: Leisure and Tourism.</p> <p>Firstly, I wish to register my support for all the Rugby recommendations laid out in the South Tyneside Playing Pitch Strategy February 2019: Page 22 https://www.southtyneside.gov.uk/media/41714/South-Tyneside-Playing-Pitch-Strategy-2019/pdf/South_Tyneside_Playing_Pitch_Strategy__2019.pdf with particular support for the recommendations “Existing quantity of rugby</p>
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ST2255	S Drummond		Miscellaneous		Diversity	Objection	<p>Thank you for the opportunity to comment regarding the housing development plan. My main comment is to say that the images/photographs used (that show people) are not very diverse. As a previous member of staff for another local authority I would have never seen such a lack of diversity allowed for any publication from them. I understand that there may be a difference in demographic, however, if people can't see themselves in roles then they may never aspire to be in those roles. I know this may not be 'the point' in your publication but as a local authority you have the responsibility to be diverse and I know from personal professional experience that such stereotypical images would not have been allowed from my previous employer so I wanted to highlight this. I really hope that you consider my concerns seriously.</p>
ST1940	Angela Curtis		Miscellaneous		Equality and Accessibility	Objection	<p>4. Accessibility</p> <p>I emphasise the need to place accessibility at the heart of the Local Plan as there is currently no mention of disabled people within the document at all. Barriers to inclusion are not homogenous and thus it is necessary to consider</p>

							the needs of different groups while formulating policies (which is a requirement under the Public Sector Equality Duty). Consequently, there is a need for clauses to be inserted into policies to ensure they are delivered in the most inclusive way. This approach should be taken across all policy areas in the finalised Local Plan. I respectfully request that a copy of the Equality Impact Assessment for the Emerging Local Plan be sent to me at your earliest convenience. As this is not publicly available at the time of the consultation, the ability of myself and other respondents to provide informed feedback pertaining to this topic is limited.
ST1933	Beverley Usher		Miscellaneous			Comment	In addition to my formal objection already submitted, I would urge South Tyneside council to pay attention to the Rt hon Esther McVeys report in respect of Broxtowe local plan dated 2nd October 2019.
ST1934	Brian Usher		Miscellaneous			Comment	In addition to my formal objection already submitted, I would urge South Tyneside council to pay attention to the Rt hon Esther McVeys report in respect of Broxtowe local plan dated 2nd October 2019.
ST0049	Linda Charlton	Resident	Miscellaneous			Comment	<p>I <u>STRONGLY OBJECT</u> TO <u>ALL</u> PLANS PUT FORWARD BY <u>GEOFF THOMPSON - S.S.F.C.</u></p> <ol style="list-style-type: none"> 1. BIGGER "STAND" THE NOISE AS IT IS, IS <u>LOUD</u> ENOUGH. WE <u>DO NOT</u> WANT MORE NOISE. 2. CUTTING ALL THE HEALTHY TREE'S DOWN 3. OPENING UP <u>TAVISTOCK PLACE</u> - THERE IS A <u>PUBLIC FOOTPATH</u> AT THE END OF THIS STREET PASSED BY <u>LAW</u>. THE STREET IS VERY SMALL AND NARROW. AND VEHICLES FROM THE 70 DWELLINGS WOULD MAKE IT A NIGHTMARE FOR THE RESIDENTS. 4. THE BUILDING OF 70 DWELLINGS WHICH WILL COME WITH AT LEAST 70-100 VEHICLES THERE IS ENOUGH VEHICLES ON THIS EST WITHOUT ADDING MORE. THIS IS A 20 M.P.H ZONE AND PRIME TIME IS VERY VERY BUSY TO GET ON AND OFF THIS EST. THEREFORE ADDING MORE VEHICLES WOULD BE A NIGHTMARE. 5. WE ALSO DO NOT NEED ANOTHER PUB. <p>IF HE WANTS TO EXPAND GO SOMEWHERE ELSE AND LEAVE THIS EST ALONE.</p>
ST0362	Gary Frazer	Resident	Miscellaneous			Comment	Health and Wellbeing of Residents: What investigations have taken place regarding the largest site being a burning burial site for cattle during past outbreaks of foot + mouth disease which could be a threat to the health and wellbeing of residents.

ST2320	Dr Kirstin Richardson		Miscellaneous		Playing Pitch Strategy	comment	<p>I am a resident of East Boldon, Chair of East Boldon Neighbourhood Forum (EBNF), a mother of two boys who play for Westoe Rugby Club, and a GP by profession. I have the following comments to make about the Draft Local Plan in three areas: Playing Pitch Strategy, Development within the East Boldon Neighbourhood Forum area and wider Boldon area, and the development of playing fields in West Boldon. Firstly, I wish to register my support for all the Rugby recommendations laid out in the South Tyneside Playing Pitch Strategy February 2019: Page 22</p> <p>https://www.southtyneside.gov.uk/media/41714/South-Tyneside-Playing-Pitch-Strategy-2019/pdf/South_Tyneside_Playing_Pitch_Strategy__2019.pdf with particular support for the recommendations “Existing quantity of rugby union pitches to be protected (unless adequately re-provided elsewhere in accordance with Sport England’s Playing Fields Policy Exception E4)”; “Seek to maximise use of the World Rugby Compliant 3G pitch at the Harton Academy, particularly for training to help address overplay” and most importantly “Should South Shields Westoe RFC not relocate to Temple Memorial Park, as part of South Shields & Westoe Club, then the alternative sites will need to be investigated given the current and future shortfalls on the site”</p> <p>South Shields and Westoe Rugby Football Club Juniors section currently fields teams from the ages of U7s to U18s and has to utilise venues across the borough and region for both training and matches due to the lack of adequate facilities at the current club at Wood Terrace; these include Harton School, Mortimer School, Temple Park, Harton Welfare and as far as Blaydon Rugby Football Club.</p> <p>We are unable to use the Rugby compliant 3G pitch at Harton School as it has been block-booked by a football team for 3 years and this has caused significant disruption to the junior section’s training programme in all age groups.</p> <p>We have teams visiting Westoe from all over the North East and quite frankly the current club is an embarrassment to South Shields; it undermines the efforts to attract tourists to South Shields for other leisure pursuits, and therefore undermines the South Shields 365 strategy, the Local Plan’s Spatial Vision and Strategic Objectives and Policy ED6: Leisure and Tourism.</p>
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