

| Our Ref | Respondent | Representative | Chapter | Policy | Para/ Criterion | Support /Object | Submitted Comments |
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| ST2527 | Story Homes | Lichfields | 11 Planning for our natural environment | NE02 | | Objection | <p>Story Homes recognises the importance of protecting biodiversity; however, draft Policy NE2 requires that proposals which will have an impact on a habitat comply with various criteria, including that there are no reasonable alternatives (2h and 3k). The NPPF (para. 175) does not refer to the need to consider alternatives, instead it seeks adequate mitigation, or, as a last resort, compensation.</p> <p>To ensure a sound Plan that is consistent with national policy (NPPF, paragraphs 35 and 175), our client requests that the reference to 'reasonable alternatives' is removed from Policy NE2.</p> |
| ST2527 | Story Homes | Lichfields | 11 Planning for our natural environment | NE03 | | Objection | <p>Story Homes considers that draft Policy NE3 could be used to support an approach towards green infrastructure that is more onerous than the NPPF and there may be circumstances where not all the criteria in this policy need to be strictly applied. When this is taken into consideration with our earlier comment on paragraph 9.7 (site specific design briefs) there is a risk to the delay in the delivery of new homes.</p> <p>To ensure a sound Plan that is based on the most appropriate strategy, in accordance with the NPPF (para. 35), it is requested that the policy is amended as follows:</p> <p>"We will deliver a good quality and accessible network of green spaces throughout the Borough to provide a range of social, economic, health and environmental benefits for all. This will be done by <u>undertaking the following, where appropriate...</u>"</p> |
| ST2527 | Story Homes | Lichfields | 11 Planning for our natural environment | NE04 | | Objection | <p>Story Homes understands the importance of green space and green infrastructure provision. However, draft Policy NE4 requires that developments provide onsite open space facilities which contribute to the green infrastructure in accordance with Developer contributions SPD 5 or any successor document; or that off-site contributions would be sought that have regard to various council studies and strategies, as well as successor documents.</p> <p>Our client is concerned that this policy is referring to a range of documents and successor documents but that the associated feasibility and viability of delivering their requirements has not been fully taken into account, especially given that the successor documents have not been prepared. As such, the full cost implications of this policy have not been taken into account in the Local Plan viability assessment work and this could have a negative impact on development viability.</p> |

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| | | | | | | | <p>To ensure a sound Plan that is positively prepared and based on appropriate evidence, in accordance with the NPPF (para. 35), the following changes are sought to this policy:</p> <p>“New major housing developments will be required to provide onsite open space facilities, <u>where possible</u>, which contribute to the green infrastructure in accordance with <u>a scheme that is to be agreed with the council, whilst taking into account the</u> Developer Contributions SPD 5 or any successor document.”</p> <p>“Where provision cannot be provided on-site, we will seek the equivalent off-site financial contributions, <u>taking into account site viability</u>, where....”</p> <p>In such circumstances off-site financial contributions will be sought for the following, <u>taking into account site viability</u>:...</p> |
| ST2413 | David Adamson | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority’s declaration of a Climate Emergency. The draft Local Plan seems ‘rushed through’ without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2101 | Mr Eoghan Johnston | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7 Climate Change Crisis - Policy NE1</p> <p>on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head.</p> |

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| ST2102 | Mrs Kathryn Tutill | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7 Climate Change Crisis - Policy NE1 on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2100 | Miss Amy Forbister | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>6 Climate Change Crisis - Policy NE1 6.1 on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2010 | Joe Thompson | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>6.0 Climate Change Crisis 6.1 The recent 'State of Nature' report suggests that 41% of UK species studied have declined, with butterflies, moths and bats amongst the hardest hit and highlights that the decline is down to ongoing changes in the way the Country manages its land, the ongoing effects of climate change and new pollutant threats which continue to emerge.</p> <p>6.2 On 18th July 2019, South Tyneside Council declared a Climate</p> |

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| | | | | | | | <p>Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. The drive for Executive Houses when affordability is the key issue is difficult to understand. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The Local Plan is probably one of the key mechanism by which we can addressing the Climate Change Crisis and yet it seems 'rushed through', being published a matter of weeks after the Crisis was declared by the Authority. There seems to be little analysis or public consultation on how it should address one of the most pressing issues of our times.</p> |
| ST2012 | Ruth Geary | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2407 | Peter Youll | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter</p> |

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| | | | | | | | <p>climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2409 | David Tutill | | 11 Planning for our natural environment | NE04 | | Objection | <p>Thirdly I would like to object to the development of the Playing fields at Disco Field, Henley Way, ref: H3.60 with 45 dwellings and of the open space at Dipe Lane/Avondale Gardens, ref: H3.69 with 17 houses. These developments directly oppose the Plan's policy NE4: Open Space and Green Infrastructure: "As defined by the Policies Map, we will seek to protect and enhance designated areas of open space, outdoor sports, playing fields and children's play facilities and the wider green infrastructure network....." and The Physical Activity Strategy (2019); In Chapter 2 the problems we have in South Tyneside with unhealthy Lifestyle Choices, Obesity and Health Inequalities have been set out and in chapter 3 the draft plan states," Promoting Positive Healthy Choices, xiii. To improve the physical and mental health and wellbeing of our communities by supporting healthy and active lifestyle choices. Providing a physical environment which encourages physical activity and social interaction though high-quality open spaces, green infrastructure networks, sports facilities and safe communities....." yet these proposals take away green space that can be used for play and activities in very densely populated areas. There is a more than 10-minute walk with busy roads to the nearest open spaces from either of these sites. It is proposed that the play parks remain, but they do not facilitate games such as football and other running games for children and families, or outdoor activities like picnics. I believe that the development of these two sites directly contravenes all of the Local Plan policies to do with health and wellbeing and open green spaces.</p> |
| ST2546 | Steven & Lorraine Riggins | | 11 Planning for our natural environment | NE01 | g | objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects</p> |

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| | | | | | | | <p>of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2509 | Louise Rea and Keith Mackey | | 11 Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. (Ref: draft Local Plan policyNE1)</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2408 | Dr Jonathan Richardson | | 11 Planning for natural environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to</p> |

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| | | | | | | | injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST1968 | Graham Mason | | 11 Planning for our Natural Environment | NE01 | g | Objection | The proposed development in areas around and on green belt sites are rather short sighted. As a resident of south Tyneside and South Shields for most of my life it would be great to see some actual 'vision' in one of these local plans. I object profusely to building in green belt land. It provides space, views, walks and general well-being opportunities for all only a short distance from suburban areas. There are many sites in South Tyneside for development that would provide a different future for the area. The riverside area like Roth Tyneside should be developed, the old school at Brinkburn and Temple Park Leisure Centre sites are sitting and deteriorating. The general feel and image of these places degrade the outside opinion of south Tyneside as having no creative vision for existing sites that could be amended. |
| ST0001 | Sarah McKeown | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | Although a number of policies in the plan pay lip service to climate change in their 'vision and objectives', this is not translated into concrete plans. The continual reference to the policy of 'mitigation and adaptation' to climate change is extremely worrying as it allows for carbon emissions to be increased by the plan as long as mitigation measures which may or may not be successful (such as more EV charging points and housing developments near woefully inadequate public transport hubs with no guarantee that they will be used by the public or incentives to do so) are put in place. This does not appear to be a proactive policy aimed at reducing emissions in compliance with the 2008 Climate Change Act or indeed the council's own declaration of a climate emergency and the actions it has promised to take to this end. |
| ST0001 | Sarah McKeown | Resident | 11 Planning for our Natural Environment | NE010 | | Object | Of particular concern is the likely increase to pollution and negative impact on the already congested areas of Boldon and Cleadon. East Boldon village will see its housing stock increased by 50% which will have a disastrous effect on the traffic pollution of the A184 (Front Street) and New Road. Policy NE10 of the local plan states 'where significant air quality impacts are likely to be generated by the development an appropriate air quality assessment would be required.' This assessment should include amongst other things 'An assessment of the effect of the proposed development on road transport emissions and air quality including the mitigation measures'. To date no such assessment appears to have taken place. |
| ST0001 | Sarah McKeown | Resident | 11 Planning for our | NE011 | | Object | Policy 11:53 states, 'air pollution particularly affects vulnerable groups such as children'. As East Boldon Infant School is situated on Front Street |

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| | | | Natural Environment | | | | <p>in East Boldon many parents and children use this road to walk to and from school. The schoolyard is only a few metres away from the very congested Front Street and their wildlife garden is situated on the main road, as are many of their classroom windows. Air quality for the children of the school is likely to be poor and a baseline assessment is needed before any further traffic is added to this already congested area.</p> <p>Policy 11:60 'we will ensure that new developments will not result in unacceptable impact on those living or working nearby through the effects of light noise order and other pollutants'. Front street is already an area that would benefit from a DECREASE in traffic pollution. Indeed as policy 11.53 states, since 2007 the government has been setting out what everyone can do to IMPROVE their quality. Simply maintaining poor air quality and introducing a plan for further congestion, with mandatory mitigation measures, is not fulfilling the obligations.</p> <p>The present improvements to the testos roundabout, clearly to cope with the expected increased traffic from the IAMP development, has been included on the council's air quality improvement policy. I feel that this is misleading. The line taken is that the traffic will move more quickly over the area and thus improve air quality at that spot. It makes no mention of the huge expected increase in traffic and the devastating environmental impact this will have in terms of land use and CO2 emissions in the borough. The new local plan requires an honest and detailed traffic and air quality assessment.</p> |
| ST0002 | Dorothy Willcock | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed</p> |

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| ST0003 | Howard Becke | Resident | 11 Planning for our Natural Environment | NE03 | | Support | 5.0 Open Green Spaces and community infrastructure - Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green Spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which inhabits it. |
| ST0004 | Sean and Maria McNally | Resident | 11 Planning for our Natural Environment | NE03 | | Support | 5.0 Open Green Spaces and community infrastructure - Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green Spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlike which inhabits it. |
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| ST0005 | Cllr Margaret Davison | Councillor | 11 Planning for our Natural Environment | NE01 | g | Object | 5.0 Climate Change Crisis 5.1 on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of |

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| | | | | | | | <p>C02 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0006 | C Walker | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of C02 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0007 | J A Bennett | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 on 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of C02 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed</p> |

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| ST0051 | Craig Jeffrey | Resident | 11 Planning for our Natural Environment | NE03 | | Support | 5.0 Open Green Spaces and community infrastructure - Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green Spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which inhabits it. |
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| ST0175 | Judith Thompson | Resident | 11 Planning for our Natural Environment | NE1 | g | Object | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed |

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| ST0224 | Mary Story | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0225 | Fiona Thomson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0226 | Mrs Christine Ogilvie | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis - Policy NE1 : On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt</p> |

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| ST0227 | Mr John Ogilvie | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | 7.0 Climate Change Crisis - Policy NE1 : On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST0228 | Benjamin Phillips | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST0229 | Darren Phillips | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects |

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| ST0230 | Sarah Peacock | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0231 | Fiona Jeffrey | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis: On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems (rushed</p> |

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| ST0232 | Mr & Mrs P Dunn | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | 5.0 Climate Change Crisis: On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems (rushed through) without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST0233 | Mr A S Graham | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | 4.0 Climate Crisis 4.1 On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. 4.2 The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems (rushed through) without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST0235 | L Harkus | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the |

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| ST0236 | Ivor Bennett | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0237 | Phoebe Lincoln | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0238 | Sandra Hedley | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0240 | Roy E Wilburn | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0240 | Roy E Wilburn | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| ST0241 | Mary Patricia Orwell | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0242 | B M Simpson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0243 | David Pick | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0244 | The occupier | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0245 | Susan Shilling | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| | | | | | | | <p>that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0246 | S Ryans | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0247 | PNJ Collins | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0248 | Barbara M Collins | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0249 | Ashley Westall | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0250 | Nicolas Westall | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| | | | | | | | <p>that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0251 | Jeff & Lenise Lilico | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0252 | Neil Henry | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0253 | SC Sanderson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0254 | MJ Sanderson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0255 | Brian Usher | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| ST0256 | BA Usher | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0257 | Stephen Rodger | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0258 | Lynsey Colman | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0259 | Ian Townsley | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0260 | Viven Davies | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| ST0261 | Butler Mr & Mrs? | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0262 | Mr I Leonard & Mrs J Leonard | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0263 | Mr & Mrs Taylor | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0264 | K Lee | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0265 | Diane Ford & Mark Reynolds | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| ST0266 | M Bambræ | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0267 | Mrs M Townsley | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0206 | Thomas Elves | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0268 | Mrs Jane Payne | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0269 | Angela Trainor | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| ST0270 | Steven Trainor | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0271 | James Routledge | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0272 | P Payne | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0273 | Patrick Routledge | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0274 | Oliver Routledge | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| | | | | | | | <p>that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0275 | Tracey Routledge | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0276 | E Minto | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0277 | Kate & John Kilner | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0278 | Gillian Orrell | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0279 | Kevin Campbell | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| | | | | | | | <p>that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0280 | John Forster | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0281 | Helen Campbell | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST0282 | Ann Witherington | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0296 | Kate McKeown | Resident | 11 Planning for our Natural Environment | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> *carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030). *Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets. *Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions). |
| ST0300 | Maureen Skevington | Resident | 11 Planning for our | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May</p> |

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| | | | Natural Environment | | | | 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems (rushed through) without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST0304 | Kate Berbuto | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems (rushed through) without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST0312 | Ron Forbister | resident | 11 Planning for our Natural Environment | NE01 | g | Objection | 7.0 Climate Change Crisis - Policy NE1 : On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers |

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| | | | | | | | adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST0313 | Kay Forbister | resident | 11 Planning for our Natural Environment | NE01 | g | Objection | 7.0 Climate Change Crisis - Policy NE1 : On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST0322 | Shirley Ford | Green Party | 11 Planning for our Natural Environment | NE01 | g | Objection | I object to the emerging local plan on the grounds that the plan fails to incorporate any carbon reduction targets – which is a legal requirement. |
| ST0323 | Gilbert Johnston | resident | 11 Planning for our Natural Environment | NE03 | | Objection | <p>Removing most of Green Belt for development is not delivering “a good quality and accessible network of green spaces throughout the Borough” In fact developing this area is doing the opposite of what Policy NE3 suggests.</p> <p>According to National Planning Policy Framework (2019): ‘The planning system should support a transition to a low carbon future in a changing climate... it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions... in line with the objectives and provisions of the Climate Change Act 2008.’</p> <p>Plans are legally required to demonstrate how their policies are in line with legally binding carbon emission reduction targets in the Climate Change Act 2008, including and understanding of baseline emissions inherent in future development... Local Plans must ensure that the actions and policies will reduce emissions in line with the trajectory set out in the Climate Change Act 2008.</p> <p>A large scale development on site H3.59 along with development on sites H3.1; H3.12 ; RG5 and H3.68 all within close proximity will increase carbon emissions not reduce them, particularly to the villages of East Boldon and Cleadon therefore totally ignores guidance in Climate Change Act (2008), so cannot be justified as this development is not sustainable, when viewed</p> |

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| | | | | | | alongside current Climate Change Legislation. Is this legal? |
| ST0323 | Gilbert Johnston | resident | 11 Planning for our Natural Environment | NE06 | Objection | <p>In addition, to allay concerns about open water, it must be clear to those using the surrounding amenity space why it is important to manage and treat the runoff from our development areas and how it is collected and stored.</p> <p>SuDS also costly and needs to be maintained, this often does not happen after developer has completed site. I understand the run off on all sites is to river `Don however SuDS is not designed to prevent river flooding at these sites It has been noted in Achieving sustainable drainage: A review of delivery by Lead Local Flood Authorities (January 2019) that: “Whilst SuDS are included as appropriate measures in areas prone to flooding, it should be noted that SuDS are not intended to prevent river flooding (fluvial), as its purpose is to address surface water flooding from rainfall (pluvial). Managing rapid surface water runoff, and in particular retrofitting SuDS, can reduce existing surface water flooding problems, which may also help reduce low level river flooding where it is exacerbated by urban runoff. However, SuDS cannot prevent river flooding on their own.’</p> <p>So SuDS will not prevent flooding from River Don therefore will not mitigate flood risk.</p> <p>Also noted</p> <p>There was concern that good conditions can be recommended, but can then be negotiated away by developers on viability grounds.</p> <p>This suggests that developers do not always do the right thing so will need planning safeguards. This suggests developers are not committed to the principles of SuDS and unwilling to deliver more than just drainage. In fact the sheer volume of development in a small area will cause many problems which are not address in Policy S1.</p> <p>Developing any of the above sites will cause flooding issues for the villages of Cleadon Whitburn and East Boldon and contradicts Policy NE6 which is concerned with flood risk and water management which states “Flood risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk of flooding. What has South Tyneside Council done to reduce the risk of flooding? Why have these sites been put forward for development when they are clearly unsuitable for housing?</p> |

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| | | | | | | | <p>I note that sustainable drainage systems (SUDs) are costly and need to be maintained and are unpopular with developers. A recent report, noted that developers often do not maintain SUDs after completing the site. I understand the run off on all sites needing flood risk assessment, SUDs and surface water management plans is to the River Don. However SUDS is not designed to prevent river flooding at these sites It has been noted in Achieving sustainable drainage: A review of delivery by Lead Local Flood Authorities (January 2019) that:</p> <p>“Whilst SuDS are included as appropriate measures in areas prone to flooding, it should be noted that SuDS are not intended to prevent river flooding (fluvial), as its purpose is to address surface water flooding from rainfall (pluvial). Managing rapid surface water runoff, and in particular retrofitting SuDS, can reduce existing surface water flooding problems, which may also help reduce low level river flooding where it is exacerbated by urban runoff. However, SuDS cannot prevent river flooding on their own.’</p> <p>So SuDS will not prevent flooding from River Don therefore will not mitigate flood risk.</p> <p>Also noted in this report:</p> <p>There was concern that good conditions can be recommended, but can then be negotiated away by developers on viability grounds.</p> <p>This suggests that developers do not always do the right thing so will need planning safeguards. This suggests developers are not committed to the principles of SUDS and unwilling to deliver more than just drainage. In fact the sheer volume of development in a small area will cause many problems which are not address in this Policy.</p> |
| ST0328 | Peter Collins | resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head.</p> <p>The use of out of date statistics to drive up housing numbers adds insult to</p> |

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| | | | | | | | injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST0338 | Phoebe Lincoln | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | In a climate emergency - will have detrimental impacts on the environment. Not sustainable - at least find more brownfield sites. |
| ST0342 | Dawn Bianchi | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | One of the best ways to mitigate the adverse affects of climate change is to retain our greenbelts! We will also lose our wildlife habitat. Not sustainable - at least find more brownfield sites. Higher levels of pollution will have a direct impact upon the environment and the Health of the Community. South Tyneside has already been assessed as having a 'Climate Emergency!' |
| ST0362 | Gary Frazer | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | Climate Emergency Loss of Green Belt: What consideration has been given to the use of 'Eco Friendly' building materials ie porous driveways to mitigate the threat of flooding, solar panels and triple glazing to comply with the Climate Emergency Declaration. |
| ST0371 | Sarah McKeown | Resident | 11 Planning for our Natural Environment | NE01 | g | object | I am also very concerned that the plan does not comply with the 2008 climate chnage act requirements or indeed Labour's national policy of achieving net zero by 2030. I would like to know how carbon reduction targets have been incorporated into the plan and would appreciate a response in writing. I would also appreciate a chance to speak at the next level of consultation. |
| ST0395 | Chris Woodhouse | | 11 Planning for our Natural Environment | NE01 | g | Object | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed |

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| ST0396 | Helen Woodhouse | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0398 | Jon Woodhouse | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST1921 | Layla Sayyadi | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <p>*carbon reduction targets for the borough should, I argue, be included in</p> |

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| | | | | | | | <p>the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside’s emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> <p>* Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, ‘suitable sites for energy generation’ would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects.</p> |
| ST1928 | Lynn Nichols | | 11 Planning for our Natural Environment | NE01 | g | object | <p>5. Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST1935 | Rachael Milne | South Tyneside Tree Action Group | 11 Planning for our Natural Environment | NE01 | g | Objection | This travesty must not be allowed to happen again. Roads are increasing, car numbers are increasing, bird numbers are declining. We are in the process of an ecological emergency. Trees and Greenbelt must be preserved and protected. South Tyneside Council declared a Climate Emergency. Now let us see action on the back of words. |
| ST1936 | Michael Bamford | | 11 Planning for our Natural Environment | NE01 | g | Object | 5-0 Climate Change Crisis: 5-1 On July 18th 2019, South Tyneside Council declared a climate emergency in the borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a climate emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The DLP seems to almost disregard this completely. The use of out-of-date statistics to drive up housing numbers adds insult to injury. Overall, there seems scant regard to the local authority's declaration of a climate emergency. The DLP seems rushed through without proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST1938 | Lisa Gribbon | | 11 Planning for our Natural Environment | NE01 | g | Objection | 5. Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available for that purpose. The draft Local Plan seems to almost turn this understanding on its head! The use of out-of-date statistics to drive up new housing numbers adds insult to injury. Overall, there seems scant – if any – regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address THE most pressing issue of our time. |
| ST1939 | J B Baker | | 11 Planning for our Natural Environment | NE01 | g | Objection | I wish to submit the following objection to the Emerging Local Plan, as I feel the current iteration of the Plan is devoid of suitably rigorous measures to mitigate Climate Change. I object on the following grounds: <ul style="list-style-type: none"> • Non-compliance with the Climate Change Act 2008, the Planning and |

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| | | | | | | <p>Compulsory Purchase Act 2004, and the NPPF.</p> <ul style="list-style-type: none"> • No carbon reduction targets. • No carbon audit of the plan. • An absence of any SMART environmental targets. • Failure to identify key sites which are environmentally-suitable for renewable energy generation. • Onshore wind cannot gain planning permission under the Emerging Local Plan. • Lack of clarity and quantification. For example, what are the minimum amount of environmental net gains that would lead to planning approval? And what is the nature of these gains? That is to say, are environmental gains fungible (for example, are having lawns equal to installing solar panels on all the houses) or do we require specific actions? To raise environmental standards we need to be specific, and measure the progress made. • Need for more detailed and ambitious travel policies. • No consideration of how people with protected characteristics will be impacted by the Plan (in particular, disabled people). • The Sustainability Appraisal is inadequate. <p>I shall now consider some of these issues in more depth.</p> <p>1. Non-compliance with Climate Change Act 2008, Planning and Compulsory Purchase Act 2004, and NPPF.</p> <p>Chapter 14, Paragraph 148 of the National Planning Policy Framework (NPPF) states:</p> <p>“The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”</p> <p>This should be carried out: ‘In line with the objectives and provisions of the Climate Change Act 2008.’ The Local Plan should, therefore, demonstrate how it will facilitate achieving a 100% reduction in carbon emissions by 2050 (from a 1990 baseline).</p> <p>For the Plan to be compliant, it would need to include an emission’s audit in order to demonstrate the carbon impact of individual polices and for the plan in its entirety. This would provide a metric, enabling the council to</p> |
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| | | | | | | <p>quantify the environmental impact of their policies in order to ensure that 'radical reductions in greenhouse gas emissions' are actually delivered, and yet this is absent. Without this, it is impossible to know whether the plan delivers any emissions reductions at all, and if it does whether they are in line with the Climate Change Act. The Plan is thus non-compliant with both the Climate Change Act and the NPPF. The Emerging Local Plan also contravenes the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008) which says:</p> <p>'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.' (Cl 19).</p> <p>Whilst it is acknowledged within the plan that carbon reductions are vital, these sentiments are siloed into sections pertaining explicitly to the environment rather than being integrated across the whole document. This is inadequate, the Town and Country Planning Association (TCPA) and the Royal Town Planning Institute (RTPI) state, for 'only by treating climate issues as central to policy formulation will a local authority have effectively discharged its duty under the 2004 Planning and Compulsory Purchase Act'. Furthermore, without a holistic carbon reduction plan, the council could unwittingly be implementing zero-, low-, and high-carbon policies simultaneously, and in the process negating any benefit (or, even, causing a net increase in emissions). Carbon auditing would, again, provide a solution, as different iterations of policies could be analysed, allowing the plan to be configured to generate maximum emissions reductions across all sectors.</p> <p>Given the non-compliance with National Policy and the lack of an objective and proportionate evidence base underpinning these policies, the Plan cannot be then considered sound.</p> |
| ST1942 | Alan Hedley | | 11 Planning for our Natural Environment | NE01 | g | <p>Objection</p> <p>At least 60 of the 75 sites allocated for housing have trees, and a total figure for at risk trees of being felled for housing developments are over 1700 plus hedgerows, while total figures for trees at risk for regeneration and economic development are a minimum of 400 plus hedgerows. This is an unacceptable total of over 2100 trees are at risk of being felled as the draft Local Plan currently stands. How can South Tyneside Council state they are "taking all necessary steps to make South Tyneside Council carbon neutral by 2030" when over 2,100 mature trees, and metres of hedgerow, which help stop climate change by removing carbon dioxide</p> |

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| | | | | | | <p>from the air, storing carbon in the trees and soil, and releasing oxygen into the atmosphere on a daily basis, are going to be removed?</p> <p>Greenbelt cannot be replaced or mitigated against. South Tyneside Council has previously, unsuccessfully attempted to build on many of the Green Belt sites in the draft Local Plan. Are the sites allocated for housing in the draft Plan driven by developers rather than lack of suitable land for housing?</p> <p>I hope that South Tyneside Council reconsiders this Local Plan in current form. It is widely understood that the protection of land and its use to mitigate the effects of carbon dioxide is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have enough land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury.</p> <p>Overall there seems scant regard to the Local Authority's recent declaration of a Climate Emergency on 18th July 2019. The draft Local Plan seems that it has been rushed through without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> <p>For that reason as well, I also wish to object to the proposed draft local plan on the grounds. I feel it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion: Carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy which sets a trajectory of achieving net zero by 2030).</p> <p>Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting emissions targets of South Tyneside.</p> <p>Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero, low and high-</p> |
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| | | | | | | | carbon policies (which would be an inconsistent position and ultimately minimise or negate net carbon dioxide reductions). |
| ST1949 | Alan Younger | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and greater identification and development of green spaces in towns will help to mitigate the effects of CO2 (alongside much greater regulation of traffic congestion and subsequent pollution). Protecting our green environment is therefore one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces. East Boldon is uniquely placed to be at the forefront of helping combat climate change due to it's inherent green spaces. As always more can be done to enhance these as identified by the people of East Boldon, evidenced at EBNF consultation events and in their questionnaire responses.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan therefore seems half baked and 'rushed through'. In addition, the seeming dismissal of East Boldon's 'green assets', lack of proper analysis and assessment as to what can be done to protect and enhance these and in so doing help to address one of the most pressing issues of our time is in effect negligent.</p> |
| ST1987 | Susan Lawrence | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed</p> |

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| | | | | | | | through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST1990 | Darren Smithies | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST1991 | Keith Blenkinsop | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST1992 | Yvonne Grunson | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter</p> |

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| | | | | | | | <p>climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST1993 | Christine Crake | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>Climate Change Crisis –</p> <ul style="list-style-type: none"> On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST1994 | Jane Drummond | | 11 Planning for our natural environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |
| ST1994 | Jane Drummond | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It</p> |

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| | | | | | | | <p>is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST1995 | Julie Burns | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST1996 | Darren Burns | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST1997 | Eadie Burns | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2000 | Richard Cowen | Durham Bird Club | 11 Planning for our natural environment | NE02 | | Objection | <p>While clearly the Club supports the proposal to include measures to protect and enhance to protect and enhance biodiversity, we represent that the word “should” in the first paragraph of this Policy is not strong enough. The word should be “shall”.</p> <p>We note the words “likely significant effect” in the section relating to Internationally Important Sites. Although this is in inverted commas in the Plan, there is no other reference to this term. We note it is probably derived from Regulation 24 of the Conservation of Habitats and Species Regulations 2017, we represent that this term should be given some definition in the Plan itself, together with the subsequent provision in the Regulations relating to the management of such sites.</p> <p>We also note the difference in the wording for the potential impact on International Sites and National Sites.. In respect of National Sites, the wording is “likely to have an adverse impact”. This could mean any adverse impact, however, slight, which could result in a National Site receiving higher protection than an International Site where the “effect” must be significant. While the response to this may be that this is the test in relation to International Sites for an Appropriate Assessment, it does possibly mean that any effect (including and adverse one) upon an International Site that is less than significant could be permitted where the presumption would presumably be to refuse permission in relation to a National Site. We represent that the paragraph relating to International Sites should also contain a provision to say that any development that will</p> |

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| | | | | | | | <p>have an adverse impact upon it will normally be refused and further, if there is likely to be a “significant effect”, it will be subject to an Appropriate Assessment.</p> <p>In paragraph (e) of this Policy, we represent that both mentions of “mitigation” should say “suitable mitigation”. It is vital to ensure that any mitigation is suitable and appropriate to the eliminate the potential impact of the proposed development upon the site, particularly one of international importance.</p> <p>We note the provisions relating to compensation where mitigation is not possible and there is an “overriding public need” for the development. We accept that this follows the NPPF provisions but represent that any compensation must also be “suitable”. For example, if habitats suitable for redshanks is affected, there is no point in providing habitat that is suitable only for garden birds. While this may not be specifically catered for in the NPPF, we represent that it is in accord with the provisions for protecting and enhancing biodiversity in Policy NE1.</p> <p>While we do not support allocations that may abut any site mentioned in this Policy, we represent that if such a case does arise, this policy must contain a provisio to ensure that direct access onto the site from the development is prevented. The Club asked for this sort of condition in relation to the former Gordon Durham site adjoining Boldon Flats and also the site at Whitburn Rifle Range.</p> |
| ST2000 | Richard Cowen | Durham Bird Club | 11 Planning for our natural environment | NE01 | | Support | The Club supports this Policy and does not want to see any diminution of it. In particular the provision of green space for fauna is in our opinion essential to all new development. We believe that this should all be in line with Policy S3 and this perhaps should be mentioned in relation to this Policy. |
| ST2000 | Richard Cowen | Durham Bird Club | 11 Planning for our natural environment | NE01 | c | Comment | However, while we note the provisions of Point (c) of this Policy, there is no specific mention in this Policy or, as far as we can see, elsewhere in the Plan of Ancient Woodland or ancient or veteran trees. While we note that the NPPF includes such woodland and trees are irreplaceable habitats in paragraph 175(c) and in the Glossary, we represent that there should be some reference to them in the Plan, even if it is only to say that none exist in the borough (should that be the case). Indeed, there is no definition of the term “irreplaceable habitat” in the Plan and we represent that this should be considered. |
| ST2000 | Richard Cowen | Durham Bird Club | 11 Planning for our | NE03 | | Objection | While the Club supports the principle of this proposed Policy, it should be made clear that it also includes biodiversity in the opening paragraph. The |

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| | | | natural environment | | | | <p>Coastal and River corridors are particularly important from a biodiversity point of view. While we note point (c), we still represent that this should be made clear in the opening sentence.</p> <p>The importance of the coast and the area above the cliffs are also important from a migration, winter roosting and foraging point of view, aspects that are as important for the survival of birds as breeding sites. If the “feeding stations” of migrating birds are taken away, it can severely impact on their ability to complete their journey. Given the nature and importance of these sites in South Tyneside for this purpose, we represent that this should be recognised in policy terms (see also our comment on this to Policy S3).</p> |
| ST2000 | Richard Cowen | Durham Bird Club | 11 Planning for our natural environment | NE04 | | Objection | <p>The purpose of this Policy needs to be clarified. Does it relate only to recreational facilities such as football pitches or may it also include wildlife sites. We note the inclusion of the words “wider green infrastructure network” which would appear to include such site.</p> <p>If this is meant only to refer to recreational green infrastructure, then the Club has no comment. If however, it is also meant to include sites that may have biodiversity interest, then it may be inconsistent with other policies in this respect and it needs to be determined how the site’s role in assessing its biodiversity importance (or lack of it) is assessed.</p> |
| ST2002 | Kathleen Ramm | | 11 Planning for our natural environment | NE01 | | objection | <p>Biodiversity - mature trees, hedges and wildlife habitat.</p> <p>Most of the sites identified for housing development are surrounded by mature trees and hedges. If these are destroyed for development there will be no wildlife at all. We are very well endowed with wildlife at present and it would be an absolute tragedy if it were lost for ever. Mitigation is impossible.</p> <p>We are in a Climate Emergency, a Wildlife Emergency, a Mental Health Emergency and an Obesity Epidemic. For these reasons our green spaces and wildlife habitats must be kept intact.</p> |
| ST2003 | Claire Ludbrook | | 11 Planning for our natural environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George’s Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |

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| ST2003 | Claire Ludbrook | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2005 | Grahame Tobin | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>6.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2006 | Andrea Tobin | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to</p> |

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| | | | | | | | injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST2009 | Eileen Thompson | | 11 Planning for our natural environment | NE01 | | Support | <p>Policy NE1 Our Strategic Approach for the Natural Environment – Support with Reservations</p> <p>This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge.</p> <p>The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this.</p> |
| ST2009 | Eileen Thompson | | 11 Planning for our natural environment | NE02 | | Support | <p>Policy NE2 Biodiversity, Geodiversity and Ecological Networks– Support with reservations</p> <p>Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors.</p> <p>I consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2.</p> |
| ST2009 | Eileen Thompson | | 11 Planning for our natural environment | NE03 | | Support | <p>Policy NE3 Green Infrastructure – Support with reservations</p> <p>Cleadon and East Boldon have significant amounts of green infrastructure, which residents also enjoy on a daily basis, as set out below:</p> <p>Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children’s play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tiesheds Burn and Pond, Boldon and South Shields Golf Courses, as well numerous public rights of way, cycle routes and bridleways.</p> <p>It is vital that all of these are safeguarded as set out in the policy.</p> |
| ST2009 | Eileen Thompson | | 11 Planning for our natural environment | NE05 | | Support | <p>Policy NE5 Areas of High Landscape Value – Support with reservations</p> <p>Cleadon And East Boldon have two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope.</p> <p>I am concerned that Housing Allocation H3.65 will have a detrimental</p> |

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| | | | | | | | impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills. |
| ST2009 | Eileen Thompson | | 11 Planning for our natural environment | NE11 | | Objection | <p>Policy NE11 Pollution</p> <p>The policy states that development proposals which could lead to significant pollution should be accompanied by a detailed assessment of the likely impacts. I am concerned that the traffic increase and resulting pollution within the ward from the proposed housing allocations will have a negative impact on our residents.</p> |
| ST2013 | Gary Attewell | | 11 Planning for our natural environment | NE04 | | Objection | <p>2.0 Loss of Green Belt: Policy S6, Paragraph 4.34 and 4.35 (Ref. Housing Allocations under Policy H3 (H3.59 Land at North Farm), (H3.61 Land south of St John's Terrace and Natley Avenue), and (H3.65 Land West of Boldon Cemetery))</p> <p>2.1 The land within the three sites listed above is currently designated as Green Belt and as such continues to meet its very important and prescribed function. I believe the case for 'exceptional circumstances' made in the draft plan as justification to change the existing designation for these sites has not been made, and there continues to be a need for the sites to function as Green Belt. This has been referenced in detail in the EBNF's response to the plan and I fully support every point raised in that document.</p> <p>2.2 The potential development of these sites would result in yet a further loss of habitat for wildlife in the vicinity, following as it does the decision to build the new IAMP on Green Belt land nearby (the IAMP development is within 1 km from the Forum's boundary).</p> <p>2.3 A significant proportion of the Green Belt in question is of high value to the community and has become 'wilded'. As well as providing important habitat (a great many species of birds, as well as foxes and small mammals such as stoats, hedgehogs, weasels, moles, mice and shrews have been seen), it is enjoyed by the community for walking, running, horse riding and general exercise. The loss of such land will have a detrimental effect upon health of those who use it and the animals which live there. Areas of green belt are acknowledged to be beneficial to public health (though improving air quality, reducing stress and providing opportunities for exercise to combat obesity and heart disease), biodiversity and in combating climate change (see point 5 below)</p> <p>2.4 With regard to area H3.59 Land at North Farm I think this should be considered as two separate sites as it was in the Strategic Land Review that was consulted on. One half is arable farmed land and the other has</p> |

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| | | | | | | | been re-wilded over 23 years and is now a mature nature reserve which contributes to the greenbelt and the environmental diversity that is a feature of East Boldon and the surrounding areas. I understand that an environmental survey has not been undertaken of this area since 2011 and therefore is out of date; I suggest that the impact on the environment of the loss of this site has not been thoroughly assessed. Both halves of this site have well used footpaths through them which contribute to the health and wellbeing of local people who use them and the loss of these would be contrary to the Plan's policy NE4: Open Space and Green Infrastructure and The Physical Activity Strategy (2019). |
| ST2013 | Gary Attewell | | 11 Planning for our natural environment | NE03 | | Support | 5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it. |
| ST2013 | Gary Attewell | | 11 Planning for our natural environment | NE01 | g | Comment | 7.0 Climate Change Crisis – Policy NE1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | | climate Change | objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the |

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| | | | | | | | most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE01 | | Comment | <p>Policy NE1 Our Strategic Approach for the Natural Environment</p> <p>This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge.</p> <p>The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this.</p> |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE02 | | Support | <p>Policy NE2 Biodiversity, Geodiversity and Ecological Networks– Support with reservations</p> <p>Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors.</p> <p>I consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2.</p> |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE03 | | Support | <p>Policy NE3 Green Infrastructure – Support with reservations</p> <p>Our ward(Cleadon and East Boldon) has significant amounts of green infrastructure, which our residents also enjoy on a daily basis, as set out below:</p> <p>Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children’s play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tilsheds Burn and Pond, Boldon Golf Course, as well numerous public rights of way, cycle routes</p> |

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| | | | | | | | and bridleways. It is vital that all of these are safeguarded as set out in the policy. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE05 | | Support | Policy NE5 Areas of High Landscape Value – Support with reservations Our ward has two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope. There is concern that Housing Allocation H3.65 will have a detrimental impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE03 | | Comment | Policy NE6 Flood Risk and Water Management Our ward has suffered from continuing flooding problems and this was recognised in the Strategic Flood Risk Assessment (2018). Further flood alleviation measures are planned in Cleadon. Two of the proposed housing sites are within the recognised Flood Risk Zones (H3.59 and (H3.61) and three of the others |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE01 | | | Policy NE1 Our Strategic Approach for the Natural Environment This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge. The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE02 | | Comment | Policy NE2 Biodiversity, Geodiversity and Ecological Networks Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors. We consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2. |
| ST2015 | Jane Arthurs | | 11 Planning for our | NE03 | | Comment | Policy NE3 Green Infrastructure Our ward has significant amounts of green infrastructure, which our residents also enjoy on a daily basis, as set out below: |

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| | | | natural environment | | | | Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children's play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tiesheds Burn and Pond, Boldon and South Shields Golf Courses, as well numerous public rights of way, cycle routes and bridleways. It is vital that all of these are safeguarded as set out in the policy. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE05 | | Comment | Policy NE5 Areas of High Landscape Value Our ward has two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope. We are concerned that Housing Allocation H3.65 will have a detrimental impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE06 | | Comment | Policy NE6 Flood Risk and Water Management Our ward has suffered from continuing flooding problems and this was recognised in the Strategic Flood Risk Assessment (2018). Further flood alleviation measures are planned in Cleadon. Two of the proposed housing sites are within the recognised Flood Risk Zones (H3.59 and (H3.61) and three of the others have a risk of surface water flooding (H3.70, H3.2 and H3.3) and further investigation is required in relation to flood risk on these sites. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE11 | | Comment | Policy NE11 Pollution The policy states that development proposals which could lead to significant pollution should be accompanied by a detailed assessment of the likely impacts. We are concerned that the traffic increase and resulting pollution within the ward from the proposed housing allocations will have a negative impact on our residents. |
| ST2015 | Jane Arthurs | | 11 Planning for our natural environment | NE07 | | Objection | Policy IN7 Accessible and Sustainable Travel –Object We have long campaigned for the expansion of the Park and Ride facilities at East Boldon station. The current car park is constantly at capacity and demand leads to parking problems in surrounding roads and streets. The statement in this policy must be, more specific with regard to additional parking. The policy proposes to safeguard land to enable additional park and ride facilities at existing metro stations but is not specific about East Boldon. The proposed improvement of the local highway network at Boldon and Tiledshed Level Crossing Scheme with new bridge and carriageways is causing concerns to local residents. |

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| | | | | | | | It is at the very early stages of design and full public consultation on its design is required as a matter of urgency. The Council has made a bid to the Department of Transport for funding and if this is not successful then there are also concerns. The Council have stated that full barriers as proposed by Network Rail "will significantly increase the time in which the level crossings are in operation and will increase delays and congestion." The addition of new housing in this area will only make this worse. |
| ST2061 | Dr Penney A. Gray | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2064 | Joanne Pick | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST2065 | Peter and Mary Crane | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2088 | Joe Miller | | 11 Planning for our Natural Environment | NE010 | | Objection | <p>The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10</p> |
| ST2089 | Rebecca Bentley | | 11 Planning for our Natural Environment | NE010 | | Objection | <p>The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10</p> |
| ST2090 | James Otterson | | 11 Planning for our Natural Environment | NE010 | | Objection | <p>The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10</p> |
| ST2091 | Amy Whittington | | 11 Planning for our | NE010 | | Objection | <p>The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air</p> |

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| | | | Natural Environment | | | | pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10 |
| ST2092 | Isla McCully | | 11 Planning for our Natural Environment | NE010 | | Objection | The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10 |
| ST2093 | Isobel Emery | | 11 Planning for our Natural Environment | NE010 | | Objection | The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10 |
| ST2094 | Georgia Slight | | 11 Planning for our Natural Environment | NE010 | | Objection | The large allocation of housing proposed for East Boldon will bring a larger number of cars possibly 1000+ to the village. This will make the air pollution worse. Policy NE10: Air Quality allows for proposals to be approved if satisfactory mitigation measures are implemented where levels exceed national air quality objectives. This is dangerously playing with residents' health. This is not in the interest of wellbeing. I therefore object to Policy NE10 |
| ST2095 | Yasmin Otterson | | 11 Planning for our Natural Environment | NE03 | | | <p>Whilst I agree with Policy NE3: Green Infrastructure it does seem to contradict the 'exceptional circumstances' deletions of the Green Belt. South Tyneside Council needs to make up its mind does it want to strengthen existing wildlife corridors and support biodiversity? or does it want to remove hedgerows and trees and green land?</p> <p>I notice at least 60 of the 75 sites allocated for housing have trees. This means a total figure for at risk trees being felled for housing development are over 1700 plus hedgerows. Total figures for trees at risk for regeneration and economic development are a minimum of 400 plus hedgerows.</p> <p>This is an unacceptable total of over 2100 trees are at risk of being felled as the draft Local Plan currently stands.</p> |

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| | | | | | | | Do STC have accurate figures for the amount of trees and hedgerows threatened by this draft plan? What measures do STC intend to take to protect trees and hedgerow in sites allocated for development? |
| ST2099 | Mrs L Grimwood | | 11 Planning for our Natural Environment | NE03 | | Support | 5.0 Open Green Spaces and community infrastructure - Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green Spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which inhabits it. |
| ST2099 | Mrs L Grimwood | | 11 Planning for our Natural Environment | NE01 | g | Object | 7.0 Climate Change Crisis On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2101 | Mr Eoghan Johnston | | 11 Planning for our Natural Environment | N03 | | Support | 5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it. |
| ST2102 | Mrs Kathryn Tutill | | 11 Planning for our | N03 | | Support | 5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to |

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| | | | Natural Environment | | | | identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it. |
| ST2103 | Pauline Barrett | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2111 | Nicola Reed | Persimmon Homes | 11 Planning for our Natural Environment | NE02 | | objection | <p>It is acknowledged that the Council have produced an SPD to address a mitigation strategy for European Sites. If a developer were to contribute to the mitigation scheme, secured via the S106 agreement, would they still be required to produce an appropriate assessment as set out under this policy? It is noted that neighbouring local authorities such as Northumberland County Council have produced a similar mitigation strategy and do not require an appropriate assessment in the event that a s106 contribution will be secured for the development.</p> <p>Part 2 of the policy in relation to nationally important sites has been written with respect to NPPF 175b. It is considered that Part 2G would be better placed if it were to be worded in accordance with NPPF para 175b. Part 3 of the policy refers to locally important sites and it is considered that the policy wording is affording local sites the same level of protection as nationally important sites. The policy wording requires developers to demonstrate that the benefits of the scheme clearly outweigh the benefits in addition to addressing the mitigation hierarchy. This is not considered appropriate in line with the NPPF and the policy wording should be amended.</p> |

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| | | | | | | | The final paragraph of this policy refers to the protection and enhancement of hedgerows, watercourses and other linking habitat. This policy should acknowledge that hedgerows and habitat features should be retained based on their value and contribution and this should not be applied as a blanket policy. |
| ST2111 | Nicola Reed | Persimmon Homes | 11 Planning for our Natural Environment | NE03 | | Observation | Part E of this policy states that where there is an identified need, developer contributions will be sought to improve the green infrastructure network. It is unclear from the supporting text whether this is in addition to any new infrastructure provided under part F of the policy or whether this is in the event that new green infrastructure provision has not been delivered on a site where this would be required. Further clarity should be provided for. |
| ST2111 | Nicola Reed | Persimmon Homes | 11 Planning for our Natural Environment | NE04 | | objection | <p>Policy NE4 identifies the criteria a developer must demonstrate if proposals are for a designated site. It is unclear whether a developer needs to meet all criteria or some criteria. This can be addressed through additions of "and" or "or" between the requirements set out within the policy.</p> <p>We note that the Developer Contributions SPD referenced within this policy is to be updated throughout progress of the plan given that it dates back to 2008. This should be subject to public consultation.</p> <p>Parts G to J of the policy identifies the types of open space and play provision which offsite financial contributions will be sought. The current policy wording suggests that an offsite contribution will be sought for all types of open space referenced under parts G to J. Flexibility should be contained within the policy as a whole to ensure that provision of the types of open space referenced within the policy will be sought where there is a need. Developers should not be providing for particular types of open space if there is sufficient provision within the area.</p> |
| ST2111 | Nicola Reed | Persimmon Homes | 11 Planning for our Natural Environment | NE05 | | Observation | Policy NE5 and the Areas of High Landscape Value are largely underpinned by an evidence base dated 2012. This should be updated to ensure the policy is underpinned by the most up to date evidence. |
| ST2111 | Nicola Reed | Persimmon Homes | 11 Planning for our Natural Environment | NE09 | | Observation | Part A of this policy requires investigations to access contamination and ground stability alongside other factors listed within this part of the policy. Does this correspond with South Tyneside's Validation Checklist in relation to what is required to support a planning application? |
| ST2111 | Nicola Reed | Persimmon Homes | 11 Planning for our | NE10 | | Observation | Policy NE10 sets out the requirements of an Air Quality Assessment and requires applications to agree receptor points with the Council prior to |

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| | | | Natural Environment | | | | <p>commencement. This places a responsibility on the Council to provide a swift response to applicants and it is important that this does not delay the preparation and submission of applications.</p> <p>Part G of the policy requires the inclusion of proposed mitigation measures. Although this policy is likely to be applied flexibly, the wording of the policy should also be flexible to ensure that mitigation measures are only suggested where appropriate therefore in the event that the impacts of the development justifies the need for mitigation.</p> |
| ST2112 | | Shlomo Memorial Trust Ltd | 11 Planning for our Natural Environment | NE02 | | objection | <p>Our client recognises the importance of protecting biodiversity; however, draft Policy NE2 requires that proposals which will have an impact on a habitat comply with various criteria, including that there are no reasonable alternatives. The NPPF (para. 175) does not refer to the need to consider alternatives, instead it seeks adequate mitigation, or, as a last resort, compensation.</p> <p>To ensure a sound Plan that is consistent with national policy (NPPF, paragraphs 35 and 175), our client requests that the reference to 'reasonable alternatives' is removed from Policy NE2.</p> |
| ST2112 | Nick Westwick | Shlomo Memorial Trust Ltd | 11 Planning for our Natural Environment | NE03 | | objection | <p>Our client considers that draft Policy NE3 could be used to support an approach towards green infrastructure that is more onerous than the NPPF and there may be circumstances where not all the criteria in this policy need to be strictly applied.</p> <p>To ensure a sound Plan that is based on the most appropriate strategy, in accordance with the NPPF (para. 35), it is requested that the policy is amended as follows:</p> <p>"We will deliver a good quality and accessible network of green spaces throughout the Borough to provide a range of social, economic, health and environmental benefits for all. This will be done by undertaking the following, where appropriate..."</p> |
| ST2112 | Nick Westwick | Shlomo Memorial Trust Ltd | 11 Planning for our Natural Environment | NE04 | | objection | <p>Our client understands the importance of green space and green infrastructure provision. However, draft Policy NE4 requires that developments provide onsite open space facilities which contribute to the green infrastructure in accordance with Developer contributions SPD 5 or any successor document; or that off-site contributions would be sought that have regard to various council studies and strategies, as well as successor documents.</p> <p>Our client is concerned that this policy is referring to a range of documents and successor documents but that the associated feasibility and viability of delivering their requirements has not been fully taken into account,</p> |

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| | | | | | | <p>especially given that the successor documents have not been prepared. As such, the full cost implications of this policy have not been taken into account in the Local Plan viability assessment work and this could have a negative impact on development viability.</p> <p>To ensure a sound Plan that is positively prepared and based on appropriate evidence, in accordance with the NPPF (para. 35), the following changes are sought to this policy:</p> <p>“New major housing developments will be required to provide onsite open space facilities, where possible, which contribute to the green infrastructure in accordance with a scheme that is to be agreed with the council, whilst taking into account the Developer Contributions SPD 5 or any successor document.”</p> <p>“Where provision cannot be provided on-site, we will seek the equivalent off-site financial contributions, taking into account site viability, where...:”</p> <p>In such circumstances off-site financial contributions will be sought for the following, taking into account site viability:</p> <p>g) Open space and children’s play provision and maintenance – having regard to the quality and quantity guidance and standards set out the most up to date Open Space Study.</p> <p>h) Playing pitch provision and maintenance – having regard to guidance set out in the action plan of our most up to date Playing Pitch Strategy.</p> <p>i) Delivering new allotment provision to meet current and future demand.</p> <p>j) Delivery of Green Infrastructure projects, prioritising those identified in Supplementary Planning Document 3/ Green Infrastructure Strategy or any successor document.”</p> |
| ST2167 | Jean Eckert | | 11 Planning for our Natural Environment | NE06 | | <p>POLICY NE6 FLOOD RISK AND WATER MANAGEMENT</p> <p>OBJECT</p> <p>This policy, very verbosely, professes to contain details of how flood risk will be taken into account at all stages of the planning process, in order to, “avoid inappropriate development in areas at current or future risk of flooding”. It then goes on to say that all sources of flood risk should be considered, without saying what these are, and then:</p> <p>“Where applicable, development proposals will be expected to be designed to mitigate against urban creep and adapt to climate change, taking account of flood risk by:</p> <p>a) Ensuring opportunities to contribute to the mitigation of flooding elsewhere are taken...”</p> <p>The list of all possibilities which may occur and have to managed when</p> |

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| | | | | | | <p>assessing flood risk then continues – but how is this a policy that is expected to prevent flood risk, if all proposals also include mitigation for urban creep and adaptation to climate change? This does not make sense. If so much is expected of development proposals, then surely it must be up to the planning authority to take charge and oversee every aspect of flood risk management on every site?</p> <p>Unfortunately this policy does not contain evidence that this will happen. There is no evidence given of any prior assessment of flooding having been taken by the planning authority before sites are allocated for sustainability assessment included in the Local Plan, and there is no inclusion of any planning authority management of the process for individual or cumulative flood risks posed by all proposed development sites in the area.</p> <p>The Plan does refer to the Strategic Flood Risk Assessment carried out by JBA Consulting in 2011 and this states:</p> <p>“Major causes of flooding are:</p> <ul style="list-style-type: none">_ 1 Coastal flooding - caused by higher sea levels than normal causing tidal water to overflow onto the land;_ 2 Inland flooding - caused by prolonged and/or intense rainfall resulting in surface water flooding, ponding in natural hollows and low-lying areas or behind obstructions;_ 3 River flooding - when the capacity of a watercourse is exceeded or a channel is blocked and excess water spills out from the channel onto adjacent low lying areas or floodplain;_ 4 Flooding from artificial drainage systems - when flow entering a system, such as an urban storm water drainage system, exceeds its discharge capacity, it becomes blocked or it cannot discharge due to a high water level in the receiving watercourse;_ 5 Groundwater flooding - when the level of water stored in the ground rises as a result of prolonged rainfall to ground level;_ 6 Estuarial flooding - due to a combination of tidal and fluvial flows, with tidal levels being dominant in most cases; and_ 7 A less frequent form of flooding arises from the failure of infrastructure designed to store or convey water (for example, the breach of a dam, a leaking canal or a burst water main), or to protect an area against flooding (e.g. breach of a flood defence, failure of a flap valve or pumping station or blockage of a pipe or culvert). Because of the sudden onset, the impacts of this form of flooding can be severe.” |
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| | | | | | | <p>South Tyneside, generally, is subject to the risk of flooding from all of these sources. Proposed development sites in the plan for Cleadon and Boldon are not subject to 1 and 6.</p> <p>The recommendations in the report are that a Sequential and Exception Test should be carried out to show that the LPA has applied this test for sites at fluvial risk and also considered surface water flood risk in equal standing.</p> <p>There is no reference made to any of these tests having been carried out in the draft Local Plan. It can only be assumed that these have not been done, particularly because key considerations for each site seem to give potential developers the responsibility for deciding the extent of flooding or flood risk for each site, but for this policy to be effective, all development sites in the whole area needs to be assessed together.</p> <p>Examples of key considerations pertaining to flooding are:</p> <p>H3.59 North Farm, West Boldon Green Belt 588 dwellings Opportunities to re-naturalise the water course should be explored iv. If the surface water is being discharged to the water course an adequate SUDS treatment assessment will be required.</p> <p>H3.61 Green Belt Land at St John's Terrace and Natley Avenue, East Boldon 63 dwellings If the surface water is being discharged to the water course an adequate SUDS treatment assessment will be required.</p> <p>H3.71 Land at Wellands Farm Whitburn Green Belt 200 dwellings iv. Surface water management plan would be required.</p> <p>H3.70 West Hall Farm, Cleadon Green Belt 231 dwellings v. The southern part of the site is affected by surface water flooding as well as the gardens on West Meadows Roads. SuDS should seek to alleviate both the flooding on the site and on West Meadows Road</p> <p>H3.68 Land to north of New Road, Boldon Colliery 138 dwellings v. Drainage improvements would be required to alleviate surface water flooding to the north east of the site.</p> <p>vi. If the surface water is being discharged to the water course an adequate SUDS treatment assess will be required.</p> <p>H3.1 Land at Benton Road, South Shields 28 dwellings vi. Proposals should be supported by a site-specific flood-risk assessment.</p> <p>Although the policy does state that SuDs will be required for all major</p> |
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| | | | | | | <p>developments of 10 or more dwellings, there is no reference to this in all key considerations. These seems to suggest that it may be possible for developers to decide their own policy. How will it be judged that these will be appropriate? What measures will be in place for developers to plan with adjacent sites so that the systems on one site does not compromise the effectiveness of the other? How will the Local Authority manage all of these systems?</p> <p>It seems a very dangerous practice to leave the management of flood risk assessment to a variety of different developers who will only act in their own best interests to maximise profit. Why is this not addressed in the policy?</p> <p>Would it not be better for the policy to contain instruction for developers based on prior evidence from assessment of individual sites? The policy should include provision for a thorough assessment to be undertaken by the Local Authority, including individual Sequential and Exception tests being carried out for each site, before they are allocated for inclusion in the Local Plan. Then when developers are planning for each site a directive can be given for which most beneficial flood protection scheme should be used on that particular site. Without a definitive plan in place, based on such prior evidence, how can flooding be assessed and managed across the Borough? Leaving the decision of which SuDs techniques to use and where these will be positioned on the site to individual developers may mean that other SuDs schemes on adjacent sites are compromised, or even that all SuDs schemes may be ineffective. Developers cannot be expected, or relied upon, to take an objective view in dealing with flood risk when the question of viability is omnipresent. Having set directives in place before the stage of development would allow for viability issues to be undertaken before sites are allocated and would also allow for continuing management of these schemes once development was complete. There is also no evidence in the policy of a cumulative assessment of the use of so many SuDs systems on flooding in other areas upstream of developments – in particular those in East and West Boldon which will have Suds systems draining into Tiledshed Burn. Mention is made for some sites that SuDs will not affect areas downstream but the areas in Cleadon, which currently are at most risk of flooding, are ‘upstream’ of these sites and the flow of water from these are all directed into the</p> |
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| | | | | | | <p>burn and River Don too. Have protection for these been accounted for in any part of this policy?</p> <p>Due to its position in the low lying areas below Cleadon Hills, flooding in Cleadon will be exacerbated by the increase in surface drainage due to climate change and also from any developments which could increase surface drainage downstream - such as sites H3.2, H3.3 and H3.70. Present flood alleviation in the village depends on holding tanks and ditches in the fields close to the burn's drainage channel. Use of Suds drainage systems on sites in East and West Boldon, which will all drain into the burn could also overload the catchment and affect drainage rates in the fields where these tanks and ditches are placed.</p> <p>Without a cumulative assessment of all these different SuDs schemes any development in this area will put areas in Cleadon, which are already experiencing flooding issues, in greater danger. A review of sustainability assessments should also be conducted to include these risks in any development within the River Don basin. This should also include assessment of drainage from the IAMP site and all SuDs drainage schemes being used for drainage of the road network from Testos junction, which will also drain into the River Don.</p> <p>Policy IN7 informs us that there is a road bridge proposed to replace the level crossings at Tilesheds and Benton Road/Boldon Lane. There is no further information given but the position of this bridge must go from Tilesheds Lane across Benton Road and back to New Road, which places it in Green Belt fields which are prone flooding. Tileshed Burn drains, via a culvert under New Road into the River Don in part of the area the bridge will cover (New Road/Boldon Lane).</p> <p>Point 7 in the major causes of flooding list (above) states that a less frequent form of flooding can arise from a failure of infrastructure designed to protect against flooding, such as culverts, and that because of the sudden onset of such events, the impact of this form of flooding can be severe. If there is no cumulative assessment of the impact of successive SuDs drainage into the burn, then there cannot have been an assessment made of the impact on the culvert at New Road.</p> <p>Also, infrastructure, such as road bridges are structural culverts. It follows that the impact of the road bridge, in addition to that of the culvert at New Road has not been assessed either. It is remiss that these schemes have not even been considered without consideration to the risk of the major flooding they could cause.</p> |
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| | | | | | | <p>SuD systems all require ongoing maintenance. What arrangements will be made to ensure that full responsibility is taken for continued maintenance of all of the SuD systems proposed? If this will fall to the Council, how will this be financed? Should these issues not be included, and addressed, in this policy?</p> <p>The health and safety issues related to SuD schemes have also not been reported. These schemes are designed to manage water run-off in open 'ponds' (individually formed open holding 'tanks') which are then landscaped. Ongoing maintenance of the filtration process used in the schemes is required. Larger development sites may require more than one SuD 'pond'. The risk to health and safety arising from the presence of this open water cannot be ignored. Buffers to 'hide' these will only be an attraction to young children. How these will be managed and safety proofed must be done before any development is allowed and all sites should be marketed with full information given about these schemes. The council must take full responsibility for this and this should be included as a matter of policy.</p> <p>The Strategic Flood Risk Assessment states: "The LPA, should seek to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk and ensuring that all development does not increase risk and where possible can help reduce risk from flooding to existing communities and development." Flood risk has not been taken into account for housing allocation, otherwise there would be no proposals to build any development along the present danger zones for both fluvial and surface water flooding in all of the Green Belt areas of Cleadon and the Boldons. The Local Plan should not consider the viability of a site before its sustainability and ongoing safety after development.</p> <p>Avoidance of including the measures to properly address all issues associated with the use of SuDs (or any scheme suggested by developers) protects viability over the actual sustainability of a site.</p> <p>The green space which is now mostly designated as Green Belt in the area of Cleadon and Boldon has not been developed previously for a very good reason. This area floods. No amount of mitigation can fight the laws of nature or the effects of climate change. That is why we need positive and effective planning which will prevent further flooding – and particularly in a Local Authority who has just declared a Climate Emergency: not a Local</p> |
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| | | | | | | | Plan which actively seeks to put development for housing in one of the most consistently 'at risk' areas of both surface water flooding and fluvial flooding in the Borough. I strongly object to this policy. It does not protect current or future dwellings from flooding. It is not sound. |
| ST2169 | Michael Miller | Natural England | 11 Planning for our Natural Environment | NE03 | | support | Natural England welcomes the emphasis in policy in regards to the creation and protection of Green Infrastructure, Areas of High Landscape Value and air quality, however we would request that a policy structured emphasis regarding Biodiversity Net Gain; delivered through new development is included in the document. This approach would recognise and promote the importance and opportunities presented through biodiversity net gain in enhancing the natural environment. In addition to introducing a policy emphasis on providing the potential for Biodiversity Net Gain, Natural England requests the proposed policy include a statement on the protection of high quality agricultural land and soils where development may have an adverse effect on this resource. |
| ST2169 | Michael Miller | Natural England | 11 Planning for our Natural Environment | NE05 | | support | Natural England welcomes the emphasis in policy in regards to the creation and protection of Green Infrastructure, Areas of High Landscape Value and air quality, however we would request that a policy structured emphasis regarding Biodiversity Net Gain; delivered through new development is included in the document. This approach would recognise and promote the importance and opportunities presented through biodiversity net gain in enhancing the natural environment. In addition to introducing a policy emphasis on providing the potential for Biodiversity Net Gain, Natural England requests the proposed policy include a statement on the protection of high quality agricultural land and soils where development may have an adverse effect on this resource. |
| ST2169 | Michael Miller | Natural England | 11 Planning for our Natural Environment | NE10 | | support | Natural England welcomes the emphasis in policy in regards to the creation and protection of Green Infrastructure, Areas of High Landscape Value and air quality, however we would request that a policy structured emphasis regarding Biodiversity Net Gain; delivered through new development is included in the document. This approach would recognise and promote the importance and opportunities presented through biodiversity net gain in enhancing the natural environment. In addition to introducing a policy emphasis on providing the potential for Biodiversity Net Gain, Natural England requests the proposed policy include a statement on the protection of high quality agricultural land and soils where development may have an adverse effect on this resource. |

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| ST2169 | Michael Miller | Natural England | 11 Planning for our Natural Environment | NE02 | | Comment | Natural England welcomes the emphasis in policy in regards to the creation and protection of Green Infrastructure, Areas of High Landscape Value and air quality, however we would request that a policy structured emphasis regarding Biodiversity Net Gain; delivered through new development is included in the document. This approach would recognise and promote the importance and opportunities presented through biodiversity net gain in enhancing the natural environment. In addition to introducing a policy emphasis on providing the potential for Biodiversity Net Gain, Natural England requests the proposed policy include a statement on the protection of high quality agricultural land and soils where development may have an adverse effect on this resource. |
| ST2169 | Michael Miller | Natural England | 11 Planning for our Natural Environment | NE02 | 11.07 | support | Natural England welcomes the inclusion of the recognition that Tourism and Leisure development may have an impact on the special interest features of designated sites through recreational disturbance, however we request that further policy emphasis is placed on ensuring appropriate mitigation is delivered to counter these impacts. |
| ST2169 | Michael Miller | Natural England | 11 Planning for our Natural Environment | NE02 | | comment | Natural England welcomes the inclusion of the recognition that Tourism and Leisure development may have an impact on the special interest features of designated sites through recreational disturbance, however we request that further policy emphasis is placed on ensuring appropriate mitigation is delivered to counter these impacts. It also would be useful to outline how these mitigation measures would be secured. In addition Natural England request that the potential for recreational disturbance is identified in policy which deals with new housing developments also. This is because recreational disturbance impacts on designated sites are identified as presented where new households are created, both in single developments and cumulative developments in the borough. It should be ingrained within the policy document that such mitigation are likely to be required where new housing developments are proposed. |
| ST2170 | Natasha Rowland | National Trust | 11 Planning for our Natural Environment | NE05 | | support | The Council is proposing under Policy NE5 to introduce a new Area of High Landscape Value along the coast, which we strongly support, but there needs to be consistency across the strategic policies. In order to reinforce the importance of this designation the weight at a strategic level should be strengthened. We recommend Criteria Cv. Is amended to state; 'Development should protect, conserve or enhance important coastal views'. We support the recognition that the coastal area from Trow point to the Sunderland City boundary is to be identified for the first time as an Area of |

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| | | | | | | | High Landscape Value. This area has recovered significantly from its recent industrial past and now provides a distinctive character area, typically recreational uses, expansive views and limestone cliffs and outcrops. The policy should recognise the coastal fringes in this area forms a significant area of undeveloped coast. This designation of AHLV is entirely consistent with NPPF paragraph 170 which explains that planning policies and decisions should contribute to and enhance the natural and local environment by: 'protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'. This area is a highly valued landscape as it forms a substantial stretch of undeveloped coast in South Tyneside and which will contain the England Coastal Path. The coastal area contains internationally significant nature designations, significant areas of biodiversity and geological value and it would be robust to extend the AHLV designation to therefore include this area in its own right. |
| ST2170 | Natasha Rowland | National Trust | 11 Planning for our Natural Environment | NE03 | | support | NT supports policy NE3 which seeks to ensure there is a good quality and accessible network of green spaces throughout the Borough to provide a range of social, economic, health and environmental benefits for all. |
| ST2172 | Ian Lyle | ELG Planning | 11 Planning for our Natural Environment | NE04 | | Objection | <p>1. Boldon Golf Club would object to part of the land which they are seeking to promote through these representations being allocated as Open Space and Green Infrastructure (Figure 1 below).</p> <p>2. Boldon Golf Club is seeking for this land to be allocated for housing, it is considered that that development of this land is necessary to raise money for the Golf Club and it would raise much needed investment to secure the long-term future of the club and allow them to invest facilities which would lead to improvements to the quality of the remainder of the Golf Club and its open space.</p> |
| ST2176 | Neil Westwick | Lichfields | 11 Planning for our Natural Environment | NE02 | | objection | <p>Our client recognises the importance of protecting biodiversity; however, draft Policy NE2 requires that proposals which will have an impact on a habitat comply with various criteria, including that there are no reasonable alternatives. The NPPF (para. 175) does not refer to the need to consider alternatives, instead it seeks adequate mitigation, or, as a last resort, compensation.</p> <p>To ensure a sound Plan that is consistent with national policy (NPPF, paragraphs 35 and 175), our client requests that the reference to 'reasonable alternatives' is removed from Policy NE2.</p> |

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| ST2176 | Neil Westwick | Lichfields | 11 Planning for our Natural Environment | NE03 | | objection | <p>Our client considers that draft Policy NE3 could be used to support an approach towards green infrastructure that is more onerous than the NPPF and there may be circumstances where not all the criteria in this policy need to be strictly applied.</p> <p>To ensure a sound Plan that is based on the most appropriate strategy, in accordance with the NPPF (para. 35), it is requested that the policy is amended as follows:</p> <p>“We will deliver a good quality and accessible network of green spaces throughout the Borough to provide a range of social, economic, health and environmental benefits for all. This will be done by undertaking the following, where appropriate...”</p> |
| ST2176 | Neil Westwick | Lichfields | 11 Planning for our Natural Environment | NE04 | | objection | <p>Our client understands the importance of green space and green infrastructure provision. However, draft Policy NE4 requires that developments provide onsite open space facilities which contribute to the green infrastructure in accordance with Developer contributions SPD 5 or any successor document; or that off-site contributions would be sought that have regard to various council studies and strategies, as well as successor documents.</p> <p>Our client is concerned that this policy is referring to a range of documents and successor documents but that the associated feasibility and viability of delivering their requirements has not been fully taken into account, especially given that the successor documents have not been prepared. As such, the full cost implications of this policy have not been taken into account in the Local Plan viability assessment work and this could have a negative impact on development viability.</p> <p>To ensure a sound Plan that is positively prepared and based on appropriate evidence, in accordance with the NPPF (para. 35), the following changes are sought to this policy:</p> <p>“New major housing developments will be required to provide onsite open space facilities, where possible, which contribute to the green infrastructure in accordance with a scheme that is to be agreed with the council, whilst taking into account the Developer Contributions SPD 5 or any successor document.”</p> <p>“Where provision cannot be provided on-site, we will seek the equivalent off-site financial contributions, taking into account site viability, where...:”</p> <p>In such circumstances off-site financial contributions will be sought for the following, taking into account site viability:</p> <p>g) Open space and children’s play provision and maintenance – having</p> |

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| | | | | | | | <p>regard to the quality and quantity guidance and standards set out the most up to date Open Space Study.</p> <p>h) Playing pitch provision and maintenance – having regard to guidance set out in the action plan of our most up to date Playing Pitch Strategy.</p> <p>i) Delivering new allotment provision to meet current and future demand.</p> <p>j) Delivery of Green Infrastructure projects, prioritising those identified in Supplementary Planning Document 3/ Green Infrastructure Strategy or any successor document.”</p> |
| ST2181 | Cleadon and East Boldon Branch Labour Party | | 11 Planning for our Natural Environment | NE01 | | support | <p>This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge.</p> <p>The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this.</p> |
| ST2181 | Cleadon and East Boldon Branch Labour Party | | 11 Planning for our Natural Environment | NE02 | | support | <p>Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors.</p> <p>We consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2.</p> |
| ST2181 | Cleadon and East Boldon Branch Labour Party | | 11 Planning for our Natural Environment | NE03 | | support | <p>Our ward has significant amounts of green infrastructure, which our residents also enjoy on a daily basis, as set out below:</p> <p>Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children’s play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tiesheds Burn and Pond, Boldon and South Shields Golf Courses, as well numerous public rights of way, cycle routes and bridleways.</p> <p>It is vital that all of these are safeguarded as set out in the policy.</p> |
| ST2181 | Cleadon and East Boldon | | 11 Planning for our | NE05 | | support | <p>Our ward has two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope.</p> <p>We are concerned that Housing Allocation H3.65 will have a detrimental</p> |

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| | Branch Labour Party | | Natural Environment | | | | impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills. |
| ST2181 | Cleadon and East Boldon Branch Labour Party | | 11 Planning for our Natural Environment | NE06 | | support | Our ward has suffered from continuing flooding problems and this was recognised in the Strategic Flood Risk Assessment (2018). Further flood alleviation measures are planned in Cleadon. Two of the proposed housing sites are within the recognised Flood Risk Zones (H3.59 and (H3.61) and three of the others have a risk of surface water flooding (H3.70, H3.2 and H3.3) We consider that further investigation is required in relation to flood risk on these sites. |
| ST2181 | Cleadon and East Boldon Branch Labour Party | | 11 Planning for our Natural Environment | NE11 | | support | The policy states that development proposals which could lead to significant pollution should be accompanied by a detailed assessment of the likely impacts. We are concerned that the traffic increase and resulting pollution within the ward from the proposed housing allocations will have a negative impact on our residents. |
| ST2185 | James Seabury | Banks Property | 11 Planning for our Natural Environment | NE05 | | comment | 4. CHAPTER 11: PLANNING FOR OUR NATURAL ENVIRONMENT Policy NE5: Areas of High Landscape Value 4.1 Banks Property acknowledge the need to protect Areas of High Landscape Value (AHLV) as defined on the proposals maps which includes the Cleadon Hills. The Cleadon Hills AHLV is proposed to be extended further south and east. Whilst part of the extension area is justified we do not consider that the land immediately to the north or site H3.71 should be included as part of the AHLV. 4.2 Extending site H3.71 to the north would round off the village of Whitburn and this area of land would not impact on long distance views to the Cleadon Hills or have an adverse impact on the landscape character itself. A landscape and visual impact assessment has been previously submitted to demonstrate the intervisibility of the proposed development site and visual impacts. 4.3 We recommend removing the area of land immediately to the north of site H3.71 and the AHLV designation to be redrawn at the new development edge of the village. |
| ST2186 | Alastair Willis | Lichfields | 11 Planning for our Natural Environment | NE02 | | Objection | Our client recognises the importance of protecting biodiversity; however, draft Policy NE2 requires that proposals which will have an impact on a habitat comply with various criteria, including that there are no reasonable alternatives. The NPPF (para. 175) does not refer to the need to consider alternatives, instead it seeks adequate mitigation, or, as a last resort, |

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| | | | | | | | <p>compensation.</p> <p>To ensure a sound Plan that is consistent with national policy (NPPF, paragraphs 35 and 175), our client requests that the reference to 'reasonable alternatives' is removed from Policy NE2.</p> |
| ST2186 | Alastair Willis | Lichfields | 11 Planning for our Natural Environment | NE03 | | objection | <p>Our client considers that draft Policy NE3 could be used to support an approach towards green infrastructure that is more onerous than the NPPF and there may be circumstances where not all the criteria in this policy need to be strictly applied.</p> <p>To ensure a sound Plan that is based on the most appropriate strategy, in accordance with the NPPF (para. 35), it is requested that the policy is amended as follows:</p> <p>"We will deliver a good quality and accessible network of green spaces throughout the Borough to provide a range of social, economic, health and environmental benefits for all. This will be done by undertaking the following, where appropriate..."</p> |
| ST2186 | Alastair Willis | Lichfields | 11 Planning for our Natural Environment | NE04 | | Objection | <p>Our client understands the importance of green space and green infrastructure provision. However, draft Policy NE4 requires that developments provide onsite open space facilities which contribute to the green infrastructure in accordance with Developer Contributions SPD 5 or any successor document; or that off-site contributions would be sought that have regard to various council studies and strategies, as well as successor documents.</p> <p>Our client is concerned that this policy is referring to a range of documents and successor documents but that the associated feasibility and viability of delivering their requirements has not been fully taken into account, especially given that the successor documents have not been prepared. As such, the full cost implications of this policy have not been taken into account in the Local Plan viability assessment work and this could have a negative impact on development viability.</p> <p>To ensure a sound Plan that is positively prepared and based on appropriate evidence, in accordance with the NPPF (para. 35), the following changes are sought to this policy:</p> <p>"New major housing developments will be required to provide onsite open space facilities, where possible, which contribute to the green infrastructure in accordance with a scheme that is to be agreed with the council, whilst taking into account the Developer Contributions SPD 5 or any successor document."</p> <p>"Where provision cannot be provided on-site, we will seek the equivalent</p> |

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| | | | | | | <p>off-site financial contributions, taking into account site viability, where...” In such circumstances off-site financial contributions will be sought for the following, taking into account site viability: g) Open space and children’s play provision and maintenance – having regard to the quality and quantity guidance and standards set out the most up to date Open Space Study. h) Playing pitch provision and maintenance – having regard to guidance set out in the action plan of our most up to date Playing Pitch Strategy. i) Delivering new allotment provision to meet current and future demand. j) Delivery of Green Infrastructure projects, prioritising those identified in Supplementary Planning Document 3/ Green Infrastructure Strategy or any successor document.”</p> | | | | | | | | | |
| ST2187 | Executive Members | Whitburn Neighbourhood Forum | 11 Planning for our Natural Environment | NE10 | comment | <p>Residents of South Tyneside Council generally have a lower life expectancy than the national average according to Public Health data reports :</p> <table border="0"> <tr> <td></td> <td>Male</td> <td>Female</td> </tr> <tr> <td>South Tyneside</td> <td>77.6 years</td> <td>81.5 years</td> </tr> <tr> <td>National Average</td> <td>79.5 years</td> <td>83 years</td> </tr> </table> <p>There is evidence to suggest that long term exposure to poor air quality increases the risk of premature mortality from cardiovascular and respiratory diseases. The premature mortality rates for cardiovascular, respiratory diseases and cancer are given below. It is important to note that other lifestyle factors such as smoking, etc. do influence these figures.</p> <p>See full representation for table</p> <p>Planning requirements to tackle Air Quality As per the National Planning Policy Framework (paragraph 181, National Planning Practice Guidance – Air quality chapter) and as per the Validation of Planning Applications in Tyneside – 2019. There is a requirement to produce an Air Quality Assessment before any developments take place in Whitburn under the following provisions:</p> <ul style="list-style-type: none"> ● Where there would be an increase of 50 parking spaces within an AQMA or 100 spaces elsewhere; ● Development in excess of 100 dwellings or 10,000 square metres floor space (or an equivalent combination) | | Male | Female | South Tyneside | 77.6 years | 81.5 years | National Average | 79.5 years | 83 years |
| | Male | Female | | | | | | | | | | | | | |
| South Tyneside | 77.6 years | 81.5 years | | | | | | | | | | | | | |
| National Average | 79.5 years | 83 years | | | | | | | | | | | | | |
| ST2187 | Executive Members | Whitburn Neighbourhood Forum | 11 Planning for our Natural Environment | NE01 | objection | <p>4 NATURAL ENVIRONMENT AND LANDSCAPE 4.1 Policies on natural environment The policies to protect and enhance the natural environment are inadequate for the following reasons: Policy NE1 states that measurable net gains for biodiversity will be</p> | | | | | | | | | |

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| | | | | | | <p>secured. However, there is no explanation or methodology as to how this will be measured. In particular, as the Plan proposes to take sites out of green belt, which have biodiversity value, the Plan should consider the loss of biodiversity for each site and include a plan as to how net gains will be achieved. Of particular importance is the consideration of how net gains will be achieved on site. If this is not possible then it should be identified:</p> <ul style="list-style-type: none"> ● Where off site this will be (which should be within the Whitburn Neighbourhood Area). ● How the loss and gains will be calculated. ● How this will be funded. <p>It needs to be known in advance whether net gain will be achievable. In particular, some sites offer unique habitats that cannot be replicated. For instance, the sites north of Shearwater offer an open field used by curlew and it will not be possible to recreate this anywhere else, leading to a net loss.</p> <p>The Plan should make reference to the current national policies and plans on biodiversity net gain, such as the Defra metric and the forthcoming Environment Bill, which intends to include mandatory net gain.</p> <p>In addition, there is no mention of climate change adaptation, which is in conflict with the National Planning Policy Framework (NPPF) para 149: 'Plans should take a proactive approach to mitigating and adapting to climate change'.</p> <p>Only mitigation is mentioned and it appears that the meaning of adaption and mitigation have been mixed up. Climate change mitigation entails measures to reduce climate change occurring in the first place, for instance through reducing greenhouse gas emissions. Adaptation refers to measures to increase resilience to the effects of climate change, such as flood risk management. The policy states that it will 'contribute to the mitigation of the likely effects of climate change'. Instead it should refer to adaptation and mitigation, and include measures that could contribute to both, in particular green infrastructure.</p> |
| ST2187 | Executive Members | Whitburn Neighbourhood Forum | 11 Planning for our Natural Environment | NE02 | | <p>Policy NE2 only refers to the need for an appropriate assessment at the design stage. However, as the Plan allocates housing with a known quantum and location, the impacts of these sites on internationally protected sites should be known in advance, and should be avoided. If it is uncertain what the impacts might be, the sites should not be allocated, which is in line with the precautionary principle. The Habitats Regulations Assessment for this Plan is inadequate in that respect, which will be</p> |

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| | | | | | | | discussed further below. Moreover, the interim mitigation strategy should be updated now that a draft Local Plan has been produced. A final mitigation strategy should be completed before the plan is submitted for examination, so that there is certainty the approach taken can in fact prevent adverse impacts on European sites. |
| ST2187 | Executive Members | Whitburn Neighbourhood Forum | 11 Planning for our Natural Environment | NE01 | | objection | 6.3 Natural environment and landscape <ul style="list-style-type: none"> • With regards to natural environment, the policies are insufficient to ensure that the Local plan will not have any negative impacts within the borough and Whitburn. |
| ST2268 | Steve Owen | | 11 Planning for our natural environment | NE06 | | Comment | What is also very unclear is how the Local Authority plan to provide suitable solutions for utility services and the like. Drainage within Whitburn & Cleadon is well known for severe flooding, both areas are at bursting point, whereby considerable areas are underwater in both summer and especially winter periods. The surface water runoff is at saturation point, any new areas have to be treated with substantive research and careful design to reduce any risk of exacerbating this problem. There are also problems with infrastructure, especially shopping & school provision. Both schooling areas are extremely overstocked. |
| ST2272 | Byron Longstaff | | 11 Planning for our natural environment | NE06 | | Comment | Please answer the following questions: How will the increased surface water be removed? Will STC be liable if the development goes ahead and houses and businesses are flooded due to negligence and ignoring facts? Again there are many other environmental problems that STC will struggle to solve like loss of habitat, what is in place to protect the wildlife? |
| ST2278 | Daniel Stone | Centre for Sustainable Energy | 11 Planning for our natural Environment | NE01 | | Objection | Objection to Policy NE1 - Our Strategic Approach for the Natural Environment - We object to the lack of consideration given to overheating within climate adaptation policies within this policy and within the plan overall. The protection and enhancement of the natural environment will be delivered by: g) Contribute to the mitigation of the likely effects of climate change, taking full account of flood risk, water supply and demand and where appropriate coastal change. Global heating is anticipated to result in increased summer heat and a greater likelihood of heat waves. The Met office UK Climate Projections predict that “Hot summers are expected to become more common. The summer of 2018 was the equal-warmest summer for the UK along with 2006, 2003 and 1976. Climate change has already increased the chance of seeing a summer as hot as 2018 to between 12-25%. With future warming, hot summers by mid- |

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| | | | | | | | <p>century could become even more common, near to 50%.” Summer temperatures in urban areas are predicted to rise between 2 and 4 degrees by 2050, increasing the existing risk posed to the elderly, the young and the sick (those who typically spend most of their time indoors during the day) of suffering from severe heat stress. The NPPF states (para 149): Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. (My emphasis) We object to the lack of consideration given to overheating within climate adaptation policies in the plan. A policy should be added to address the mitigation of overheating, making clear that new development should follow the cooling hierarchy to avoid reliance on high-carbon mechanical cooling. Policy examples to follow are given in the GBC policy playbook and the RTPI / TCPA climate guide.</p> |
| ST2281 | Simon Hedley | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>I also wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> - carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030). -Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting emissions targets of South Tyneside. - Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would be an inconsistent position and ultimately minimise or negate net carbon dioxide reductions). -Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey |

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| | | | | | | <p>(determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, "suitable sites for energy generation" would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider South Tyneside for their projects.</p> <p>-As policy IN4 does not identify "suitable sites for onshore wind energy generation" the policy in effect bans it for the lifetime of the plan. Given that we're in a climate emergency, I'd ask South Tyneside council to reverse this decision.</p> <p>Policy ST1 states an intention to deliver a "clean and green environment". South Tyneside Council declared a 'climate emergency' on July 18th 2019 to prevent an environmental crisis in the area. I understand this involves:</p> <ul style="list-style-type: none">- Taking all necessary steps to make South Tyneside Council carbon neutral by 2030. Building on Green Belt and increasing traffic to residential areas will cause an increase in carbon emissions, so South Tyneside cannot be carbon neutral by 2030 if this Local Plan is adopted in current draft.- Leading by example through establishing South Tyneside Council as a champion for a carbon neutral future for the borough. This will include using the council's advocacy role to influence actions across all our communities and across the region that promotes carbon reduction.- Calling on the leader and chief executive to write to the Government to pass the necessary legislation and provide the powers and resources necessary to deliver our climate change goals. Producing a comprehensive Climate Change Strategy that will set clear and unambiguous targets for carbon reduction, including interim targets. This will be the product of consultation with key stakeholders including the voluntary and community sector and will be considered by council on March 31, 2020. This will include an action plan for the next five years. Policy ST1 does not make clear how these targets will be met. <p>I notice at least 60 of the 75 sites allocated for housing have trees, and a total figure for at risk trees of being felled for housing developments are over 1700 plus hedgerows, while total figures for trees at risk for regeneration and economic development are a minimum of 400 plus hedgerows. This is an unacceptable total of over 2100 trees are at risk of being felled as the draft Local Plan currently stands. How can South Tyneside Council state they are "taking all necessary steps to make South Tyneside Council carbon neutral by 2030" when over 2,100 mature trees,</p> |
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| | | | | | | | and metres of hedgerow, which help stop climate change by removing carbon dioxide from the air, storing carbon in the trees and soil, and releasing oxygen into the atmosphere on a daily basis, are going to be removed? Greenbelt cannot be replaced or mitigated against. South Tyneside Council has previously, unsuccessfully attempted to build on many of the Green Belt sites in the draft Local Plan. Are the sites allocated for housing in the draft Plan driven by developers rather than lack of suitable land for housing? I hope that South Tyneside Council reconsiders this Local Plan in current form. it is widely understood that the protection of land and its use to mitigate the effects of carbon dioxide is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have enough land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's recent declaration of a Climate Emergency on 18th July 2019. The draft Local Plan seems that it has been rushed through without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2283 | Nicola Usher | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> *carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030). *Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets. *Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high- |

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| | | | | | | | <p>carbon policies (which would ultimately minimise or negate net co2 reductions).</p> <p>* Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, 'suitable sites for energy generation' would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects.</p> <p>* As policy IN4 does not identify 'suitable sites for onshore wind energy generation' it , in effect, bans it for the lifetime of the plan. Given that we're in a climate emergency, I'd ask the council to reverse this decision. I also wish to amplify the concerns of those objecting to the proposed house building project, which is disproportionately concentrated within Boldon and Cleadon.</p> |
| ST2284 | Nicky Butler | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. To lose vegetation and therefore habitat and associated wildlife, whilst increasing surface water runoff leading to flooding within the village as well as worsening flooding further downstream, and to exacerbate sewerage problems are all steps in the wrong direction. Both H3.61 and H3.59 are partly within both flood risk and surface water flood risk areas.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE01 | | Object | <p>Our Strategic Approach for the Natural Environment (Strategic Policy)</p> <p>CPRE supports Policy NE1, but is concerned at whether the commitment to follow through on the Policy is there.</p> <p>For example Policy NE1c, states:</p> <p>“Policy NE1: Our Strategic Approach for the Natural Environment (Strategic Policy) The protection and enhancement of the natural environment will be delivered by:</p> <p>“c) Protecting against the loss of the Borough’s trees, woodland and hedgerows and irreplaceable habitats whilst securing new tree planting and habitat creation particularly that which would contribute towards flood risk management; “</p> <p>The loss of trees and over pruning of hedges have been a major concern for residents in recent years.</p> <p>STTAG, the South Tyneside Tree Action Group, have analysed the housing site allocations and have found:</p> <p>“•At least 60 of the 75 sites for housing have trees.</p> <ul style="list-style-type: none"> •Total figures for at risk trees of being felled for housing developments are over 1700 plus hedgerows. •total figures for trees at risk for regeneration and economic development are a minimum of 400 plus hedgerows. •a total of over 2100 trees are at risk of being felled as the local plan currently stands.” <p>The comments of Durham Bird Club are also noted.</p> |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE02 | | Support | <p>Biodiversity, Geodiversity and Ecological Networks (Strategic Policy) - CPRE generally supports Policy NE2, but there are concerns and the comments of Durham Bird Club are noted.</p> |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE03 | | Support | <p>Open Spaces and Green Infrastructure Provision- CPRE supports Policy NE3, particularly the identification of a Green Belt corridor, but also notes the comments of Durham Bird Club.</p> |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE04 | | Support | <p>Open Spaces and Green Infrastructure Provision - CPRE generally supports Policy NE4, but there are concerns and the the comments of Durham Bird Club are noted.</p> |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our | NE05 | | Support | <p>Areas of High Landscape Value (Map) -CPRE supports Policy NE5</p> |

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| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE06 | | Support | Flood Risk and Water Management - CPRE supports Policy NE6 |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE07 | | Support | Protecting Water Quality - CPRE supports Policy NE7 |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE08 | | Support | Coastal Change (Map) - CPRE supports Policy NE8 |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE09 | | Support | Contaminated Land and Ground Stability - CPRE supports Policy NE9 |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE10 | | Support | Air Quality - CPRE supports Policy NE10 |
| ST2285 | Gillan Gibson | CPRE | 11 Planning for our natural environment | NE11 | | Support | Pollution - CPRE supports Policy NE11 |
| ST2289 | Martin Kinlen | | 11 Planning for our natural environment | NE01 | g | Object | <p>We should not be building on fertile land. This is where we grow our food. There is only a small proportion of the earth where food can be grown. Most of the earth is either: too wet, too dry, too hot, too cold, too much stone, too much sand, too steep to cultivate, etc. Think of places like The Netherlands where land was recovered from the sea or many parts of the world where land was terraced in order to grow food. At current day prices these areas would cost billions to create. We have what those people battled to create and we are trashing it! If you take good farm land and build on it, it can not be used for farm land for probably 500 years. As one architect said, "when you construct a building, you are stealing the land from the earth."</p> |

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| ST2290 | Sue Stonehouse | | 11 Planning for our natural environment | NE01 | g | object | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> * Carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030). * Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation, detailing how it would contribute to meeting South Tyneside’s emissions targets. * Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions). * Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, ‘suitable sites for energy generation’ would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects. * As policy IN4 does not identify ‘suitable sites for onshore wind energy generation’ it , in effect, bans it for the lifetime of the plan. Given that we’re in a climate emergency, I’d ask the council to reverse this decision. <p>I also wish to amplify the concerns of those objecting to the proposed house building project, which is disproportionately concentrated within Boldon and Cleadon.</p> |
| ST2297 | Gillian Johnston | | 11 Planning for our | NE01 | g | Object | <p>According to National Planning Policy Framework (2019): ‘The planning system should support a transition to a low carbon future in a changing climate... it should help to: shape places in ways that contribute</p> |

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| | | | natural environment | | | | <p>to radical reductions in greenhouse gas emissions... in line with the objectives and provisions of the Climate Change Act 2008.”</p> <p>Plans are legally required to demonstrate how their policies are in line with legally binding carbon emission reduction targets in the Climate Change Act 2008, including and understanding of baseline emissions inherent in future development... Local Plans must ensure that the actions and policies will reduce emissions in line with the trajectory set out in the Climate Change Act 2008.</p> <p>A large scale development on site H3.59 along with development on sites H3.1; H3.12 ; RG5 and H3.68 all within close proximity will increase carbon emissions not reduce them, particularly to the villages of East Boldon and Cleadon therefore totally ignores guidance in Climate Change Act (2008), so cannot be justified as this development is not sustainable, when viewed alongside current Climate Change Legislation.</p> <p>Is this legal?</p> |
| ST2301 | Geraldine Kilgour | Councillor | 11 Planning for our natural environment | NE06 | | comment | <p>Flood risk management</p> <p>Lead Local Flood Authority</p> <p>South Tyneside Council is a Lead Local Flood Authority (LLFA) under the Flood and Water Management Act(2010). This means we have a number of duties and responsibilities in relation to managing flood risk across South Tyneside. We are responsible for managing the risk of flooding from local sources, including:</p> <ul style="list-style-type: none"> · Surface water runoff · Groundwater · Ordinary watercourses <p>Often the causes of flooding can be complex and it is not always the result of one factor.We work closely with partner organisations like the Environment Agency and Northumbrian Water to manage the risk. A number of documents have been produced in relation to flood risk management:</p> <p>Strategic Flood Risk Assessment</p> <p>The aim of the Strategic Flood Risk Assessment (SFRA) is to avoid inappropriate development in high flood-risk areas. The SFRA assesses the risk of flooding from all sources, and includes mapping of Flood Zones 1, 2, 3a and 3b. The SFRA also provides background information for our Local Development Framework and will help to influence and shape planning decisions, whilst assisting with emergency planning, shoreline management and drainage responsibilities.</p> |

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| | | | | | | | <p>Strategic Flood Risk Assessment (Feb.2011)[pdf - 132Mb]</p> <p>Preliminary Flood Risk Assessment</p> <p>The Preliminary Flood Risk Assessment (PFRA) is a high level summary of risk, describing the probability of future flooding and the consequences of past flooding. It identifies areas where the risks are significant and warrant further examination.</p> <p>Preliminary Flood Risk Assessment[pdf - 4Mb]</p> <p>Surface Water Management Plan</p> <p>South Tyneside Council commissioned a Surface Water Management Plan to investigate local flooding issues. This plan identifies the mechanisms of flooding and identifies opportunities to reduce surface water in South Tyneside.</p> <p>Surface Water Management Plan Final Report[pdf - 4Mb]</p> <p>Appendix A Detailed Modelling Report[pdf - 8Mb]</p> <p>Appendix B Catchment Wide Flood Map[pdf - 10Mb]</p> <p>Appendix C Hotspot Overview[pdf - 13Mb]</p> <p>Flood and Coastal Management Strategy</p> <p>The Flood and Water Management Act (2010) requires South Tyneside Council to set out its approach to flood risk management within a formal strategy. We are currently working towards the completion of this new strategic document. NE1, NE2, NE3, NE4, NE6, NE7, NE10, NE11, IN3 all refer to the sites that we defend.</p> |
| ST2320 | Dr Kirstin Richardson | | 11 Planning for our natural environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2323 | Chrsitine Mayne | | 11 Planning for our | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st</p> |

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| | | | natural environment | | | | <p>2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2327 | Ian Guard | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 8th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside - shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2330 | Barry Edmondson | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head.</p> |

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| | | | | | | | <p>The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan is undoubtedly 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> <p>Finally, please provide details of the addresses of the planners and councilors involved. It will be most interesting to see their locations in relation to the proposed development sites.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE01 | | Objection | <p>Policy NE1 Our Strategic Approach for the Natural Environment</p> <p>This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge.</p> <p>The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE02 | | Support | <p>Policy NE2 Biodiversity, Geodiversity and Ecological Networks– Support with reservations</p> <p>Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors.</p> <p>I consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2.</p> |

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| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE03 | | Support | <p>Policy NE3 Green Infrastructure – Support with reservations</p> <p>Our ward(Cleadon and East Boldon) has significant amounts of green infrastructure, which our residents also enjoy on a daily basis, as set out below:</p> <p>Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children’s play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tilsheds Burn and Pond, Boldon Golf Course, as well numerous public rights of way, cycle routes and bridleways.</p> <p>It is vital that all of these are safeguarded as set out in the policy.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE05 | | Support | <p>Policy NE5 Areas of High Landscape Value – Support with reservations</p> <p>Our ward has two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope.</p> <p>There is concern that Housing Allocation H3.65 will have a detrimental impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE06 | | Objection | <p>Policy NE6 Flood Risk and Water Management</p> <p>Our ward has suffered from continuing flooding problems and this was recognised in the Strategic Flood Risk Assessment (2018). Further flood alleviation measures are planned in Cleadon. Two of the proposed housing sites are within the recognised Flood Risk Zones (H3.59 and (H3.61) and three of the others</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE01 | | Objection | <p>Policy NE1 Our Strategic Approach for the Natural Environment</p> <p>This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge.</p> |

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| | | | | | | | The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this. |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE02 | | Objection | <p>Policy NE2 Biodiversity, Geodiversity and Ecological Networks</p> <p>Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors.</p> <p>We consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE03 | | Objection | <p>Policy NE3 Green Infrastructure</p> <p>Our ward has significant amounts of green infrastructure, which our residents also enjoy on a daily basis, as set out below:</p> <p>Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children's play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tiesheds Burn and Pond, Boldon and South Shields Golf Courses, as well numerous public rights of way, cycle routes and bridleways.</p> <p>It is vital that all of these are safeguarded as set out in the policy.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE05 | | Support | <p>Policy NE5 Areas of High Landscape Value – Support with reservations</p> <p>Our ward has two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope.</p> <p>There is concern that Housing Allocation H3.65 will have a detrimental impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our natural environment | NE06 | | Objection | <p>Policy NE6 Flood Risk and Water Management</p> <p>Our ward has suffered from continuing flooding problems and this was recognised in the Strategic Flood Risk Assessment (2018). Further flood alleviation measures are planned in Cleadon. Two of the proposed housing sites are within the recognised Flood Risk Zones (H3.59 and (H3.61) and three of the others have a risk of surface water flooding (H3.70, H3.2 and H3.3) and further investigation is required in relation to flood risk on these sites.</p> |
| ST2337 | Peter Arthurs | | 11 Planning for our | NE11 | | Objection | <p>Policy NE11 Pollution</p> <p>The policy states that development proposals which could lead to significant pollution should be accompanied by a detailed assessment of</p> |

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| | | | natural environment | | | | the likely impacts. We are concerned that the traffic increase and resulting pollution within the ward from the proposed housing allocations will have a negative impact on our residents. |
| ST2341 | Lesley EL ALAMI | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2344 | Michael Jarvis | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2346 | Jillian Duncan | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects</p> |

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| | | | | | | | <p>of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2347 | LJ Duncan | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2350 | Carly Carrahar | | 11 Planning for our Natural Environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure - Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green Spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which inhabits it.</p> |
| ST2350 | Carly Carrahar | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of</p> |

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| | | | | | | | <p>the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2354 | Rebecca Higgins | | 11 Planning for our Natural Environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure - Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green Spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which inhabits it.</p> |
| ST2354 | Rebecca Higgins | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2356 | Sam Attewell | | 11 Planning for our Natural Environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This</p> |

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| | | | | | | | area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it. |
| ST2356 | Sam Attewell | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2358 | Jack Attewell | | 11 Planning for our Natural Environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |
| ST2358 | Jack Attewell | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |

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| ST2359 | Peter & Moria Wrighton | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>In these days where climate change is considered to be one of the major threats to our existence, this plan supports destroying open areas which are beneficial to mankind for the building of housing which generates more CO2. This year. South Tyneside Council declared a climate emergency in the borough, this would appear to be a joke considering this proposal to decimate our green belt.</p> <p>The proposed use of brownfield sites is very limited compared to the loss of greenbelt and local park areas, surely all brownfield sites should be prioritised and utilised for housing before any consideration is given to development of green areas.</p> |
| ST2360 | Claire Camsey | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for the purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2361 | Robert Camsey | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green</p> |

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| | | | | | | | <p>Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for the purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2362 | Ann Jarvis | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE01 | | Support | <p>Policy NE1 Our Strategic Approach for the Natural Environment – Support with Reservations</p> <p>This policy states that it will contribute to the mitigation of the likely effects of climate change. In Paragraphs 3.1, Strategic Vision and Paragraph 3.3 Strategic Objectives there is reference to tackling Climate Change. However on 18 July 2019, the Council declared a Climate Emergency which ensures that all Council strategic decisions, policies and strategies are in line with shift towards carbon neutral by 2030. The Draft Local Plan has proposals to develop Green Belt land which runs counter to this pledge.</p> <p>The declaration includes producing a Climate Change Strategy by March 2020 and the Local Plan strategy should be reviewed in light of this.</p> |
| ST2365 | Delia McNally | | 11 Planning for our | NE02 | | Support | <p>Policy NE2 Biodiversity, Geodiversity and Ecological Networks– Support with reservations</p> |

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| | | | natural environment | | | | <p>Our villages are surrounded by land with very high environmental designations, which are enjoyed by our residents on a daily basis. The national designations of Sites of Special Scientific Interest and Local Nature Reserves and Local Wildlife and Geodiversity Sites connect together to provide wildlife corridors.</p> <p>We consider that any reduction of Green Belt designation adjoining these sites and any further expansion of our villages will have a detrimental impact which does not accord with Policy NE2.</p> |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE03 | | Support | <p>Policy NE3 Green Infrastructure – Support with reservations</p> <p>Our ward has significant amounts of green infrastructure, which our residents also enjoy on a daily basis, as set out below:</p> <p>Coulthard and Grange Parks and Gardens, Glencourse Open Space, Oakleigh Gardens playing fields and sports facilities, Boldon Cricket Club and Archery Ground, Boldon Lawn Tennis Club, Mundles Lane Children’s play area, Boldon Cemetery, Oakleigh Gardens and Victoria Allotments, Tiesheds Burn and Pond, Boldon and South Shields Golf Courses, as well numerous public rights of way, cycle routes and bridleways.</p> <p>It is vital that all of these are safeguarded as set out in the policy.</p> |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE03 | | Support | <p>10 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George’s Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE05 | | Support | <p>Policy NE5 Areas of High Landscape Value – Support with reservations</p> <p>Our ward has two major Areas of High Landscape Value, which are Cleadon Hills and Boldon Downhill- summit and scarp slope.</p> <p>We are concerned that Housing Allocation H3.65 will have a detrimental impact on the Boldon Downhill designation and Housing Allocation H3.3 will have a similar impact on Cleadon Hills.</p> |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE06 | | Support | <p>Policy NE6 Flood Risk and Water Management – Support with reservations</p> <p>Our ward has suffered from continuing flooding problems and this was recognised in the Strategic Flood Risk Assessment (2018). Further flood alleviation measures are planned in Cleadon. Two of the proposed housing sites are within the recognised Flood Risk Zones (H3.59 and (H3.61) and three of the others have a risk of surface water flooding (H3.70, H3.2 and</p> |

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| | | | | | | | H3.3) We consider that further investigation is required in relation to flood risk on these sites. |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE11 | | Support | Policy NE11 Pollution – Support with reservations The policy states that development proposals which could lead to significant pollution should be accompanied by a detailed assessment of the likely impacts. We are concerned that the traffic increase and resulting pollution within the ward from the proposed housing allocations will have a negative impact on our residents. |
| ST2365 | Delia McNally | | 11 Planning for our natural environment | NE01 | g | Objection | 7.0 Climate Change Crisis – Policy NE1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. I hope that the Local Council Officers are able to amend the current draft Local Plan in order to work with East Boldon Neighbourhood Forum to achieve good and reasonable outcomes for the people of the Forum area whose best interests and future wellbeing we are all trying faithfully to represent and safeguard. |
| ST2371 | Miriam Hardie | | 11 Planning for our natural environment | NE01 | g | Objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's |

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| | | | | | | | declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2372 | George Tisseman | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2376 | Angela Beattie | | 11 Planning for our natural environment | NE10 | | Comment | <p>POLLUTION & AIR QUALITY</p> <p>The Local Plan will result in significant levels of increased pollution and a reduction in air quality which will damage the health of existing and future residents. The health of our children, the future of our region, will be adversely affected. Please explain how the Council propose to address these issues.</p> |
| ST2376 | Angela Beattie | | 11 Planning for our natural environment | NE11 | | Comment | <p>POLLUTION & AIR QUALITY</p> <p>The Local Plan will result in significant levels of increased pollution and a reduction in air quality which will damage the health of existing and future residents. The health of our children, the future of our region, will be adversely affected. Please explain how the Council propose to address these issues.</p> |
| ST2376 | Angela Beattie | | 11 Planning for our natural environment | NE01 | g | Comment | <p>SEWAGE, DRAINAGE, FLOODING, CLIMATE CHANGE</p> <p>Sewage and drainage problems are already clearly evident within South Tyneside and also in adjoining local authority areas, as widely publicised. Offshore sewage discharge levels are at capacity as is surface water drainage. Flooding is a significant problem. This plan will increase sewage, increase flooding and accelerate climate change.</p> <p>How does South Tyneside propose to deal with these issues?</p> |

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| ST2378 | Karen Blenkinsop | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2380 | Steve Clingly | | 11 Planning for our natural environment | NE10 | | Objection | <p>Air quality will also be reduced. Pollutants carried in the air from traffic have harmful effects on human health and particularly cause lung damage. Increase of traffic through the village and past the school could cause health problems for school children and residents in the surrounding roads. Spatial planning should improve air quality by reducing exposure to air pollution. The developments proposed in the Local Plan promote these.</p> |
| ST2382 | Ruth Geary | | 11 Planning for our natural environment | NE01 | | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2383 | Mavis Middleton | | 11 Planning for our | NE01 | | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate</p> |

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| | | | natural environment | | | | <p>Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2387 | Jane Siddle | | 11 Planning for our natural environment | NE01 | | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2389 | Mamta Gupta | | 11 Planning for our natural environment | NE01 | | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head.</p> |

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| | | | | | | | The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2389 | Emma Johnston | | 11 Planning for our natural environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2390 | Laura Kennedy | Northumbrian Water | 11 Planning for our natural environment | NE07 | | Support | <p>Moving on, we welcome the inclusion of Policies NE6 and NE7 which address flood risk, sustainable drainage and water quality. With regard to Policy NE6, we are strongly supportive of the points included to manage surface water from new developments. It is pleasing to note the requirement at point 'f' to promote a coordinated approach so that sustainable options may become viable as a joint undertaking. We would suggest that the wording could be updated to make clear that it is a coordinated approach between multiple development sites, or between a development site and other water management schemes, that this point refers to. Within the Sustainable Drainage Systems section of Policy NE6, we recognise that the threshold for inclusion of SuDS reflects national guidance, however we believe that the policy could encourage SuDS on developments of all sizes to maximise opportunities for sustainable water management across the Borough. We are however strongly supportive of the requirements relating to discharge rate and location included within the policy. In summary, we are supportive of the Local Plan and consider that, together with the suggestions outlined above, the policies and supporting information will assist in guiding sustainable water management in new developments across South Tyneside. I trust that this information is useful to you,</p> |

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| | | | | | | | however should you have any queries or wish to discuss our response further, please do not hesitate to contact me at [REDACTED] or on [REDACTED] |
| ST2390 | Laura Kennedy | Northumbrian Water | 11 Planning for our natural environment | NE06 | | Support | <p>Moving on, we welcome the inclusion of Policies NE6 and NE7 which address flood risk, sustainable drainage and water quality. With regard to Policy NE6, we are strongly supportive of the points included to manage surface water from new developments. It is pleasing to note the requirement at point 'f' to promote a coordinated approach so that sustainable options may become viable as a joint undertaking. We would suggest that the wording could be updated to make clear that it is a coordinated approach between multiple development sites, or between a development site and other water management schemes, that this point refers to. Within the Sustainable Drainage Systems section of Policy NE6, we recognise that the threshold for inclusion of SuDS reflects national guidance, however we believe that the policy could encourage SuDS on developments of all sizes to maximise opportunities for sustainable water management across the Borough. We are however strongly supportive of the requirements relating to discharge rate and location included within the policy. In summary, we are supportive of the Local Plan and consider that, together with the suggestions outlined above, the policies and supporting information will assist in guiding sustainable water management in new developments across South Tyneside. I trust that this information is useful to you, however should you have any queries or wish to discuss our response further, please do not hesitate to contact me at [REDACTED] or on [REDACTED]</p> |
| ST2391 | Stewart Miller | | 11 Planning for our natural environment | NE01 | g | Object | <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed</p> |

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| | | | | | | | <p>through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> <p>The decision to build on the limited green spaces in this area is entirely irresponsible given the gravity of the twin emergencies of climate change and biodiversity loss. Nothing in the Draft Local Plan attempts to offset the damage that would be done by its implementation. In this current crisis councils should be attempting to expand green (wild) spaces and not decrease them. If each council in the county acts in the manner proposed by this draft Local Plan then we will be in serious danger of destroying our immediate environment for many generations to come.</p> |
| ST2392 | Ken Burnitt | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2404 | Rachael Tobin | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –just after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. (Ref: draft Local Plan policy NE1)</p> <p>The draft Local Plan is ignoring with complete disregard the importance of green areas in the protection of existing built upon land. The Local Authority declaring a Climate Emergency and then planning to build on huge areas of designated green belt land is preposterous. Using out dated</p> |

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| | | | | | | | statistics to prove a need for housing that isn't actually there as proved by relevant National statistics is absolutely shameful. There appears to be no planning for facilities and infrastructure to cope with a 50% increase in homes in the village alone. When considered along with the neighboring proposals to build on areas adjacent to the village and the huge areas of green belt already proposed to be lost to the IAMP project the loss of further green areas is reckless. |
| ST2405 | Graham Black | Durham County Council | 11 Planning for our natural environment | NE01 | | Comment | <p>Environment</p> <p>There are no issues with regard to the environment, ecology and coastal policies.</p> <p>The HRA of the Plan is at an early stage, however it acknowledges that some of the sensitive areas for the qualifying features lie out-with their own boundaries. We welcome the opportunity to continue to work with South Tyneside and the other coastal authorities, through the regional Natura 2000 Liaison meetings, to ensure that the wider impacts on adjacent/neighbouring authority coastlines are adequately assessed and that their mitigation strategy aligns with neighbouring authorities to ensure that the coastline and its associated species are mitigated as a whole, as recommended by Natural England.</p> <p>I trust that these comments are useful to you in refining and the development of your local plan. Should you wish to discuss the matter further please do not hesitate to contact myself or a member of my team.</p> |
| ST2408 | Dr Jonathan Richardson | | 11 Planning for our natural environment | NE04 | | Comment | <p>2.0 Loss of Green Belt: Policy S6, Paragraph 4.34 and 4.35</p> <p>(Ref. Housing Allocations under Policy H3 (H3.59 Land at North Farm), (H3.61 Land south of St John's Terrace and Natley Avenue), and (H3.65 Land West of Boldon Cemetery))</p> <p>2.1 The land within the three sites listed above is currently designated as Green Belt and as such continues to meet its very important and prescribed function. I believe the case for 'exceptional circumstances' made in the draft plan as justification to change the existing designation for these sites has not been made, and there continues to be a need for the sites to function as Green Belt. This has been referenced in detail in the EBNF's response to the plan and I fully support every point raised in that document.</p> <p>2.2 The potential development of these sites would result in yet a further loss of habitat for wildlife in the vicinity, following as it does the decision to build the new IAMP on Green Belt land nearby (the IAMP development</p> |

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| | | | | | | | <p>is within 1 km from the Forum's boundary).</p> <p>2.3 A significant proportion of the Green Belt in question is of high value to the community and has become 'wilded'. As well as providing important habitat (a great many species of birds, as well as foxes and small mammals such as stoats, hedgehogs, weasels, moles, mice and shrews have been seen), it is enjoyed by the community for walking, running, horse riding and general exercise. The loss of such land will have a detrimental effect upon health of those who use it and the animals which live there. Areas of green belt are acknowledged to be beneficial to public health (though improving air quality, reducing stress and providing opportunities for exercise to combat obesity and heart disease), biodiversity and in combating climate change (see point 5 below)</p> <p>2.4 With regard to area H3.59 Land at North Farm I think this should be considered as two separate sites as it was in the Strategic Land Review that was consulted on. One half is arable farmed land and the other has been re-wilded over 23 years and is now a mature nature reserve which contributes to the greenbelt and the environmental diversity that is a feature of East Boldon and the surrounding areas. I understand that an environmental survey has not been undertaken of this area since 2011 and therefore is out of date; I suggest that the impact on the environment of the loss of this site has not been thoroughly assessed. Both halves of this site have well used footpaths through them which contribute to the health and wellbeing of local people who use them and the loss of these would be contrary to the Plan's policy NE4: Open Space and Green Infrastructure and The Physical Activity Strategy (2019).</p> |
| ST2408 | Dr Jonathan Richardson | | 11 Planning for our natural environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |
| ST2408 | Dr Jonathan Richardson | | 11 Planning for our natural environment | NE04 | | Comment | <p>Thirdly I would like to object to the development of the Playing fields at Disco Field, Henley Way, ref: H3.60 with 45 dwellings and of the open space at Dipe Lane/Avondale Gardens, ref: H3.69 with 17 houses. These developments directly oppose the Plan's policy NE4: Open Space and Green Infrastructure: "As defined by the Policies Map, we will seek to</p> |

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| | | | | | | <p>protect and enhance designated areas of open space, outdoor sports, playing fields and children’s play facilities and the wider green infrastructure network.....” and The Physical Activity Strategy (2019); In Chapter 2 the problems we have in South Tyneside with unhealthy Lifestyle Choices, Obesity and Health Inequalities have been set out and in chapter 3 the draft plan states,” Promoting Positive Healthy Choices, xiii. To improve the physical and mental health and wellbeing of our communities by supporting healthy and active lifestyle choices. Providing a physical environment which encourages physical activity and social interaction though high-quality open spaces, green infrastructure networks, sports facilities and safe communities.....” yet these proposals take away green space that can be used for play and activities in very densely populated areas. There is a more than 10-minute walk with busy roads to the nearest open spaces from either of these sites. It is proposed that the play parks remain, but they do not facilitate games such as football and other running games for children and families, or outdoor activities like picnics. I believe that the development of these two sites directly contravenes all of the Local Plan policies to do with health and wellbeing and open green spaces.</p> |
| ST2409 | David Tutill | | 11 Planning for our natural environment | NE04 | Objection | <p>2.0 Loss of Green Belt: Policy S6, Paragraph 4.34 and 4.35 (Ref. Housing Allocations under Policy H3 (H3.59 Land at North Farm), (H3.61 Land south of St John’s Terrace and Natley Avenue), and (H3.65 Land West of Boldon Cemetery))</p> <p>2.1 The land within the three sites listed above is currently designated as Green Belt and as such continues to meet its very important and prescribed function. I believe the case for 'exceptional circumstances' made in the draft plan as justification to change the existing designation for these sites has not been made, and there continues to be a need for the sites to function as Green Belt. This has been referenced in detail in the EBNF’s response to the plan and I fully support every point raised in that document.</p> <p>2.2 The potential development of these sites would result in yet a further loss of habitat for wildlife in the vicinity, following as it does the decision to build the new IAMP on Green Belt land nearby (the IAMP development is within 1 km from the Forum's boundary).</p> <p>2.3 A significant proportion of the Green Belt in question is of high value to the community and has become 'wilded'. As well as providing important habitat (a great many species of birds, as well as foxes and small mammals</p> |

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| | | | | | | | <p>such as stoats, hedgehogs, weasels, moles, mice and shrews have been seen), it is enjoyed by the community for walking, running, horse riding and general exercise. The loss of such land will have a detrimental effect upon health of those who use it and the animals which live there. Areas of green belt are acknowledged to be beneficial to public health (though improving air quality, reducing stress and providing opportunities for exercise to combat obesity and heart disease), biodiversity and in combating climate change (see point 5 below)</p> <p>2.4 With regard to area H3.59 Land at North Farm I think this should be considered as two separate sites as it was in the Strategic Land Review that was consulted on. One half is arable farmed land and the other has been re-wilded over 23 years and is now a mature nature reserve which contributes to the greenbelt and the environmental diversity that is a feature of East Boldon and the surrounding areas. I understand that an environmental survey has not been undertaken of this area since 2011 and therefore is out of date; I suggest that the impact on the environment of the loss of this site has not been thoroughly assessed. Both halves of this site have well used footpaths through them which contribute to the health and wellbeing of local people who use them and the loss of these would be contrary to the Plan's policy NE4: Open Space and Green Infrastructure and The Physical Activity Strategy (2019).</p> |
| ST2409 | David Tutill | | 11 Planning for our natural environment | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |
| ST2409 | David Tutill | | 11 Planning for our natural environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> |

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| | | | | | | | The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. |
| ST2410 | Paul Taylor | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces, so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out-of-date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2420 | Phil Barrett | | 11 Planning for our natural environment | NE01 | g | objection | <p>5.0 Climate Change Crisis:</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to contradict this understanding. The use of out of date statistics to drive up housing numbers exacerbates this contradiction. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan should be reviewed to explicitly address this pressing issue.</p> |
| ST2423 | Matthew McKenna | | 11 Planning for our natural environment | NE01 | g | objection | I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion: |

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| | | | | | | | <p>Carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets.</p> <p>Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> |
| ST2425 | Lesley Hanson | | 11 Planning for our natural environment | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <p>*carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> |
| ST2425 | Lesley Hanson | | 11 Planning for our | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the</p> |

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| | | | natural environment | | | <p>environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <p>*carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> |
| ST2428 | Howard Lawrence | | 11 Planning for our natural environment | NE01 | Objection | <p>Policy NE1</p> <p>a) The potential development of sites H3.59, 61 & 65 would result in yet a further loss of habitat for wildlife in the vicinity, following as it does the decision to build the new IAMP on Green Belt land nearby (the IAMP development is within 1 km from the Forum's boundary).</p> <p>b) On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST2428 | Howard Lawrence | | 11 Planning for our natural environment | NE02 | | Comment | <p>Policy NE2</p> <p>A significant proportion of the Green Belt in question is of high value to the community and has become 'wilded'. As well as providing important habitat (a great many species of birds, as well as foxes and small mammals such as stoats, hedgehogs, weasels, moles, mice and shrews have been seen), it is enjoyed by the community for walking, running, horse riding and general exercise. The loss of such land will have a detrimental effect upon health of those who use it and the animals which live there. Areas of green belt are acknowledged to be beneficial to public health (through improving air quality, reducing stress and providing opportunities for exercise to combat obesity and heart disease), biodiversity and in combating climate change.</p> |
| ST2428 | Howard Lawrence | | 11 Planning for our natural environment | NE11 | | Comment | <p>Policy NE11</p> <p>a) Given that the village of East Boldon already suffers from high volumes of traffic, particularly at peak times, and will be affected by increased traffic flows as a result of the International Advanced Manufacturing Park (IAMP), a major development on its door step, a further increase in traffic as a result of the proposals contained in the draft Local Plan will undoubtedly result in serious pollution and road safety issues which will be harmful to the health and well-being of local adults and children alike.</p> <p>b) There is local evidence that coastal pollution has resulted from overflow events from the NWL pumping station at Whitburn, which can seriously effect water quality issues. The sewage infrastructure in this area will have to deal with the discharge from approximately 1,800 additional homes from the Boldons, Cleadon & Whitburn. Have the appropriate Impact Assessments been done by the Council & NWL, & can the future water quality of the sea & along the shoreline be guaranteed?</p> |
| ST2430 | Gillian Attewell | | 11 Planning for our natural environment | NE04 | | Comment | <p>2.0 Loss of Green Belt: Policy S6, Paragraph 4.34 and 4.35 (Ref. Housing Allocations under Policy H3 (H3.59 Land at North Farm), (H3.61 Land south of St John's Terrace and Natley Avenue), and (H3.65 Land West of Boldon Cemetery))</p> <p>2.1 The land within the three sites listed above is currently designated as Green Belt and as such continues to meet its very important and prescribed function. I believe the case for 'exceptional circumstances' made in the draft plan as justification to change the existing designation for these sites has not been made, and there continues to be a need for the sites to function as Green Belt. This has been referenced in detail in the EBNF's response to the plan and I fully support every point raised in</p> |

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| | | | | | | <p>that document.</p> <p>2.2 The potential development of these sites would result in yet a further loss of habitat for wildlife in the vicinity, following as it does the decision to build the new IAMP on Green Belt land nearby (the IAMP development is within 1 km from the Forum's boundary).</p> <p>2.3 A significant proportion of the Green Belt in question is of high value to the community and has become 'wilded'. As well as providing important habitat (a great many species of birds, as well as foxes and small mammals such as stoats, hedgehogs, weasels, moles, mice and shrews have been seen), it is enjoyed by the community for walking, running, horse riding and general exercise. The loss of such land will have a detrimental effect upon health of those who use it and the animals which live there. Areas of green belt are acknowledged to be beneficial to public health (though improving air quality, reducing stress and providing opportunities for exercise to combat obesity and heart disease), biodiversity and in combating climate change (see point 5 below)</p> <p>2.4 With regard to area H3.59 Land at North Farm I think this should be considered as two separate sites as it was in the Strategic Land Review that was consulted on. One half is arable farmed land and the other has been re-wilded over 23 years and is now a mature nature reserve which contributes to the greenbelt and the environmental diversity that is a feature of East Boldon and the surrounding areas. I understand that an environmental survey has not been undertaken of this area since 2011 and therefore is out of date; I suggest that the impact on the environment of the loss of this site has not been thoroughly assessed. Both halves of this site have well used footpaths through them which contribute to the health and wellbeing of local people who use them and the loss of these would be contrary to the Plan's policy NE4: Open Space and Green Infrastructure and The Physical Activity Strategy (2019).</p> |
| ST2430 | Gillian Attewell | | 11 Planning for our natural environment | NE03 | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |

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| ST2430 | Gillian Attewell | | 11 Planning for our natural environment | NE01 | g | Comment | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2430 | Gillian Attewell | | 11 Planning for our natural environment | NE04 | | Comment | <p>Thirdly I would like to object to the development of the Playing fields at Disco Field, Henley Way, ref: H3.60 with 45 dwellings and of the open space at Dipe Lane/Avondale Gardens, ref: H3.69 with 17 houses. These developments directly oppose the Plan’s policy NE4: Open Space and Green Infrastructure: “As defined by the Policies Map, we will seek to protect and enhance designated areas of open space, outdoor sports, playing fields and children’s play facilities and the wider green infrastructure network.....” and The Physical Activity Strategy (2019); In Chapter 2 the problems we have in South Tyneside with unhealthy Lifestyle Choices, Obesity and Health Inequalities have been set out and in chapter 3 the draft plan states,” Promoting Positive Healthy Choices, xiii. To improve the physical and mental health and wellbeing of our communities by supporting healthy and active lifestyle choices. Providing a physical environment which encourages physical activity and social interaction though high-quality open spaces, green infrastructure networks, sports facilities and safe communities.....” yet these proposals take away green space that can be used for play and activities in very densely populated areas. There is a more than 10-minute walk with busy roads to the nearest open spaces from either of these sites. It is proposed that the play parks remain, but they do not facilitate games such as football and other running games for children and families, or outdoor activities like picnics. I believe that the development of these two sites directly contravenes all of the Local Plan policies to do with health and wellbeing and open green spaces.</p> |

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| ST2460 | Sonia Ali | Resident | 11 Planning for our natural environment | NE10 | | Objection | <p>Air quality in East Boldon is already near to government recommended high levels. The South Tyneside Council 2018 Air Quality Annual Status Report (ASR) Appendix B : Full Monthly Diffusion Tube Results for 2017 show the levels of Nitrogen Dioxide for Front Street/Boker Lane (DT6), which is near to the road route for site H3.59. For 4 months of the year from 29th November 2017 to 3rd March 2018 it was recorded as 47.32µg/m³ an exceedance of the NO₂ annual mean objective of 40µg/m³ . It was also recorded during November 2017 (3.11.17-29.11.17) as 49.01µg/m³. At the beginning of 2017 (11.1.17-7.2.17) Front Street/ Grange Terrace (DT5) NO₂ recorded as 45.88µg/m³. This is very worrying as the levels are above the NO₂ annual objective of 40µg/m³.</p> <p>Is South Tyneside planning to monitor the air pollution in East Boldon, particularly with 1000 + houses which could add at least 1000+ cars to the congestion? Policy S3: Promoting health and wellbeing in South Tyneside states: New development will be required to contribute to providing healthy communities by:ensuring that pollutants, including noise and air pollution, and hazards detrimental to public health and residential amenity are addressed prior to development.</p> <p>It seems to me that the council already are aware of the pollution in East Boldon and that work should be underway to address this, however this is not evident in the Local Plans supporting documents. It is not acceptable to say that “ ...Proposals that would result in exposure to air pollution that exceeds national air quality objectives will only be approved where satisfactory mitigation measures can be implemented” as this gives no reassurance to residents. The developments could be over many years and the health of peoples’ lungs can never be mitigated.</p> <p>I therefore object to Policy NE10 as it builds in a get out clause for striving for good air quality.</p> |
| ST2462 | Brian Navi | Resident | 11 Planning for our natural environment | N03 | | Support | <p>I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George’s Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it.</p> |
| ST2500 | Leslie and Jacqueline Watson | | 11 Planning for our | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st</p> |

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| | | | natural environment | | | | <p>2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. (Ref: draft Local Plan policy NE1)</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2505 | Martyn Earle | Bellway Homes Limited (North East) | 11 Planning for our natural environment | NE02 | | Objection | <p>22.1 Policy NE2 – Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)</p> <p>22.1.1 Our Client acknowledges the importance of protecting the Borough's biodiversity and specific designated sites, however the policy, as worded, is general in nature and should specify that impacts on biodiversity sites will need to be assessed on a site by site basis (informed by relevant studies/surveys). It is then that any required mitigation/compensation can be ascertained (if necessary). For instance, new development may be able to successfully integrate wildlife corridors into its design and can retain or indeed enhance existing biodiversity on a site. Currently the policy appears to assume that all development will have a negative biodiversity impact on such sites/corridors and so requires developers to immediately seek mitigation/compensation. This approach is currently unsound for being ineffective and unjustified.</p> |
| ST2505 | Martyn Earle | Bellway Homes Limited (North East) | 11 Planning for our natural environment | NE03 | | Objection | <p>22.2 Policy NE3 – Green Infrastructure (Strategic Policy)</p> <p>22.2.1 Although we welcome the clear definition of Green Infrastructure in paragraph 11.15, in line with our comments above in relation to Policy NE2, an assessment of the impact of a proposed development on Green Infrastructure should be undertaken on a site-specific basis. This will then determine any impact and steer applicants towards how best to incorporate/provide Green Infrastructure in their developments.</p> <p>22.2.2 This needs to be better reflected in the wording of the policy to ensure that it is effective and therefore sound. We would also reiterate our objections expressed in Policy D3 in that references to SPDs should not</p> |

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| | | | | | | | be made within development plan policies themselves as this effectively gives SPDs development plan weight when their role should be to explain policy in more detail rather than become policy themselves. References to SPD3 therefore need to be deleted; not least given that this document pre-dates the emerging Local Plan and so its approach to Green Infrastructure does not balance this with the need to identify further housing allocations. Parts of the SPD are therefore inconsistent with the direction of the draft Local Plan. It is noted that the LDS highlights that SPDs will be reviewed and updated as necessary. This would further question the worth of highlighting this SPD within the policy. |
| ST2505 | Martyn Earle | Bellway Homes Limited (North East) | 11 Planning for our natural environment | NE04 | | Objection | <p>22.3 Policy NE4 – Open Space and Green Infrastructure Provision</p> <p>22.3.1 The second part of this policy outlines the requirement for new major housing developments to provide open space facilities. The priority is for this to be made on site, but it does allow for instances where off-site or financial contributions can be made.</p> <p>22.3.2 This flexibility is welcomed by our Client, although it needs to be emphasised in the policy that the scope for open space contribution will need to be defined by up to date evidence on need and then clearly articulated within this (or another) policy. Currently this is not the case.</p> <p>22.3.3 The policy does make reference to two SPDs which are both relatively dated and linked to previous development plan documents and these do include some standards. In line with our comments made in relation to Policy D3, we again object to the references of SPDs within this policy (SPD5 and SPD3) as these are not development plan documents and have not been scrutinised to the same degree. However, their inclusion in the policy effectively gives them development plan status. We would therefore request that references to SPDs 3 and 5 should be removed from the policy text and if necessary, put in the supporting text (emphasising that this is to support the policy rather than being the policy itself). It is clear these should also be updated with reference to the latest national guidance and informed by up to date evidence.</p> |
| ST2506 | Mark Gabrele | Bellway Homes Limited (North East) | 11 Planning for our natural environment | NE02 | | Objection | <p>5.15.1 Policy NE2 – Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)</p> <p>5.15.1.1 Our Client acknowledges the importance of protecting the Borough's biodiversity and specific designated sites, however the policy, as worded, is general in nature and should specify that impacts on biodiversity sites will need to be assessed on a site by site basis (informed by relevant studies/surveys). It is then that any required</p> |

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| | | | | | | | mitigation/compensation can be ascertained (if necessary). For instance, new development may be able to successfully integrate wildlife corridors into its design and can retain or indeed enhance existing biodiversity on a site. Currently the policy appears to assume that all development will have a negative biodiversity impact on such sites/corridors and so requires developers to immediately seek mitigation/compensation. This approach is currently unsound for being ineffective and unjustified. |
| ST2506 | Mark Gabrele | Bellway Homes Limited (North East) | 11 Planning for our natural environment | NE03 | | Objection | <p>5.16 Policy NE3 – Green Infrastructure (Strategic Policy)</p> <p>5.16.1 Although we welcome the clear definition of Green Infrastructure in paragraph 11.15, in line with our comments above in relation to Policy NE2, an assessment of the impact of a proposed development on Green Infrastructure should be undertaken on a site-specific basis. This will then determine any impact and steer applicants towards how best to incorporate/provide Green Infrastructure in their developments.</p> <p>5.16.2 This needs to be better reflected in the wording of the policy to ensure that it is effective and therefore sound. We would also reiterate our objections expressed in Policy D3 in that references to SPDs should not be made within development plan policies themselves as this effectively gives SPDs development plan weight when their role should be to explain policy is more detail rather than become policy themselves. References to SPD3 therefore need to be deleted; not least given that this document pre-dates the emerging Local Plan and so its approach to Green Infrastructure does not balance this with the need to identify further housing allocations. Parts of the SPD are therefore inconsistent with the direction of the draft Local Plan. It is noted that the LDS highlights that SPDs will be reviewed and updated as necessary. This would further question the worth of highlighting this SPD within the policy.</p> |
| ST2506 | Mark Gabrele | Bellway Homes Limited (North East) | 11 Planning for our natural environment | NE04 | | Objection | <p>5.17 Policy NE4 – Open Space and Green Infrastructure Provision</p> <p>5.17.1 The first part of this policy relates to bringing forward development proposals on designated open space and green infrastructure provision. Although this element of the policy is understood, for clarification the policy should explain that this does not apply to sites which have been allocated for other uses.</p> <p>5.17.2 The second part of this policy outlines the requirement for new major housing developments to provide open space facilities. The priority is for this to be made on-site, but it does allow for instances where off-site or financial contributions can be made.</p> <p>5.17.3 This flexibility is welcomed by our Client, although it needs to be</p> |

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| | | | | | | | emphasised in the policy that the scope for open space contribution will need to be defined by up to date evidence on need and then clearly articulated within this (or another) policy. Currently this is not the case. 5.17.4 The policy does make reference to two SPDs which are both relatively dated and linked to previous development plan documents and these do include some standards. In line with our comments made in relation to Policy D3, we again object to the references of SPDs within this policy (SPD5 and SPD3) as these are not development plan documents and have not been scrutinised to the same degree. However, their inclusion in the policy effectively gives them development plan status. We would therefore request that references to SPDs 3 and 5 should be removed from the policy text and if necessary, put in the supporting text (emphasising that this is to support the policy rather than being the policy itself). It is clear these should also be updated with reference to the latest national guidance and informed by up to date evidence. |
| ST2510 | Prof Faith M Williams | | 11 Planning for our natural environment | NE03 | | Objection | Section 11 Planning for the natural environment The plan suggests that the impact of reducing green space can be mitigated – this is not defined. Planting a line of trees will not mitigate the loss of an area of land to be covered by tarmac and houses as will happen with the density of housing proposed. It is highlighted that reducing green corridors has led to the decline in wild life. New developments of houses particularly high density do not take into account the need for corridor through the development eg rewilding areas through the development, open green spaces with wild flowers and trees , ponds , reopening stream courses |
| ST2514 | Dave McGuire | Sport England | 11 Planning for our natural environment | NE04 | | Objection | Policy NE4: Open Space and Green Infrastructure Provision. The policy covers playing fields, but as written does not provide the protection required by paragraph 97 of the NPPF nor Sport England’s playing field policy. There should be a presumption against proposals which result in the loss of playing field. The term ‘surplus to requirement’ in criterion a) is open to interpretation. For example an education institution may decide that an area of playing field is surplus to its requirements whilst there is a shortage of such provision in the locality. A number of the proposed housing allocations demonstrate this point. We trust you will give our comments your full consideration. |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our | NE01 | | Support | Support policy in principle but unsure about method of delivery under current Draft Local Plan Ref: NE1 a: In light of the Climate Emergency declaration in Parliament on |

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| | | | natural environment | | | <p>May 1st 2019 and South Tyneside on July 18th, EBNF is supportive of carbon divestment schemes including greenbelt retention.</p> <p>EBNF is working closely with the community and is taking advice from local Nature organisations e.g. NEENP, DWT, CPRE, RSPB to get the best, carbon neutral outcomes for the Forum and for South Tyneside.</p> <p>NE1d: We support this policy. The Forum is at an advanced stage preparing nominations for Local Green Space and Open Space sites in consultation with our community in the EBNF area.</p> <p>Ref: NE1 b: In order to protect and enhance biodiversity, high value sites with high biodiversity require protection and enhancement.</p> <p>Proposed new housing site H3.59 (North Farm, 588 homes)</p> <p>This site is completely rewilded with high biodiversity. Infected animal carcasses were buried on the site in 1957 (Foot and mouth outbreak). Permission to build onsite was refused as recently as the 1990's.</p> <p>"Net gains' are characteristically achieved by 'OFFSETTING' e.g. build in one area and plant trees in another area to offset the loss. This approach has been found to fail locally. For example: "We fight climate change and our kids won't get as much asthma." That win-win ends up being broken under the terms of offsetting because you get a deal that says, "OK we can start polluting here but we will buy offsets somewhere else." The win is gone locally. It is sacrificed for unwanted development for ever in the case of greenbelt.</p> <p>H3.65 - Downhill site, 54 homes</p> <p>Large site on the magnesian limestone Downhill escarpment. South Tyneside regards Downhill as one of 3 priority landscapes in South Tyneside. NEENP regard such sites as rare Nationally and seek to protect them.</p> <p>https://neenp.org.uk/natural-environment/durham-priority-habitats/magnesian-limestone-grassland-action-plan/</p> <p>Priorities:</p> <ol style="list-style-type: none"> 1. Protect and maintain the current extent of Magnesian Limestone Grassland and re-create it where opportunities allow. 2. Restore degraded sites and ensure appropriate management. 3. Establish sustainable populations of all priority species supported by Magnesian Limestone Grassland. 4. Raise public awareness of the importance and special characteristics of Magnesian Limestone Grassland. <p>Evidence that greenbelt is being put forward for development even</p> |
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| | | | | | | <p>though the homes may never be needed: Ref the Guardian September 10th 2019: https://www.theguardian.com/uk-news/2019/sep/09/green-belt-to-be-destroyed-for-homes-which-wont-be-needed</p> <p>NE1c: A significant number of trees will be lost with the development of housing on site H3.59. This is in direct contravention of this policy. In the associated Local Plan document 'Stage Three Green Belt Review: Site Specific Exceptional Circumstances'</p> <p>Para 3.119: Proposed housing site H3.61: The site performs moderately in terms of its contribution to the NPPF purposes and the overall integrity of the wider strategic Green Belt. It is considered that any harm arising from the release of the site could potentially be mitigated.</p> <p>Comment: The term 'performs moderately' has no meaning. In order for it to mean anything it must be measurable and therefore quantifiable. The fact is, we simply do not know what the impact of building on this site will be in terms of the impact on nature, the SSSI and on the wildlife corridor.</p> <p>'Mitigation' in this context means offsetting by planting biomass somewhere else in an effort to remediate the harm done by the destruction of development. The method has been found unsuccessful, as previously stated and there is no mitigation for the pressure on the SSSI nearby.</p> <p>Para 3.107 - Site H3.65 Land West of Boldon Cemetery, (54 homes) "The site performs relatively strongly in terms of its contribution to the NPPF purposes and the overall integrity of the wider strategic Green Belt. It is considered that any harm arising from the release of the site could potentially be mitigated"</p> <p>Comment: The statement is unconvincing. It reads as though even the author is not convinced that it will be easy to mitigate harm resulting in a narrowing of the greenbelt between Sunderland and South Tyneside at this location. Again, 'performs relatively strongly' is not quantifiable. The site is on the Magnesian Limestone escarpment. It is one of three protected landscapes 'of high value' in South Tyneside. Close to the site of the Battle of Nanny Cow Hill. Close to the Boldon Downhill quarry Neolithic burial site. It is greenbelt although degraded in biodiversity because of modern farming practices it</p> |
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| | | | | | | still has the potential to be a site where the following nationally rare species (on this nationally rare habitat): Chalk Carpet moth, Least Minor moth, Cistus Forester moth, Northern Brown Argus could make a welcome return. |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE02 | Objection | <p>Support in principle but with the specified reservations about its application in the Forum area.</p> <p>EBNF supports the adherence of the LP to the Statutory Obligation to conserve and enhance biodiversity, in particular through 2017 conservation and Habitats and Species Regulations plus 2006 Natural Environment and Rural Communities Act.</p> <p>It is essential that there is APPROPRIATE ASSESSMENT, at the design stage, to show that any development has no adverse effect on our SSSI, Boldon Flats (referred to as Boldon Pastures in the draft LP document)</p> <p>Draft LP Ref paras 11.3 -11.9 - EU HABITATS DIRECTIVE – this confers special protections on coastal sites.</p> <p>There are no coastal areas inside EBNF area.</p> <p>EBNF agrees with this approach. A healthy coastline is an indicator of a healthy environment.</p> <p>Nationally Important Sites (Ref: NE2 g)</p> <p>SSSI Boldon Flats is within the EBNF area.</p> <p>EBNF believes that this is a move away from the position previously adopted whereby changes/ developments that adversely affect a SSSI are not permitted. We believe this to be a retrograde step.</p> <p>We query the statement “(g) we will only support an exception where the applicant can demonstrate that: The benefits of the development clearly outweigh both any adverse impact on the features of the site that makes it of special scientific interest, and any broader impacts on the network of SSSIs (i) The appropriate level of mitigation, and/or, where necessary, the appropriate level of compensation, is provided to redress the impact.”</p> <p>Under those terms the Boldon Flats site could be permanently harmed.</p> <p><u>Locally Important Sites</u></p> <p>General Observation:</p> <p><u>Page 137 Local Plan: Wildlife Corridors:</u></p> <p>We note that the Boldon Greenbelt is not mentioned as a wildlife corridor. We have a lot of evidence (including film) to support its status as a wildlife corridor.</p> <p>The following sites are regarded in the Local Plan as Wildlife Corridors: South Pier to Trow Point; Trow Point to Whitburn Steel; Cleadon North</p> |

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| | | | | | | <p>Farm to Cleadon Hill; Cleadon Lane to Marsden; River Tyne; Bede's World to River Tyne; West Fellgate Farm to River Don; Boldon Fellgate Farm to River Don; Boldon North Bridge to Bede's World.</p> <p>We challenge the omission of the Boldon greenbelt land from the list and request that it is added to this list.</p> <p>While two wildlife corridors in the EBNF area are shown on the map which accompanies the draft LP, they are not explicitly mentioned in Table 3. The Boldon greenbelt is part of the greenbelt swathe separating South Tyneside from Sunderland and Gateshead to the south of the Tyne and merits inclusion in the list.</p> <p>Other additions to Locally Important Sites are listed below. Please may we request that these sites are added to the South Tyneside list:</p> <p><u>Mundles Farm.</u></p> <ul style="list-style-type: none"> • Peter Alderslade is on the steering committee of BASE UK https://base-uk.co.uk , a National farming organisation for progressive, ecology minded farmers. His pioneering ploughing methods have made him a World leader in the practice of this methodology. He lectures all over the world and his methods have caused “ an explosion of biodiversity” on Mundles Farm in East Boldon. He has attended our consultations and shown us the rare species his innovative techniques attract. Justification: evidence of local wildlife in area – little owls, redshank, lapwings, reptiles. <p><u>Site H3.59 - Land at North Farm</u></p> <ul style="list-style-type: none"> • This field to the east of the bridleway has been inaccessible to vehicles for almost 30 years and has re-wilded. It has a wetland area because Tiled Burn flows through the site. The RSPB has advised residents to approach the Council in order to secure designation for this site. <p><u>Site H3.61 - Land to the east of St John's Terrace and Natley Avenue</u></p> <p>Ref: Environment Agency Flood Map below (A larger version occurs in the Natural Environment Background Paper (page 36) produced by EBNF to help inform the Local Plan)</p> <p>It clearly shows that the H3.61 site lies directly above the same body of water that supplies Boldon Flats and the area is therefore prone to flooding. It is on the South Tyneside Excel Spread sheet in flood zone 3b (highest risk) The area is damp and is a location where animals moving to and from the flats are able to rest and reconnect. The Flats are metres away, across the railway line. It is part of the SSSI wildlife corridor.</p> |
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| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE03 | | Support | <p>Support in principle but with the specified reservations about its application in the Forum area.</p> <p>EBNF supports this policy in full and will have identified needs from the Neighbourhood Plan for developer contributions to improve the quality, use and value to the green infrastructure network of the green spaces.</p> <p>Evidence from EBNF Consultation Event March 16th, 2019: Questionnaire on Natural Environment:</p> <p>Para 11.15 (page 138):</p> <p>River corridor – River Tyne and River Don and associated tributaries; eg Tileded Burn on site H3.59. Part of the River Don corridor will be adversely affected by the proposals for this site.</p> <p>Durham Biodiversity Action Plan</p> <p>Prioritises Wet Woodland and scrub as a habitat – we would argue that the field forming the eastern part of H3.59 should be classified as such a habitat and should be protected.</p> <p>Wetlands/Tiledsheds Burn/along railway/Tiledsheds Nature reserve:</p> <p>EBNF notes that the site consists of two fields separated by an ancient bridleway. It has previously been described on the SLR as 25A and 25B. There was an acceptance from the LA that H3.59 is two sites. The fields are very different in character. One is in use for arable farming. The other has been rewilded and undisturbed over a period of thirty years.</p> <p>EBNF believes that the original designation of the North Farm site as 2 sites was a better, fairer description of this large area of greenbelt land. Re-wilding strips are evident on combined Local Authority plans for the IAMP to a width of 50 metres. Inside site H3.59, a tributary of the River Don; Tileded Burn flows through this site. Associated with the site are frogs, toads, smooth and palmate newts and various water birds including grey heron.</p> <p>At this site, the draft Plan specifies an 8-metre wildlife strip associated with Tileded Burn.</p> <p>Conclusion</p> <p>EBNF believes that this seems a low allocation bearing in mind the commitment in the Local Plan to safeguard, protect and enhance existing green infrastructure networks. The strip should be extended to 50 meters. Local people are very well aware of the natural treasures they have on their doorstep in EBNF area. We have gathered evidence from community consultations, which have been happening for several years; evidence gathering for our Neighbourhood Plan.</p> |
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| | | | | | | <ul style="list-style-type: none">• We are required to consult with our Forum members and local residents. As a result we have discovered a great deal of new information about our Neighbourhood Forum Area.• More dialogue would be welcome between Forum representative and the authors of the Local Plan. <p>Once our natural treasures are destroyed they will not return. The sense of urgency engendered by catastrophic loss is the engine that drives the Climate Emergency movement.</p> <p>EBNF's standpoint and our community's responses are clearly in line with the government's 'Green Future' 25 Year Environment Plan (DEFRA 2018, revised 2019) to protect and enhance the environment. We are the 'stake holders' they talk about and wish to be part of their 'Nature Recovery Network'. Therefore EBNF urges STC to take heed of the clear and present danger of eroding our green belt and spaces and take note of the following... 'People in greener surroundings have longer and healthier lives. Green infrastructure brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures.' (p79)</p> <p>We believe that H3.59 should be subject to a detailed site assessment to identify the wildlife and biodiversity value in advance of any proposed allocation within the Local Plan.</p> <p>Coastal Corridor EBNF supports protection of coastal corridor. Coastal so not applicable to EBNF area.</p> <p>Greenbelt Corridor EBNF supports the view that the greenbelt surrounding the Boldons, although not so extensive as the Durham and Northumberland Coastal tract is equally important for wildlife locally, nationally and internationally and should therefore be recognised as part of the wildlife corridor to the south of South Tyneside.</p> <p>Birds that occur on inland sites are especially vulnerable to changes in land use.</p> <p>For obvious reasons –chiefly linked to coastal erosion and climate change, the building on coastal sites has been largely abandoned in recent years. Inland farmland, particularly ancient, wooded wetland is increasingly rare and species that need this type of habitat are under pressure as never before.</p> <p>Such land is currently abundant in EBNF area and we enjoy unusual</p> |
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| | | | | | | <p>abundance of avian visitors –not least of all because of our proximity to the internationally recognised SSSI, Boldon Flats..</p> <p>Birds seen on the greenbelt in Boldon include waxwings (from Scandinavia) skylarks, linnets, song thrush, lapwings, swallow, and house martin along with many other endangered species.</p> <p>EBNF Community Consultation Natural Environment March 16th 2019: Durham Biodiversity Action Plan (Farmland birds action plan)</p> <p>East Boldon has many of the birds identified in the Farmland Birds Action Plan adopted in Northumberland and Durham biodiversity action plans for special protection. These birds are under pressure across the country and are disappearing. The BAP recognises the problem and has conferred the special protections in order to arrest the loss we are experiencing and bring about an upsurge in the health and vigour of the identified populations of at-risk species.</p> <p>All footpaths (e.g. Old North Road, Railway line to Tiledsheds) (2 comments)</p> <p>Parks and Gardens</p> <p>EBNF Community Consultation March 16th 2019: EBNF has nominated 19 spaces within the Forum boundary to be nominated as Local Green Space</p> <p>Nominated Parks are: Open Spaces</p> <p>Response from Community Consultation March 16th 2019 EBNF has nominated the following Open Spaces in the Forum area: Playing Fields and Sports Facilities</p> <p>Response from Community Consultation March 16th 2019: EBNF Nominated Sites for Local Green Space: Children’s Play Areas</p> <p>Response from Community Consultation March 16th 2019 EBNF Nominated Sites for Local Green Space: Natural Open Space and Wildlife Corridors</p> <p>Response from Community Consultation March 16th 2019 EBNF Nominated Sites for Local Green Space: To reiterate, the Forum believes that the greenbelt of the Boldons is part of a wildlife corridor and should be designated as such –particularly since it separates South Tyneside from Sunderland.</p> <p>Cemeteries and Churchyards:</p> |
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| | | | | | | <p>Response from Community Consultation March 16th 2019: EBNF Nominated Spaces for Local Green Space: Blue Spaces: Rivers, streams and ponds</p> <p>Response from Community Consultation March 16th 2019 EBNF Nominated Spaces for Local Green Space: Allotments</p> <p>Response from Community Consultation March 16th 2019 EBNF Nominated Spaces for Local Green Space: Green Corridors: Public rights of way, cycle routes, bridleways</p> <p>Response from Community Consultation March 16th 2019 EBNF Nominated Spaces for Local Green Space: An ancient road bisects the greenbelt at H3.59, which is now part of the South Tyneside Cycleway.</p> <p>Deer have been filmed in the North Farm fields beside this bridleway in the last 2 years. Stoats, hedgehogs, nesting pheasants visit the gardens at Ravensbourne and Beckenham Avenues –the properties that abut this site. Policy NE3,para 11.16 – Expresses a wish to maintain a well planned ...network of green infrastructure assets.</p> <p>The arrow indicates site H3.59, which represents the largest area of greenbelt loss inside EBNF area. The draft LP proposes to develop this area with 588 houses.</p> <p>EBNF believes that here is nothing positive in terms of a green infrastructure replacement that can mitigate the catastrophic loss of a genuinely significant wildlife corridor such as this.</p> <p>The chunk of high value wet woodland scrub in question constitutes about 20% (by eye) of the neighbourhood forum area. 588 new homes on this site represents increasing the residential stock of East Boldon (currently circa 1,800 homes) by almost 32.6% by developing this site in the way described.</p> <p>The total increase of 950 homes is a 53% increase and we believe this is a plan to harm the natural environment in EBNF area.</p> <p>Evidence from EBNF Community Consultation March 16th 2019: Site H3.59 is part of a wildlife corridor. Species that live here include: The claims made in the policy statement 11.16 are laudable but hollow if sites such as the field at North Farm are going to be developed. There is no way that these species will remain in situ if this valuable habitat is developed. It is much more likely that they will disappear from the Forum area altogether and therefore they will be increasingly under pressure in</p> |
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| | | | | | | <p>the borough and across the country if other LA's are permitting this type of development.</p> <p>EBNF wishes to challenge the H3.59 Site assessment published in the 2019 stage 3 greenbelt review</p> <p>Policy NE3, 11.17</p> <p>New developments should prioritise green infrastructure within the design.</p> <p>EBNF Community Consultation March 16th 2019</p> <ul style="list-style-type: none">• Our residents expressed concerns about the capacity of our infrastructure to support large-scale housing. The Lakes Estate and The Paddock to the south of the H3.59 site are incursions into greenbelt, which placed a significant strain on our infrastructure when they were built in the late 1980's. <p>The destruction of wet woodland will happen despite ST Policy statements.</p> <p>This is an example of a situation where the statement describes conservation but the policy in practice does the opposite.</p> <p>The landscape buffer strip at Tiledshed Burn (8 metres) is minimal.</p> <p>EBNF Comments:</p> <p>In the context of the proposal, it is again difficult to ascertain what 'performs moderately' means.</p> <p>The review admits the existence of priority species on the site but does not mention the rare habitats. We don't get one without the other in nature conservation.</p> <p>The Strategic Greenbelt Review Stage 3 mentions on pages 30-33 that there is a public right of way on site, which forms part of the green infrastructure corridor.</p> <p>The right of way is the old road to Boldon Colliery, now made wild with Hawthorn hedging to either side of the path. The hedging has been in place for over 60 years.</p> <p>All hedgerows, which contain more than 80% native species, are now classified as Priority Habitats in the UK and have their own Habitat Action Plan.</p> <p>The Western site is being promoted for development by consultants acting on behalf of the landowner. It is of less value ecologically than the Eastern site, which is in private ownership.</p> <p>EBNF would argue that:</p> <p>Development of the land at North Farm is not a 'rounding off'. We argue</p> |
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| | | | | | | <p>that development of this site is a new incursion into valuable greenbelt land.</p> <p>The Boldon Downhill site is a magnesian limestone escarpment –a rare rock type which produces alkaline soil and is associated with indicator species, rare across the country.</p> <p>HEIDI JANE ABBOTT submitted a dissertation entitled “THE BIOGEOGRAPHY OF THE MAGNESIAN LIMESTONE GRASSLAND FLORA OF EAST DURHAM AND TYNE & WEAR” in part fulfilment of the requirements for the degree of Masters of Science in Ecology at the University of Durham September 1995. The following extract is relevant to this site:</p> <p>1.1 MAGNESIAN LIMESTONE GRASSLAND</p> <p>“Calcareous grassland supports one of the most diverse plant communities in the British Isles with over 330 characteristic species. However "huge losses among calcareous grasslands and their continuing vulnerability to either agricultural improvement or neglect have greatly enhanced the nature conservation interest of surviving stands." (Rodwell 1992). The Magnesian Limestone Grasslands (MLG) of North East England are no less vulnerable. Together with agricultural practice and myxomatosis, quarrying of the Magnesian Limestone has largely confined this vegetation community to a few intractable slopes and artificial habitats within a matrix of otherwise non-natural habitat. Dalby (1991) calculated that over 66% of the remaining MLG occurs within East Durham and Tyne&Wear. The core MLG community termed CG8 in the National Vegetation Classification occurs entirely within East Durham and Tyne & Wear with a total area of 67 hectares.</p> <p>The coincidence of Durham and Tyne & Wear's northern geographical position (55°N), climate regime (700-750 mm precipitation per annum and 3.75 average hours of bright sunshine per day) and geology facilitates the presence of a unique calcareous grassland community. The associated flora contains a mixture of species with varied overall geographical distributions within the UK and Europe. The flora demonstrates affinities to both the Arctic-Alpine grasslands (Association: Elyno-Sesleriatea) and the lowland thermophilous calcareous grasslands (Association: Festuco-Brometea) (Shimwell 1968). Therefore many of the more restricted species in the Durham MLG flora are close to either their northern or southern range limits within the British Isles.</p> <p>It is not therefore surprising that the MLG of North East England has been the focus of much scientific attention. There have been a series of reviews,</p> |
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| | | | | | | <p>starting with the that of Heslop-Harrison & Richardson (1953) and concluding with the latest Dalby (1991). These reviews stress the importance of conserving this resource.”</p> <p>Para 11.18 Supplementary Planning Document 3: Green Infrastructure Strategy (2013) sets out the green infrastructure assets (referred to in this policy) and the various partners involved in green space provision. It contains a vision, background evidence, recommendations and an action plan.</p> <p>Para 2.2 (From SP Doc 3) states: Green infrastructure is more than individual green spaces – it includes a wide variety of different land uses and environments, which provide a range of environmental, social and economic benefits. Green infrastructure is made up of natural assets such as beaches, rivers, natural and semi-natural green spaces, and recreational spaces, including allotments, playing pitches and cycleways. The different types of green infrastructure in South Tyneside and also the benefits that these spaces provide are set out below.</p> <p>EBNF Comment Building on the H3.59 site will involve destroying</p> <ul style="list-style-type: none"> • Part of the Boker Lane Bridleway –part of ST cycleway network. • Woodland scrub • Wet woodland <p>The latter 2 habitats are in decline across the UK and the species that live there are under pressure like never before. We are adding to the damage that the climate emergency was declared to prevent if we allow development on H3.59.</p> <p>Para 11.19 To ensure our Green Infrastructure network continues to provide good quality and accessible green spaces, developer contributions will be sought to help improve the existing Green Infrastructure network and support the delivery of new projects where appropriate.</p> <p>BC 25a and b site (now H3.59)’.Greenbelt review 3.79 (the inspector agreed that) ‘development in this area would reduce the gap, in terms of distance, between Boldon and South Shields still further and would increase pressure on the remainder.’</p> <p>In Para 3.80 Greenbelt Review The Inspector considered land at BC27/BC27a and BC25a/BC25b (now H3.59): ‘if considering only the Green Belt, then I would prefer the subject</p> |
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| | | | | | | | <p>site to the south of South Lane to be allocated, as the Green Belt to the south is more substantial. However, the subject site lies in more attractive landscape and is closer to the Boldon Conservation Area, which is insulated from the northern site by relatively recent housing development. Thus in terms of the settlement and ignoring Green Belt issues I would prefer the northern site (Land south of Tiledshed Lane [BC25a/BC25b] and East of Boker Lane [BC27/BC27a]).’</p> <p>EBNF Comment</p> <p>It is clear from the inspector’s comments that neither site is ideal. If it is developed, it knocks out a massive area of greenbelt in the Forum area. There are access issues and the whole site is greatly valued by East Boldon residents. Many of us regularly walk this wildlife corridor –in fact it is seldom unoccupied. It is so good for mental and physical health –there is no comparable accessible, safe bridleway in the Forum area. The wildlife is exceptional on the site –as already explained.</p> |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE04 | | Support | <p>Support but have concerns with its application to specific sites in the EBNF area</p> <p>EBNF Supports council Key Priorities Promote Healthy Lifestyles along with access to green infrastructure, networks and open spaces, outdoor and quality Leisure Facilities.</p> <p>Community Consultation July 15th 2017</p> <p>Residents showed they look upon plans to cherish the green spaces we have and take steps that involve:</p> <p>“Protecting wildlife including (creating) Nature Reserves”</p> |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE05 | | Support | <p>Support but with specifies reservations.</p> <p>Areas of High Landscape Value are shown on the Proposals Map. They are:</p> <ul style="list-style-type: none"> . a) Cleadon Hills . b) Boldon Downhill – summit and scarp slope . c) The Coast – Trow Point to the administrative boundary with City of Sunderland . <p>Areas of High Landscape Value are shown on the Proposals Map. They are:</p> <ul style="list-style-type: none"> . a) Cleadon Hills . b) Boldon Downhill – summit and scarp slope . c) The Coast – Trow Point to the administrative boundary with City of Sunderland . <p>The policy states in paras 11.28 and 11.29 that to be considered appropriate, proposals for development within these designated areas should:</p> |

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| | | | | | | | <p>i. Retain and enhance the open and undeveloped character of the area;</p> <p>ii. Ensure the views from and of key landmarks are retained and where possible enhanced;</p> <p>iii. Encourage accessibility and enhancement of the green infrastructure network and opportunities for habitat enhancement.</p> <p>iv. Provide appropriate landscape mitigation where required.</p> <p>Proposals for development considered having a significant negative impact on the integrity and character of the landscape will be resisted.</p> |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE06 | | Support | <p>Support in principle but with specified reservations.</p> <p>The Environment Agency is currently raising awareness of surface flooding in light of Climate Change in a promotional video circulated through South Tyneside 'Inspire'. It makes the point that as water levels rise, planning decisions that advocate building on Greenbelt aren't helping the worsening rise in water levels. The transpiration current through green plants helps to evaporate off groundwater and reduces flooding. Where does water go when we pave over gardens and concrete swathes of greenbelt? Furthermore the situation isn't static; globally, water levels are rising as a result of climate change.</p> |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE07 | | Support | <p>Support in principle but with concerns over impact of proposed developments in EBNF area.</p> <p>Ref: Para 11.38</p> <p>We support the aims of the Water Framework Directive to protect and enhance the quality of the Borough's surface freshwater areas, rivers, wetlands and groundwater and to achieve "good ecological status" in all water-bodies (including surface, ground and coastal waters)</p> <p>EBNF Community Consultation March 16th 2019:</p> <p>"Very important greenbelt isn't built on or tidied up, manage it for wildlife. Support creation of more ponds and wetlands, especially as flood alleviation, for which funding could be available."</p> <p>"Retain for future generations; provide wildlife habitat (flora and fauna); provide wildlife corridors; build ponds to aid rapid drop in UK amphibians;"</p> <p>NB, East Boldon Forum area has many amphibian species in the field at North Farm because of Tiled Burn and wet wooded scrubland found on this site.</p> <p>"We have rich, diverse wildlife habitats in & around village, these link to areas of SSSI, these must be preserved, they also contribute to unique character of village, in turn helps to create positive well being of humans who share it."</p> |

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| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE08 | | Support | <p>Support but with concerns over the impact of proposed development in EBNF area EBNF is fully supportive of this policy statement. We do not have a coastal area inside the Forum boundary but we believe that the proposal for 950 new homes may be unintentionally negatively affecting the ecology, hygiene and fishing industry at the South Tyneside coast.</p> <p>We ask that</p> <p>(i) South Tyneside Council reviews its housing numbers allocated in the Local Plan and</p> <p>(ii) Urgently review the effectiveness of the existing methods for treatment of sewage that comes from housing developments in the EBNF area, Cleadon and Whitburn. There is strong evidence to suggest that a high volume of untreated sewage is being released into the North Sea at Whitburn and further development of 950 homes in the EBNF area (and more in Cleadon and Whitburn) will exacerbate the situation.</p> |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE010 | | Support | <p>Support in principle but argue that the proposed development in the EBNF area will be in contravention of the policy. Paragraph 181 of the NPPF states that opportunities to improve air quality or mitigate impacts should be identified, so far as possible at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. The impacts of the proposed site allocations has not been assessed and are unknown at this stage and measures to improve air quality and mitigate impacts have not been identified at the plan-making stage contrary to the NPPF. The following sites are proposed: RG5 (Cleadon Lane 245 homes), H3.59 (North Farm, 588 homes), H3.61 (St Johns/Nately Ave 63 homes), H3.65 (Boldon Cemetery 54 homes) In addition, a large flyover is planned at the Tilesheds level crossing, in the region of H3.59, turning a semi-rural road into a busy polluting highway. Building 950 homes in the Forum area with many other homes scheduled for the Boldons will increase atmospheric pollution by at least one third more than is current on a daily basis in the Forum area. Airborne carbon particulates produced by incomplete combustion of fuels in car engines (especially diesel) are now recognised as a major health risk associated with cancers of the soft tissues including lungs, brain, stomach and liver. They are associated with asthma and other respiratory</p> |

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| | | | | | | <p>complaints</p> <p>EBNF States:</p> <p>At the time of the Community Consultation in March 2019, nobody had any idea of the scale of development being proposed for East Boldon. These plans - 950 homes in the Forum area when we only have 1800 homes in the whole Forum area at the moment – are wholly disproportionate and unfair.</p> <p>It will bring a doubling at least in the flow of traffic through East Boldon and a doubling of the pollution we can expect to receive.</p> <p>Our local businesses are asking “At what point does East Boldon cease to be a village?”</p> <p>EBNF Position Statement</p> <p>South Tyneside Council has produced a Local Plan at a momentous juncture in history. It can, if it chooses embrace new ideas about sustainable development and become a leader in the field of decarbonisation and combating climate change.</p> <p>Para 11.56</p> <p>“The Air Quality Annual Status Report (ASR) (2018) provides an overview of air quality in South Tyneside. We review Nitrogen Dioxide (NO2) annually so that we can identify any changes and take action where air quality exceeds national targets.”</p> <p>Paragraph 181 of the NPPF states that opportunities to improve air quality or mitigate impacts should be identified, so far as possible at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. The impacts of the proposed site allocations has not been assessed and are unknown at this stage and measures to improve air quality and mitigate impacts have not been identified at the plan-making stage contrary to the NPPF.</p> <p>The following sites are proposed:</p> <p>RG5 (Cleadon Lane 245 homes), H3.59 (North Farm, 588 homes), H3.61 (St Johns/Nately Ave 63 homes), H3.65 (Boldon Cemetery 54 homes)</p> <p>In addition, a large flyover is planned at the Tiledsheds level crossing, in the region of H3.59, turning a semi-rural road into a busy polluting highway. Building 950 homes in the Forum area with many other homes scheduled for the Boldons will increase atmospheric pollution by at least one third more than is current on a daily basis in the Forum area.</p> <p>Airborne carbon particulates produced by incomplete combustion of fuels in car engines (especially diesel) are now recognised as a major health risk</p> |
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| | | | | | | | associated with cancers of the soft tissues including lungs, brain, stomach and liver. They are associated with asthma and other respiratory complaints |
| ST2516 | Dave Hutchinson | East Boldon Neighbourhood Forum | 11 Planning for our natural environment | NE011 | | Support | <p>Support in principle but with reservations about the impact of proposed development.</p> <p>EBNF support this policy in principle but have major concerns regarding the adverse impact which the Draft Local Plan could have on existing coastal pollution problems.</p> <p>There is long standing evidence of coastal pollution emanating from the NWL sewage pumping station adjacent to Shell Hill, Whitburn. For example, over the last Bank Holiday weekend, bathing was prohibited on two occasions at local beaches due to poor water quality.</p> <p>The addition of 950 new homes within the Forum area and a further 247 at West Boldon/Boldon Colliery, 231 at Cleadon and 397 at Whitburn will create significant further demands on the pumping station.</p> <p>Have the Council and NWL seriously considered these capacity issues (ie the public sewer network but particularly the pumping station), in order to reduce/minimise existing sea pollution and prevent additional pollution. Paragraph 11.63 refers to the requirement for relevant impact assessments (Environmental Protection Act 1990) – has this work been done?</p> <p>EBNF members are supportive of measures to reduce traffic on our roads and decrease pollution. We believe the best way to achieve this is to retain green spaces and build on brownfield sites.</p> |
| ST2539 | Gary Mayne | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed</p> |

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| | | | | | | | through' without a proper analysis or debate on how it can address one of the most pressing issues of our |
| ST2540 | Graham Mountford | | 11 Planning for our natural environment | NE01 | g | Objection | E. Both National and Local Government quite rightly are constantly speaking of the environment and issues of global warming. On the 18th July this year, South Tyneside council indeed declared a Climate Emergency in the borough - shortly after the May 1st declaration by Parliament of a climate emergency. It is well known that the protection of green belt land is the most important things that we can do to counter climate change. Surely the Council would agree therefore that building on green belt land in East Boldon is totally against it's and National Governments policies. |
| ST2546 | Steven & Lorraine Riggins | | 11 Planning for our natural environment | NE01 | g | Objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2547 | Tina Balbach | | 11 Planning for our natural environment | NE01 | g | objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's |

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| | | | | | | | declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2550 | Yvonne Woolson | Resident | 11 Planning for our natural environment | NE01 | g | objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2553 | Phillip Balmer | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside, shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that greenbelt policy is one of the most effective means available to protect our fields and green spaces so that we have enough land available for that purpose.</p> <p>The draft Local Plan seems to turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems to be scant regard for the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2556 | Elaine Francis | | 11 Planning for our natural environment | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> |

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| | | | | | | | <p>*carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside’s emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> <p>* Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, ‘suitable sites for energy generation’ would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects.</p> |
| ST2557 | JP Sanderson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed</p> |

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| | | | | | | | through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2558 | EM McNally & Delia McNally | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2559 | Zolla Rees | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2560 | Jane Nell | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects</p> |

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| | | | | | | | <p>of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2561 | David Nell | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2562 | HL McQuillan | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's</p> |

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| | | | | | | | declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2563 | David Lee | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2564 | KA Worles | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2565 | LG Hyeth | Resident | 11 Planning for our | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st</p> |

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| | | | Natural Environment | | | | <p>2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2566 | Susan Herd | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2567 | Stephanie Whittington | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to</p> |

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| | | | | | | | injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2568 | GP Frazer | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2569 | Fred Colman | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2570 | Joan Colman | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely</p> |

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| | | | | | | | <p>understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2571 | Susan & Paul Bates | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2572 | CA Frazer | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's</p> |

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| | | | | | | | declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2573 | Marilyn Atkinson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2574 | Margaret Jackson | Resident | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2575 | Gillian Johnston | resident | 11 Planning for our Natural Environment | NE03 | | Objection | <p>Removing most of Green Belt for development is not delivering “a good quality and accessible network of green spaces throughout the Borough”</p> <p>In fact developing this area is doing the opposite of what Policy NE3 suggests.</p> <p>According to National Planning Policy Framework (2019):</p> |

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| | | | | | | <p>“The planning system should support a transition to a low carbon future in a changing climate... it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions... in line with the objectives and provisions of the Climate Change Act 2008.”</p> <p>Plans are legally required to demonstrate how their policies are in line with legally binding carbon emission reduction targets in the Climate Change Act 2008, including and understanding of baseline emissions inherent in future development... Local Plans must ensure that the actions and policies will reduce emissions in line with the trajectory set out in the Climate Change Act 2008.</p> <p>A large scale development on site H3.59 along with development on sites H3.1; H3.12 ; RG5 and H3.68 all within close proximity will increase carbon emissions not reduce them, particularly to the villages of East Boldon and Cleadon therefore totally ignores guidance in Climate Change Act (2008), so cannot be justified as this development is not sustainable, when viewed alongside current Climate Change Legislation.</p> <p>Is this legal?</p> |
| ST2575 | Gillian Johnston | resident | 11 Planning for our Natural Environment | NE06 | Objection | <p>In addition, to allay concerns about open water, it must be clear to those using the surrounding amenity space why it is important to manage and treat the runoff from our development areas and how it is collected and stored.</p> <p>SuDS also costly and needs to be maintained, this often does not happen after developer has completed site. I understand the run off on all sites is to river `Don however SuDS is not designed to prevent river flooding at these sites It has been noted in Achieving sustainable drainage: A review of delivery by Lead Local Flood Authorities (January 2019) that:</p> <p>“Whilst SuDS are included as appropriate measures in areas prone to flooding, it should be noted that SuDS are not intended to prevent river flooding (fluvial), as its purpose is to address surface water flooding from rainfall (pluvial). Managing rapid surface water runoff, and in particular retrofitting SuDS, can reduce existing surface water flooding problems, which may also help reduce low level river flooding where it is exacerbated by urban runoff. However, SuDS cannot prevent river flooding on their own.’</p> <p>So SuDS will not prevent flooding from River Don therefore will not mitigate flood risk.</p> <p>Also noted</p> <p>There was concern that good conditions can be recommended, but can</p> |

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| | | | | | | <p>then be negotiated away by developers on viability grounds.</p> <p>This suggests that developers do not always do the right thing so will need planning safeguards. This suggests developers are not committed to the principles of SuDS and unwilling to deliver more than just drainage. In fact the sheer volume of development in a small area will cause many problems which are not address in Policy S1.</p> <p>Developing any of the above sites will cause flooding issues for the villages of Cleadon Whitburn and East Boldon and contradicts Policy NE6 which is concerned with flood risk and water management which states “Flood risk will be taken into account at all stages in the planning process to avoid inappropriate development in areas at current or future risk of flooding. What has South Tyneside Council done to reduce the risk of flooding? Why have these sites been put forward for development when they are clearly unsuitable for housing?</p> <p>I note that sustainable drainage systems (SUDs) are costly and need to be maintained and are unpopular with developers. A recent report, noted that developers often do not maintain SUDs after completing the site. I understand the run off on all sites needing flood risk assessment, SUDs and surface water management plans is to the River Don. However SUDS is not designed to prevent river flooding at these sites It has been noted in Achieving sustainable drainage: A review of delivery by Lead Local Flood Authorities (January 2019) that:</p> <p>“Whilst SuDS are included as appropriate measures in areas prone to flooding, it should be noted that SuDS are not intended to prevent river flooding (fluvial), as its purpose is to address surface water flooding from rainfall (pluvial). Managing rapid surface water runoff, and in particular retrofitting SuDS, can reduce existing surface water flooding problems, which may also help reduce low level river flooding where it is exacerbated by urban runoff. However, SuDS cannot prevent river flooding on their own.’</p> <p>So SuDS will not prevent flooding from River Don therefore will not mitigate flood risk.</p> <p>Also noted in this report:</p> <p>There was concern that good conditions can be recommended, but can then be negotiated away by developers on viability grounds.</p> <p>This suggests that developers do not always do the right thing so will need planning safeguards. This suggests developers are not committed to the principles of SUDS and unwilling to deliver more than just drainage. In fact</p> |
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| | | | | | | | the sheer volume of development in a small area will cause many problems which are not address in this Policy. |
| ST2576 | Chrsitine Mayne | | 11 Planning for our natural environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2121 | Sheila Graber | | 11 Planning for our natural environment | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion: *carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030). *Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside’s emissions targets. *Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions). * Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey</p> |

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| | | | | | | | (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, 'suitable sites for energy generation' would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects |
| ST2122 | Brittany Hansen | | 11 Planning for our natural environment | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> *carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030). *Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets. *Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions). * Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, 'suitable sites for energy generation' would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects. |
| ST2320 | Dr Kirstin Richardson | | 11 Planning for our | NE03 | | Support | <p>5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1</p> <p>I would like to state my support for Policy N3. In East Boldon we intend to</p> |

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| | | | Natural Environment | | | | identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it. |
| ST2389 | Emma Johnston | | 11 Planning for our natural environment | NE03 | | Objection | 5.0 Open Green Spaces and community infrastructure – Policy N3 and paragraph 12.1 I would like to state my support for Policy N3. In East Boldon we intend to identify some Green spaces within our Neighbourhood Plan. One of the sites which is in question is the area in front of St George's Church. This area is neglected and unsightly and detracts from the Church, making it very difficult to attract congregation. I would like to see it become accessible and landscaped, while respecting the wildlife which habits it. |
| ST2406 | Jean Youll | | 11 Planning for our natural environment | NE01 | g | Objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2416 | R Adamson | | 11 Planning for our natural environment | NE01 | g | Objection | 5.0 Climate Change Crisis 5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. |

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| | | | | | | | The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time. |
| ST2413 | David Adamson | | 11 Planning for the natural environment | NE01 | g | objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST0306 | Sue Balmer | resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis - Policy NE1 : On 18th July 2019 South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside- shortly after the 1st May 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose. The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST1948 | Lesley Younger | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and greater identification and development of green spaces in towns will help to mitigate the effects of</p> |

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| | | | | | | | <p>CO2 (alongside much greater regulation of traffic congestion and subsequent pollution). Protecting our green environment is therefore one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces. East Boldon is uniquely placed to be at the forefront of helping combat climate change due to its inherent green spaces. As always more can be done to enhance these as identified by the people of East Boldon, evidenced at EBNF consultation events and in their questionnaire responses.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan therefore seems half baked and 'rushed through'. In addition, the seeming dismissal of East Boldon's 'green assets', lack of proper analysis and assessment as to what can be done to protect and enhance these and in so doing help to address one of the most pressing issues of our time is in effect negligent.</p> |
| ST1988 | Michael Constable | | 11 Planning for our Natural Environment | NE01 | g | objection | <p>Draft Local Plan Comments</p> <p>1. The Council's Emerging Local Plan clashes with a recent Council 'climate emergency' pledge to reduce carbon emissions to help combat climate change. The removal of plants, trees and grassland necessary for the proposed developments would reduce current Carbon Dioxide absorption levels, resulting in an overall increase compared to the pre-development condition. Add to this the increased levels of pollution caused during the development phase and increase in traffic pollution on completion of the build and we will realise a quite significant increase in Carbon emissions.</p> |
| ST2196 | P Murray | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>On a more ecological note, the council recently declared a climate change emergency but are apparently ignorant of the fact that the grass and trees absorb CO2 and the grassland drains rain. Concrete does neither of those things. In fact, the Green Belt is a feature of the environment that can actually help climate change. Perhaps the council is ignorant of this natural phenomenon, or chooses not to pay heed to it and only has its eyes on the income the land will bring them?</p> |
| ST2257 | Mandy Purvis | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>I object to the emerging local plan on the grounds that the plan fails to incorporate any carbon reduction targets – which is a legal requirement. The local plan should be designed to help us achieve emissions reductions across all sectors, and therefore should include a carbon emissions analysis of all the different potential versions of the local plan.</p> |

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| | | | | | | | Furthermore, I wish to see the implementation of SMART targets for all environmental goals rather than the vague objectives currently included, and for the identification of the most optimal sites for renewable energy generation and conservation interventions. |
| ST2258 | George Williams | | 11 Planning for our Natural Environment | NE01 | g | Objection | I object to the emerging local plan on the grounds that the plan fails to incorporate any carbon reduction targets – which is a legal requirement - not to mention an opportunity for South Tyneside Council to demonstrate that it's leading the response to the climate crisis. The local plan should be designed to help us achieve emissions reductions across all sectors, and therefore should include a carbon emissions analysis of all the different potential versions of the local plan. Furthermore, I wish to see the implementation of SMART targets for all environmental goals rather than the vague objectives currently included, and for the identification of the most optimal sites for renewable energy generation and conservation interventions. |
| ST2266 | Abeer Bayyat | | 11 Planning for our Natural Environment | NE01 | g | Objection | I object to the emerging local plan on the grounds that the plan fails in its entirety to incorporate any carbon reduction targets...which is a legal requirement. The local plan should be designed to help us achieve emissions reductions across all sectors, and therefore should include a carbon emissions analysis of all the different potential versions of the local plan. Furthermore, i wish to see the implementation of SMART targets for all environmental goals rather than the vague objectives currently included, and the identification of the most optimal sites for renewable energy generation, and conservation interventions. |
| ST2278 | Daniel Stone | Centre for Sustainable Energy | 11 Planning for our Natural Environment | NE01 | g | Comment | Legislative and National Planning Policy Framework around climate change mitigation and adaptation Section 19 of the 2004 Planning and Compulsory Purchase Act (as amended by the Planning Act 20081) states “Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change” and to shape places to contribute to “radical reductions in carbon emissions”. Paragraph 148 of the National Planning Policy Framework (NPPF2) states: “The planning system should support the transition to a low carbon future in a changing climate... It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions...” Footnote 48 of the NPPF explains further that this provision should be complied with “in line with the objectives and provisions of the Climate Change Act 2008”3. As originally passed into |

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| | | | | | | <p>law, the Climate Change Act set a legal duty for the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline. On 12 June 2019 the Government amended the Climate Change Act to target full net carbon neutrality (a 100% reduction of greenhouse gas emissions) in the UK by 2050 compared to 1990 levels⁴. The online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides the following further interpretation of the NPPF (paragraph 1): “Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.”</p> <p>“Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change.” In respect of the approach to identifying climate mitigation measures, paragraph 7 states: “Every area will have different challenges and opportunities for reducing carbon emissions from new development such as homes, businesses, energy, transport and agricultural related development. Robust evaluation of future emissions will require consideration of different emission sources, likely trends taking into account requirements set in national legislation, and a range of development scenarios. Information on carbon emissions at local authority level has been published by the government for 2005 onwards, and can be drawn on to inform emission reduction options. Information is also available on GOV.UK on how emissions are reported against the national target to reduce the UK’s greenhouse gas emissions by at least 80% (from</p> |
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| | | | | | | <p>the 1990 baseline) by 2050. The distribution and design of new development and the potential for servicing sites through sustainable transport solutions, are particularly important considerations that affect transport emissions. Sustainability appraisal should be used to test different spatial options in plans on emissions.”</p> <p>Additional policy – Safeguarding Renewable Energy</p> <p>Given the importance of maximising renewable energy generation to achieving carbon reductions and the paucity of significant RE sources, existing and potentially deployable renewable energy resources should be safeguarded. We would therefore suggest a further policy is created similar to that set out in the Cornwall Local Plan¹⁵: Example policy - Cornwall Local Plan Policy 15: Safeguarding renewable energy New development, where appropriate, should show that it does not significantly harm the performance of any existing facility and the potential for optimisation of strategic renewable energy installations, or the availability of their resource (where the operation is dependent on uninterrupted flow of energy to the installation).</p> <p>We hope these comments are taken constructively as they are intended, and we may be able to offer high level support to improve the plan, if this would be useful.</p> |
| ST2278 | Daniel Stone | Centre for Sustainable Energy | 11 Planning for our Natural Environment | NE01 | g | <p>Objection</p> <p>1. Principle Objection – non-compliance with Climate Change Act 2008 and Planning and Compulsory Purchase Act 2004 (as amended) duties and NPPF guidance – carbon accounting and climate mitigation</p> <p>As set out in detail above, national legislation and guidance both strongly stress the central role of the planning system in securing radical reductions in greenhouse gas emissions and require Local Plans to:</p> <ul style="list-style-type: none"> - Take into account baseline emissions - Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios; <p>Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050. The South Tyneside Local Plan fails to do any of these things, and is therefore unsound and challengeable. The South Tyneside Local Plan should include an audit of the carbon emissions inherent in new development. The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options</p> |

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| | | | | | | <p>available to achieve the highest level of ambition possible to meet this goal. To the extent possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years. A major review of the plan is required in order to bring it into compliance with legislative and policy requirements around climate change. Where local authorities have followed the process of carbon auditing their plans set out in the NPPF and Planning Practice Guidance, the conclusions are often that it would be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for very ambitious planning policies around building performance. Common policy approaches (adopted by the London Authorities and others) to secure zero carbon development comprise: binding energy performance standards on new development, binding 'Merton' rule policies requiring the incorporation of renewable energy within new developments and payments into a carbon offset fund to pay for off-site carbon abatement.</p> <p>The best developed example we have seen, which includes all of these elements and has been in operation for several years is policy S12 of the London Plan5: Example policy - London Plan Policy S12: Minimising greenhouse gas emissions 'A Major development should be net zero-carbon. This means reducing carbon dioxide emissions from construction and operation, and minimising both annual and peak energy demand in accordance with the following energy hierarchy: 1) Be lean: use less energy and manage demand during construction and operation. 2) Be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly. Development in Heat Network Priority Areas should follow the heating hierarchy in Policy S13 Energy infrastructure. 3) Be green: generate, store and use renewable energy on-site. B Major development should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and will be expected to monitor and report on energy performance. C In meeting the zero-carbon target a minimum on-site reduction of at least 35 per cent beyond Building Regulations is expected. Residential development should aim to achieve 10 per cent, and non-residential development should aim to achieve 15 per cent through</p> |
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| | | | | | | | <p>energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided: 1) through a cash in lieu contribution to the relevant borough's carbon offset fund, and/or 2) off-site provided that an alternative proposal is identified and delivery is certain. D Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver greenhouse gas reductions. The operation of offset funds should be monitored and reported on annually.'</p> <p>Many authorities have been using the free Scatter6 tool to measure baseline emissions, model policy scenarios, and set reduction targets. The RTP1 / TCPA Climate Change Guide7 and The Policy Playbook by the Green Building Council8 both contain policy wording adopted by other councils which could be adapted to the South Tyneside context and further sources of viability evidence. Within the context of this overarching objection, we would also make the following comments in relation to the detailed policies which follow on.</p> |
| ST2328 | Cllr Joan Atkinson | Councillor | 11 Planning for our Natural Environment | NE01 | g | Objection | <ul style="list-style-type: none"> • The effects of removing greenbelt and greenfield is to contribute further to the release of carbon. As a Council we have declared a climate emergency and to be carbon neutral by 2030 and be a leader for others to do the same. The Draft does not set out or reassure how this can be achieved in our communities and that developers will be required to support the pledge. • Climate change is evidenced in extreme weather conditions and flooding is a real and present challenge. When more of the land is concrete and not green field or greenbelt we will have even more of a challenge to deal with the rainwater. • Farming will become even more important to the nation as we exit the EU but also seek to reduce the carbon miles travelled in food production. Local and regional producers will be more and more desirable as providers to the awakening of the public's social and moral conscience to climate change. Therefore our farmers' fields should be seen as assets for the future and not stripped for housing. |
| ST2333 | Michael Collier | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>Additional and higher levels of pollution will have a direct impact upon the environment and health of the community. South Tyneside has recently declared a 'Climate Emergency' and higher pollution levels will impact further upon the environment and the loss of recreational services and</p> |

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| | | | | | | | space will have a detrimental impact upon the mental health and well-being of the community. |
| ST2336 | Judith Turner | | 11 Planning for our Natural Environment | NE01 | g | Objection | I would like to point out that the Earth is experiencing an environmental crisis and climate emergency, directly caused by human activity, including the destruction of countryside. The Council itself has declared a climate emergency. This being the case one of the first immediate actions needs to be to stop any construction on our precious Greenbelt. It is our duty to future generations to protect these areas. What will the Council do in relation to green spaces to respond to the climate emergency? |
| ST2396 | Jules Ewing | | 11 Planning for our Natural Environment | NE01 | g | Object | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> *carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030). *Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets. *Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions). * Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, 'suitable sites for energy generation' would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects. |

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| ST2456 | Kevin Curtis | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <p>*carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside’s emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions</p> |
| ST2462 | Brian Navi | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>7.0 Climate Change Crisis – Policy NE1</p> <p>On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st, 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency.</p> |
| ST2463 | Shirley Ford | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>I wish to object to the Pre-Publication Draft of the Local Plan on the grounds that it is not compliant with the 2008 Climate Change Act. Further, the environmental policies which are included are unsuitably weak. In particular, the following policies are absent and must be included:</p> <p>*carbon reduction targets for the borough must be included in the Local</p> |

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| | | | | | | | <p>Plan. These should be set in-line with either the Climate Change Act, or, preferably, the Labour Party's national policy, which sets a trajectory of achieving net zero by 2030.</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the Local Plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire Local plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> |
| ST2465 | Peter Gibson and Elizabeth Gibson | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2470 | Carl Buckley | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside –shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> |

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| | | | | | | | <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2472 | Ms Jane Pigford | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2473 | Cllr David Francis | Councillor | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>I wish to object to the emerging local plan on the grounds that it is not fully compliant with the 2008 climate change act. I also feel that the environmental policies which are included are weak, as they currently stand.</p> <p>As stated in Section 19 of the Planning & Compulsory Purchase Act 2004, "Development plan documents must include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change." I don't believe that the current version of the plan does this with sufficient rigour. Paragraph 8 of the National Planning Policy Framework (2019) makes it clear that "mitigating and adapting to climate change" is a core planning objective. The NPPF also highlights climate change as a key part of strategic planning policy which local authorities are legally obliged to set out in their local plans. Again, I see insufficient evidence of this in the current draft.</p> <p>Paragraph 148 of the NPPF goes on to say "The planning system should support the transition to a low carbon future in a changing climate... it</p> |

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| | | | | | | <p>should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions... in line with the objectives and provisions of the Climate Change Act 2008.”</p> <p>Once again, I am certain that much more detail on how this will be achieved (and associated SMART targets) will ensure that we are compliant with the current legislation.</p> <p>In particular, I also object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <p>*carbon reduction targets for the borough should be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside’s emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> |
| ST2474 | Gary Pigford | Resident | 11 Planning for our Natural Environment | NE01 | g | <p>Objection</p> <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST2477 | Sophia Friedrich | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2487 | Allan McFarlane | Resident | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2492 | Nicola O'Riordan | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so</p> |

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| | | | | | | | <p>that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2493 | Bruce and Liz Harper | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2495 | Ian McFarlane | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |

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| ST2496 | Rosalind Hughes & Warren Hughes | | 11 Planning for our Natural Environment | NE01 | g | Objection | Does the local plan not need to take into account the recently declared climate emergency (2019)? How can South Tyneside justify declaring a climate emergency then shortly after publish the local plan via the destruction of valuable green spaces including nature and wildlife habitats. |
| ST2497 | Joe O’Riordan | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2499 | David Herbert | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>There is also a lack of consideration given to overheating within climate adaptation policies in the plan. A policy should be added to address the mitigation of overheating, making clear that new development should follow the cooling hierarchy to avoid reliance on high-carbon mechanical cooling. Policy examples to follow are given in the GBC policy playbook and the RTPI / TCPA climate guide.</p> <p>There is a lack of concrete policies and commitment to deliver Renewable and Low Carbon Energy Generation</p> <p>There has been no surveying work done to identify the generation capacity of different renewable technologies across the borough. The NPPF states (para 151) that “to help increase the use and supply of renewable and low carbon energy and heat, plans should:</p> <ol style="list-style-type: none"> a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and b) consider identifying suitable areas for renewable and low carbon energy sources...” <p>This should include potential wind power.</p> <p>This Draft Plan needs to make the inclusion and maximising of on-site renewable energy generation a standard requirement in all developments.</p> |

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| ST2529 | Jayne Mackie | | 11 Planning for our Natural Environment | NE1 | g | Objection | Does the local plan not need to take into account the recently declared climate emergency (2019)? How can South Tyneside justify declaring a climate emergency then shortly after publish the local plan via the destruction of valuable green spaces including nature and wildlife habitats. Pollution has not been considered. |
| ST2531 | David Herbert | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>There is also a lack of consideration given to overheating within climate adaptation policies in the plan. A policy should be added to address the mitigation of overheating, making clear that new development should follow the cooling hierarchy to avoid reliance on high-carbon mechanical cooling. Policy examples to follow are given in the GBC policy playbook and the RTP / TCPA climate guide.</p> <p>There is a lack of concrete policies and commitment to deliver Renewable and Low Carbon Energy Generation</p> <p>There has been no surveying work done to identify the generation capacity of different renewable technologies across the borough. The NPPF states (para 151) that “to help increase the use and supply of renewable and low carbon energy and heat, plans should:</p> <p>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and</p> <p>b) consider identifying suitable areas for renewable and low carbon energy sources...”</p> <p>This should include potential wind power.</p> <p>This Draft Plan needs to make the inclusion and maximising of on-site renewable energy generation a standard requirement in all developments.</p> |
| ST2531 | David Herbert | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>There is also a lack of consideration given to overheating within climate adaptation policies in the plan. A policy should be added to address the mitigation of overheating, making clear that new development should follow the cooling hierarchy to avoid reliance on high-carbon mechanical cooling. Policy examples to follow are given in the GBC policy playbook and the RTP / TCPA climate guide.</p> <p>There is a lack of concrete policies and commitment to deliver Renewable and Low Carbon Energy Generation</p> <p>There has been no surveying work done to identify the generation capacity of different renewable technologies across the borough. The NPPF states (para 151) that “to help increase the use and supply of renewable and low carbon energy and heat, plans should:</p> <p>a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and</p> |

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| | | | | | | | <p>b) consider identifying suitable areas for renewable and low carbon energy sources...”</p> <p>This should include potential wind power.</p> <p>This Draft Plan needs to make the inclusion and maximising of on-site renewable energy generation a standard requirement in all developments.</p> |
| ST2533 | Clare Newton | | 11 Planning for our Natural Environment | NE1 | g | Objection | <p>5.0 Climate Change Crisis</p> <p>5.1 On 18th July 2019, South Tyneside Council declared a Climate Emergency in the Borough of South Tyneside – shortly after the May 1st 2019 Parliamentary declaration of a Climate Emergency. It is widely understood that the protection of land and its use to mitigate the effects of CO2 is one of the most important things we can do to help counter climate change. It is also understood that Green Belt policy is one of the most effective means available to protect our fields and green spaces so that we have sufficient land available for that purpose.</p> <p>The draft Local Plan seems to almost turn this understanding on its head. The use of out of date statistics to drive up housing numbers adds insult to injury. Overall there seems scant regard to the Local Authority's declaration of a Climate Emergency. The draft Local Plan seems 'rushed through' without a proper analysis or debate on how it can address one of the most pressing issues of our time.</p> |
| ST2538 | Jim Ewing | | 11 Planning for our Natural Environment | NE01 | g | Objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <ul style="list-style-type: none"> *carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour’s national policy (which sets a trajectory of achieving net zero by 2030). *Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside’s emissions targets. *Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high- |

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| | | | | | | | <p>carbon policies (which would ultimately minimise or negate net co2 reductions).</p> <p>* Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, 'suitable sites for energy generation' would be identified in the plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects.</p> |
| ST2555 | Trisha Doyle | | 11 Planning for our Natural Environment | NE01 | g | objection | <p>I wish to object to the emerging local plan on the grounds that it is non-compliant with the 2008 climate change act. I also feel that the environmental policies which are included are unsuitability weak. In particular, I object to the absence of the following policies, and respectfully request you consider their inclusion:</p> <p>*carbon reduction targets for the borough should, I argue, be included in the plan (which should be in-line with either the Climate change act, or, preferably, Labour's national policy (which sets a trajectory of achieving net zero by 2030).</p> <p>*Compliance with these carbon reduction targets must then act as a foundational principle, with the entirety of the local plan facilitating this outcome. This will require that every policy be accompanied with an evidence-based explanation detailing how it would contribute to meeting South Tyneside's emissions targets.</p> <p>*Accordingly, a calculation of the carbon emissions of different iterations of both the entire plan and individual policies is essential. Otherwise, the council could unwittingly be picking the most carbon-intensive pathway, or, alternatively, be simultaneously implementing zero-, low- and high-carbon policies (which would ultimately minimise or negate net co2 reductions).</p> <p>* Whilst I welcome the support for renewable energy, I would like to see the plan offer a concrete pathway towards increased renewable energy generation within our borough. Best practice would be to conduct a survey (determining renewable energy generation capacity and then physical and policy constraints for all sites across the borough), the results of which would be published within the local plan. As a consequence of gathering this data, 'suitable sites for energy generation' would be identified in the</p> |

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| | | | | | | | plan. This would act to highlight the potential of key sites, thereby inviting energy companies to seriously consider our area for their projects. |
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