

ID Ref	Respondent	Organisation	Representative	Chapter	SA Assessment	Site/ Option	Objective	Support/ Comment / Objection	Comments
ST0302			Richard Buxton Solicitors	App 1		H03	OBJ04	Objection	<p>2.4. In any event, the IDP does reveal that there is a serious transport problem in the district before the added housing growth is considered and that the district is heavily car dependent (the majority of movements by people and freight will continue to be by road in the short-medium term - IDP 4.11): These places are connected by a series of important distributor roads, with South Tyneside experiencing a net outflow of commuter trips. Given the flows of people, the result is localised congestion along key routes, particularly during peak periods. Connections to the strategic road network and the local economic centres are all subject to delays at key junctions (IDP 4.8).</p> <p>2.5. The IDP highlights numerous amber and red warnings associated with the Boldon allocations (IDP Table 1). In particular, three large allocations (amounting to 1,126 dwellings) are completely dependent on transport mitigation.1 As a result of the omission to publicise the modelling in a transport assessment as part of this Reg 18 evidence base, our clients have been unable to make expert technical submissions through a transport consultant on the adequacy of the modelling or transport information to assess the environmental impacts of traffic associated with housing growth on this scale, or to assess whether the Council has met its duty to promote "sustainable patterns of development" (NPPF 103; Calverton [19]).</p> <p>2.6. In short, there was no point in local residents (with limited funding) instructing an expert transport consultant to review an 8-year old 2010/2011 transport assessment which has no regard to the how the proposed 11 allocations in Boldon would affect the road network. KBG reserves its position as to whether the consultation is lawfully adequate because of this lack of</p>

									<p>transport impact assessment. If and when the Council produces expert transport evidence, KBG intends to seek expert assessment on the adequacy of the information to support the proposed allocations in Boldon.</p> <p>2.7. In our view the Reg 18 consultation is legally defective for the following reasons:</p> <p>(1) The Council cannot reliably judge the transport impacts of 1,352 new dwellings in Boldon or how the allocations promote sustainable patterns of growth;</p> <p>(2) The lack of up-to-date transport assessment, which in turn infects the SA scoring; and</p> <p>(3) The inability of local residents to scrutinise the transport modelling creates doubt and uncertainty as to whether the model is fit for purpose.</p>
ST1922	Ian Lyle	ELG Planning	Frank Moore	App 1	Site Specific	H03.0 1	OBJ04	Objection	<p>Our client would also like to take this opportunity to object to the following sites being allocated for housing:</p> <ul style="list-style-type: none"> • H3.1 – Land at Benton Road, South Shields; • H3.2 – Land South of Cleadon Park; • H3.3 – Land West of Sunnyside Farm; • H3.12 - Land at Chuter Ede Education Centre; • H3.59 – Land at North Farm, Boldon; • H3.62 – Land North of Tower End Farm; and • H3.68 – Land North of New Road. <p>5. These housing allocations are on what is currently Green Belt land, and whilst it is agreed that land needs to be released from the Green Belt, it is considered that the release of these sites would cause unacceptable harm to the Green Belt and its objectives. These sites are located in the gap between Boldon and South Shields, their allocation individually and collectively would result in the gap between settlements being reduced to less than 300m in some places, which is clearly in contradiction to one of the main purposes of Green Belt land; to prevent neighbouring towns merging into one another. Our client would also like to object to how the above sites have been assessed in the Sustainability Assessment. The allocated sites have</p>

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ST1922	Ian Lyle	ELG Planning	Frank Moore	App 1	Site Specific	H03.1 2	OBJ04	Objection	<p>Our client would also like to take this opportunity to object to the following sites being allocated for housing:</p> <ul style="list-style-type: none"> • H3.1 – Land at Benton Road, South Shields; • H3.2 – Land South of Cleadon Park; • H3.3 – Land West of Sunnyside Farm; • H3.12 - Land at Chuter Ede Education Centre; • H3.59 – Land at North Farm, Boldon; • H3.62 – Land North of Tower End Farm; and • H3.68 – Land North of New Road. <p>5. These housing allocations are on what is currently Green Belt land, and whilst it is agreed that land needs to be released from the Green Belt, it is considered that the release of these sites would cause unacceptable</p>

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ST2518	Brian Foster		Resident	App 1	Site Specific	H03.2 5	OBJ01	Objection	<p>Point 1 - No Surface water has been identified by the SFRA 2018 according to the report. When was the report compiled? July or August 2018 when we have</p>

									decent weather? The grassed area being considered for development often floods as do all of the paths around this site. Development of this site will cause an extra strain on the sewerage system which intersects this site and into Kings Meadow
ST2518	Brian Foster		Resident	App 1	Site Specific	H03.2 5	OBJ02	Objection	Point 2 States that the nearest wildlife site is 500m away. We live right next to the Burn and there is lots of wildlife there. This is less than 100m from the proposed site and i fear that development of this site will attract wildlife from the burn and into Kings Meadow.
ST2518	Brian Foster		Resident	App 1	Site Specific	H03.2 5	OBJ12	Objection	Points 12 and 13 are key. They both refer to promoting better neighbourhoods, healthier people and communities. I live at [REDACTED] on the end of the cul-de-sac and right next to the area under consideration for development. My first question is where is the road going to be into the new development? I am concerned that the only access road will be through Kings Meadow, leading to greater traffic passing my house and an increased risk to children playing in the area. I have attached a photo and you will note the space where I fear the road will travel through. There is currently car parking outside my house. Will this remain in situ once the development is completed? Again, a fear for me and other residents is that we will simply be a through fare to the new estate and parking outside of my house will become non existent.
ST2518	Brian Foster		Resident	App 1	Site Specific	H03.2 5	OBJ13	Objection	Points 12 and 13 are key. They both refer to promoting better neighbourhoods, healthier people and communities. I live at [REDACTED] on the end of the cul-de-sac and right next to the area under consideration for development. My first question is where is the road going to be into the new development? I am concerned that the only access road will be through Kings Meadow, leading to greater traffic passing my house and an increased risk to children playing in the area. I have attached a photo and you will note the space where I fear the road will

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ST2518	Brian Foster		Resident	App 1	Site Specific	H03.2 5	Summary	Objection	The assessment summary suggests that this development would have an overall positive effect. I would like to know who it will have a positive effect on? I believe that if the road into the development comes through Kings Meadow, then it will very much have a negative effect on the very few (9 houses in the main part of Kings Meadow and 3 at the front on the main road) houses that make up Kings Meadow.
ST2477	Emma Callaghan			App 1	Site Specific	H03.2 7		Objection	The two documents, the 'South Tyneside Site Specific Sustainability Appraisal App 1: Fellgate and Hedworth (August 2019) and the 'South Tyneside Site Specific Sustainability Appraisal App 1: Draft Local Plan Allocations (August 2019)' both present site-specific sustainability appraisals for locations within the Borough. However, the two documents dated the same month show different results and descriptions for the same sites. For example, our client's site (SHLAA ref SFG015) is listed as being 1.2ha in the Fellgate and Hedworth document, having potential for 32 units, and scoring overall neutrality for sustainability which is in contrast to the information provided about the site in the Local Plan. However, in the Overall Sustainability Appraisal Document, where the policy reference is listed alongside the SHLAA reference, the site is listed as 1.08ha, does not specifically list a number of units, and rates the site positively for sustainability. Our client supports the information listed in the latter document as being correct and consistent with the emerging Local Plan, and although the Draft Local Plan interim Sustainability Appraisal: App 1 (August 2019) document does go some way to outline differences between the two documents, our client requests that further

									clarification is given about the difference between the appraisals and their weight in relation to the emerging Local Plan and its policies within the documents themselves.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.2 9	OBJ01	Objection	1. Adapt & mitigate the effects of climate change: This area has undergone extensive work on the construction of storm drains especially on the Glenside/Greenlands area due to flooding when there is heavy rainfall. This area still has issues with flooding on all footpaths caused by large amounts of surface run off. This will only get worse with the removal of permeable ground caused by the development of residential properties and the increase of concrete and tarmac areas. Further surface flooding issues will be caused by unpredictable weather, flash flooding and climate change.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.2 9	OBJ02	Objection	2. Conserve and enhance biodiversity: This site has large mature bushes which house local wildlife such as hedgehogs, insects and birds. Removing these mature bushes by building residential properties will have a detrimental effect on these species. Disturbing the soil will disrupt habitats and cause pollution to water sources. The land proposed for development is a green area which can provide a communal open space for residents. The mature bushes also ensure a buffer which is important to maintaining the setting of residential properties at present. Pollution will be caused with the waste disposal of concrete, metal and bricks producing a negative impact and an increased level at landfill.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.2 9	OBJ03	Objection	3. Safeguarding our environmental assets and natural resources: 'Trees and shrubs help capture CO2 and other pollutants' – Public Health Matters, Public Health England, 09/11/2016, Health and Wellbeing, health and climate change There is an abundance of evidence to show that the health of the public can vastly improve when there is access to green space which in turn helps to improve the quality of our natural environment. It is evident to

									see that existing green environmental assets in this area are worth safeguarding for all existing residents. The impacts on mental wellbeing, social networks and sustainable communities work through a variety of mechanisms and the strongest evidence is emerging that urban green space can improve the public's health.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.29	OBJ04	Objection	4. Protecting our green belt: Although this area for the proposed development is not an area of green belt, it is located adjacent to one. The area proposed for development is an area of green open space valued by all residents especially the elderly that do not leave the house frequently who face directly onto it. This area also houses mature bushes and wildlife. Children also use this space to play and the removal will have a negative impact on the oth the community and environment.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.29	OBJ05	Objection	5. Enhancing our green infrastructure: Physical benefits from green infrastructure include improved air quality, less noise pollution and reduced risk from flooding and heatwaves. The proposed development will remove a large areaof green open space having a negative impact on the area.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.29	OBJ07	Objection	7. Promote sustainable transport and accessibility: If this area is developed it will cause problems regarding parking, accessibility to housing and disruption to roads and pavements. The estate is already overcrowded with cars and residents have experienced several near misses caused by the amount of cars parked on roadsides and poor visibility on the corners due to cars parking. Areas of land on the estate have already been made into car parking without providing a solution to the problem and the estate cannot afford to lose any other green space. Further residential properties will enhance this problem as the majority of houses have between 1-2 cars per household. An extra 10-20 vehicles will cause major issues for the area. The Climate Act, 2008 was brought in to reduce CO2 emissions by 20% by 2050. This legally binding target

									will not be achieved by building new residential properties as the machinery required to build properties, plus an increase in residence and vehicles will produce an increase in pollution.
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.29	OBJ12	Objection	<p>12. Providing better housing neighbourhoods and good design: Unfortunately, Hedworth Estate and especially Heathway is brighted with a huge drug problem and anti-social beaviour which is well known to Councillors presernting the area nad local policing teams. The Northumbrian Water flooding sustem which si positioned at Heathway is a constant issue for the police and residents. Building additional residential properties in this area is only going to impact negatively on the anti-social behaviour that the current residents are subjected to on a daily basis. The children's play park which is directly opposite the proposed site is well known to the police as a hot spot for anti-social behaviour both day and night.</p>
ST0073	Kevin & Janet Bradley	-	Resident	App 1	Site Specific	H03.29	OBJ13	Objection	<p>13. Promote healthier people and communities: In the draft plan it states that there is a healthcare facility 250m from the proposed location. This is a negative statement against the proposal as there is no healthcare facility on Hedworth or Calf Close estate and it has not been there for many years. New residents will have to travel further afield for healthcare facilities which are already in high demand. Further properties in the area will cause a strain on health care facilities and schools.</p> <p>Removing green spaces will also have an impact on mental health for residing residents as it is well documented that green spaces contribute positively to physical and mental health. Buildings will cause less light for local residents. Good quality, open, natural landscapes in urban areas can positively affect mental health by improving air quality, less noise pollution and reduce the risk of flooding. Open space also provides a therapeutic intervention for treatment of mental health reducing the strain on already struggling NHS services.</p>

									South Tyneside has one of the highest rates of childhood obesity, removing areas of green space will further contribute to this issue and will not improve rates. Green, open space should be promoted as a natural way to reduce obesity which will help lessen the burden on NHS resources.
ST2506	Mark Gabrele		Bellway Homes Limited (North East)	App 1	Site Specific	H03.5 5		Objection	<p>5.3.4.8 The Council's assessments have in turn fed into the wider Sustainability Appraisal of the draft allocation.</p> <p>5.3.4.9 Whilst this concludes that the site is suitable to be carried forward as a residential allocation, it does note potential negative scores against the Green Belt considerations and green infrastructure. As outlined in the tables above, our view is that the impact on the Green Belt is capable of being adequately mitigated (this is supported by the Council's own assessment contained in its Site Allocations Topic Paper). With regards to green infrastructure, the site is generally enclosed and screened and so its role in providing openness in the green infrastructure corridor is limited. The initial indicative masterplan also demonstrates that a generous amount of green space will also be retained in the south of the site.</p> <p>5.3.4.10 The Sustainability Appraisal does note the site's sustainable location and its good public transport links and it is considered that this underlines the site's suitability to be brought forward and its development will complete the regeneration of the former college site.</p> <p>5.3.4.11 It is noted however that the Sustainability Appraisal does not include an assessment of the wider economic benefits of developing the sites in terms of job creation through the construction of the site and beyond, plus the ability to attract new residents and expenditure to the area. The development would also</p>

									help retain future workers within South Tyneside and so presents the opportunity to facilitate more sustainable patterns of development. These positive elements should be drawn out further within the Sustainability Appraisal. This would result in a more balanced and positive scoring for the site.
ST2505	Martyn Earle		Bellway Homes Limited (North East)	App 1	Site Specific	H03.59		Objection	<p>The Council's assessments have in turn fed into the wider Sustainability Appraisal of the draft allocation.</p> <p>Whilst this concludes that the site is suitable to be carried forward as a residential allocation, it does note potential negative scores against the Green Belt considerations and green infrastructure. As outlined in the tables above, our view is that the impact on the Green Belt is capable of being adequately mitigated (this is supported by the Council's own assessment contained in its Site Allocations Topic Paper). With regards to green infrastructure, the site is generally enclosed and screened and so its role in providing openness in the green infrastructure corridor is limited. The initial indicative masterplan also demonstrates that a generous amount of green space will also be retained in the south of the site.</p> <p>It is noted however that the Sustainability Appraisal does not include an assessment of the wider economic benefits of developing the sites in terms of job creation through the construction of the site and beyond, plus the ability to attract new residents and expenditure to the area. The development would also help retain future workers within South Tyneside and so presents the opportunity to facilitate more sustainable patterns of development. These positive elements should be drawn out further within the Sustainability Appraisal. This would result in a more balanced and positive scoring for the site.</p>
ST1922	Ian Lyle	ELG Planning	Frank Moore	App 1	Site Specific	H03.59	OBJ04	Objection	Our client would also like to take this opportunity to object to the following sites being allocated for housing:

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ST2516	Dave Hutchinson	East Boldon Neighbourhood Forum		App 1	Site Specific	H03.59	OBJ03	Objection	Sustainability question: Will it protect areas of high landscape value? In the EBNF area, the sites chosen e.g. the protected landscape of Downhill, the cricket club site, North Farm site are all areas of high landscape value with dense building suggested. Building on the EBNF sites will not protect areas of high landscape value.
ST2108	Mervyn Butler			App 1	Site Specific	H03.59	Summary	Objection	Sustainability Appraisals In the supporting documentation to the Draft Local Plan, the field has been subject to at least two sustainability appraisals. In the SLR appraisal the site concludes that the potential development of this site could score negatively against climate change, biodiversity, Green Belt and green infrastructure objectives. Overall, it is considered to have a negative impact. However the Local Plan appraisal considers through mitigation provided through Local Plan policies, the development of this site would largely have a positive effect against the sustainability objectives. I do not agree with this contradictory assessment. It is not clear that development of the scale suggested in Proposal H3.59 can be mitigated through the Local Plan Policies listed in the appraisal.
ST2516	Dave Hutchinson	East Boldon Neighbourhood Forum		App 1	Site Specific	H03.61	OBJ03	Objection	Sustainability Objective: 3 Safeguarding our environmental assets and natural resources Sustainability Question: Will it contribute to protecting and managing water resources and quality?: H3.61 (Cricket Club 63 homes),

									This site is situated (EA maps) above the same body of water that lies under the SSSI. Tinkering with nature and building too close to a treasure of nature risks loss of biodiversity.
ST1922	Ian Lyle	ELG Planning	Frank Moore	App 1	Site Specific	H03.6 2	OBJ04	Objection	<p>Our client would also like to take this opportunity to object to the following sites being allocated for housing:</p> <ul style="list-style-type: none"> • H3.1 – Land at Benton Road, South Shields; • H3.2 – Land South of Cleadon Park; • H3.3 – Land West of Sunnyside Farm; • H3.12 - Land at Chuter Ede Education Centre; • H3.59 – Land at North Farm, Boldon; • H3.62 – Land North of Tower End Farm; and • H3.68 – Land North of New Road. <p>5. These housing allocations are on what is currently Green Belt land, and whilst it is agreed that land needs to be released from the Green Belt, it is considered that the release of these sites would cause unacceptable harm to the Green Belt and its objectives. These sites are located in the gap between Boldon and South Shields, their allocation individually and collectively would result in the gap between settlements being reduced to less than 300m in some places, which is clearly in contradiction to one of the main purposes of Green Belt land; to prevent neighbouring towns merging into one another. Our client would also like to object to how the above sites have been assessed in the Sustainability Assessment. The allocated sites have been marked as ‘amber’ for impact on the Green Belt, whereas the non-allocated Green Belt sites have been marked as ‘red’. It is considered that this demonstrates an unfair prejudice against the sites that the Council do wish to see allocated for housing. The allocation of the sites listed above will close the gap between settlements significantly and so should be marked ‘red’ for this reason, or all sites should be marked as ‘amber’ to ensure consistency. A housing allocation on the site at Red Lodge, Sunnyside Lane will, at most, reduce the gap between settlements by around 200m, however a</p>

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ST2250	Patrica Orrell		Resident	App 1	Site Specific	H03.6 5		Objection	SHLAA Ref: SBC111 SLR Site Ref: BC20 - Land west of Boldon Cemetery, Hylton Lane, West Boldon : The Sustainability Appraisal itself outlines that this location will have a negative impact - Overall, it is considered that the development of this site could have a negative effect against this sustainability appraisal. The reasons stated are shown to outweigh the positive scores in other areas of the evaluation, as outlined:
ST1922	Ian Lyle	ELG Planning	Frank Moore	App 1	Site Specific	H03.6 8	OBJ04	Objection	Our client would also like to take this opportunity to object to the following sites being allocated for housing: <ul style="list-style-type: none"> • H3.1 – Land at Benton Road, South Shields; • H3.2 – Land South of Cleadon Park; • H3.3 – Land West of Sunnyside Farm; • H3.12 - Land at Chuter Ede Education Centre; • H3.59 – Land at North Farm, Boldon; • H3.62 – Land North of Tower End Farm; and • H3.68 – Land North of New Road. 5. These housing allocations are on what is currently Green Belt land, and whilst it is agreed that land needs to be released from the Green Belt, it is considered that the release of these sites would cause unacceptable harm to the Green Belt and its objectives. These sites are located in the gap between Boldon and South Shields, their allocation individually and collectively

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ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Site Specific	H03.7 1		Objection	<p>H3.71 Land at Wellands Farm - SHLAA SWH009</p> <p>The background documents for site impacts contain various inconsistencies: within the site allocation document, the site is described as being 5.33ha, whilst in the SA this is 8.6ha.</p> <p>Impacts on the Local Wildlife Site should be looked into</p>

									<p>at an early stage, because of its proximity to it. Mitigation refers to a policy on net gain, however, there has been no consideration of how net gain would be achieved. As the development is allocated in the local plan, this should be worked out in advance. Referring to a policy only is not considered mitigation.</p> <p>In addition, the site is adjacent to the Cleadon Hills Area of High Landscape Value, which means that impacts are unavoidable. This should be considered in advance and whether this can be mitigated. Again, referring to a policy is not mitigation and there should be concrete plans to do so. The impact assessment also incorrectly states that the site is 250-500m from Cleadon Hills, whilst it is in fact adjacent to it. It therefore rates impacts wrong and it does not consider mitigation either.</p> <p>The loss of green belt is considerable. Mitigation referred to is that the land will be deallocated as green belt, which is not mitigation at all. A reference is made to a policy that considers defensible boundaries between development and green belt. Again, this will not mitigate the loss of green belt. Therefore, the impact of the Local Plan as a result of development should not be changed to positive, as there is no mitigation in place for the loss of green belt.</p> <p>The green belt review furthermore refers to providing a suitable landscape buffer to mitigate the loss of green belt. However, in the densities proposed any scope for this would be very minimal. This also means there would be no scope to mitigate the loss of biodiversity and impacts on the landscape.</p>
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	OBJ03	Objection	<p>Section 3 states that developing the this site will have a neutral impact upon safeguarding our environmental assets and resources. The whole point of the green belt down Cleadon Lane was to keep the scenic views across open fields up to the Cleadon Hills. I regard these views as very much an environmental asset. The building of houses on these green field sites woulestry this scenic</p>

									asset. I consider that this is a negative impact rather than the neutral one assigned to it.
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	OBJ04	Objection	I agree with the first part of Section 4 that developing this site could (I think would is a better word) have a negative impact upon protecting our green belt. The second part of the statement seems to me to be trying to reduce the importance of the loss of this site by saying that it has substantial vegetated boundaries and abuts existing residential areas. It's true that during its use by Sunderland football club trees and bushes were allowed to grow along the boundary, but this could quickly be sorted out with the use of a chainsaw. The existing residential areas were there before the green belt was put into place. The Green Belt was put there to stop further residential development and to keep the views up to Cleadon Hills open. The Charlie Hurley Field as the first field in this green belt that goes up Cleadon Lane performs a very important function as a long term boundary to residential development, the time that it has been a boundary, over 50 years I feel is very important, its development for residential development would make the next field up the boundary which would be a very recent boundary from the planning departments point of view in their consideration of development sites.
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	OBJ05	Objection	Section 5 states that the site is disused with former playing pitches which were not in community use. The site is on the periphery of a green infrastructure corridor with substantial screening which could be further enhanced to mitigate potential impacts. I have no doubt that if the land was for sale at Green Belt prices it could be put to green belt use. I can only wonder if its non use at present is more due to its present owner hoping to sell it at development land prices. The second part of the above statement I find vague, the site is the Green Belt boundary against residential sites for Green Belt fields going up Cleadon Lane. I take it that the "screening which could be further enhanced to mitigate

									potential impacts" means that further trees and bushes could be put in so people would not see the new view of four bedroom houses. People going up Cleadon Lane would see a green wall, people who had bought a house on the estate would have the scenic view up to Cleadon Hills, this would be a view for the few, not for the many.
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	OBJ07	Objection	Section 7 states that the site is well served by public transport which it is with an hourly bus service, however this bus runs down Cleadon Lane and all other Green Belt blocks on this lane would be closer to the bus stop which does not bode well for this Green Belt. It should be noted that bus stops in Cleadon Village and half way down Cleadon Lane are good places for the elderly to alight and enjoy a walk with scenic views. I do not recognise that this is a positive for the Green are for elderly and others who do not have cars.
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	OBJ08	Objection	Section 8 says that developing this area would have a positive impact on the objectives as it will provide increased critical mass supporting local and wider services. I doubt this, parking in Whitburn is terrible it is far more likely that residents on a new estate would use their cars to shop at places with better parking. As for services such a medical and Educational, these are already oversubscribed and the need in the village is for more doctors and school places, which the planning department do not seems to be addressing. Our two doctors are already oversubscribed and could use another doctor, increasing patient load can only increase waiting times for existing patients to see a doctor and receive treatment. The school situation means that the schools can not find places for existing applicants. Increasing numbers of applicants by developing new housing estates is irresponsible as it would mean busing of pupils to other schools in the South Shields area and would certainly upset a lot of parents if their children were being bused out of the village while newcomers were going to local schools. So

									I do not believe that an increased number of people in the village would benefit the village it could make life worse for existing residents, this could build up negative feelings toward people from new estates.
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	Obj12	Objection	Section 12 seems to be saying that the provision of 88 new homes on this site will provide greater choice and help meet residents needs. This I regard as not true, the need in Whitburn is for cheaper homes for children of residents. The terraced and semi detached homes in the village usually sell for around £140 000. I think new four bedroom homes on a Greenfield site with scenic views would sell for around £300000 and if there were a few cheaper homes with say a 20% discount these would be around £240000 these would be well out of reach of most Whitburn residents, it would mean the incoming of people from areas of Sunderland and South Shields so changing the character of the village.
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H03.7 2	Obj13	Objection	Section 13 says developing this site would promote healthier people and communities I certainly disagree with this statement. This site has been playing fields for over fifty years and could easily be again as a Green Field site, not as a housing estate. The pressure on Doctors with an increased population would certainly not promote healthier people and communities. I also note the conclusions of the Whitburn Neighbourhood Forum, who have put a lot of work into looking at the Draft Local Plan and feel that their conclusions on a lack of school places, lack of medical facilities, problems with increased traffic, the need for evidence of insufficient sewage capacity especially with regard to sewage discharges into the ocean are sound. The area along the sea front is a tourist area and tourists will not be impressed if they find themselves swimming in faecal matter.
ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Site Specific	H03.7 2		Objection	H3.72 Land north of Cleadon Lane – SHLAA SWH013 Developing this site would have a negative impact on protecting green belt, which is rated red in the SA. However, in the allocations document, this impact is

									<p>suddenly marked as positive (non-green belt). It then goes on to say that the final impact is positive as well. The reasoning is that it will be deallocated in the Local Plan. This is an incorrect method of measuring this, as the SA is supposed to assess the impacts caused by the Local Plan, and the Local Plan is the measure through which the site is allocated. There is no mitigation for this impact.</p> <p>The Appendix with an overview of sites allocated also wrongly states that impacts on green belt would be moderate. This site is sensitive to impacts on landscape and green belt, in particular as it is a prominent site when entering the village from the west. The trees along Cleadon Lane form an important landmark when entering the village and any development that would affect these trees would therefore affect the character of this part of the village.</p> <p>In addition, impacts on local biodiversity have not been considered at all. There is no certainty that net gain can be achieved.</p>
ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Site Specific	H03.73		Objection	<p>H 3.73 - Land at Whitburn Lodge – SHLAA SWH025</p> <p>The impacts correctly refer to the site being within 400m of a European protected site. Again, there is no link made between the HRA and SA. The assessment states that the impact with respect to European sites is rated red, yet the final impact is neutral. As per the site hierarchy, any impacts on European sites will have more weighting than other sites and the final impacts should be rated red also.</p> <p>This site is partly developed, which would mean less impact on landscape, green belt and GI. However, the site should be considered together with the green fields to the south, which are proposed to be allocated also. All three sites together would have the potential to have around 125 dwellings built on them, according to the Plan, meaning that the boundary of Whitburn will move further up north and closer to South Shields. It would change the character of this part of the village</p>

									considerably. The site also has historical significance and forms a key landmark when entering the village from the north. This is in particular due to the presence of Hope House, which is an old farm building in existence since the 18th century before it was used as part of the colliery. Yet the significance of this site is not assessed in purpose 4, which should be rated D.
ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Site Specific	H03.74		Objection	<p>4.2 Site allocations and impacts on the natural environment</p> <p>The Plan does not consider the impacts from the proposed site allocations in Whitburn fully. As proposed the allocations would have adverse impacts on the natural environment, landscape and green belt. The background evidence of the Plan is contained in various documents, including a green belt review, a site allocations plan, a sustainability assessment (SA) and a habitats regulations assessment (HRA). This section will discuss the impacts per site, whilst more general remarks on the background documents will be discussed in further sections.</p> <p>H3.74 - Land to North of Shearwater - SHLAA SWH026 and H3.75 - Land to North of Shearwater, and East of Mill Lane - SHLAA SWH027</p> <p>There is no explanation why these two sites were separated. Their impacts are discussed individually, but not in combination, which means impacts are underestimated.</p> <p>The background evidence documents contain inconsistencies – the Plan states that site H3.74 is 1.8ha and can contain 57 dwellings. The SA states that site H3.75 is 0.61 ha and can contain 40 dwellings, meaning that the draft Plan includes 97 houses for these two sites. However, the ‘Site Specific Sustainability Appraisal: Whitburn’ document states that both sites would be able to have 50 dwellings in total. This means that impacts have not been considered fully.</p> <p>Within ‘Site Specific Sustainability Appraisal: Whitburn’</p>

									<p>for H3.74 and H3.75, 'Objective 3 – distance from an area of high landscape value' is incorrectly classed as neutral (over 501m), which instead should be rated red (less than 500m). No mitigation is identified as a result, whilst this is highly significant as it is adjacent to two areas of high landscape value.</p> <p>Within the 'Local Plan Allocations: Site Specific Sustainability Appraisal', site SWH027 is missing and it is unclear if a complete assessment has taken place.</p> <p>The SA correctly refers to the sites being within 400m of a European protected site. The impact assessment states that the impact with respect to European sites is rated red, yet the final impact is orange. As per the site hierarchy, any impacts on European sites will have more weighting than impacts on nationally and locally designated sites; the final impact should be rated red also. Despite these significant impacts, no link is made between the HRA and the SA, meaning that there is no mention of measures that would avoid or mitigate impacts on European sites.</p> <p>The mitigation proposed refers to policies only. A policy is not a mitigation measure. Detailed and specific measures need to be considered in advance to make a valid assessment of impacts. Therefore, due to the potential for impacts and the lack of mitigation identified, and following the precautionary principle, the sites should be removed from allocations.</p> <p>The sites together also have a high biodiversity value that is not recognised in the SA because there is insufficient evidence. Curlews are regularly seen on the site during winter months. These birds need to have long sightlines to be able to rest or feed, and therefore any development on this field will mean that curlews will lose their habitat. This impact cannot be mitigated (where else would a new field be created for curlew?), and therefore any development should be avoided.</p>
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ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Site Specific	H03.74		Objection	<p>The sites are located between two areas of high landscape value, the coastal area and Cleadon Hills). The sites form part of the open space between these two designated landscape areas, which means it plays a crucial role in the open setting of these landscapes. The two landscapes complement each other and together with the open green / agricultural space between them, this area in Whitburn offer a sense of openness and long-ranging views from the open fields to the west, towards the open coast to the east, without any development currently blocking this. The site is very sensitive to landscape impacts; any development would form a barrier to this openness and would create the loss of views from and towards the two areas of high landscape value, including the open coast. This goes against the Plan's policies on these landscape areas, which states that the open and undeveloped character of the areas should be retained and enhanced. These impacts cannot be mitigated.</p> <p>The impact assessment also states that it is situated in a green infrastructure (GI) corridor, yet concludes that the final impacts would be neutral. There is no explanation of why the impact would be neutral. It is well known that the purposes of GI are diverse and include benefits to biodiversity, climate change adaptation and mitigation, landscape, health and wellbeing, flood risk management etc. For these sites in particular, the importance of GI is great and includes maintaining the setting of two areas of high landscape value, supporting biodiversity and retaining an open character of the coastal area. GI also contributes to climate change mitigation and adaptation. There is no mitigation plan in place. Therefore, it is uncertain whether GI can be replicated. This goes against the Plan's own policies on GI, and also on areas of high landscape value, which implies that GI forms an important aspect of a landscape.</p> <p>For the same reasons, impacts on green belt in this area</p>
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									<p>would be high. The two sites are assessed as one in the green belt review, but its impacts are underestimated. The site is only adjacent to existing development to the south. Currently, the White Rocks Grove / Shearwater developments form a clear boundary between the urban area and green belt / GI corridor. There is a new housing development nearby and across Mill Lane, which replaced the former colliery bath buildings, as well as terraced houses which form part of the mining heritage of what was the former Whitburn Colliery. To the north is also the historical Lodge / Hope House. The Whitburn Coastal Park is part of the undeveloped coastal area and was part of the colliery. Therefore, there is an existing and meaningful boundary between the village (south of this site allocation) and the former colliery and green belt sites (north of the allocated sites), with the green field in between, which forms the allocation.</p> <p>Therefore, the sites contribute significantly to the openness of the north of the neighbourhood area. The sites offer long-ranging views from east to west, which the assessment acknowledges. This is also supported by the fact that curlews use this field as a habitat. They offer open views towards two areas of high landscape value.</p> <p>The loss of green belt is considerable. Mitigation referred to is that the land will be deallocated as green belt, which is not mitigation at all. A reference is made to a policy that considers defensible boundaries between development and green belt. Again, this will not mitigate the loss of green belt. Therefore, the impact of the Local Plan as a result of development should not be changed to positive, as there is no mitigation in place for the loss of green belt.</p>
ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Site Specific	H03.74		Objection	<p>The proposed density also makes it impossible to mitigate for the loss of openness; there will be insufficient space left over after building 97 dwellings and it will be impossible to mitigate the loss of</p>

									<p>landscape, GI and biodiversity. Its proposed density is greater than that of the developments of Shearwater and White Rocks Grove, which form the current boundary. This means that the site will be more densely built on and unable to provide a softer boundary. The urban edge would be harder and the urban boundary would simply be moved north, meaning that the gap between the settlements of Whitburn and South Shields would be narrower. It would create ribbon development and would encourage further sprawl. This would result in the loss of the identity of this part of the neighbourhood area. It will also block the link between the two areas of high landscape value, resulting in the loss of long-ranging views and blocking the GI corridor and wildlife corridors.</p> <p>The green belt assessment should be:</p> <p>Purpose Current marking Correct marking Reason Purpose 1 – gap between settlements C (site has two developed boundaries) D Site is only developed to south. Northern boundary is undeveloped garden and undeveloped coast(al park); east boundary is undeveloped coast; west boundary is agricultural fields Purpose 4 – historic landscape A (no impact on townscape) E Impacts on historic setting of former colliery and the setting of the village of Whitburn within the green landscape</p> <p>Overall assessment C - moderate E - significant See above</p>
ST2016	Mr Robert Crooks		Resident	App 1	Site Specific	H3.72	OBJ02	Objection	<p>Section 2 of the proforma states that the site is over 1km from biodiversity designations but it is within the 2km buffer zone which may result in some impact on the European sites. I consider that this is a negative rather than the neutral one assigned to it.</p>
ST2516	Dave Hutchinson	East Boldon Neighbourhood Forum		App 1	Site Specific	Sustainability Appraisal	OBJ03	Objection	<p>Sustainability Question: Will it positively contribute to air quality?</p> <p>In the Boldons in general, 1500 homes (25% of the borough's total) are to be built on 8 greenfield sites with 3, sites accounting for 29 homes on brownfield</p>

									sites. Boldon is very small and we can expect at least another 3000 cars using our narrow roads and contributing to air pollution.
ST2527	Neil Westwick			App 1	Site Specific	WH11	OBJ03	Objection	<p>In terms of the potential impact on the efforts to conserve and enhance biodiversity, the assessment states that the development of the site could lead to negative impacts on a LWS (Kitchener Road) , LNR (Whitburn Point), SSSI (the Durham Coast) and European Designated Site (Northumbria Coast Special Protection Area). As explained in the appended Statement (submitted to the Council in April 2019 during the Call for Sites), the proximity of the site to these designated sites is not unique and indeed all sites in and around Whitburn would be subject to the same considerations. It is also considered that any potential impact of developing the site in this regard could be sufficiently mitigated.</p> <p>This is also supported by the Extended Phase 1 Habitat Survey, prepared by BSG Ecology (included within the appended Land east of Lizard Lane, Call for Sites (April 2019) Statement), which considers the habitats, species and designated sites that may be a constraint to development. The Survey report describes that, given the site is predominantly comprised of arable land, with only small areas of poor semi-improved grassland, its ecological value as a habitat is limited. The Survey also confirms that no protected species are likely to be affected by the proposed development.</p> <p>It is recognised that the site is located relatively close to statutory designated sites – notably the Northumbria Coast Special Protection Area (SPA), Ramsar sites and the Durham Coast Special Area of Conservation (SAC) – however the BSG Ecology Survey confirms that it is unlikely that the proposed development will impact directly on any designated sites. This is because they are of a sufficient distance away that any effects will be buffered by the separating agricultural land.</p> <p>With regards to the potential habitat for Curlew – as</p>

									<p>highlighted in the Sustainability Appraisal, this is not exclusive to the site and, given that there is evidence of the species using much of the surrounding land, it is not considered that this would preclude the development of the site.</p> <p>The Survey work identifies clear mitigation measures which would ensure that there are no unacceptable impacts to developing the site.</p>
ST2527	Neil Westwick			App 1	Site Specific	WH11	OBJ04	Objection	<p>As set out above, our client considers there to be an error in the assessment of the site in the Stage 2 Green Belt Review which appears to have subsequently influenced the assessment in the Sustainability Appraisal. If this were to be corrected, we anticipate that the negative effect in respect of 'Protecting our Green Belt' would be reduced from (--) to (-) and therefore consistent with other sites currently in the Green Belt which are proposed to be allocated in the emerging Local Plan.</p>
ST2527	Neil Westwick			App 1	Site Specific	WH11	Obj10	Objection	<p>We would also query the score given by the Council for sustainability objective 10 (increase opportunities for employment and education and improve living standards). The scoring system appears to be based solely upon the number of jobs resulting from proposals for employment use and makes no allowance for the educational component of the criteria. This fails to acknowledge that our client's land at Lizard Lane is unique in that it offers the opportunity to facilitate the expansion of Marsden Primary School as well as assisting in delivering much needed housing in the village. Considering both the additional jobs which would be created in the school and the enhanced education provision which will be available to the local community we would suggest that our client's site should score positively on this objective.</p>
ST2187	Executive Members	Whitburn Neighbourhood Forum		App 1	Methodology			Objection	<p>5 SUPPORTING DOCUMENTS</p> <p>5.1 Sustainability appraisal</p> <p>The methodology of the SA is incorrect.</p> <p>Firstly, with regards to site allocation, the only factor</p>

								<p>that is included for 'adapt to and mitigate the impacts of climate change' refers to surface water flooding. Climate change has far-reaching impacts and the NPPF states that a Plan should adapt to and mitigate the effects of this. This is not limited to surface water flooding. Green infrastructure plays an important part in adapting to and mitigating climate change, yet the loss of GI and its impacts on climate change is not considered.</p> <p>The SA does not incorporate and link to an up-to-date HRA. Guidance states that the SA and HRA should inform each other.</p> <p>It is also apparent that the impact assessment of the SA is flawed. It attempts to simply add up negative, neutral and positive impacts; however, not every factor has a complete range of impacts. For instance, some have only neutral and positive impacts (e.g. vitality of town centres and villages), meaning that the final impact will always be skewed towards positive.</p> <p>With regards to healthcare provision, the impact assessment only looks at distance from these facilities. This is not an impact as a result of the Plan. The impact would be the on the ability of people being able to access a healthcare facility, i.e. whether a facility would be able to take in the increase in population, or whether it would create a shortage. SAs of other Local Plans in different parts of the country do take this into account. As already discussed within the section on healthcare provision, Whitburn already has a shortage of GPs, yet this is not considered at all.</p> <p>The SA lacks any (reference to) impact assessments of alternatives to taking land out of green belt. There is no consideration of plan impacts of the alternative that includes the development of just the identified brownfield sites, without any green belt allocations. The SA also lacks detail on the alternative of taking a large site out of green belt in area 3. It considers that new infrastructure would be required and views this as a</p>
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									constraint; however, it dismisses the fact that the South Sunderland Growth Area does just that successfully. By focusing development into one area, it would arguably be easier to fund the creation of new community facilities and infrastructure instead of spreading out development. Instead, the SA argues that dispersing development is more sustainable. However, there is a disproportionate allocation within the small villages south of South Shields. Dispersing development around villages means that there will not be enough funding to create new facilities and road networks, putting strain on schools, roads, surgeries etc. that are already under pressure. In addition, it does not take into account impacts on European sites – this will be explained in the section on the HRA.
ST2537	Laverck Hall Park Limited			App 1	Fellgate & Hedworth		OBJ07	Objection	xi. In terms of the Sustainability Appraisal of the Laverick Park sites against Objective 7 (Transport / Accessibility), 11 of the 13 sites score positively in the Council's assessment, with the remaining two sites scored as neutral. The two neutral sites represent larger parcels within the overall Laverick Park site and the Council's appraisal notes that whilst both sites are within close proximity to existing public transport, some areas of the site would be beyond 400m. The Council's appraisal does not take any account of where development would be located within the parcel or the fact that new bus stops could be provided along existing routes to bring development closer to existing services, or that bus services could be brought into the site to further reduce walking distances to bus stops. Overall it is concluded that all 13 parcels that comprise the wider Laverick Park development area should be scored positively against Objective 7.