

Statement of Consultation (2025)

As required by regulation 22 (1) (c) of The Town and Country Planning (Local Planning) (England) Regulations 2012 in support of South Tyneside Local Plan 2023-2040



South Tyneside Council

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CONTENTS

Contents	2
1. Introduction	3
2. South Tyneside Local Plan - Production Time Line.....	5
3. Summaries of main Issues raised – Regulation 18 & Regulation 19	7
4. Conclusion	38
Appendix A: South Tyneside Pre-Publication draft Local Plan Consultation – Council Responses to Representations Received (2021)	39
Appendix B: Consultation Statement Regulation 18 (2022)	207
Appendix C: Key Changes made to the south tyneside local plan between regulation 18 consultation (2022) and publication draft regulation 19 consultation (2024).....	208
Appendix D: Regulation-19 Statement of Representation Procedure.....	217
Appendix E: Regulation 19 Consultation Letter	220
Appendix F: Regulation 19 Statutory Consultees and Other Organisations	225
Appendix G: Regulation 19 Press Articles and Social Media.....	229
Appendix H: Regulation 19 Representation Guidance	247
Appendix I: Regulation 19 Response Forms.....	250
Appendix J: Regulation 19 Representations Summaries and Council Responses	254
Appendix K: Representations relating to the Sustainability Appraisal (2024) and Habitats Regulations Assessment (2024)	610

1. INTRODUCTION

PURPOSE OF REPORT

- 1.1 This Consultation Statement sets out how South Tyneside Council (referred to as ‘the Council’) has involved residents and key stakeholders in preparing the South Tyneside Local Plan 2023 to 2040 (referred to as ‘the Plan’) in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted [Statement of Community Involvement](https://southtyneside.gov.uk/article/11451/Statement-of-Community-Involvement-published-June-2022) (SCI) (2022).
<https://southtyneside.gov.uk/article/11451/Statement-of-Community-Involvement-published-June-2022>
- 1.3 The SCI sets out how the Council will consult and involve the public and statutory consultees in planning matters.
- 1.4 In accordance with Regulation 22 (1)(c), this Statement sets out:
 - i. Which bodies and persons the local planning authority invited to make representations under Regulation 18;
 - ii. How those bodies and persons were invited to make representations under Regulation 18;
 - iii. A summary of the main issues raised by the representations made pursuant to Regulation 18;
 - iv. How any representations made pursuant to Regulation 18 have been taken into account;
 - v. If representations were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised in those representations; and
 - vi. If no representations were made in Regulation 20, that no such representations were made.

BACKGROUND

- 1.5 This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Plan. It sets out how such efforts have shaped the Plan and outlines the main issues raised at consultation and from representations.
- 1.6 The Plan will set out the strategic vision, objectives and spatial strategy for the Borough, as well as planning policies that will guide future development. The Plan will look ahead to 2040 and identify the main areas for sustainable development growth. It will establish policies and guidance to ensure local development is in accordance with the principles set out in the National Planning Policy Framework (NPPF).
- 1.7 The Plan will replace the adopted Local Development Framework (LDF) that currently makes up the development framework for South Tyneside.

- 1.8 The Plan and its supporting documents were published in accordance with Regulation 19 for a seven-week consultation period running from 15th January until 3rd March 2024. The Council consulted statutory bodies, neighbourhood forums, local residents' groups, businesses and individuals. A variety of consultation techniques were used in accordance with the Statement of Community Involvement (SCI). These are set out in more detail in Section 3 of this report and in Appendices D-I.

STRUCTURE OF STATEMENT

- 1.9 This Consultation Statement consists of:

- Section 1: Introduction.
- Section 2: The timeline that has been followed in preparing the Plan in accordance with the up-to-date Local Development Scheme (LDS).
- Section 3: A summary of the main issues raised during the course of the consultations that were carried out under Regulations 18 and 19 and how the comments received have been considered by the Council.
- Section 4: Conclusion.
- Appendix A: South Tyneside Pre-Publication draft Local Plan (2019) Consultation – Council Responses to Representations Received
- Appendix B: Regulation 18 (2022) Consultation Statement
- Appendix C: Key Changes made to the South Tyneside Local Plan between Regulation 18 Consultation (2022) and Publication draft Regulation 19 Consultation (2024)
- Appendix D: Statement of Representation Procedure (Regulation 19 Publication Draft (2024)
- Appendix E: Regulation 19 Consultation Letters
- Appendix F: Regulation 19 Statutory Consultees and other Organisations
- Appendix G: Regulation 19 Press Releases and Social Media Posts
- Appendix H: Guidance on how to respond to the Regulation 19 consultation
- Appendix I: Regulation 19 Response Forms
- Appendix J: Regulation 19 Representations Summaries and Council Responses
- Appendix K: Representations relating to the Sustainability Appraisal (2024) and Habitats Regulations Assessment

2. SOUTH TYNESIDE LOCAL PLAN - PRODUCTION TIME LINE

- 2.1 The creation of a Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document that is tailored to the needs of South Tyneside in terms of strategy and policy.
- 2.2 Table 1 sets out the timetable outlining the main consultation stages of the emerging Plan up until the submission date of March 2025.

South Tyneside Local Plan Production Timeline		
Consultation Stage	Consultation dates	Summary
Key Issues and Options	25 th February – 12 th April 2013	A public consultation on the key issues and options took place over a 7-week period in 2013. Questionnaires were produced and made available to statutory consultees, stakeholders and residents.
Local Plan Growth Options	8 th June – 10 th July 2015	A more focused public consultation took place on the potential scale of growth. The consultation invited views on three growth options.
Strategic Land Review	9 th May – 31 st July 2016	A consultation on a Strategic Land Review (SLR) was undertaken to inform Local Plan policies and provide evidence of South Tyneside's capacity to accommodate housing and employment.
South Tyneside Local Plan Pre-Publication Draft (Regulation 18) (August 2019)	19 th August – 11 th October 2019	A consultation was carried out on a full draft version of Local Plan and its evidence base.
South Tyneside draft Local Plan (Regulation 18) (2022)	20 th June 2022 – 14 th August 2022	Following Cabinet approval in March 2021 to review the Local Plan spatial options, a consultation took place on a revised Regulation 18 Local Plan and evidence base.

South Tyneside Publication draft Local Plan (Regulation 19) (2024)	15 th January – 3 rd March 2024	The Council considered representations received during the Regulation 18 draft Local Plan consultation to inform the next version; the Regulation 19 Publication draft Local Plan. An extensive update of the Plan's evidence base was also carried out. The Plan was made available for stakeholders and the public to comment on for 7 weeks. In accordance with the Local Plan Regulations, this consultation was formal and statutory, seeking specifically the Plan's soundness for Examination in Public.
Submission to Secretary of State	March 2025	The Council assessed the comments received during the Regulation 19 consultation and concluded that none of the representations caused it to change its view that the Plan was legally compliant and sound and therefore ready to be submitted for Independent Examination. The Plan was submitted to the Secretary of State in March 2025.
Examination	Mid/Late 2025 (estimate)	The South Tyneside Local Plan will be examined by an independent Planning Inspector.
Adoption	Mid/late 2026 (estimate)	The Plan will be adopted and will replace the Local Development Framework Development Plan documents to form the development plan for South Tyneside, alongside the International Advanced Manufacturing Park (IAMP) Area Action Plan (2017) and any made Neighbourhood Plans.

Table 1: South Tyneside Local Plan – Production Timeline

- 2.3 The Plan has been prepared over a long period of time and the evidence base has been reviewed and updated on an iterative basis to ensure a robust evidence base in support of the Plan.
- 2.4 The Statutory Consultation Stages undertaken in the preparation of this Plan consist of the Regulation 18 draft Local Plan (2019 & 2022) consultations and Regulation 19 Publication draft Local Plan (2024) consultation. The documents and supporting evidence from the Regulation 18 (2022) and Regulation 19 (2024) consultations are considered to be the primary documents and consultation stages in support of this submission.

3. SUMMARIES OF MAIN ISSUES RAISED – REGULATION 18 & REGULATION 19

3.1 This section of the report provides a summary of the Plan preparation process, consultation and engagement methods and the main issues raised in responses to Regulation 18 (2019 and 2022) consultations and Regulation 19 (2024) consultation.

STATUTORY CONSULTATION – REGULATION 18 DRAFT LOCAL PLAN (2019)

3.2 The Council published the Regulation 18 South Tyneside Local Plan Pre-Publication draft (2019) and supporting evidence base on 19th August 2019. The consultation ran for 8 weeks from 19th August to 11th October 2019. The consultation was undertaken in accordance with the SCI. The Plan document, the Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) were made available for inspection at Jarrow and South Shields Town Halls.

3.3 All persons, agents and organisations on the Local Plan database of contacts and statutory consultees were notified of the consultation by email or letter. Dedicated, in-person drop-in events were held throughout the Borough to help publicise the Plan. Details of these events is set out in Table 2.

Regulation 18 (2019) Consultation Events Schedule		
Date	Time	Location
Monday 2 nd September 2019	2pm – 8.30pm	Jarrow Focus, Cambrian Street, Jarrow, NE32 3QN
Tuesday 3 rd September 2019	2pm – 8.30pm	Haven Point, Pier Parade, South Shields, NE33 2JS
Wednesday 4 th September 2019	2pm – 8.30pm	Lukes Lane Community Centre, Lukes Lane, Hebburn, NE31 2BA
Thursday 5 th September 2019	2pm – 8.30pm	Hedworthfield Community Centre, Cornhill, Jarrow, NE32 4QD
Monday 9 th September 2019	2pm – 8.30pm	Boldon Community Centre, New Road, Boldon Colliery, NE35 9DZ
Tuesday 10 th September 2019	2pm – 8.30pm	Barnes Institute, East Street Whitburn, SR6 7BY
Monday 16 th September 2019	2pm – 8.30pm	Hebburn Central, Glen Street, Hebburn, NE31 1AB
Tuesday 17 th September 2019	2:30pm – 8pm	Cleadon Methodist Church, Sunderland Road, Cleadon, SR6 7UT
Thursday 19 th September 2019	2pm – 7pm	Whitburn Community Library, Hedworth Terrace, Whitburn, SR6 7EN
Wednesday 25 th September 2019	5pm – 8pm	East Boldon Scout Hut, Rear of Grey Horse, easy Boldon, NE36 0SJ
Monday 30 th September 2019	4pm – 8pm	Town End Farm WMC, Bexhill Road, Sunderland, SR5 4QD

Table 2: Regulation 18 (2019) Consultation Events Schedule

3.4 The Council received 18,969 comments in response to the consultation. Table 3 breaks these down according to respondent.

Number of Respondents to Regulation 18 Local Plan consultation (2019)		
Respondent Category	Number of Respondents	Number of Comments
Residents	2,505	17,790
Land Promoters	36	504
Statutory Consultees	17	253
Neighbourhood Forums	2	99
Action Groups	10	239
MPs and Councillors	13	84

Table 3: Number of Respondents to Regulation 18 Local Plan consultation (2019)

Key issues and matters raised

3.5 The most significant issues raised in response the Regulation 18 Local Plan (2019) were as follows:

- The overwhelming majority of comments from residents were objections to the allocation of land for housing in the Green Belt;
- Objection to the use of 2014 household projection data to inform the housing requirement;
- Failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed allocation of land for housing that is currently in the Green Belt;
- The disproportionate proportion of housing allocated in the villages;
- Loss of biodiversity and wildlife;
- Impact on mental health and wellbeing;
- Impact on the character and distinctiveness of the villages;
- Impact on the social infrastructure of the villages, including school and primary health care provision, traffic congestion;
- Objection to allocations that would lead to a loss of playing field land; and
- Objection to the spatial strategy and, in particular, to a single, large Green Belt allocation having not been assessed through the sustainability appraisal process in tandem with both sustainable urban area growth and multiple smaller Green Belt releases.

3.6 A full summary of the representations received in response to the consultation and comments raised is provided in Appendix A.

SOUTH TYNESIDE LOCAL PLAN CABINET REPORT – MARCH 2021

- 3.7 The Council considered the responses to the Regulation 18 Local Plan consultation (2019). These, along with a number of other factors, led to the need to re-consider the strategic spatial approach for the Plan. A Cabinet report published in March 2021 set out the need to undertake a review of the spatial options and prepare a new draft Plan for Regulation 18 consultation.

STATUTORY CONSULTATION - REGULATION-18 DRAFT LOCAL PLAN CONSULTATION (2022)

- 3.8 This section provides an overview of the Regulation 18 public consultation undertaken by South Tyneside Council from 20th June to 14th August 2022. The [Regulation 18 Consultation Statement](https://www.southtyneside.gov.uk/article/21144/Regulation-18-Consultation-Statement) and accompanying appendices provide more detail regarding how the consultation was undertaken and how the Council has responded to the key issues raised. <https://www.southtyneside.gov.uk/article/21144/Regulation-18-Consultation-Statement>
- 3.9 The Regulation 18 consultation was undertaken in accordance with the provisions set out in the SCI.
- 3.10 It was originally scheduled to run for 6 weeks from Monday 20th June to Sunday 31st July 2022. However, in response to a request to extend the consultation, it was extended by two weeks for a total of eight weeks.

Who we engaged with

- 3.11 When developing statutory documents, the Town and Country Planning Regulations (Local Planning) (England) 2012 identifies those statutory consultees that must be included in the consultation process. The list of statutory consultees consulted as part of the Regulation 18 draft Local Plan is provided in Appendix F.
- 3.12 Other organisations and stakeholders registered on the Council's Local Plan Register of Consultees were also consulted. These include:
- Landowners, planning consultancies and developers;
 - East Boldon and Whitburn Neighbourhood Forums;
 - Campaign groups such as CPRE, Client Earth, and Keep Boldon Green; and
 - Stakeholders such as Nexus, Go North East, National Farmers Union, Home Builders Federation, Durham Wildlife Trust, and the National Federation of Gypsy Liaison Groups.
- 3.13 In addition, residents and other interested parties registered on the Local Plan database were also notified of the consultation. Copies of the letter sent to consultees can be viewed in Appendix B.

How we engaged

- 3.14 The following section summarises the different engagement methods used by the Council to publicise the Regulation 18 draft Local Plan. More detail on how the consultation was undertaken is set out in Appendix B.

Letters and Emails

- 3.15 An email or letter was sent to statutory consultees and individuals/organisations on the Local Plan database on 16th June 2022. An additional email or letter was sent on 15th July 2022 detailing the

two-week extension to the consultation period. In total, 787 letters and 772 emails were sent to consultees.

Availability of documents and consultation materials

- 3.16 In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, Local Plan documents were made available for inspection in South Shields and Jarrow Town Halls during normal office hours.
- 3.17 The Plan document, policies map, interactive map and supporting evidence base documents are published on the Council's website. All documents are available as PDF documents, and an accessible version (HTML) of the Plan was provided through a dedicated digital consultation platform.
- 3.18 A range of consultation materials were produced to support information sessions and to publicise the consultation. These included leaflets and postcards, electronic advertising, and large outdoor banners across South Tyneside. The Council also produced a digital animation providing an overview of the Plan. This was made available on the Local Plan webpages, social media and was played at in-person information sessions.

In-person information sessions and Community Area Forums (CAFs)

- 3.19 In-person information sessions attended by Council officers were arranged at different times and venues across the Borough. A total of 16 events took place: 11 information sessions and 5 Community Area Forums (CAFs) (Table 4). The information sessions included a short presentation on the Plan followed by questions and answers. Each event was attended by the Spatial Planning Team and was chaired by an independent chairperson. At least 418 people attended these sessions.

Press releases and social media

- 3.20 A series of news releases were issued at key milestones including Cabinet consideration, Cabinet decision, launch of the consultation and to announce an extension to the consultation period. In total nine stories were published in the local and regional press in both print and online, as well as being shared across news outlet social media channels.
- 3.21 A double-sided article highlighting the Plan and the forthcoming consultation which signposted readers to the Council's website appeared in the June 2022 edition of the Residents' Newsletter. This was delivered to every household in South Tyneside (72,000).
- 3.22 The use of social media was an important means of communication and raising awareness of the consultation. Social media messaging was posted on various platforms. The social media campaign ran in advance of and throughout the consultation period promoting the Plan, online consultation portal and in-person information sessions. A total of 25 posts were made with a combined reach of 115,752.

Date	Type of Event	Venue	Time	Attendance
Monday 4th July	Information session	Hedworthfield Community Association	6pm – 8pm	81
Tuesday 5th July	Riverside CAF	Reception Room, South Shields Town Hall	10am	-
Wednesday 6th July	Information session	East Boldon Junior School	6pm – 8pm	75
Thursday 7th July	Jarrow and Boldon CAF	Jarrow Town Hall	10am -12pm	-
Thursday 7th July	Information session	Cleadon Methodist Church	6pm – 8pm	70
Friday 8th July	Information session	Whitburn Parish Hall	6pm – 8pm	10
Monday 11th July	Hebburn CAF	Hebburn Central	10am - 12pm	-
Tuesday 12th July	Information session	Jarrow Focus	10am – 12pm	5
Thursday 14th July	Information session	Hebburn Central	10am – 12pm	25
Thursday 14th July	East Shields and Whitburn CAF	St. Gregory's Church Hall	6pm – 8pm	
Monday 18th July	Information session	South Shields Town Hall	10am -12pm	15
Tuesday 19th July	Information session	Cleadon Methodist Church	10am -12pm	38
Wednesday 20th July	Information session	Boldon Community Association	6pm – 8pm	20
Thursday 21st July	Information session	Hedworthfield Community Association	10am – 12pm	39
Friday 22nd July	Information session	Boldon Community Association	10 am – 12pm	30
Thursday 28th July	West Shields, Cleadon and East Boldon CAF	Cleadon Methodist Church	10am – 12pm	10

Table 4: Regulation 18 Local Plan Consultation (2022) in-person information sessions

MAIN ISSUES RAISED AT REGULATION 18 (2022)

- 3.23 A total of 1887 individual representations were received, generating 2213 separate comments. Of these, 273 representations were submitted directly through the digital platform, and more than 500 emails and 900 letters and postcards were received.
- 3.24 A number of petitions were submitted during the consultation period or were referenced as part of individual representations. These petitions generally related to potential strategic development sites.
- 3.25 Outlined below is a high-level summary of the key issues raised. More detailed responses are set out in Appendix B.
- **Objection to development on Green Belt & Safeguarded Land**
 - Impact on the Green Belt.
 - Impact on the character of the villages.
 - The Plan must release even more land from the Green Belt as insufficient land is allocated to meet the Borough's housing needs.
 - **Objection to Housing Numbers and the use of the Standard Methodology**
 - The use of 2014 housing projections is out of date and the latest census data shows the population is in decline.
 - The 15% buffer should be reduced to 5% so that less Green Belt land will be allocated.
 - **Objection to Housing Numbers on the grounds they are too low**
 - An uplift to the housing requirement is required to address the Borough's affordable housing needs. More sites need to be released from the Green Belt and included as additional allocations and/or safeguarded land to ensure that the Plan identifies a sufficient supply of deliverable housing sites in the short term (i.e. 5 years), the remainder of the plan period, and beyond.
 - **Impact on Sewerage Capacity and Water Quality**
 - Improve sewerage treatment works to cope with the current demand before any future developments are proposed.
 - **Objection to the Consultation Strategy**
 - The process to register comments is complicated.
 - The consultation period is too short.
 - **Objection to Increased Traffic and Congestion**
 - The roads are at breaking point and the Infrastructure Delivery Plan does not adequately address this issue.
 - Increased traffic congestion will lead to increased air pollution.
 - **Objection to Sports Provision and Playing Pitches**
 - It is likely that the allocation of those sites at site reference SP4 will result in a shortfall of playing pitches to the overall detriment of the Plan.

- **Objection to affordable housing targets**
 - The current approach outlined in the Plan does not fully address affordable housing need.
- **Site Allocations**
 - Objections to proposed housing allocations. Concerns are set out in more detail in Appendix B.

HOW REGULATION 18 REPRESENTATIONS WERE TAKEN INTO ACCOUNT

3.26 Following the Regulation 18 consultation, the Council sought to respond appropriately to the representations received. In some instances, this involved extensive discussions and joint working with statutory consultees. Where necessary, further evidence was produced to ensure that issues raised were satisfactorily addressed.

3.27 Key changes to the Plan made between Regulation 18 and Regulation 19 are set out below:

Plan Period

3.28 Paragraph 22 of the NPPF requires strategic planning policies to look ahead over a minimum 15-year period from adoption. The Plan start date should, therefore, be as close to the date of adoption as possible (approximately 2025). Accordingly, a 2023 start date at Regulation 19 was proposed and would reflect the updated evidence base.

Green Belt Exceptional Circumstances - Removal of 15% Housing Buffer and Safeguarded Land

3.29 The Regulation 18 Plan proposed a 15% buffer be applied to the housing requirement to provide flexibility in housing delivery. The impact of applying this buffer increased the amount of land needing to be allocated in the Green Belt, as there were no alternative non-Green Belt or brownfield sites in South Tyneside. The Green Belt Study (2023) confirmed that this would result in allocating some sites of high or very high harm to the purpose of Green Belt. It was therefore considered unlikely that exceptional circumstances for Green Belt release of land to provide a buffer could be demonstrated in these circumstances. In addition, the Council made the decision to no longer take forward the option of safeguarded land to the south of Fellgate.

Housing need

3.30 Information published by the Office for National Statistics (ONS) in March 2023 showed that the housing affordability ratio for South Tyneside had decreased. Taking this new affordability ratio into account, the standard method outcome for South Tyneside reduced to 309 dwellings per annum, down from 321. In combination with a number of sites having been granted planning permission (or a resolution to grant planning permission) in the interim period, the residual housing requirement has fallen and the number of new homes the Council needs to plan for has decreased from 4471 to 3443. As a result, and in accordance with the spatial strategy, the amount of development that would need to take place on land currently in the Green Belt is significantly reduced.

Site Allocations

3.31 A number of site allocations have been removed and do not appear in the Regulation 19 Publication draft Plan (Table 5).

Regulation 18 sites not taken forward to Regulation 19		
Site Ref:	Site Name:	Justification:
GA1	Land south of Cleadon Park	Green Belt Study identifies the site as having high harm on the purposes of the Green Belt.
GA2	Land west of Sunnyside Farm	Green Belt Study identifies the site as having high harm on the purposes of the Green Belt.
GA5	Former MoD bunkers, medical stores & associated land	Green Belt Study identifies the site as having high harm on the purposes of the Green Belt.
GA6	Land south of St John's Terrace and Natley Avenue	Flood risk concerns across the site means a reasonable layout could not be achieved.
GA10	Land at Wellands Farm	Impact on wading birds which are a priority species and/or high on the list of conservation concern.
GA11	Land west of Cleadon Lane, Whitburn	Green Belt Study identifies the site as having high harm on the purposes of the Green Belt.
H.8	Land at Bradley Avenue	Access to the site cannot be guaranteed. Site no longer considered to be deliverable.
H.16	Land at Essex Gardens	Site is no longer considered to be achievable due to the layout of the site and tight access.
H.17	Land at Brockley Avenue	Site is no longer considered to be achievable due to the layout of the site and tight access.
H.19	Land at Heathway, Hedworth	Site is no longer considered to be achievable due to the layout of the site and tight access.
H.20	Land at Heathway/Greenlands, Hedworth	Site is no longer considered to be achievable due to the layout of the site and tight access.
H.21	Land at Kings Meadow, Hedworth	Site is no longer considered to be achievable due to unsuitable access.
H.22	Land at Calf Close Walk	The Open Space Assessment (2023) identifies the site as good quality open space. The site is no longer considered suitable.
H.23	Land to North and East of Holland Park Drive	The Open Space Assessment identifies the site as good quality open space. The site is no longer considered suitable.
H.24	Land at Salcombe Avenue	Flood alleviation scheme on the site means a reasonable development layout could not be achieved. The site is no longer considered suitable.
H.28	Land at Leamside	Site is no longer considered to be achievable due to former landfill use.
H.30	Land at Peel Gardens	Site is no longer considered to be achievable due to the layout of the site and tight access.

H.33	Land to North of former day care centre	Site no longer considered to be suitable as development would restrict maintenance access to remaining open space.
H.36	Land off Mountbatten Avenue	Flood alleviation scheme on the site means a reasonable development layout could not be achieved. The site is no longer considered suitable.
H.37	Land at Lilac Walk	Flood alleviation scheme on the site means a reasonable development layout could not be achieved. The site is no longer considered suitable.
H.38	The Disco Field, Henley Way	Site is no longer considered to be achievable due to restrictive covenants on the site.
H.39	Open space at Dipe Lane/Avondale Gardens	Site no longer available for residential development.
RG6	Land off Prince Georg Square (former library site)	Council aspirations for the site have changed. The site is no longer available for residential development.
H.27	Land at previously Nolan Hall, Concorde Way	The site now has planning permission.
H.32	Ashworth Frazer Industrial Estate & Hebburn Community Centre	The site now has planning permission.
H.35	Father James Walsh Day Centre, Hedgeley Road	The site now has planning permission.
H.40	Land at Cleadon Lane Industrial Estate (resolution to grant)	The site has a resolution to grant planning permission. This is expected to be resolved before the Plan is adopted.

Table 5: Site Allocations that have been removed from the Plan

3.32 To inform the preparation of the Plan, the following evidence base documents were produced or updated:

- Strategic Housing Market Assessment (2023)
- Gypsy and Traveller and Travelling Show person Accommodation Assessment (2023)
- Houses in Multiple Occupancy Topic Paper (2024)
- Site-Selection Topic Paper (2024)
- Density Report (2024)
- Efficient Use of Land Topic Paper (2024)
- Fellgate Sustainable Growth Area Supplementary Planning Document: Site Capacity and Opportunities Paper (2024)
- Site Frameworks for Publication Draft Local Plan 2023 to 2040 [2023]
- Employment Land Review (2023)
- Employment Land Technical Paper (2024)
- Town, District and Local Centre Studies (2023)
- South Tyneside Green and Blue Infrastructure (GBI) Strategy (2023)
- Local Green Space Topic Paper (2023)

- Open Space Study (2023)
- Heritage Impact Assessment (2024)
- Level 1 Strategic Flood Risk Assessment Addendum (2023)
- Level 2 Strategic Flood Risk Assessment: Scoping Report (2023)
- Sequential Flood Test Report (2024)
- South Tyneside Waders Survey (2023)
- Climate Change Topic Paper (2024)
- South Tyneside Green Belt Study (2023)
- South Tyneside Green Belt Exceptional Circumstances Paper (2024)
- Infrastructure Delivery Plan (2024)
- Strategic Road Network Forecast Report (2024)
- Viability Report (2023)
- Traffic Assessment (2023)
- Waste Capacity Study (2023)

3.33 Appendix C provides an overview of how policies were amended as a result of the updated evidence base.

STATUTORY CONSULTATION – REGULATION 19 PUBLICATION DRAFT LOCAL PLAN

3.34 This section provides an overview of the public consultation undertaken between 15th January and 4th March 2024 in respect of the Regulation 19 Publication draft Local Plan.

3.35 The SCI provides information about how the Council will engage with the public and relevant consultees in the preparation of Plan documents and in the assessment of planning applications. The Statement of Representation Procedure is provided in Appendix D.

3.36 The consultation began on 15th January 2024 and was scheduled to run for six weeks, ending on 25th February 2024. In response to requests to extend the consultation period, a one-week extension was agreed on 19th January. Therefore, the consultation ran for seven weeks, ending on 3rd March 2024.

Who we engaged with

3.37 When developing statutory documents, the Town and Country Planning Regulations (Local Planning) (England) (2012) sets out those groups that must be included in the consultation process. Those statutory consultees and organisations that were consulted are identified in Appendix F. Residents and interested parties registered on the Local Plan database were also notified.

How we engaged

3.38 The following section summarises the different engagement methods used by the Council to publicise the Plan. More detail is set out in Appendices D-I.

Letters and Emails

3.39 An email/letter was sent to statutory consultees and individuals/organisations on the Local Plan database on 9th January 2024. Another letter was sent on 23rd January 2024 announcing the

extension to the consultation period. A total of 1034 letters and 2788 emails were sent to consultees. Copies of the consultation letter and extension letter are provided in Appendix E.

Availability of Planning Documents

- 3.40 In accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, Plan documents were made available for inspection in South Shields and Jarrow Town Halls during normal office hours.
- 3.41 The Plan document, policies map, interactive map and supporting evidence base documents were published on the Council's website. All documents were available as PDF documents. In addition, an HTML accessible version of the Plan was made available on the Council's website.
- 3.42 The consultation had a prominent presence on the Council website. It was a lead story on the home page carousel throughout the consultation period and was highlighted on both the Planning landing page and the 'Have your Say' web page. User friendly plain English web content was created as well as a friendly URL (Uniform Resource Allocator) which all communications were directed to. User friendly interactive policy maps were also created. During the consultation period the content relating to the Plan received 20,452 views on the Council website.

In-person Information Sessions and Community Area Forums (CAFs).

- 3.43 In-person information sessions attended by Council officers were arranged at different times and venues across the Borough. A total of 14 events took place: 9 Information sessions and 5 Community Area Forums (CAF¹). Table 6 provides the details of the in-person events.
- 3.44 The information sessions included a short presentation on the Plan followed by questions and answers. Each event was attended by the Spatial Planning Team and was chaired by an independent chairperson. At least 269 people attended the in-person events.

1.1_____

¹ CAF attendances represent members of the public in attendance only. Some attendees may have been at the CAF for reasons other than the Local Plan.

Date	Venue	Time	Attendance
Tuesday 9 th January	Riverside CAF	6pm - 8pm	8
Monday 15 th January	Hedworthfield Community Association	6pm - 8pm	49
Tuesday 16 th January	East Boldon Junior School	6pm - 8pm	60
Wednesday 17 th January	Whitburn Village Primary School	6pm - 8pm	4
Thursday 18 th January	Hedworthfield Community Association	10.30 – 12.30am	33
Friday 19 th January	Cleadon Methodist Church	6pm - 8pm	36
Monday 22 nd January	The Word, South Shields	4.30pm -6.30pm	8
Tuesday 23 rd January	Jarrow Focus	5pm - 7pm	4
Wednesday 24 th January	Hebburn Central	6pm - 8pm	12
Thursday 25 th January	West Shields CAF	5pm - 7pm	13
Friday 26 th January	Boldon Community Association	6pm - 8pm	14
Thursday 15 th February	Jarrow CAF	10am - 12pm	7
Thursday 15 th February	East Shields and Whitburn CAF	6pm - 8pm	7
Monday 19 th February	Hebburn CAF	10am - 12pm	14

Table 6: Consultation Events

Communications – Materials

3.45 A range of consultation materials were produced to support the consultation events and publicise the Local Plan consultation. These included:

- Outdoor banners - large banners highlighting the consultation were located in high traffic areas including outside of South Shields Town Hall.



Fig 1. Local Plan Outdoor Banner – Westoe Road -photo taken 20th February 2024

- Electronic advertising – electronic advertising screens on King Street, South Shields and on the A194 next to the Mill Lane roundabout were used to publicise the consultation. Plasma screens promoting the consultation were visible inside Council buildings for staff and in Council receptions, leisure facilities and library buildings.
- Newsletters – an article and link to the Local Plan consultation was included in the Council’s newsletter (November 2023), ‘Staff Briefing’ email (17th January 2024), and e-newsletter (17th January 2024).



Figure 2: Notification included in the Council's newsletter (November 2023)

Communications – Press releases and social media

3.46 A series of press releases were issued at key milestones including Cabinet consideration, Cabinet decision and the launch of the consultation. These are documented in Appendix G.

3.47 The use of social media has been an important means of communication and raising awareness. The Council's Communication Team put posts out on the following social media platforms:

- Facebook
- Twitter
- NextDoor
- LinkedIn

3.48 11 social media posts were made throughout the consultation period with a combined reach of 44,464 views. Appendix G provides examples of these social media posts and the reach each post has had.

Additional resources

3.49 To assist individuals in preparing a response to the Plan, the Council produced detailed guidance notes and online response forms. The response forms were accessible via the Council website and provided a structured format to assist representors in preparing their response and could either be edited electronically or printed and sent in. Examples can be viewed in Appendices H and I.

MAIN ISSUES RAISED BY REPRESENTATIONS RECEIVED AT REGULATION 19

Methodology

3.50 'Representors' are individuals who submitted representation(s) to the Regulation 19 Publication draft Local Plan consultation. Representors include statutory consultees, groups, organisations, individuals, and members of the general public. Some representors chose to use agents such as planning consultants to assist. Representors were able to submit multiple representations on a range of specific points including policies, sites, paragraphs, maps, and evidence base documents. This meant that each representor could make multiple representations.

3.51 The Council received a total of 1889 comments made by 384 individual representors. 301 (78.38%) representors submitted their responses via email, 76 (19.79%) through a dedicated digital platform, and 7 (1.82%) were received in the form of hard copy letter or response form submissions.

3.52 When submitting representations, representors were asked whether they believed the Plan, in whole or in part, to be sound, legally compliant and compliant with the duty to cooperate. Representors were also given the opportunity to provide comments and propose modifications.

3.53 In accordance with the General Data Protection Regulations (GDPR), sensitive personal data was redacted. Where necessary, representations that were submitted by email or in hard copy were transferred into the Council's digital platform (Citizen Space). Each representor was given an individual Local Plan reference number. Those who had submitted representations to the Regulation 18 Draft Local Plan consultation were given the same Local Plan reference number for consistency. Representations were divided by chapter or policy and given representation reference numbers. Officers then summarised these comments and provided a Council response.

- 3.54 Analysis of representations was carried out in Microsoft Excel. All representations relating to the consultation can be accessed on the Council's Local Plan Examination web pages.
- 3.55 Alongside the Regulation 19 Publication draft Local Plan consultation, the Council consulted on the Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report. 241 individual representations were received and comments that were also deemed relevant to Local Plan Policy SP8 were included in the Microsoft Excel database to ensure that all Plan-related comments are made available to the Planning Inspector.
- 3.56 A petition containing 144 duly made signatures objecting to Local Plan allocation SP8: Fellgate Sustainable Growth Area was also submitted. In order for a signature to be duly made, both a name and an address had to be legible.
- 3.57 The Council also received a petition 'Save the Greenbelt – South Fellgate Housing Development' in May 2024. The petition contained some 2,248 signatures objecting to the proposed allocation of the Fellgate Sustainable Growth Area. This petition was received outside of the consultation period and therefore was not considered a duly made representation. Therefore, this representation was not processed or included in this analysis of representations.
- 3.58 A response was received from Northumberland County Council after the consultation ended. The response did not raise any comments and therefore this representation was not processed or included in the analysis of representations.

Analysis

- 3.59 In relation to the soundness of the Plan, 987 representations considered the Plan not to be sound, whilst 127 representations considered the Plan to be sound.
- 3.60 In relation to the legal compliance of the Plan, 277 representations considered the Plan legally compliant, whilst 256 representations considered the Plan not to be legally compliant.
- 3.61 In relation to the compliance of the Plan with the duty to cooperate, 179 representations considered the Plan to be compliant with the duty to cooperate, whilst 287 representations considered the Plan not to be compliant.
- 3.62 Two representations were submitted against Appendices 1-5 by one representor, and five representations were made regarding the Policies Map by five individual representors.
- 3.63 Table 7 identifies which policies received the most responses in relation to soundness, legal compliance and compliance with the duty to cooperate and indicates how many representors were of the view that the policy met these requirements and how many disagreed. The table also shows this as a percentage of the 384 individual representors identified.

Policy	Legally Compliant?				Sound?				Compliant with the Duty to Cooperate?			
	Yes	%	No	%	Yes	%	No	%	Yes	%	No	%
Policy SP8	7	1.82%	44	11.46%	2	0.52%	62	16.15%	5	1.30%	36	9.38%
Policy SP3	7	1.82%	24	6.25%	2	0.52%	77	20.05%	5	1.30%	18	4.69%
Policy SP7	8	2.08%	18	4.69%	2	0.52%	71	18.49%	5	1.30%	21	5.47%
Policy SP2	6	1.56%	19	4.95%	1	0.26%	72	18.75%	4	1.04%	19	4.95%
Policy SP16	6	1.56%	11	2.86%	1	0.26%	43	11.20%	5	1.30%	11	2.86%

Table 7: Policies in receipt of the most responses

Site-specific representations

3.64 When processing representations, officers kept a record of how many times policies SP4 and SP7 were referred to. Table 8 shows a high-level breakdown of the types of issues raised within those representations and which individual site allocations were mentioned. Those site allocations that are not included within the Table 8 did not receive any specific comments.

Site	Number of representations	Of which had issues with soundness	Of which had issues with the duty to cooperate	Of which had issues with legal compliance
GA1	29	17	3	3
GA2	68	49	14	13
GA3	35	19	3	3
GA4	50	26	4	4
GA5	33	21	5	5
GA6	33	21	5	5
H6	1	1	0	0
H7	3	2	0	0
H8	1	1	0	1
H20	1	0	0	0

Table 8: Representations received in relation to SP4 and SP7 site allocations

3.65 Table 9 provides a high level break down of the representations received in relation to the other strategic housing allocations (SP5, SP6 and SP8).

Policy	Number of representations	Of which had issues with soundness	Of which had issues with the duty to cooperate	Of which had issues with legal compliance
SP5: Former Brinkburn Comprehensive School	39	34	3	4
Policy SP6: Former Chuter Ede Education Centre	36	20	3	4
SP8: Fellgate Sustainable Growth Area	230	62	36	44

Table 9: High level break down of representations received regarding other housing policies within The Plan

3.66 A number of omission sites were promoted by landowners and site promoters seeking to promote alternate growth strategies for the Plan, including an increase to the housing requirement and the release of additional Green Belt sites. Some omission sites were also suggested by members of the public as alternative sites which could be used to displace some of the housing allocations identified in the Plan. These were recorded as Strategic Housing Land Availability Assessment (SHLAA) reference numbers: SBC004, SBC052, SBC053, SBC054, SBC055, SBC063, SBC070, SBC080, SBC081, SBC085, SBC087, SBC100, SBC101, SBC111, SBC120, SFG048, SFG067, SHB045, SHB046, SJA019, SJA021, SOS001, SOS050, SWH009 and SWH013.

Key Issues Regulation 20

3.67 Table 10 identifies key issues where 5 or more similar comments have been made. A high-level Council response has also been provided. Appendix J provides a summary of every representation submitted to the Plan and includes a Council response.

Key issues Regulation 20 (receiving 5 or more representations)		
Key Issue Raised	Council Response	Number of Comments
Legal Compliance		
The Plan has not been produced in accordance with the Duty to Cooperate.	<p>The Publication draft Local Plan has been produced in accordance with the Duty to Cooperate, as set out in national planning policy and legislation.</p> <p>The Council has produced a Duty to Co-operate Statement that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate.</p> <p>A number of Statements of Common Ground either have been agreed, or are in the process of being agreed, with the relevant statutory bodies.</p>	287
The Local Plan or individual policies are not considered to be sound.	The Council considers that the Publication draft Local Plan has been prepared in accordance with national planning policy and legislation. The Plan is supported by a robust and up to date evidence base which informed its production. Furthermore, the Council contends that the policies within the Plan are compliant with national planning policy and legislation.	987
The Local Plan/ policies are not considered to be legally compliant.		256
Green Belt		
Exceptional circumstances for Green Belt release have not been demonstrated.	<p>The Council is confident that a sound and robust approach has been undertaken in identifying exceptional circumstances for Green Belt release. The Green Belt Exceptional Circumstances paper (2024) examines the strategic context and existing evidence base to examine whether exceptional circumstances exist, taking into account:</p> <ul style="list-style-type: none">• The key constraints affecting growth within the Borough;• The scale of need for homes and jobs;• The nature of the supply of land for both homes and jobs from non-green field sources;• The ability of our neighbouring authorities to assist with meeting any of our unmet needs; and	195
Sites in the Green Belt should not be released.		186

	<ul style="list-style-type: none"> Whether the Council can deliver sustainable development within the Borough without impinging on the Green Belt. <p>The paper concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the Borough in accordance with national policy.</p>	
Housing		
The housing requirement is too high/inaccurate.	<p>The standard method was used to calculate the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing a Plans unless exceptional circumstances exist to justify an alternative approach.</p> <p>The Strategic Housing Market Assessment (SHMA) does not identify any exceptional circumstances that would justify an alternative approach, and the Council is confident that the housing requirement is in accordance with national planning policy and guidance.</p>	113
The Local Plan does not meet the housing needs identified in the Strategic Housing Marketing Assessment (SHMA) 2023 / Housing mix	<p>Whilst the Plan considers evidence from the SHMA, policies in the Plan also consider viability evidence.</p> <p>Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, taking into account site specific circumstances and the SHMA.</p>	161
The housing requirement is too low.	<p>The standard method calculation was used to determine the housing requirement for the Plan.</p> <p>The SHMA does not recommend an uplift to the housing requirement.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance.</p>	61
The Plan does not provide a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the	The Council considers that the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period by carefully considering anticipated delivery rates for those sites identified as allocations. This approach is explained in the Strategic Housing Land Availability Assessment (SHLAA).	17

required levels throughout the plan period.	Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations that are not allocated through the Plan can still come forward for development.	
Omission Sites.	<p>The Council considers that the Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the SHLAA.</p> <p>The Plan makes adequate provision to meet the development needs of the Borough and incorporates sufficient flexibility.</p> <p>Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations that are not allocated through the Plan can still come forward for development.</p>	21
Infrastructure		
Impacts on air pollution/measures should be introduced to mitigate increased traffic and air pollution.	<p>The Council regularly reviews and assesses air quality across the Borough. Air quality monitoring, data analysis and ratification is undertaken and used to produce an Annual Status Report each June. These reports require submission and approval by the Department for Environment Food and Rural Affairs (DEFRA). The Local Air Quality Strategy and Action Plan for South Tyneside (2023) sets clear objectives for driving down levels of pollutants and improving local air quality.</p> <p>Development proposals will need to comply with Policy 2: Air Quality. The policy requires the submission of an appropriate air quality assessment, and it states that development that would result in exposure to air pollution that exceeds national air quality objectives will only be approved where satisfactory mitigation can be implemented.</p> <p>Policy SP26: Delivering Sustainable Transport requires development to meet the need of public transport users and links to the Local Cycling and Walking Infrastructure Plan by prioritising active travel to reduce the need to travel by private vehicle.</p>	66
The Plan will worsen sewerage infrastructure capacity/water quality.	It is acknowledged that there are concerns among residents and community groups in relation to sewerage infrastructure and capacity.	139

	<p>Northumbrian Water has advised that it has sufficient network and treatment capacity to support the Plan's proposed allocations. In addition, they have a legal duty under Section 94 of the Water Industry Act to ensure that their network is maintained, improved and extended to meet growth demands.</p> <p>The Environment Agency has not raised any concerns regarding the Plan's allocations.</p> <p>The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations.</p>	
Development will worsen infrastructure capacity including school places/healthcare provision.	<p>The Local Plan is supported by an Infrastructure Delivery Plan (IDP). The IDP summarises the Council's evidence regarding the impact of the development proposed in the Plan on the highway network, opportunities to travel by public transport and other sustainable travel modes, air quality, water and sewerage utilities, health, education and other infrastructure and the options for mitigating these impacts where necessary.</p> <p>The Council has assessed the needs that will arise as a result of the Plan and work is progressing to identify options for how those needs can be met.</p> <p>The Council have and continue to liaise with the North East and North Cumbria Integrated Care Board regarding capacity and mitigation options.</p>	255
Development will worsen pollution.	<p>It is acknowledged that there are concerns among residents and community groups in relation to pollution.</p> <p>Policy 3: Pollution requires development proposals to incorporate measures to prevent or reduce pollution to an acceptable standard. The policy states that where pollution levels are assessed as being unacceptable, development proposals will only be permitted where mitigation measures can be introduced to provide an acceptable living or working environment.</p> <p>The policy also states that proposals that would result in significant adverse environmental effects during the construction phase will require a Construction Environmental Management Plan.</p>	157
Development will worsen flooding.	<p>The Plan is supported by a robust evidence base relating to the assessment of flood risk in South</p>	191

	<p>Tyneside and considers its approach to dealing with flood risk to be sound. The Level 1 Strategic Flood Risk Assessment (SFRA) (2022) takes into account all the potential sources of flood risk across the entirety of the Plan area and takes account of the potential impacts of climate change.</p> <p>The Sequential Test for flood risk (2022) steers the selection of development sites in the Plan to areas with the lowest risk of flooding.</p> <p>A SFRA Level 2 was undertaken for sites within the Port of Tyne.</p> <p>The evidence base identified above has helped inform the selection of site allocations within the Plan and informed the development of Plan policies. It is therefore considered that the assessment of flood risk for the Plan fully complies with national planning policy and guidance.</p> <p>The Plan includes specific development management policies relating to the management of flood risk. For example, Policy 7: Flood Risk and Water Management requires development proposals to follow the sequential approach, directing new development to the lowest areas of flooding. Policy 8: Flood Risk Assessment and Drainage Strategy requires development proposals to demonstrate that they are not at risk of flooding and would not increase flood risk elsewhere.</p>	
Development will worsen traffic congestion.	<p>The Local Road Network – Traffic Capacity Assessment (2023) assessed how Plan-related growth will impact on the local road network across the Borough.</p> <p>The assessment provides a detailed evidence base demonstrating how the impact of future development on the highway network has been considered and the scale of mitigation measures which could be used to accommodate any such development.</p> <p>An approximate cost has been identified by the assessment to provide the necessary comfort that the nature and scale of the improvements could be delivered and funded by Section 106 Planning Obligations, S278 agreements and/or other funding sources, if necessary.</p> <p>National Highways has modelled the impact of the Plan-related development up to the year 2040 and has established that the highway infrastructure is</p>	

	<p>insufficient to accommodate the anticipated increase in traffic on the strategic road network (SRN). Therefore, the following additional schemes will be required to adequately mitigate the impact of the Plan:</p> <ul style="list-style-type: none"> • Southbound A19 Lane Gain / Lane Drop between Southern Portal of Tyne Tunnel and Lindisfarne junctions; and • Major Scheme Improvements to A194(M) / A184 / White Mare Pool junction. <p>These schemes are identified in the Infrastructure Delivery Plan Delivery Schedule and in the Plan's Fellgate Sustainable Growth Area policy.</p>	
Site Allocations		
SP5: Former Brinkburn Comprehensive School	<p>The Council notes the number of objections made to housing allocations within the Plan. More detailed responses are provided in Appendix J.</p> <p>The Plan has allocated sites in order to meet the housing needs of the Borough up to 2040. The Council has prioritised development in the Main Urban Area. However, as set out in the Green Belt Exceptional Circumstances paper (2024), the Council has concluded that there are justified reasons to consider Green Belt land for development.</p> <p>The sites identified have been subject to a robust assessment, including Sustainability Appraisal, and are considered to be sustainable and deliverable.</p> <p>The Plan policies set out a suite of mitigation measures for the sites identified in this table, and any development proposals would be considered against the Plan policies as a whole.</p> <p>The Council is progressing a masterplan for the Fellgate Sustainable Growth Area which will inform the development of a Supplementary Planning Document to support the allocation of SP8.</p>	39
Policy SP6: Former Chuter Ede Education Centre		36
SP7: GA1 Land at South Tyneside College, Hebburn Campus		29
SP7: GA2 Land at North Farm		68
SP7:GA3 Land to North of Town End Farm		35
SP7:GA4 Land at West Hall Farm		50
SP7:GA5 Land at Whitburn Lodge		33
SP7:GA6 Land to North of Shearwater		33

SP8: Fellgate Sustainable Growth Area		230
Local Plan		
The Local Plan does not support the strategic objective 'Promoting healthy communities'.	Improving the health and wellbeing is a central aim of the Plan as set out in Strategic Objective 2: Promoting Healthy Communities. It is considered that the Plan has a holistic approach to delivering this aim with many of the Plan policies contributing towards improving the wider environmental determinants of health. Key policies within the Plan that contribute to this Strategic Objective include Policy 1: Promoting healthy communities and Policy 32: Hot Food Takeaways. For site allocations, development proposals will be required to comply with the policies in the Plan and ensure mitigation is provided where necessary.	31
The Local Plan is contrary to the East Boldon Neighbourhood Plan.	<p>The Plan sets out the strategic priorities for the Borough, including housing need.</p> <p>The provision of delivery for homes in the East Boldon Neighbourhood Plan (EBNP) area is based on the Council's spatial strategy and the availability of suitable and sustainable sites.</p> <p>The EBNP does not set a housing requirement for the East Boldon area and therefore the Council does not consider the Plan to be contrary to the EBNP.</p> <p>Following the consultation on the Regulation 18 draft Local Plan (2022), the Spatial Planning team worked with the East Boldon Neighbourhood Forum to strengthen links between the Local Plan and the Neighbourhood Plan. This work informed the Regulation 19 Publication draft Local Plan (2024).</p>	47
The Local Plan does not sufficiently consider the economic and community value of the farm.	The land allocated as SP8: Fellgate Sustainable Growth Area in the Plan seeks to identify a broad area of land that is considered to be suitable for development. The Council considers that a sound assessment of the site has taken place through the Sustainability Appraisal (2024) and the preparation of the Plan. The future of existing business and land use within the allocation is a matter for the landowner(s).	19
The Consultation Strategy was flawed.	The Council considers that the Regulation 19 Publication draft consultation was undertaken in	49

	<p>accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.</p> <p>A public consultation was undertaken between 15th January and 4th March 2024. Stakeholders and consultees were notified of the public consultation. The consultation was also subject to widespread publicity before and throughout the consultation period and was supported by in-person information sessions attended by council officers. More details of how the consultation was conducted can be found in Section 3 of this paper.</p>	
Support for Local plan/ Chapter / Allocation	Support for the Plan policies and allocations is noted and welcomed.	241
The Plan does not sufficiently address climate change mitigation and adaptation/support renewable energy	<p>The Council considers the Plan to be sound and consistent with national policy and emerging national standards. The Plan is viable, and deliverable as demonstrated in the viability assessment (2023).</p> <p>The Plan aims to balance the often competing and conflicting issue of protecting the environment and addressing the challenges of climate change with growth required to meet economic, housing and infrastructure needs. Paragraphs 7.1 – 7.6 of the Plan explain how the Plan seeks to address climate change. Climate change mitigation and adaptation is a key thread that runs throughout the Plan.</p> <p>Policy 6 sets out a positive strategy and guidance for delivering energy from renewable and low carbon sources across the Borough, whilst ensuring that development does not have a harmful impact on the character of the surrounding area.</p>	96
The Local Plan should not be setting local energy efficiency standards for buildings that go beyond national requirements.	The Plan does not set local energy efficiency standards. Policy 5 sets out ways in which development can reduce energy consumption and support sustainable development. Paragraph 7.12 acknowledges that in 2025 compliance with the Government's Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.	9
The Plan does not sufficiently protect	Protection of the natural environment is a key aim of the Plan as identified in Strategic Objectives 11 - 13. The Council considers that Plan policies SP21: Natural	157

wildlife/wildlife corridors	Environment, Policy 33: Biodiversity, Geodiversity and Ecological Networks and Policy 34: Internationally, Nationally and Locally Important Sites provided a clear and robust policy framework for protecting important habitats and wildlife corridors. In addition, Policy 35: Delivering Biodiversity Net Gain provides local guidance on the delivery on Biodiversity Net Gain (BNG) for new developments. The Council believes these policies are sound and no change is required.	
Modifications proposed	Proposed modifications are noted. The Council considers the Plan to be sound but would be willing to consider minor modifications in respect of some of the suggestions made.	166
The Plan does not adequately provide for playing pitch mitigation.	Policy 37 provides the policy context in which mitigation is required for the loss of playing field land within the Borough. In addition, site allocation policies which affect playing field land clearly state that the loss of playing field land should be subject to mitigation. The Council has worked with Sport England and sport's National Governing Bodies on the production of a Playing Pitch Strategy. The Council continues to work with Sport England on this issue via a Statement of Common Ground.	11
Evidence Base		
Evidence set out in the Density Report is flawed.	The Council is considers that the evidence set out in the Density Report (2024) to be robust and proportionate.	32
Evidence set out in the traffic modelling is flawed.	The Council is confident that that the traffic modelling for the Local Road Network – Traffic Capacity Assessment (2023) and the Strategic Road Network Forecast Report (2024) have been conducted using a robust methodology to support the Plan. The Council believes that the traffic modelling evidence is relevant, robust and up to date.	20
Evidence base documents are flawed	The Council is confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.	10
Evidence set out in the Employment Land Review and Employment Land	The Council is confident that that the Employment Land Review (ELR) (2023) is robust, reflecting both national guidance and specific local circumstances. The Employment Land Technical Paper was produced in-	26

Technical Paper is flawed.	house, drawing on the findings of the ELR and the South Tyneside Economic Assessment (2021) and is considered to be robust.	
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Table 10: Key Issues and Council Responses

Statutory Consultees

3.68 Table 11 provides a high-level summary of the representations received from statutory consultees in response to the Regulation 19 consultation. Statements of Common Ground have also been prepared between the Council and statutory consultees, where relevant. Full summaries of representations and Council responses are set out in Appendix J.

Statutory Consultee	Summary of comments raised	STC Actions / Response
Coal Authority	Support for Policy 4: Contaminated Land and Ground Stability.	Support welcomed.
Environment Agency	The Environment Agency considers the Local Plan to be sound.	Support welcomed. The Council has agreed a Statement of Common Ground with the Environment Agency.
National Highways	National Highways considers that the Strategic Road Network – Forecast Report is a robust evidence base. Proposed amendments to the wording of some policies and to the Infrastructure Delivery Plan.	The Council is preparing a Statement of Common Ground with National Highways.
Historic England	Historic England strongly support the references to the historic environment with the Local Plan Vision. Historic England have commented on the wording of several policies and have proposed amendments.	The Council has agreed a Statement of Common Ground with Historic England.
Marine Management Organisation	The MMO considers that the Plan has a sound understanding of the North East Marine Plan and alignment between the North East Marine Plan policies and Local Plan policies.	The Council has agreed a Statement of Common Ground with the Marine

		Management Organisation.
National Grid	National Grid request a new strand to Policy 47: Design Principles, referencing existing site constraints including utilities.	Comments noted and considered in more detail in Appendix J.
National Gas Transmissions	National Gas Transmissions request a new strand to Policy 47: Design Principles, referencing existing site constraints including utilities	Comments noted and considered in more detail in Appendix J.
Natural England	Comments regarding the Habitats Regulations Assessment, the Sustainability Appraisal, and the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report	The Council is preparing a Statement of Common Ground with Natural England.
Network Rail	Concerns over any proposals that may impact on the operational safety and risk of a railway crossing. Network Rail will be seeking funding from developers to mitigate these risks. Network Rail welcomes the opportunity to work with the Council in respect of Tilesheds and Boldon level crossings.	Comments noted and considered in more detail in Appendix J.
NHS Property Services	Health infrastructure should be a priority for infrastructure delivery. Detailed comments provided on several policies e.g. recommend that as part of implementing Policy 18: Affordable Housing, the need for affordable housing for NHS staff is considered.	Comments noted and considered in Appendix J.
Northumbrian Water	No further comments on the Local Plan at this stage. Support for the progression of the Fellgate Sustainable Growth Area SPD Scoping Report.	The Council has agreed a Statement of Common Ground with Northumbrian Water.
Sunderland City Council (SCC)	SCC welcomes the recognition of infrastructure impacts of the Land to the North of Town End Farm allocation this within the policy but considers that it should be strengthened. SCC will continue to work closely with South Tyneside Council in supporting the delivery of the IAMP. SCC welcomes support for the re-opening of the Leamside Line.	The Council is preparing a Statement of Common Ground with SCC.

Sport England	<p>Support for the Plan's theme of promoting the Health and Wellbeing of the Borough's residents, alongside the policy which protects open spaces.</p> <p>Objects to those allocations that are in whole or in part on land used or last used as playing field.</p>	The Council is preparing a Statement of Common Ground with Sport England.
Gateshead Council	<p>Green Belt in South Tyneside should not prejudice development of employment land in Gateshead.</p> <p>Policy SP8 should ensure strategic cross boundary connectivity to address the direct and indirect impacts of the Fellgate Sustainable Growth Area on biodiversity and ecological connectivity. It should also give greater emphasis to active/sustainable travel and should refer to impacts on Gateshead's highway network.</p> <p>Duty to Co-operate Objection to Policies SP14, SP25 and SP26.</p> <p>Gateshead Council requires additional information in order to consider Plan's impacts on and mitigation for the Gateshead highway network and Whitemare Pool and to discuss active travel and public transport.</p> <p>Support for policies 24 and 35.</p>	<p>Gateshead Council formally withdrew objections to policies SP14, SP25 and SP26 on 10th December 2024.</p> <p>The Council has now agreed a Statement of Common Ground with Gateshead Council.</p>

Table 11: Statutory Consultee responses

Gateshead Council Representations – Regulation 19

3.69 As stated in Table 11, Gateshead Council submitted representations to the Publication draft Local Plan which included a Duty to Co-operate objection to the following Local Plan policies:

- SP14 – Wardley Colliery
- SP25 –Infrastructure
- SP26 - Delivering sustainable transport

3.70 Following the consultation period, both councils engaged in discussions to address the points raised to policies SP14, SP25 and SP26. This engagement is set out in detail in the Duty to Co-operate Statement (2024) and Statement of Common Ground between Gateshead Council and South Tyneside. As a result of those discussions and further work being undertaken to address Gateshead's concerns, Gateshead formally withdrew their objections to the above policies on 10th December 2024, which included Duty to Cooperate objection.

SUSTAINABILITY APPRAISAL (2024) REPRESENTATIONS

3.71 The Council received 35 representations in relation to the Sustainability Appraisal (SA) consultation which ran alongside the Regulation 19 Publication draft Local Plan consultation. The range of topics covered is illustrated in Figure 2.

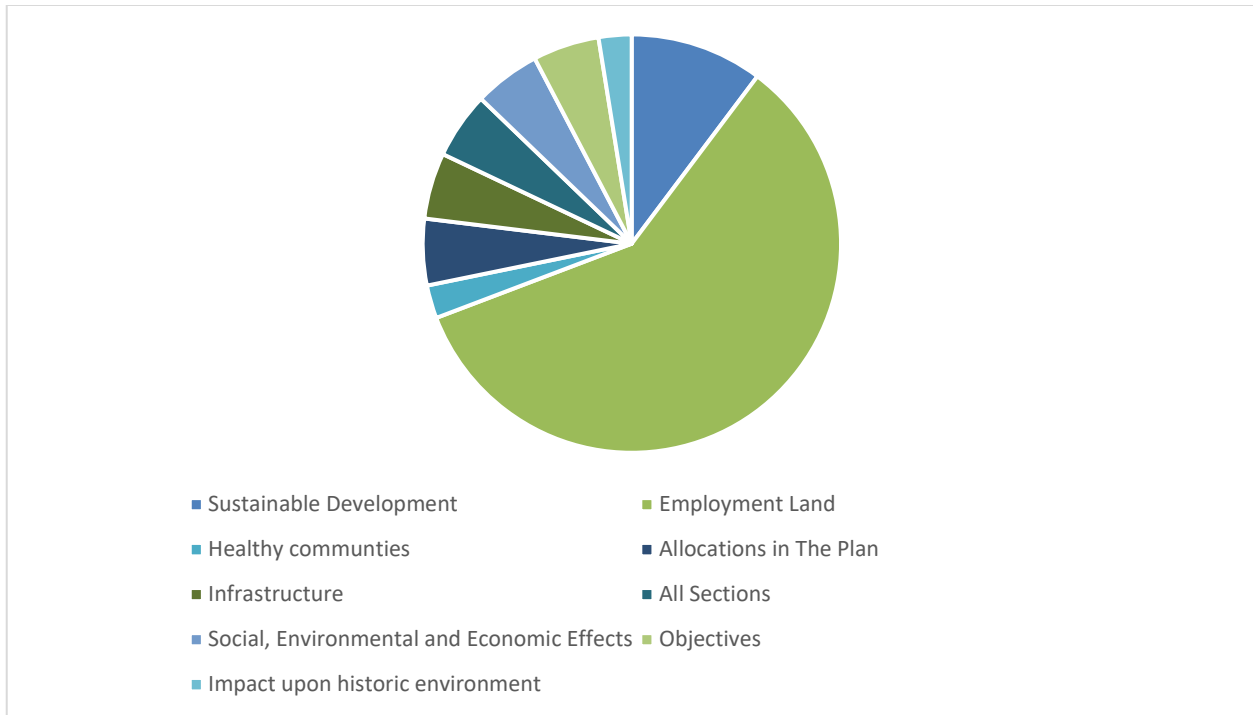


Figure 1: Sustainability Appraisal themes addressed in Representations

- 3.72 The majority of representations relating to the SA had regard to employment land. A common argument is that the amount of land allocated for employment is too high and should instead be allocated for housing in existing urban areas, thus reducing the amount of land required to be released from the Green Belt.
- 3.73 Representations made in regard to the SA are set out in Appendix K.

HABITATS REGULATIONS ASSESSMENT (HRA) (2024) REPRESENTATIONS

- 3.74 The Council received 23 representations in response the Habitats Regulations Assessment (HRA) consultation which ran alongside the Regulation 19 Publication draft Local Plan consultation.
- 3.75 The main area of concern was that the housing allocations in the Plan with have a negative impact on wildlife, biodiversity and the purposes of the Green Belt. It was also felt that there would be an impact on climate change and noise and air pollution, and that housing development could increase the risk of flooding in some areas.
- 3.76 Representations relating to the Habitats Regulations Assessment are set out in Appendix L.

PUBLICATION DRAFT LOCAL PLAN – BOROUGH COUNCIL SEPTEMBER 2024

- 3.77 The Council took a report to Borough Council on 5th September 2024 seeking approval to submit the Publication draft South Tyneside Local Plan (2024) to the Secretary of State (Planning Inspectorate) in order that it is subject to an Examination in Public.

- 3.78 However, a political consensus could not be reached, and the Plan was not progressed in line with the timeline set out in the Local Development Scheme (LDS).

PUBLICATION DRAFT LOCAL PLAN – BOROUGH COUNCIL FEBRUARY 2025

- 3.79 As a result of the publication of the revised NPPF on 12th December 2024, and its implications on transitional arrangements for Plan making, the Council took the decision to convene an Extraordinary Borough Council meeting on 27th February 2025. The NPPF (December 20204) allowed Local Plans at an advanced stage to be submitted by 12th March 2025. A report sought approval to submit the Publication draft South Tyneside Local Plan (2024) to the Secretary of State (Planning Inspectorate) in order that it is subject to an Examination in Public.

4. CONCLUSION

- 4.1 In carrying out its consultation processes, the Council considers that it has complied with both the Town and Country Planning (Local Planning) (England) Regulations 2012 and with the provisions of its Statement of Community Involvement (SCI).

**APPENDIX A: SOUTH TYNESIDE PRE-PUBLICATION DRAFT LOCAL PLAN
CONSULTATION – COUNCIL RESPONSES TO REPRESENTATIONS RECEIVED (2021)**

South Tyneside

Pre-Publication Draft Local Plan Consultation

Council Responses to Representations Received

(March 2021)



South Tyneside Council

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 1: The Local Plan

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 1 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 1: The Local Plan received 59 comments of which 23 were objections, 8 were in support and 28 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 1: The Local Plan – breakdown of representations				
Theme	Number of comments			
	Total	Comment	Support	Objection
Representations on Local Plan consultation	14	0	0	14
Representations from Statutory Bodies and Neighbouring Authorities	6	3	3	0
Evidence Base	3	0	2	1
Miscellaneous	50	19	4	7

Summary of key issues raised in consultation comments by Theme:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Representations on Local Plan consultation	<ul style="list-style-type: none"> • Length and timing of consultation • Communication of consultation • Location and notification of drop-in events
Representations from Statutory Bodies and Neighbouring Authorities	<ul style="list-style-type: none"> • Representations received from Neighbouring Authorities • Representations received from Statutory Bodies
Evidence Base	<ul style="list-style-type: none"> • Representations made towards evidence base documents
Miscellaneous	<ul style="list-style-type: none"> • Representations on plan preparation and new sites submitted through the consultation. • Accessibility • General representations to the Local Plan and Sites • Next Steps in preparing a Local Plan

Theme: Representations on Local Plan consultation

Length and timing of the consultation

Comments were received criticising the fact that the consultation commenced during the school summer holidays when people are likely to be on holiday. For this reason, the consultation period should have been extended to allow more time for people to respond.

Council Response

Whilst this was not a formal stage in the process, we exceeded the minimum consultation length required by the Town and Country Planning (Local Planning) (England) Regulations 2012 which is for “no less than 6 weeks”. The Regulations do not require the granting of additional time for holiday periods. It remains the discretion of the Local Planning Authority and we took the decision to consult for 8 weeks as is common practice who consult at the Regulation 18 stage of the Plan over any holiday period.

Insufficient communication regarding the consultation

Comments criticised the perceived lack of communication regarding the consultation. Comparisons were made with 2016 Strategic Land Review Consultation when the Council sent out leaflets to every household in the Borough. Respondents noted that they hadn’t seen notices in their local area regarding drop in events or had heard about the consultation via word of mouth rather than directly from the Council. A concern was also raised regarding the perceived lack of diversity in the pictures used through the Local Plan document.

Council Response

Notification of the consultation was sent to over 600 individuals and organisations on our consultee database. We also distributed posters to libraries and notice boards around the Borough at the start of the consultation, followed by the distribution of more posters and more drop-in event dates were added. The Council also posted several notifications of the consultation on our social media channels. Comments regarding diversity noted.

Next Steps

The Council will continue to ensure Local Plan consultations are consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 as well as the Council’s Statement of Community Involvement.

Location and notification of drop-in events

Representations were received criticising the location as well as the perceived lack of communication or short notice given ahead of the drop-in events.

Council Response

The Council strived to hold drop-in events at as many locations in the Borough as possible. The events were, of course, reliant on availability of suitable venues. The Council added additional drop-in dates on top of the 11 dates scheduled at the start of the consultation. The Council deliberately did not schedule any events within the first two weeks of the consultation to give people time to review the Plan ahead of the drop-in events.

Next Steps

The Council will continue to ensure Local Plan consultations are consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 as well as the Council’s Statement of Community Involvement.

Theme: Representations from statutory bodies and neighbouring local authorities

Representations received from statutory bodies and neighbouring local authorities

The Council received representations from our neighbouring Local Authorities. These representations were in general support of the draft Local Plan and recognised the Duty to Co-operate. General representations were also received from statutory bodies.

Council Response and Next Steps

The Council welcomes support received for the draft Local Plan and will continue to work closely with neighbouring authorities on cross boundary issues and statutory bodies where necessary. Specific policy related comments from neighbouring authorities and statutory bodies have been addressed within the Council responses for those policies.

Theme: Evidence Base

Representations made towards evidence base documents

A number of representations were made towards evidence base documents supporting the draft Local Plan. These included:

- Sustainability Appraisal
- Habitat Regulations Assessment
- Playing Pitch Strategy
- Strategic Housing Market Assessment
- Site Allocations Topic Paper

Council Response

For detailed responses to comments received towards the Sustainability Appraisal and Habitat Regulations Assessment, please refer to the Consultation Summary and Response Paper: Sustainability Appraisal and Habitat Regulations Assessment.

Regarding comments and support received for the recommendations within the Playing Pitch Strategy, the Council notes the response and welcomes support for the document.

Regarding comments on the Strategic Housing Market Assessment and Site Allocations Topic Paper, please refer to the Councils Responses in Chapter 5: Planning for Homes.

Next Steps

None required.

Theme: Miscellaneous

Representations on plan preparation and new sites submitted through the consultation

The Council received general comments on plan preparation. Submissions were also received suggesting new sites for consideration as allocations for housing development and recreational purposes within the draft Local Plan.

Council Response

New sites submitted through the consultation for housing development are detailed in the Councils responses for Chapter 5: Planning for Homes. Sites submitted for other purposes will be considered through the plan preparation process. Specific policy related comments have been addressed within the Council responses for those policies.

Next Steps

None required.

Accessibility

The Council received comments criticising the lack of emphasis on accessibility within the Local Plan and the lack of consideration to meeting the needs of different groups in policy formulation, a

requirement under the Public Sector Equality Duty. The comment also states that the Equality Impact Assessment for the Emerging Local Plan is not publicly available.

Council Response

The council is aware of the need to ensure that the Local Plan and the outcomes of the plan are accessible and beneficial to all members of the community. A Sustainability Appraisal has been produced to support the development of the Local Plan, the Sustainability Appraisal framework has been designed to incorporate an Equality Impact Assessment and Health Impact Assessment. Objective 11 of the Sustainability Appraisal is 'Promote equality of opportunity and access and promote good relations between diverse communities', to support this there are a number of sustainability questions, including 'Will it impact upon people who share a protected characteristic identified in the Equality Act 2010?'. Each policy within the draft Local Plan has been subject to a Sustainability Appraisal assessment and therefore assessed to identify whether there would be any impacts on the identified characteristics of the Equality Act. The Sustainability Appraisal also includes a summary of the impacts on Health and Equality in Section 12 of the Sustainability Appraisal.

Next Steps

None required.

General representations to the Local Plan and Sites

The Council received a number of objections and comments to the Local Plan and specific sites from residents.

Council Response

The Council welcomes responses made to the Local Plan consultation. Objections to the Local Plan are noted by the Council. Council responses to specific issues can be found in the relevant chapter documents.

Next Steps

None required.

Next Steps in preparing a Local Plan

The Council received a representation querying the next steps of the Plan preparation process.

Council Response

Preparing a Local Plan involves several stages which must be undertaken before the Plan is adopted by the Council. The consultation stage which has taken place on the draft Plan is known as Regulation-18. This stage includes the consultation on draft policies and available evidence. The proposals set out in the Plan at this stage will become more fixed as the Plan moves through the process to the Publication stage.

The next stage is Regulation 19 when the Council produces a Publication draft Local Plan. At this stage another formal consultation will take place and there will be further opportunity to comment on the Local Plan.

Following Regulation 19, the Local Plan is submitted to the Planning Inspectorate in preparation of the Examination in Public. An Inspector from the Planning Inspectorate will lead an assessment on the soundness of the Plan and make recommendations. If the Plan is found to be 'sound' by the Inspector, the Local Plan can then be adopted by the Local Authority and will become the development plan for the Borough.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 3: Spatial Vision and Strategic Objectives

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 3 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 3: Spatial Vision and Strategic Objectives received 31 comments of which 4 were objections, 4 were comments and 23 were in support.

Table 1. Chapter 3: Spatial Vision and Strategic Objectives– breakdown of representations				
Theme	Number of comments			
	Total	Comment	Support	Objection
Representations on the Spatial Vision	13	3	9	1
Representations on the Strategic Objectives	18	1	14	3

Summary of key issues raised in consultation comments:

The below table provides a summary of comments and issues raised:

Table 2. Summary of comments received	
Spatial Vision	<ul style="list-style-type: none"> • Support/wording considerations • Objection to release of Green Belt
Strategic Objectives	<ul style="list-style-type: none"> • Contrary to National Policy • Climate Change

Theme: Spatial Vision

Spatial Vision: Council Response and Next Steps

Support/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the National Planning Policy Framework.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Objection to the release of Green Belt

The Council received an objection to the statement that the Green Belt will continue to protect the unique identity of the Borough, pointing to the fact that the Council intends to release land from the Green Belt elsewhere in the Plan.

Council Response

It is acknowledged that there is an unavoidable loss of openness with the release of any land from the Green Belt for development. However, the remaining Green Belt will continue to contribute towards the five purposes including 'to assist in safeguarding the countryside from encroachment'.

Next Steps

None required.

Theme Strategic Objectives

Strategic Objectives: Council Response and Next Steps

Contrary to National Policy

A number of expressions of support of the Council's Strategic Objectives were received. However, several objections were received stating that this part of the Plan is contrary to National Policy. The objectives are interlinked and should not be split into themes.

The Council also received an objection stating that the Local Plan would fail to deliver the Council's Strategic Objectives.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Climate Change

The Council received an objection to Objective 3.3 vii, particularly regarding the loss of trees.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 4: Delivering the Strategy

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 4 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 4: Delivering the strategy received 3850 comments of which 3702 were objections to policies, 99 were in support and 49 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 11: Planning for our Natural Environment – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy S1: Spatial Strategy (Strategic Policy)	3623	32	31	3560
Policy S2: Strategic Development Principles (Strategic Policy)	39	4	3	32
Policy S3: Promoting health and wellbeing in South Tyneside (Strategic Policy)	22	3	5	14
Policy S4: Presumption in favour of Sustainable Development (Strategic Policy)	39	9	3	27
Policy S5: Re-use of Previously Developed Land (Strategic Policy)	76	5	54	17
Policy S6: Appropriate Development within the Green Belt (Strategic Policy)	42	4	1	37
Policy S7: Extensions and Alterations to and Replacement of Buildings in the Green Belt (Strategic Policy)	4	1	1	2
Policy S8: Policy S8: Replacement of Buildings in the Green Belt (Strategic Policy)	5	2	1	2

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy S1: Spatial Strategy (Strategic Policy)	<ul style="list-style-type: none"> • Criticism of Spatial Strategy • Exceptional Circumstances has not been demonstrated • Use of 2014 household projection data • Local Highway Infrastructure • Air quality and pollution • Loss of agricultural land • The distribution of housing • The character and distinctiveness of the

	<p>villages</p> <ul style="list-style-type: none"> • Coalescence between settlements • Loss of biodiversity and wildlife habitat • School Places • Health Care Provision • Health and Wellbeing • Sewerage and Drainage Capacity • Flooding • Sustainable Urban Drainage Systems • Economic Growth outside of South Shields Town Centre • Land reserved for tourism, guest houses and hotels • Empty properties • The supply of brownfield sites • The Brownfield Register • The enduring permanence of the Green Belt • Climate Change • South Tyneside Council Climate Change emergency declaration • Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits • Loss of Green Belt and effects on Climate Change • Impacts of development on trees and hedgerows • Amendments/ wording considerations /support for the policy
Policy S2: Strategic Development Principles (Strategic Policy)	<ul style="list-style-type: none"> • Criticism of evidence used to support policy • Mapping Issues • Climate Change • Policy S2 does not address the impacts of development • Amendments/ wording considerations /support for the policy
Policy S3: Promoting health and wellbeing in South Tyneside (Strategic Policy)	<ul style="list-style-type: none"> • No identification of new sporting provision or facilities. • Objection to Green Belt development which would be contrary to Policy S3. • Policy S3 does not mitigate Climate Change. • Policy S3 is contrary to Policy NE9. • Policy S3 is vague and unsound • Amendments/ wording considerations /support for the policy
Policy S4: Presumption in favour of Sustainable Development (Strategic Policy)	<ul style="list-style-type: none"> • Not positively prepared • Not consistent with the National Planning Policy Framework • Climate Change • The Status of Neighbourhood Plans

	<ul style="list-style-type: none"> • Policy S2 does not address the impacts of development • Amendments/ wording considerations /support for the policy
Policy S5: Re-use of Previously Developed Land (Strategic Policy)	<ul style="list-style-type: none"> • Development of brownfield land should be prioritised • Policy should not limit sustainable greenfield development • Cleadon Lane Industrial Estate • Amendments/ wording considerations /support for the policy
Policy S6: Appropriate Development within the Green Belt (Strategic Policy)	<ul style="list-style-type: none"> • Green Belt release • Failure to comply with the National Planning Policy Framework • Amendments/ wording considerations /support for the policy
Policy S7: Extensions and Alterations to and Replacement of Buildings in the Green Belt (Strategic Policy)	<ul style="list-style-type: none"> • Wording considerations • Failure to comply with the National Planning Policy Framework
Policy S8: Policy S8: Replacement of Buildings in the Green Belt (Strategic Policy)	<ul style="list-style-type: none"> • Too prescriptive • Wording considerations

Policy S1: Spatial Strategy (Strategic Policy)

Policy S1: Council response and next steps

Criticism of Spatial Strategy

The council received representations which critiqued the spatial strategy underpinning Policy S1 and is set out in the Interim Sustainability Appraisal (2019). The main comments are:

- The Council's Interim Sustainability Appraisal methodology for the spatial strategy is procedurally flawed.
- Highways assessments and other mitigation proposals were not taken into account at spatial options stage.
- Criticism of SHLAA in assessment of a large Green Belt release i.e. site consider in smaller parcels and not as one site.
- Support for the Council's approach in identifying the most appropriate location to accommodate a larger scale development.
- The Council has not assessed all reasonable Spatial Options, notably a Spatial Option which focuses on a large-scale Green Belt release site alongside other smaller Green Belt releases or a large sale Green Belt release which goes beyond the housing need of the Local Plan.

Council Response

The Council does not support the assertion that the Sustainability Appraisal methodology is materially flawed. It welcomes the comments set out in the representations with regard to Spatial Options 1 and 2; however, the council believes that the approach to assessing Options 3 & 4 are justified at this stage. The reasons for selecting the preferred option for the spatial distribution of housing growth are summarised in Table 7.4. The findings of the appraisal work have been drawn on

to justify the selection of the preferred option (Option 4 - Sustainable Urban Area Growth and smaller multiple Green Belt releases) and the justification given for the approach selected is considered to be reasonable.

The Council acknowledges that there is a lack of evidence to support some of the SA conclusions for the spatial options, for example detailed highways assessment work that could mitigate effects, and that the appraisal is based on assumptions about scale of development and scale of effects. At the time the Interim SA for the Local Plan was undertaken, the highway modelling work was ongoing and subject to change. Furthermore, representations state that the SA has not considered the potential mitigation that would be delivered alongside the developments. The council acknowledges that the representation is supported by the developers own assessments; however, detailed site-level mitigation proposals can reasonably be left out of the SA at the Regulation 18 stage when appraising reasonable alternative site options on a consistent basis (i.e. before sites are selected for inclusion in the draft plan), as the same level of detail is not available for all site options. There is a requirement for the SA to be undertaken in a proportionate manner, and it is considered to be a reasonable approach for the appraisal of high level 'in principle' spatial options to be undertaken in a similarly high-level manner. The Council considers that the approach taken at this stage is reasonable.

With regard to the assessment of the 'Laverick Park' site within the SHLAA; the 13 sites identified within the wider site area, have been identified through the SHLAA and SLR. However, the council acknowledges that this approach has not provided a site-specific assessment of the wider Laverick Park site in the same manner as other reasonable options. This will be reviewed at the next stage of the draft Local Plan.

The council acknowledges the comments that a reasonable option which considered a large-scale Green Belt release alongside smaller Green Belt releases was not considered in the Regulation 18 SA. The Council has considered the option of a larger-scale Green Belt release alongside sustainable urban area growth (Option 3) which would continue to prioritise the development of smaller brownfield sites over the identification of alternative smaller Green Belt sites, which would limit impacts on the Green Belt.

With regard to assessing a reasonable option which goes beyond the housing need of the Local Plan; as stated in Section 6, para 6.6 – 6.14 of the SA, the Council does not consider that there are any exceptional circumstances which would support a level of growth above that of the standard methodology; and therefore does not consider an option which goes beyond Local Plan housing numbers to be a reasonable option for South Tyneside.

Next Steps

The Council will undertake a review of the reasonable spatial options to inform the next iteration of the Local Plan and Sustainability Appraisal. The next iteration will also be informed by the most up to date evidence and fully consider all site reasonable options. Policy S1 will subsequently be informed by this review.

Exceptional Circumstances

The Council received a significant number of objections based on the view that exceptional circumstances has not been demonstrated for amending Green Belt boundaries in order to address the development needs of the Borough.

Council Response

The Stage One Green Belt Review evidences whether the approach to Green Belt in the preparation of our emerging Local Plan has been appropriate, if “exceptional circumstances” exist at the Borough wide level to release land from the Green Belt for development purposes. If those circumstances exist, it explores opportunities to reduce any potential impacts on the Green Belt to the lowest practical extent. The Stage One Green Belt Review does not however, consider the Green Belt and exceptional circumstances at a site-specific level. These have been addressed through the Stage Two Green Belt Review: Site Assessments (July 2019) and the Stage Three Green Belt Review: Site Specific Exceptional Circumstances (August 2019).

The focus for the Stage One Review is in relation to the provision of new homes and jobs given that new objectively assessed development needs have been identified for these specific matters. The Stage One Review is clear that meeting the development needs for new homes and jobs constitute sufficiently exceptional circumstances to justify the release of land from the current extent of the Green Belt.

In summary, despite a thorough analysis as required by the National Planning Policy Framework, there remains an acute need for land to meet the needs for new homes and jobs. This is affected by the inherent constraints on the supply from all reasonable non-Green Belt sources to meet those minimum requirements. For housing needs in particular, the scale of under provision from non-Green Belt sources is significant and is not one that could be readily rectified.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Use of 2014 household projection data

The Council received a significant number of objections to the policy based on the grounds that the calculation used to derive the housing requirement applies the 2014-based rather than the 2016-based ONS Household Projections.

Council Response

Drawing on the 2016-Based Household projections has been debated and discounted at a national level. The Government’s Planning Practice Guidance (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>) at Paragraph: 005 Reference ID: 2a-005-20190220 confirms that The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes. Furthermore, Paragraph: 015 Reference ID: 2a-015-20190220 confirms that “Any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”

Next Steps

None required

Local Highway Infrastructure

The Council received a significant number of objections to the policy stating that the capacity of the local highway network is not adequate for the development proposed in the villages. The key concerns include:

- Traffic congestion
- The capacity of the A184
- The capacity of the A183
- Pollution
- No up to date traffic assessment

Council Response

At the time the Pre-Publication Draft Local Plan was published, highway modelling work was ongoing and subject to change but interim findings provided the basis for an indicative assessment of the potential impacts of the draft housing allocations on the strategic highway and local transport network and this was published in the Infrastructure Delivery Plan (2019).

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan. Updated highway modelling will be published when the next iteration of the Local Plan is published.

Air Quality and Pollution

The Council received a significant number of objections to the policy based on the view that the development proposed in the villages would have an unacceptable impact on air quality and/or pollution.

Council Response

Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required, and proposals will only be approved where satisfactory mitigation measures can be implemented. In line with the National Planning Policy Framework, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity. Both policies specify that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Loss of Agricultural Land

The Council received a significant number of objections relating to the loss of agricultural land as a result of development allocations.

Council Response

The effects on soils is a key consideration within the sustainability appraisal of environmental effects. The draft Local Plan is supported by a Sustainability Appraisal which considered the site-specific effects for each site.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The distribution of housing

A number of representations have questioned the proportionality of the distribution of housing in the Pre-Publication Draft Local Plan (August 2019), often with particular reference to the number of homes distributed to the villages.

Council Response

The justification of the Spatial Strategy adopted in the Local Plan is set out in the Sustainability Appraisal. An approach to the distribution of housing based purely on being proportionate to the existing level of population would not be deliverable. This is because the supply of Strategic Housing Land Availability Assessment (SHLAA) sites that are deliverable and developable does not neatly align with the distribution of population.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The character and distinctiveness of the villages

The Council received a significant number of objections to the policy based on the view that supporting growth which respects the distinctive character of each village is not realistic.

Council Response

It is acknowledged that it is important that the separate identities of the villages are preserved and that there will be harm to the Green Belt arising from achieving the sustainable development proposed in the Pre-Publication Draft Local Plan (August 2019). There are clear opportunities to minimise the harm at a site-specific level through the careful selection of sites together with the appropriate mitigation measures such as appropriate densities, the provision of open space at the edge of settlements and use of landscaping and buffers.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Coalescence between settlements

The Council received a significant number of objections based on the view that the alteration of Green Belt boundaries, particularly in relation to Cleadon, the Boldons and Whitburn, would result in settlements merging.

Council Response

The Stage Two Green Belt Review: Site Assessments (July 2019) provides an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology

which has been consistently applied. The method is based on a review of national policy, guidance and good practice. It is acknowledged that the Spatial Strategy requires deletions from the Green Belt but we have sought to minimise impacts as far as possible through mitigation opportunities identified in plan policies. However remaining Green Belt will continue to contribute towards the five purposes of Green Belt including ‘to prevent neighbouring towns from merging into one another’.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Loss of biodiversity and wildlife habitat

The Council received a significant number of objections on the basis that the proposed alteration to Green Belt boundaries in order to accommodate housing development, particularly around Cleadon, the Boldons and Whitburn, would result in an unacceptable loss of biodiversity and wildlife habitat.

Council Response

The governments Planning Practice Guidance: Green Belt (Paragraph: 002 Reference ID: 64-002-20190722) requires local authorities where Green Belt boundaries are to be amended to ‘set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt’. These improvements could include new and enhanced green infrastructure, woodland planting, new and enhanced cycle routes and habitat improvements. It is considered that these compensatory measures would also play an important role in mitigating the effects of climate change. Draft Plan policies NE1, NE3, NE4, NE6, H3 and S2 provide support for the provision of these compensatory measures.

In accordance with section 180(5) of the Planning Act 2008, all development plan documents have been subject to a sustainability appraisal (SA) throughout their production in order to ensure that new plans and strategies contribute towards sustainable development. The SA process outlines the sustainability credentials of each site including potential impacts on biodiversity, wildlife and the natural environment to highlight any issues which are likely to require mitigation. In addition, a Habitat Regulations Assessment (HRA) has been undertaken to ensure that the effects of growth delivered through the plan are identified and appropriately mitigated. Further information can be found in the South Tyneside Site Selection Topic Paper (2019).

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

School Places

The Council received a significant number of objections based on the view that housing development in the villages would result in unsustainable pressure on school places.

Council Response

The Spatial Planning team are working with the School Places Planning Managers to ensure that the need for additional school places arising from all the housing allocations in the Local Plan will be met.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Health Care Provision

The Council received a significant number of objections based on the view that housing development in the villages would result in unsustainable pressure on health care provision.

Council Response

The Spatial Planning team are liaising with the Council's Public Health team and the South Tyneside Clinical Commissioning group to ensure that they have as much information as possible in order to forward plan to meet the health care provision requirements arising from all the housing allocations in the Local Plan.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Health and Wellbeing

The Council received a significant number of objections based on the view that the alterations to Green Belt boundaries around the villages in order to accommodate housing development would impact negatively on the health and wellbeing of residents.

Council Response

It is acknowledged that the loss of Green Belt land is the loss of a resource that alongside other benefits can contribute towards health and well-being. Green Belt land is valued very highly. However, this must be balanced with the necessity of releasing Green Belt land in order to meet the housing needs of the Borough.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Sewerage and Drainage Capacity

The Council received a significant number of objections to the policy based on the view that housing development in the villages would result in unsustainable pressure on sewerage capacity. Key points made by respondents include:

- The sewage system cannot cope with the volumes at the moment with sewage being pumped out to sea at Whitburn at regular intervals
- An independent assessment should be made of the network
- The sewage system in Cleadon would need to be renewed

Council Response

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for

organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

To summarise and to be clear, Northumbrian Water holds an Appointment under the Water Act 1989 as a water and sewerage undertaker. South Tyneside Council does not have any legislative remit whatsoever to act as a surrogate for Northumbrian Water in its statutory role. In respect of the emerging Local Plan, Northumbrian Water has advised that the development proposed in the emerging Local Plan do not present any critical capacity issues and that any investment necessary in water and sewerage capacity will be undertaken when required to do so.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Flooding

The Council received a significant number of objections to the policy based on the view that housing development in the villages, particularly Cleadon, would be at an unacceptable risk from flooding.

Council Response

Currently surface water is falling on undeveloped land which is of high clay content in much of South Tyneside. This is largely an impermeable soil type; therefore, the infiltration rates are very low, which is the main contributor to the amount of surface water on these fields. In addition, there is no means of managing the surface water therefore the rainfall does not have anywhere to go – and will build each time it rains. The low infiltration means water can often sit on these areas for long periods of time.

Any development will help manage the surface water by conveying it to an installed drainage system. Any drainage system will allow for current rainfall events as well as planning for future climate change (40%) and any additional rainfall this may bring. This includes the use of sustainable drainage systems such as storage basins, permeable paving, upsized pipes and underground storage crates. All drainage systems are designed and approved by the department before installation through planning conditions. There is also a request for validation reports post installation to ensure that the drainage system has been installed according to the approved designs. It has been found

that development can prevent future flooding as all the water is managed appropriately whereas it may not be in open fields.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Sustainable Urban Drainage Systems

The Council received an extensive objection the policy that referenced Sustainable Urban Drainage Systems (SuDS). The objection included 'This policy does nothing to conserve or enhance biodiversity, SuDS policies put forward does nothing to enhance natural environment ... SuDS also costly and needs to be maintained, this often does not happen after developer has completed site. I understand the runoff on all sites is to river `Don however SuDS is not designed to prevent river flooding at these sites... This suggests developers are not committed to the principles of SuDS and unwilling to deliver more than just drainage'.

Council Response

The maintenance of SuDS is managed through the planning system to secure the long-term maintenance of the SuDS It is the case that SuDS are not intended to prevent river flooding, they address surface water flooding. However, they can help reduce run off from a site as without SuDS, a site may run off directly to the watercourse uncontrolled. SuDS are required for any major development and South Tyneside work closely with developers through the planning process. There are a range of sustainable drainage techniques available and we will work with the developer to ensure that the right solution is agreed for each development, so they are both compliant and viable.

Flood risk is considered as part of developments and, in the case of any development in the vicinity of the River Don, would be managed. with the installation of SuDS offering storage and treatment before entering the Don to ensure that flood risk is not passed on downstream along with any contamination of the watercourse.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Economic Growth outside of South Shields Town Centre

The Council received a representation stating that Policy S1 does not support economic growth outside of South Shields Town Centre.

Council Response

Policy S1 supports economic development on existing viable and marketable employment areas that are accessible by a range of transport modes and take advantage of the road, rail and River Tyne networks. It also provides for a new allocation at Wardley Colliery. Further it states that we will direct proposals that contribute to our tourist and cultural economy to the Main Urban Area, along the River Tyne Corridor and the Foreshore. This provides an enabling spatial planning framework to meet the economic needs of the Borough.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Land reserved for tourism, guest houses and hotels

The Council received representations that stated that land has been reserved for tourism and building of more guest houses and hotels that could be better utilised to build houses. For example, 'However this land has been reserved for tourism and building of more hotels and guest houses which are not needed as South Shields only aspires to be a tourist destination. Far better to build houses that will be occupied than hotels and guest houses and hotels which will stand empty, particularly when Green Belt land is at stake. This land in South Shields needs to be prioritised for housing rather than Green Belt sites allocated in this plan'.

Council Response

The purpose of the planning system is to balance different development needs. The promotion of tourism and meeting the housing needs of the Borough are both embodied within Policy S1. A representation has referred to land 'being reserved for tourism and building of more hotels and guest houses' within the central area and contends that this is contributing to the need to release Green Belt land for housing development. Whilst the policy does state that we will direct proposals that contribute to our tourist and cultural economy to the Main Urban Area, no land has been reserved for this purpose and no conflict is recognised regarding meeting housing needs.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Empty Properties

The Council received a significant number of objections to the policy based on the view that the empty properties in the Borough could be utilised to make a more substantive contribution to addressing the housing requirement, thereby removing or reducing the need to alter Green Belt boundaries in order to accommodate development needs.

Council Response

The homes included in the statistics for empty homes can include properties whose former residents have been decanted as they await demolition i.e. are not available for re-use, it is a normal and healthy feature of a housing market to have a certain percentage of empty homes owing to churn in the housing market, really long-term empty homes are traditionally low in South Tyneside and the reason that many empty homes are empty is that they are in areas of very low housing market demand and also are often flat accommodation and therefore unlikely to meet the primary need which is for family housing. In addition, the Government's Planning Practice Guidance states that 'to be included as a contribution to completions it would be necessary for the authority to ensure that empty homes had not already been counted as part of the existing dwelling stock'. Due to resource constraints the authority no longer has an Empty Homes Team. Some empty homes were brought back into use when more resources to do so were available to the authority. However, the numbers were very modest and it is not possible to ensure that they had not already been counted as part of the existing dwelling stock. For these reasons it is not considered feasible to plan for the meeting of housing need based on bringing empty homes back into use.

Next Steps

The Council will continue to review opportunities to bring empty properties back into use and continue working with landlords to ascertain why properties are empty.

The supply of brownfield sites

The Council received a significant number of objections to the policy based on the view that proposing to change the designation of land from Green Belt to housing is unnecessary because there is an adequate supply of brownfield sites to address the housing requirement.

Council Response

The supply of deliverable brownfield housing sites is not enough to achieve a five year supply of deliverable housing sites at the outset of the plan period. Therefore, the release of some Green Belt land early in the plan period is necessary in order to achieve a five-year supply of deliverable housing sites. The South Tyneside Council Green Belt Review: Stage One, provides a full commentary on why the total amount of deliverable and developable housing land from non-Green Belt sources including urban brownfield land is not enough to meet the Borough's total housing need. Regarding the reference to omitting '194 out of 226 brownfield sites as unsuitable without robust, up to date assessment', the Strategic Housing Land Availability Assessment (2019) reviewed 213 brownfield sites (excluding 13 completed sites) of which 142 were assessed as not deliverable or developable. Please see the Council responses to the Sustainability Appraisal and Habitat Regulations Assessment representations for further information on this issue.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The Brownfield Register

The Council received objections relating to the fact that at the time of the consultation on the Pre-Publication Draft Local Plan, the Brownfield Register had not been updated since 2016.

Council Response

Regarding the reference to the Brownfield Register, our efforts focussed on updating both our Employment Land Review (2019) and the Strategic Housing Land Availability Assessment (2019). These datasets clearly distinguish between brownfield and greenfield sites but are far more comprehensive than the existing Brownfield Register in terms of the wider range of up to date information regarding the potential land supply. So in our assessments of land supply, we have worked from a more robust baseline. For completeness, the Register will be updated prior to the preparation of the next iteration of the Local Plan.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The enduring permanence of the Green Belt

The Council received representations from developers and agents stating that, with reference to paragraph 139 of the National Planning Policy Framework, the spatial strategy should consider deliverability beyond the plan period and consider additional allocations or safeguarding land for housing which will help address the current housing need and ensure permanence of Green Belt boundaries beyond the plan period.

Council Response

The Council is aware of the provision for Safeguarded Land contained within the National Planning Policy Framework and the circumstances in which it may be necessary.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Climate Change

The Council received a significant number of objections to the policy based upon the issue of Climate Change. Objections on this topic can be categorised into three main issues which are summarised below. The Council will provide a response to each of these points:

- South Tyneside Council Climate Change emergency declaration;
- Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits;
- Loss of Green Belt and effects on climate change.

South Tyneside Council Climate Change emergency declaration

Representations were received which objected to or referenced the South Tyneside Climate Change Emergency Declaration and the absence of the commitments of the declaration within the Local Plan.

Council Response

The Council declared a Climate Emergency on the 18th July 2019. The declaration requires all council strategic decisions, policies and strategies are in line with the shift towards carbon neutral by 2030. On 7 August 2019, the Council's Cabinet considered and approved the Pre-Publication Draft Local Plan for consultation. There were practical constraints associated with updating the draft Local Plan to reflect the declaration and therefore, the Council acknowledges that the draft Local Plan did not reflect the climate change emergency declaration. It is noted that a number of representations quote the actions of the declaration. It should be noted that these actions are for South Tyneside Council as a whole and not to be specifically addressed in Local Plan policies. It is the role of the Local Plan and its policies to assist in delivering the aims of the declaration.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they are in line with the Climate Change Emergency as far as possible.

Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits

Representations were made which object to the Local Plan on the basis that it is non-compliant with national legislation, specifically, the Planning and Compulsory Purchase Act 2004, Climate Change Act 2008 and the National Planning Policy Framework (NPPF). Objections state that the Local Plan has failed to demonstrate how policies will reduce emissions in line with the Climate Change Act 2008. Objections also suggest that the Local Plan is also non-compliant as it does not set carbon emission targets and suggest the Local Plan is required to undertake an emissions/ carbon audit.

Council Response

We, as a planning authority strongly support the global, national and local imperative to mitigate the effects of climate change. We fully agree that addressing climate change is one of the core land use planning principles to be addressed and that this should underpin both plan making and decision taking. With regard to noncompliance with national policy the Council considers that the draft Local Plan policies and supporting documents comply with national legislation and section 149 of the National Planning Policy Framework by including policies which mitigate and adapt to the impacts of climate change. The Council do not agree that it is a legal requirement to include carbon emission targets within the Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 states that ‘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’. This section does not provide an express statutory obligation to include carbon reduction targets within Local Plans. The obligation is a much broader one — to “include policies designed to secure that the development and use of land contribute to the mitigation of, and adaption to, climate change”. Furthermore, the National Planning Policy Framework does not include a specific obligation to include a carbon reduction target which tracks national and international obligations in a local development plan. Furthermore, the Local Plan is not required through the NPPF to provide SMART targets. The Local Plan and its policies are subject to monitoring through specific performance indicators as specified in Policy IM1.

Footnote 48 of the NPPF states that local planning authorities should address rising temperatures “in line with the objectives and provisions of the Climate Change Act 2008”, those provisions do not place local planning authorities under a specific obligation in respect of carbon reduction; obligations are placed on the Secretary of State. The objectives of the Climate Change Act 2008 are plainly the reduction of greenhouse gas emissions. However, footnote 48 of the National Planning Policy Framework does not support the proposition that a specific carbon reduction target which tracks national and international obligations must be included in local development plans.

Next Steps

Many of the emerging policies in the draft Plan are “designed to secure that the development and use of land contributes to the mitigation of and adaption to climate change”. Climate Change is a cross cutting theme which is central to the sustainability of the whole Plan itself. To reflect the importance of this, the draft Local Plan will be reviewed to ensure new Climate Change policies and policies contributing to Climate Change adaptation/mitigation are clearly identified within the Local Plan. Supporting documents will also be updated and produced to demonstrate how the council has complied with national Climate Change legislation.

The next stage of the Local Plan will be informed by the most up to date baseline information in regard to Climate Change. Local Plans are supported by a Sustainability Appraisal (SA) which assesses the environmental, social and economic effects of the Local Plan; the SA includes a Scoping Report, which considers the baseline information for the Strategic Environmental Assessment (SEA) objectives which are assessed within the SA. Furthermore, the Council are undertaking a carbon audit of the strategic spatial options and reasonable options for development allocations. The

carbon audit will provide further evidence and consideration in understanding the potential effects of development sites which will contribute to the SA and inform the next iteration of the Local Plan.

Loss of Green Belt and effects on Climate Change

A number of representations argue that the loss of land from the Green Belt would be contradictory to the Local Plans commitment to mitigating and adapting the effects of climate change.

Council Response

It is acknowledged that undeveloped land within the Green Belt can contribute to mitigating the effects of climate change. It is considered that the Council has adopted a sustainable approach to development and through Plan policies seeks to mitigate and adapt to the impacts of climate change. In addition, the governments Planning Practice Guidance: Green Belt (Paragraph: 002 Reference ID: 64-002-20190722) requires local authorities where Green Belt boundaries are to be amended to 'set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt'. These improvements could include new and enhanced green infrastructure, woodland planting, new and enhanced cycle routes and habitat improvements. It is considered that these compensatory measures would also play an important role in mitigating the effects of climate change and in some cases may provide opportunities to enhance the contribution to climate change mitigation.

Next Steps

The Council will continue to review our strategic approach to development to ensure the Local Plan delivers sustainable patterns of development.

Impacts of development on trees and hedgerows

A number of comments raise the issue of trees and hedgerows being felled to facilitate development, despite the policy stating it will protect trees; and also the negative effect of losing vegetation with regard to mitigating Climate Change impacts

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S2: Strategic Development Principles (Strategic Policy)

Policy S2: Council response and next steps

Criticism of evidence used to support policy

Comments were received which stated that the landscape character areas referenced within the policy are based on the South Tyneside Landscape Character Study (2012) and should be supported by a more up to date evidence base.

Council Response

The council believes that the 2012 Landscape Character Study continues to be fit for purpose and a reliable evidence source to support the emerging Local Plan. It is considered that most areas in the Plan have not been subject to development which would significantly change the outcomes of the current report.

Next Steps

None required.

Mapping Issues

The council received comments querying why the landscape character areas were not identified on the Local Plan Proposals Map. Comments were also received querying the status of Green Belt land allocated for development and how that is represented in Inset Map 1: The Three Landscape Areas.

Council Response

The Policies map does not include the settlement boundaries identified in Policy S2. The settlement boundaries are clearly identified on inset Map 1: The Three Landscape Areas. It was considered that the addition of these layers to the Policies Map would reduce the clarity and make it difficult to identify amongst the other designations shown on the map.

Insert Map 1: The Three Landscape Areas identifies sites allocated within the Plan as Main Urban Areas and Villages. Therefore Map 1 correctly identifies areas of Green Belt land which would be deallocated through the Local Plan and have been identified for development within this category. Any development which would come forward on these sites would therefore be assessed against the principles of criterion A of Policy S2, rather than section B, which addressed development within the Green Belt as identified in the emerging Local Plan.

Next Steps

None required.

Climate Change

Representations were made highlighting that Policy S2 does not contribute to tackling Climate Change.

Council Response

It is acknowledged that Policy S2 does not directly address Climate Change, however, some of the principles of the policy could contribute to wider climate change mitigation. Please refer to the Council response to Climate Change issues provided against Policy S1 for further information.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they seek to deliver the aims of the Councils Climate Change Emergency and fulfil its legal requirements in this regard.

Policy S2 does not address the impacts of development

The council received several objections to Policy S2 stating that the policy does not address the impacts of development or provide detail of how impacts are to be mitigated. The main criticisms are set out below:

- Objection to site allocations against principles of Policy NE2
- Policy S2 does not address the conflict between development and the environment
- Policy S2 does not protect the Green Belt or preserve special character of villages
- Development in Green Belt would be harmful to views/ openness
- Policy S2 does not indicate how landscape and open space proposals will be designed or maintained or retain existing landscape features, trees etc
- Policy S2 does not conserve or enhance biodiversity or green infrastructure
- Policy S2 does not protect landscapes from increased risk of surface flooding

Council Response

Policy S2 is a strategic policy which provides development principles for new development within the borough. Policy S2 should be considered alongside other design and development management based policies within the Local Plan.

Policy S2 does not refer to the building of new houses in the borough and does not allocate sites for development. Policy S2 provides high level development principles which are applicable to all forms of development within all areas of South Tyneside. Please refer to the Site Allocations Topic Paper (2019) for further detail on the site.

Policy S2 does not allocate sites within the Green Belt; it provides guidance for developments within the Green Belt where there are very special circumstances. The National Planning Policy Framework and Policy S1 provide further protection to the Green Belt. Policy S2 provides design principles for development in South Tyneside including within the Main Urban Area and Villages; which includes brownfield sites as well as Green Belt allocations where there are very special circumstances. Policy S2 will ensure that new development in and around the villages will positively contribute to the area through the application of policies a) i - vii. Policy S2 b)i) states that development within the Green Belt will only be granted where it will preserve openness.

Policy S2 strongly advocates the enhancement of the natural environment through the retention of high-quality areas of open space, trees and hedgerows and additional woodland and hedgerow planting where appropriate. Any development will be considered alongside other Local Plan

policies, including NE1 and NE2 which protects and enhances our most sensitive sites and the wider ecological networks.

Policy S2 strongly supports the protection and enhancement of Green Infrastructure within new development. The Local Plan seeks to protect our most valuable and sensitive areas whilst providing opportunities to enhance our wider green infrastructure networks. To support the mitigation required by developments, developers will engage with the council to provide contributions towards the maintenance of mitigation measures where appropriate. This is set out in Supplementary Planning Document 5: Planning Obligations and Agreements.

The policy strongly advocates the protection of landscapes within the borough and is informed by The South Tyneside Landscape Character Study (2012). Any application would be assessed on the principles of Policy S2 and alongside Policy NE5: Areas of High Landscape Value which protects our most sensitive landscapes. The installation of SuDS features as a method of surface water management is highlighted as key in the Governments 25 Year Environment Plan. This will be strengthened through new planning guidance as well as improving existing arrangements for the management of surface water flooding and the outcomes delivered by Lead Local Flood Authorities, Risk Management Authorities and water companies. Any development allocated within the Local Plan will be required to comply with the National Planning Policy Framework, Policy NE6 and where appropriate site-specific mitigation set out in Policy H3.

With regard to increased flood risk, any proposals for development will be assessed against all relevant policies within the Local Plan. Policy S2 does not provide guidance on flood risk issues as this is covered by Local Plan Policy NE6: Flood Risk and Water Management. With regard to considering the impacts of development the Site Allocations Topic Paper (2019) which details the wider planning considerations that have been considered in the site selection process including impacts on flood risk and biodiversity.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S3: Promoting health and wellbeing in South Tyneside (Strategic Policy)

Policy S3: Council response and next steps

No identification of new sporting provision or facilities.

Comments were received against Policy S3 which question why Policy S3 does not identify new sports provision within the Borough, particularly in regard to Policy H3 which identifies existing

playing pitches for housing allocations. Comments suggest that Policy S3 or a new policy should be provided to identify new sport provision.

Council Response

Comments are noted with regard to sports provision not specifically identified within the Local Plan. At the time of preparing the Local Plan there were no identified plans to provide new sports provision and therefore policies within the Local Plan reflect this. The Local Plan does however support the retention and enhancement of our existing leisure provision through Local Plan policies. Policy IN3: Social and community infrastructure: criterion k) supports 'proposals which widen the Borough's cultural, sport, recreation and leisure offer'. Therefore, should suitable leisure facilities be brought forward through the plan period, they would be supported by this policy.

The Council notes Sport England guidance which states that Local Authorities should support new provision and where possible allocating new sites for sport and physical activity which meets identified needs; and, the National Planning Policy Framework which requires mitigation for playing pitches which are lost to development.

Next Steps

The Council continues to work with our partners to identify playing pitch mitigation to support the emerging Local Plan and to also meet the sporting needs of the Borough. This work will inform the next iteration of the Local Plan.

Objection to Green Belt development which would be contrary to Policy S3

Objections were received to Policy S3 which referred to the Local Plans proposals for Green Belt deletions. Comments highlighted the potential negative effects on health and wellbeing Green Belt deletions and wider impacts on green infrastructure networks may cause. Comments also referred to negative impact upon biodiversity and air pollution/ quality.

Council Response

Policy S3 is a strategic policy which sets out the principles for supporting healthy communities and development through the Local Plan. Policy S3 is intended to be read alongside other Local Plan policies.

With regard to the loss of Green Belt and Policy S3; the Council acknowledges the role of the natural environment, the Green Belt and open spaces contribution to health and wellbeing. It also acknowledges the impacts of the loss of Green Belt on existing communities; however, Criterion c) of Policy S3 seeks to support proposals which enhance the quality of the natural environment, this is in addition to other Local Plan policies which seek to retain, enhance and provide opportunities for natural environment and green infrastructure which will contribute towards providing natural spaces which can contribute to healthy communities.

Policy S3 supports proposals which seek to support health and wellbeing of the community; it does not directly seek to conserve or enhance biodiversity as this is addressed in other Plan policies. As stated above, criteria c) does support proposals which will enhance the quality of the natural environment and green infrastructure.

With regard to comments raised relating to air quality; part g) of Policy S3 states: 'ensuring that pollutants, including noise, and air pollution, and hazards detrimental to public health and residential amenity are addressed prior to development'. Furthermore, Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required, and proposals will only be approved where satisfactory mitigation measures can be implemented. In line with the National Planning Policy Framework paragraph, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity. Each policy specifies that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Next Steps

None required.

Policy S3 does not mitigate Climate Change

The Council received several objections to Policy S3 stating that the policy was unsound as it did not contribute to mitigating Climate Change.

Council Response

Policy S3 does not directly refer to climate change. However, the council acknowledges the health impacts which can arise from the effects of climate change. Please refer to the Council response to Climate Change issues provided against Policy S1 for further information.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they seek to deliver the aims of the Council's Climate Change Emergency and fulfil its legal requirements in this regard.

Policy S3 conflicts with Policy NE9: Contaminated Land

Objections were received which stated that Policy S3 conflicts with Policy NE9 which deals with contaminated land. In addition, the proposed development of Cleadon Lane Industrial Estate (RG 5 SBC010) will also have a negative impact on health and wellbeing as this land is contaminated.

Council Response

Policy S3 does not conflict with Policy NE9. Any outstanding contamination issues would be addressed by Policy NE9; furthermore, criteria g) also states the 'hazards detrimental to public health and residential amenity are addressed prior to development'. The above policies will be applicable to any proposed development at Cleadon Lane Industrial Estate.

Next Steps

None required.

Policy S3 is vague and unsound

Comments were received which claim that Policy S3 as currently worded is 'unnecessarily vague' and unsound as it hints that new development should provide towards open space and playing fields

without evidence to support the requirements. Furthermore, comments questioned the inclusion of 'affordable housing' in Part D of the policy.

Council Response

The Council does not agree that this policy is ineffective and unsound. The health of South Tyneside's residents is generally worse than the national average and it is a strategic aim of the council to improve health and wellbeing.

With regard to comments on open space provision; it is widely acknowledged that access to open space has benefits for the health and wellbeing of residents. This policy does not provide any requirements for the delivery of open space or playing fields. This policy should be read alongside other Plan policies which set out the requirements for open space and green infrastructure delivery and mitigation.

With regard to Part D, the inclusion of affordable housing this policy relates to the links between housing and health and wellbeing. Unaffordable and poor-quality housing contribute to the wider detriments of health which can result in unhealthy lifestyles choices and poor mental wellbeing. The council acknowledges that the affordable housing is addressed in other policies within the Local Plan and therefore this policy should be read in conjunction with those.

Next Steps

The Council will review the wording of the policy to ensure clarification with regard to the development contributions to open space provision.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S4: Presumption in Favour of Sustainable Development (Strategic Policy)

Policy S4: Council response and next steps

Not positively prepared

The Council received a number of objections stating that the policy is not sustainable and has not been positively prepared and that the adverse impacts of building on any of the Green Belt allocations would significantly and demonstrably outweigh any benefits.

Council Response

A presumption in favour of sustainable development is at the heart of the National Planning Policy Framework. Securing sustainable development is therefore the central theme which runs through the draft Local Plan. The draft Local Plan is positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework.

Next Steps

The Council will continue to prioritise the presumption in favour of sustainable development.

Not consistent with the National Planning Policy Framework

A number of objections to the policy were received stating that the policy is not justified, nor is it consistent with National Policy, which makes it clear that Green Belt deletion is a last resort.

Council Response

The draft Local Plan is positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. Policy H1[a] sets out the Borough's overall minimum housing requirement of 7,000 new homes over the period 2016 to 2036. The Stage 1 Green Belt Review: Exceptional Circumstances (2019) and its update (2020) have tested all potential sources of land from non-Green Belt sources in accordance with the NPPF (2019). These conclude there are inherent constraints on the supply of land from reasonable non Green Belt sources (including brownfield land) to meet both the need for homes and jobs in full.

Next Steps

None required

Climate Change

The Council received criticism that Policy S4 does not adapt to and mitigate climate change.

Council Response

The Council declared a Climate Emergency on the 18th July 2019. The declaration requires all council strategic decisions, policies and strategies are in line with the shift towards carbon neutral by 2030. On 7 August 2019, the Council's Cabinet considered and approved the Pre-Publication Draft Local Plan for consultation. There were practical constraints associated with updating the draft Local Plan to reflect the declaration and therefore, the Council acknowledges that the draft Local Plan did not reflect the climate change emergency declaration. It is noted that a number of representations quote the actions of the declaration. It should be noted that these actions are for South Tyneside Council as a whole and not to be specifically addressed in Local Plan policies. It is the role of the Local Plan and its policies to assist in delivering the aims of the declaration.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they are in line with the Climate Change Emergency as far as possible.

The Status of Neighbourhood Plans

The Council received several objections regarding the status of Neighbourhood Plans in the planning system. It was suggested that the policies contained within Neighbourhood Plans ought to be considered first and foremost when housing is allocated.

Council Response

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development.

Whilst neighbourhood planning cannot be used to block the building of the homes and businesses considered to be necessary to meet the borough's current and future needs, they can be used to influence the type, design, location and mix of new development. Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development. They should be about local rather than strategic issues. If adopted, they will form part of the development plan for the Borough and used to assist in the determination of all planning applications in that area.

When the Pre-Publication Draft Local Plan was prepared, the emerging Whitburn and East Boldon Neighbourhood Plans had not been published.

Next Steps

The Council will continue to work with the Neighbourhood Forums.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S5: Re-use of Previously Developed Land (Strategic Policy)

Policy S5: Council response and next steps

Development of brownfield land should be prioritised

Objections were received stating that the Plan should prioritise the re-use of brownfield land for residential development over greenfield and Green Belt land. Questions were raised over what the Council is doing to facilitate brownfield development and concerns were raised that brownfield sites have been overlooked and the Brownfield Register is out of date meaning there is no compelling evidence for developing Green Belt sites.

Comments were received stating that Policy S5 doesn't protect the Green Belt as the supporting text acknowledges that new brownfield sites will inevitably become available over the Plan period and this information should be used to mitigate the loss of Green Belt sites.

Council Response

The supply of deliverable brownfield housing sites is not enough to achieve a five year supply of deliverable housing sites at the outset of the plan period. Therefore, the release of some Green Belt land early in the plan period is necessary in order to achieve a five-year supply of deliverable housing sites. The South Tyneside Council Green Belt Review: Stage One, provides a full commentary on why the total amount of deliverable and developable housing land from non-Green Belt sources including urban brownfield land is not enough to meet the Borough's total housing need. Please see the Council responses to the Sustainability Appraisal and Habitat Regulations Assessment representations for further information on this issue.

Regarding the reference to the Brownfield Register, our efforts focussed on updating both our Employment Land Review (2019) and the Strategic Housing Land Availability Assessment (2019). These datasets clearly distinguish between brownfield and greenfield sites but are far more comprehensive than the existing Brownfield Register in terms of the wider range of up to date information regarding the potential land supply. So in our assessments of land supply, we have worked from a more robust baseline. For completeness, the Register will be updated prior to the preparation of the next iteration of the Local Plan.

Next Steps

The Local Plan's evidence base will be kept under review and updated as necessary, this includes the Brownfield Register which will be updated ahead of the next draft of the Plan. However, it is considered that the Strategic Housing Land Availability Assessment is a comprehensive assessment of available sites in the Borough, including brownfield sites.

Policy should not limit sustainable greenfield development

Several comments were received raising concerns that the current wording of the policy, 'we will prioritise the re-use of brownfield land', is not consistent with the National Planning Policy Framework which does not prioritise the use of brownfield land over greenfield. Comments claim that the current wording of the policy would limit sustainable greenfield development and it would be illogical to prioritise unsustainable brownfield sites over more sustainable greenfield sites.

Council Response

The Council welcomes support for the policy and comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Cleadon Lane Industrial Estate

The Council received several comments in support of the principal of the policy however objecting to the allocation of a brownfield site, land at Cleadon Lane Industrial Estate, for housing. The comments perceived the allocation of this site to be an unsound application of Policy S5 for the following reasons:

- Development of the site will have a negative impact on climate change as this land is contaminated;
- Allocation of the site does not encourage development in the most sustainable locations as development of the site will increase traffic;
- Development of the site would not enhance biodiversity as there is contamination on the site;
- Allocation of the site doesn't promote healthier communities as there is contamination on the site.

Council Response

Policy S5 does not allocate specific sites for development. Policy S5 provides high level development principles which are applicable to all forms of development within all areas of South Tyneside. Policy

S5 should be considered against other development policies within the Plan such as Policy NE9 which deals with contaminated land.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S6: Appropriate Development Within the Green Belt (Strategic Policy)

Policy S6: Council response and next steps

Green Belt Release

A significant number of objections to Policy S6 were received in relation to the proposed release of land in the Green Belt. It was felt that exceptional circumstances had not been demonstrated.

Council Response

Strategic Policy S1 is the overarching policy that sets out that the Green Belt boundary will be amended to facilitate sustainable growth and the site allocations are clearly identified on the Policies Map. Policy S6 is not intended to list the site allocations but rather to assist in ensuring that any future development proposals within the Green Belt are appropriate.

Next Steps

None required.

Failure to Comply with the National Planning Policy Framework

The Council received a number of objections stating that Policy S6 was not positively prepared. It was suggested that the policy instead focuses on what is inappropriate, and that the policy repeated what was already contained within the National Planning Policy Framework.

Concerns were also raised about the lack of clarity within the suite of policies that would effectively apply to proposals relating to major development sites.

Council Response

National policy is effectively clear on those parameters by which development would be considered appropriate within the Green Belt and the implementation of Green Belt policy through S6 would direct applicants to apply the National Planning Policy Framework. The exceptions to that are Policies S7 and S8 which provide further detailed guidance. The purpose of a local plan is not to regurgitate what is in the National Planning Policy Framework. S6 ensures that the policy remains consistent with national policy should there be any changes in approach at the national level. Policy

S6 is consistent with the National Planning Policy Framework, positively worded, clear and therefore effective.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S7: Extensions and Alterations to and Replacement of Buildings in the Green Belt (Strategic Policy)

Policy S7: Council response and next steps

Wording Considerations.

An objection to the wording of the policy was received.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Failure to comply with the National Planning Policy Framework

Several objections were received stating that policies S6, S7 and S8 should be comprehensively reconsidered in order to avoid ambiguity surrounding the decision-making of proposals in the Green Belt.

Council Response

Policies S6, S7 and S8 serve a clear purpose regarding common proposals for new development in the Green Belt and they provide greater clarity to those types of proposals to which they relate. They are consistent with the National Planning Policy Framework, positively worded, clear and therefore effective.

Next Steps

None required.

Policy S8: Replacement of Buildings in the Green Belt (Strategic Policy)

Policy S8: Council response and next steps

Too Prescriptive

The Council received an objection to the use of a percentage limit for replacement buildings in the Green Belt. This figure is not set out in the National Planning Policy Framework and whilst it is often used as a broad guide this should only be expressed within the supporting text to the policy not as an explicit rule.

Council Response

The National Planning Policy Framework states that replacement of buildings in the Green Belt is not inappropriate provided that the replacement building is not materially larger than the existing building. It is considered that a limit of 30% is generous.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Wording Considerations.

An objection to the wording of the policy was received.

Council Response

The Council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Chapter 5: Planning for Homes

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 5 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 5: Planning for Homes received 11215 comments of which 10883 were objections to policies, 95 were in support and 237 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 5: Planning for Homes – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
H1: The Number of Homes Needed by 2035 (Strategic Policy)	2067	14	7	2046
Policy H2: Ensuring a sufficient supply of deliverable and developable housing land	16	3	2	11
Policy H3: Housing Allocations and Commitments (Strategic Policy)	9035	199	62	8774
Policy H4: Windfall Housing Proposals (Strategic Policy)	6	0	2	4
Policy H5: Efficient use of Land and Housing Density	20	6	1	13
Policy H6: Our Existing Stock	5	3	2	0
Policy H7: Houses in Multiple Occupation	1	0	1	0
Policy H8: Specialist Housing- Extra Care & Supported Housing (Strategic Policy)	3	0	3	0
Policy H9: Affordable Housing	21	7	4	10
Policy H10: Housing Mix	24	3	8	13
Policy H11: Technical Design Standards for New Homes	14	1	2	11
Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)	3	1	1	1

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy H1{a}: The Number of Homes Needed by 2035 (Strategic Policy)	<ul style="list-style-type: none"> • The use of 2014 household projection data • Does Policy H1[a] build in assumptions about economic growth e.g. for the Strategic Economic Plan (SEP) and IAMP? • Does Policy H1[a] make allowance for contingencies such as a no deal Brexit? • Should Policy H1[a] have a higher housing requirement than 7,000 new homes? • Should Policy H1[a] incorporate a higher buffer than 10%?
Policy H1{b}: The Number of Homes Needed by 2035 (Strategic Policy)	<ul style="list-style-type: none"> • The distribution of housing to the villages • The Minimum Number of Homes Required within the Neighbourhood Forum Areas • Impacts of development on trees and hedgerows
Policy H2: Ensuring a sufficient supply of deliverable and developable housing land	<ul style="list-style-type: none"> • Does Policy H2 protect the Green Belt? • Concerns about the effectiveness of the policy
Policy H3: Housing Allocations and Commitments (Strategic Policy)	<ul style="list-style-type: none"> • The Local Plan will not control the pace of development in East Boldon • The distribution of housing is disproportionate in respect of the villages • The distinctiveness and character of the villages will not be respected • Brownfield land should be used in preference to Green Belt land • The Local Plan does not reference the tree numbers that will be lost.
Policy H4: Windfall Housing Proposals (Strategic Policy)	<ul style="list-style-type: none"> • Concerns that the policy is too limiting and not positively prepared
Policy H5: Efficient use of Land and Housing Density	<ul style="list-style-type: none"> • Policy should include more flexibility taking into account other policies in the Plan • Wording of the Policy is too ambiguous • Although the policy promotes a standard density approach, the indicative dwelling yields (policy H3) shows higher densities in some areas.
Policy H6: Our Existing Stock	<ul style="list-style-type: none"> • Representations raised questions about what the Council is currently doing to bring empty properties back into use. • Queries over when the Enforced Sale Policy will be introduced.
Policy H7: Houses in Multiple Occupation	<ul style="list-style-type: none"> • One comment in support of the Policy was received.

Policy H8: Specialist Housing- Extra Care & Supported Housing (Strategic Policy)	<ul style="list-style-type: none"> • The policy doesn't specify how much accommodation is required to meet the needs of the elderly. • One site was put forward for the development of an elderly care village.
Policy H9: Affordable Housing	<ul style="list-style-type: none"> • Comments in support of the Policy recognised the need for more affordable housing in the Borough • Vagueness of the term 'affordable' • Concerns over the evidence used to support the Policy and impacts of the Policy on viability
Policy H10: Housing Mix	<ul style="list-style-type: none"> • Support for the flexibility in the policy and the need to increase the supply of detached homes in the Borough. • Concerns over the inclusion of 'executive homes' • There is a need for affordable housing and housing for the elderly population
Policy H11: Technical Design Standards for New Homes	<ul style="list-style-type: none"> • Lack of evidence to support the policy • Comments pointed towards a shortage of suitable housing in the Borough for the elderly
Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)	<ul style="list-style-type: none"> • Policy should require a Transport Assessment ahead of the release of the safeguarded site at Whitemare Pool. • GTAA shows a need which is not being met by the policy.

Policy H1[a]: The Number of Homes Needed by 2035 (Strategic Policy)

Policy H1[a]: Council response and next steps

The use of 2014 household projection data

The Council received a significant number of objections to the policy based on the grounds that the calculation used to derive the housing requirement applies the 2014-based rather than the 2016-based ONS Household Projections.

Council Response

Drawing on the 2016-Based Household projections has been debated and discounted at a national level. The Government's Planning Practice Guidance (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>) at Paragraph: 005 Reference ID: 2a-005-20190220 confirms that The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Furthermore, Paragraph: 015 Reference ID: 2a-015-20190220 confirms that "Any method which relies on using the 2016-based household projections

will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”

Next Steps

None required

Does Policy H1[a] build in assumptions about economic growth e.g. for the Strategic Economic Plan (SEP) and IAMP?

The Council has received objections to Policy H1[a] based on the view that it builds in economic assumptions about growth that are unrealistic.

Council Response

As part of the preparation of the IAMP Area Action Plan, work has been undertaken to assess the potential impact of housing growth. It is common ground between South Tyneside Council and Sunderland City Council to review that work. The Planning Practice Guidance does indicate that it is permissible for Plans to go above their minimum requirements and cites examples to support this may include:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

However, our application of the standard method makes no allowance for economic growth (e.g. IAMP) to determine the minimum number of homes required. There is therefore no requirement to evidence significant job creation that is not accounted for in ONS projections. Also for the benefit of absolute clarity, the standard method is not linked to economic strategies, including any which it is contended are predicated on ‘pass the parcel’ assumptions about economic growth and the Local Planning Authority has not placed any reliance on ‘NELEP Strategic Economic Plan SEP and IAMP’ in determining the housing requirement.

With regard to considering a spatial option greater than the housing need for the Local Plan, as stated in Section 6, para 6.6 – 6.14 of the Interim Sustainability Appraisal, the Council does not consider that there are any exceptional circumstances which would support a level of growth above that of the standard methodology; and therefore does not consider an option which goes beyond Local Plan housing numbers to be a reasonable option for South Tyneside.

Next Steps

None required

Does Policy H1[a] make allowance for contingencies such as a no deal Brexit?

The Council has received objections to the policy based on the view that it does not make allowance for contingencies such as a no deal Brexit.

Council Response

The Plan relies upon the Government's Standard Method to calculate the minimum number of homes required which does not include any potential uncertainties associated with Brexit.

Next Steps

None required

Should Policy H1[a] have a higher housing requirement than 7,000 new homes?

The Council received representations from the development industry which contended that the housing need is higher than the standard method indicates, and that a higher housing requirement should be included in the Plan, in order to make allowance for economic growth.

Council Response

It is acknowledged that the National Planning Practice Guidance provides the flexibility for local planning authorities to plan for a higher housing requirement than the housing figure provided by the Standard Method. However it does not provide an explicit duty for them to do so. We are committed to meeting in full the housing need figure of 7,000 new homes produced by the Standard Method and, as stated in Policy H1[a], that figure will not be applied as a maximum. Policy H1[a] explicitly refers to 'the delivery of at least' [emphasis added] 7,000 new homes'. With regards to the contention that we should examine the needs of specific age cohorts with a view to uplifting from the figure produced by the Standard Method, this is not required by the National Planning Practice Guidance. The Pre-Publication draft Local Plan (August 2019) includes an allowance for flexibility so in reality, it proposes to deliver 7,489 homes over the plan period which equates to an annual average of 374 homes per year.

Next Steps

The Council will review Policy H1[a] when preparing the next iteration of the Local Plan.

Should Policy H1[a] incorporate a higher buffer than 10%?

Through the supply of housing land, the Pre-Publication Draft Local Plan proposes an overprovision of 10% above the minimum number of homes required. This is intended to provide a contingency buffer in the event of housing under-delivery. The Council has received several representations which have contended that the buffer is not sufficient. In this context it has also been referenced that Appendix 1: Housing Trajectory, 'demonstrates a strong period of delivery as expected in the middle of the plan period, however there is a significant decline in housing delivery towards the back end of the plan period'.

Council Response

The need for flexibility is acknowledged. It was considered that the provision of a 10% buffer provides adequate flexibility in the event of under-delivery and that, together with the opportunity to review the Local Plan five years after adoption, provides adequate contingency for the declining curve in the housing trajectory at the end of the plan period. The level of buffer considered appropriate will be kept under review.

Next Steps

The Council will review Policy H1[a] when preparing the next iteration of the Local Plan.

Support for the Policy

The Council received expressions of support for the policy as it is supportive of the National Planning Policy Framework at paragraph 59 which sets out the Government's objective significantly boosting the supply of homes.

Council Response

Support for the policy welcomed.

Next Steps

The Council will review Policy H1[a] when preparing the next iteration of the Local Plan.

Policy H1[b]: The Number of Homes Needed by 2035 (Strategic Policy)

Policy H1[b]: Council response and next steps

The distribution of housing to the villages

A number of representations have questioned the proportionality of the distribution of housing in the Pre-Publication Draft Local Plan (August 2019), often with particular reference to the number of homes distributed to the villages.

Council Response

The justification of the Spatial Strategy adopted in the Local Plan is set out in the Sustainability Appraisal. An approach to the distribution of housing based purely on being proportionate to the existing level of population would not be deliverable. This is because the supply of Strategic Housing Land Availability Assessment (SHLAA) sites that are deliverable and developable does not neatly align with the distribution of population.

Next Steps

The Council will review Policy H1[b] when preparing the next iteration of the Local Plan.

The Minimum Number of Homes Required within the Neighbourhood Forum Areas

Policy H1[b] states that to ensure that the Borough's overall housing requirement is met; provision is made for the provision of at least 950 new homes within the designated East Boldon Neighbourhood Forum Area and 397 new homes within the designated Whitburn Neighbourhood Forum Area. Both Neighbourhood Forums have commissioned their own assessments of the housing need for their respective Forum Areas. These studies, which were undertaken by AECOM, suggest that lower levels of growth would be appropriate for the Forum Areas (240 new homes for the East Boldon Forum Area and 120 new homes for the Whitburn Forum Area respectively. The Council has received representations to Policy H1[b] from local residents and both Forums with a common theme being that Policy H1b should be based on the evidence provided by the AECOM studies. Representations have also queried why these studies did not form part of the evidence base for the preparation of the draft Local Plan.

Council Response

The National Planning Policy Framework states that within the overall housing requirement, 'strategic policies should also set a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations'

(Paragraph 65). The National Planning Practice Guidance elaborates on this by stating that, while there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services (Paragraph: 101 Reference ID: 41-101-20190509). It also adds that 'In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.'

In order to determine overall scale of development required the Local Planning Authority applied the Standard Method for determining housing need. The overall strategy for the pattern and scale of development was determined through the Sustainability Appraisal process.

Four reasonable spatial options were considered to deliver the housing need in the Borough. Each assessment showed that there would be an impact on sustainability which could require mitigation through the Plan process; the degree of mitigation which would be required would vary depending on each of the spatial options. Option 4 'Sustainable Urban Area Growth and smaller multiple Green Belt releases' was considered to be on balance an appropriate option and the one that was taken forward into the South Tyneside Pre-Publication draft Local Plan. The sustainability appraisal process that informed the preferred spatial option in Policy S1 of the Pre-Publication Draft Local Plan is set out in full at South Tyneside Draft Local Plan Interim Sustainability Appraisal (August 2019) (<https://www.southtyneside.gov.uk/article/36012/Emerging-Local-Plan>). The Sustainability Appraisal process took into consideration those assets of particular importance set out within the footnote 6 of the National Planning Policy Framework that are applicable to the Borough.

In parallel with the Sustainability Appraisal process, the Strategic Housing Land Availability Assessment and Employment Land Review were undertaken. The Strategic Housing Land Availability Assessment informed the initial assessment of the overall supply of available land that is suitable, deliverable and developable. This was from the starting point of looking at brownfield, then greenfield and finally once it was demonstrated there was an insufficient supply, from Green Belt sources. The Green Belt Review determined whether exceptional circumstances exist both to justify at a strategic level the release of land from the Green Belt and on a site-specific basis.

In due course, the East Boldon Neighbourhood Forum and the Whitburn Neighbourhood Forum must each demonstrate that their respective Plans passes the 'Basic Conditions' test which requires the neighbourhood plan to be in general conformity with the strategic policies of the development plan for the area. The above National Planning Practice Guidance (Paragraph: 105 Reference ID: 41-105-20190509), also requires the neighbourhood planning body to take into account 'the existing and emerging spatial strategy' if they are looking to determine a housing requirement. In this context, the East Boldon Housing Needs Assessment notes at Para 49 that 'where Local Authorities are still developing new policies which could affect the strategy for the neighbourhood area, there is a consequent need for the neighbourhood group to continue to engage with the LPA to agree and/or update the need figure for the Neighbourhood Plan'.

It has been contended that the Housing Need Assessments commissioned by the East Boldon and Whitburn Forums should have formed part of South Tyneside Council's evidence base to inform Policy H1. Whilst Officers have read both studies, they necessarily cannot form part of the Council's evidence in support of Policy H1[a]. This has been based on the application of the Government's Standard Method to determine a Borough-wide housing requirement. The Assessments do not form part of the evidence base to determine Policy H1[b] as this was determined using the process/evidence set out above.

Next Steps

The Council will review Policy H1(b) when preparing the next iteration of the Local Plan.

Impacts of development on trees and hedgerows

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the NPPF, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Policy H2: Ensuring a Sufficient Supply of deliverable and developable housing land.

Policy H2: Council Response and next Steps

Does Policy H2 protect the Green Belt?

The Council received several objections to Policy H2 stating that the policy does nothing protect the Green Belt.

Council Response

The Pre-Publication draft Local Plan needs to be read as a whole. It is not the role and function of Policy H2 to protect the Green Belt. However, policies S1[h], S6, S7 and S8 all protect the openness and permanence of the Green Belt.

Next Steps

The Council will review Policy H2 when preparing the next iteration of the Local Plan.

Concerns about the effectiveness of the policy

The Council received several objections to the policy from the development industry stating that, although they supported the principle of the policy, they had concerns about its effectiveness.

Council Response

The Council will maintain an open dialogue with the development industry regarding the implementation the policy.

Next Steps

The Council will review Policy H2 when preparing the next iteration of the Local Plan.

Policy H3: Housing Allocations and Commitments (Strategic Policy)

Policy H3: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The Local Plan will not control the pace of development in East Boldon
- The distribution of housing is disproportionate in respect of the villages
- The distinctiveness and character of the villages will not be respected
- Brownfield land should be used in preference to Green Belt land
- The Local Plan does not reference the tree numbers that will be lost.

Council Response

Please see Council responses for Policy S1 (the Spatial Strategy) regarding the distribution of housing, the priority given to brownfield sites and the impact of the distribution proposed in the Pre-Publication draft Local Plan on the distinctiveness and character of the villages.

Next Steps

The Council will review Policy H3 when preparing the next iteration of the Local Plan.

The pace of development in East Boldon

The Council received a significant number of representations stating that the Local Plan remains silent on whether the pace of development in East Boldon is to be controlled i.e. phased so as to mitigate the impact on village life.

Council Response

It is essential that the Plan is able to remain responsive and flexible to housing market conditions and needs, so it is not considered appropriate to introduce specific phasing requirements within the Plan over the release of land. The role of the Infrastructure Delivery Plan is to identify both the scale of infrastructure required as well as the trigger points for its delivery. Timely delivery of the supporting infrastructure would be secured through a Section 106 Agreement that could require the delivery of advanced infrastructure items and/or linked to the completion of a specified number of homes.

Next Steps

The Council will review Policy H3 when preparing the next iteration of the Local Plan.

The Local Plan does not document the number of trees that will be lost

The Council received a representation which stated that no numbers of trees at risk are available from South Tyneside Council.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the NPPF, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

None required

Policy H3.1: Land at Benton Road

Policy H3.1: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- It will cause harm to the Green Belt;
- The perceived lack of demand for the development;
- Objection to the Level Crossing Scheme
- The impact on trees;
- the perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt; and
- The perceived loss of biodiversity and wildlife.

Council Response and Next Steps

The Council will review Policy H3.1 when preparing the next iteration of the Local Plan. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiledshed Level Crossing Closure Scheme.

Policy H3.2: Land south of Cleadon Park

Policy H3.2: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- the perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding
- the perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;

- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived potential for air, light and noise pollution.

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiled Level Crossing Closure Scheme. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.2 when preparing the next iteration of the Local Plan.

Policy H3.3: Land west of Sunnyside Farm

Policy H3.3: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- the perceived potential for air, light and noise pollution.

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to

brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiled Level Crossing Closure Scheme. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.3 when preparing the next iteration of the Local Plan.

Policy H3.4: Land at Robinson Street

The Council received no objections to this policy.

Policy H3.5: Land adjacent to Ocean Road

The Council received no objections to this policy.

Policy H3.6: Land at Chatsworth Court

Policy H3.6: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.6 when preparing the next iteration of the Local Plan.

Policy H3.7: Former Woodhave House (Site B)

Policy H3.7: Council Response and Next Steps

Policy H3.8: South Shields Westoe Sports Club and playing fields

Policy H3.8 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential implications of developing this site for Temple Park;
- The potential impact on trees; and
- The South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.8 when preparing the next iteration of the Local Plan.

Policy H3.9: South Tyneside College - South Shields Campus (playing fields)

Policy H3.9 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision; and
- The potential impact on the local highway network.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.9 when preparing the next iteration of the Local Plan.

Policy H3.10: Former Brinkburn Comprehensive School

Policy H3.10 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees; and
- The South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.10 when preparing the next iteration of the Local Plan.

Policy H3.11: Land to the rear of Simonside Arms Public House

Policy H3.11 Council Response and Next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response and Next Steps

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.11 when preparing the next iteration of the Local Plan.

Policy H3.12: Land at Chuter Ede Education Centre

Policy H3.12 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees
- Objection to the Level Crossing Scheme;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- the use of 2014 household projection data to inform the housing requirement;
- the perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- the South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision;
- The perceived risk from flooding;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiled Level Crossing Closure Scheme.

Next Steps

The Council will review Policy H3.12 when preparing the next iteration of the Local Plan.

Policy H3.13 Former Temple Park Infant School

Policy H3.13 Council Response and Next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.13 when preparing the next iteration of the Local Plan.

Policy H3.14 Connolly House, Reynolds Avenue

Policy H3.14 Council Response and Next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.14 when preparing the next iteration of the Local Plan.

Policy H.15: Temple Park Junior School (west)

Policy H3.15 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- Local children play on the field; and
- The potential impact on the local highway network.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.15 when preparing the next iteration of the Local Plan.

Policy 3.16 Land at Bradley Avenue

Policy H3.16 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- Loss of open space; and
- The potential impact on the local highway network.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.16 when preparing the next iteration of the Local Plan.

Policy H3.17 Land at Farding Square

Policy H3.17 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- Traffic will increase on an already busy road.
- Unclear how access will be achieved
- Local children play on the field
- The site is listed as open space in the Council's Open Space Addendum (2019)

Council Response

The site now has planning permission for residential development. Therefore it is no longer available for allocation.

Next Steps

None required

Policy H3.18 Landreth House, Boldon Lane/South Dene

The Council received no objections to this policy.

Policy H3.19 Demolished nursery school, Wharfdale Road

Policy H3.19: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.19 when preparing the next iteration of the Local Plan.

Policy H3.20 Land at Orchard Close

The Council received no objections to this policy.

Policy H3.21 Land south of Bedale Court / Heworth Court

Policy H3.21: Council Response and next Steps

The Council received an objection to the policy which included the following grounds:

- The potential impact on trees; and
- Loss of open space;

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space.

Next Steps

The Council will review Policy H3.21 when preparing the next iteration of the Local Plan

Policy H3.22 Land behind Ryedale Court

Policy H3.22: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.22 when preparing the next iteration of the Local Plan.

Policy H3.23 Land at Lizard Lane

Policy H3.23: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.23 when preparing the next iteration of the Local Plan.

Policy H3.24 Land at Dean Road

The Council received no objections to this policy.

Policy H3.25 Land adjacent Lakeside Inn

Policy H3.25: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- Loss of agricultural land;
- The boundary includes the farms car park and one of the access roads into the farm.
- The perceived risk from flooding;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on air quality.

Next Steps

The Council will review Policy H3.25 when preparing the next iteration of the Local Plan.

Policy H3.26: Land at Hedworthfield Community Association Car Park

Policy H3.26: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The perceived risk from flooding;
- The site is actively used for community activities e.g. sport
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the impact on air quality and the impact on the social infrastructure. See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.26 when preparing the next iteration of the Local Plan.

Policy H3.27 Land to east of Lakeside Inn

Policy H3.27: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The perceived risk from flooding;
- The site is actively used for community activities e.g. sport
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on biodiversity and wildlife;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on air quality.

Next Steps

The Council will review Policy H3.27 when preparing the next iteration of the Local Plan.

Policy H3.28 Land at Heathway, Hedworth

Policy H3.28: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Change to the character of the estate
- It is green space;

- the perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for Policy S1 regarding the impact on social infrastructure and the impact on air quality. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.28 when preparing the next iteration of the Local Plan.

Policy H3.29 Land at Heathway/Greenlands, Hedworth

Policy H3.29: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Change to the character of the estate;
- The perceived risk from flooding;
- The perceived impact on biodiversity and wildlife;
- The site is listed as high value open space in the Council's Open Space Addendum (2019);
- the perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on health and wellbeing;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on air quality. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.29 when preparing the next iteration of the Local Plan.

Policy H3.30 Land at Kings Meadow, Hedworth

Policy H3.30: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- It is a green space;

- The perceived risk from flooding;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for Policy S1 regarding the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.30 when preparing the next iteration of the Local Plan.

Policy H3.31 Land at Calf Close Walk

Policy H3.31: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The perceived impact on biodiversity and wildlife;
- It is green space and promotes community cohesion;
- The perceived risk from flooding;
- The site has value as an archaeological site;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure and the impact on air quality. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.31 when preparing the next iteration of the Local Plan.

Policy H3.32: Land at Wark Crescent/Pathside, Primrose

Policy H3.32: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The potential for noise pollution;
- It is greenspace;
- The perceived impact on biodiversity and wildlife;

- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived inability for the site to be satisfactorily accessed;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on noise pollution. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.32 when preparing the next iteration of the Local Plan.

Policy H3.33 Land to North and East of Holland Park Drive

Policy H3.33: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The perceived risk from flooding;
- It is greenspace;
- The perceived impact on biodiversity and wildlife;
- the perceived impact on schools;
- The perceived inability for the site to be satisfactorily accessed;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.33 when preparing the next iteration of the Local Plan.

Policy H3.34 Land at Grange Road/Monkton Road

The Council received no objections to this policy.

Policy H3.35 Land at Salcombe Avenue

Policy H3.35: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The site is listed as open space in the Council's Open Space Addendum (2019);
- The perceived impact on biodiversity and wildlife;
- The perceived impact on schools;
- The perceived impact on health and wellbeing;
- The perceived potential for air, light and noise pollution;
- The perceived inability for the site to be satisfactorily accessed;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.35 when preparing the next iteration of the Local Plan.

Support for the policy

The Council also received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.35 when preparing the next iteration of the Local Plan.

Policy H3.36 Neon Social Club, Perth Avenue

The site now has planning permission for residential development

Policy H3.37 Perth Green Youth Centre, Perth Avenue

Policy H3.37: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- 'The potential impact on trees
- The site is listed as open space in the Council's Open Space Addendum (2019);

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space.

Next Steps

The Council will review Policy H3.37 when preparing the next iteration of the Local Plan.

Support for the policy

The Council also received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.37 when preparing the next iteration of the Local Plan.

Policy H3.38 Land at Kirkstone Avenue / Coniston Road

Policy H3.38: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- It functions as a roundabout for the local bus service; and
- It has been identified as potential parking for the parents taking their children to the two local schools;

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.38 when preparing the next iteration of the Local Plan.

Policy H3.39 Land previously Martin Hall, Prince Consort Road

Policy H3.39: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.39 when preparing the next iteration of the Local Plan.

Policy H3.40 Land at previously Nolan Hall, Prince Consort Road

Policy H3.40: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.40 when preparing the next iteration of the Local Plan.

Policy H3.41 Land at Falmouth Drive

Policy H3.41: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Loss of trees;
- The site is listed as open space in the Council's Open Space Addendum (2019);
- The perceived impact on biodiversity and wildlife;
- The perceived risk from flooding;
- The perceived impact on health and wellbeing;
- the perceived potential for air and noise pollution;
- Access/egress from the estate;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.41 when preparing the next iteration of the Local Plan.

Policy H3.42 Land at rear of Shaftesbury Avenue

Policy H3.42: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Loss of trees;
- The site is listed as open space in the Council's Open Space Addendum (2019);
- The perceived impact on biodiversity and wildlife;
- The perceived risk from flooding;
- The perceived impact on health and wellbeing;

- The perceived potential for air, light and noise pollution;
- Access/egress from the estate;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.42 when preparing the next iteration of the Local Plan.

Policy H3.43 Land at Ayrey Avenue

Policy H3.43: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The perceived impact on biodiversity and wildlife;
- The perceived impact on health and wellbeing;
- The perceived potential for air pollution; and
- The perceived impact on the local road network.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and air pollution.

Next Steps

The Council will review Policy H3.43 when preparing the next iteration of the Local Plan. See Council responses for Policy D2 regarding loss of trees.

Policy H3.44 Phase 2- Eskdale Drive, Primrose

The Council received no objections to this policy.

Policy H3.45 Land off Glen Street (Hebburn New Town)

Policy H3.45: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.45 when preparing the next iteration of the Local Plan.

Policy H3.46 Land at Westmoreland Court

Policy H3.46: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.46 when preparing the next iteration of the Local Plan.

Policy H3.47 Former Roadhouse Public House, Victoria Road West

The Council received no objections to this policy.

Policy H3.48 Ashworth Frazer Industrial Estate and Hebburn Community Centre

Policy H3.48: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The site is in active employment use; and
- The proposed allocation omits land southwest of Bell Street currently in use as a car park.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. It is acknowledged that the allocation represents a loss of employment land.

Next Steps

The Council will review Policy H3.48 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.48 when preparing the next iteration of the Local Plan.

Policy H3.49 Land to the north of former day care centre

Policy H3.49: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The perceived impact on the local social infrastructure i.e. schools and primary healthcare provision;
- It is green space;
- The site would be classified by Sport England as a playing field and/or pitch;
- The potential impact on trees;
- Road safety concerns;
- The perceived impact on the local road network; and
- the added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.49 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.49 when preparing the next iteration of the Local Plan.

Policy H3.50 The Clock playing field, Victoria Road East

Policy H3.50: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The local area has already undergone (or has ongoing) a significant amount of development;
- The perceived impact on the local social infrastructure i.e. schools and primary healthcare provision;
- The perceived risk from subsidence;
- It is green space;
- The site would be classified by Sport England as a playing field and/or pitch;
- The potential impact on trees;
- The perceived impact on the local road network;
- Road safety concerns; and

- The added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.50 when preparing the next iteration of the Local Plan.

Policy H3.51 Campbell Park Road Civic Site / Hebburn Police Station

Policy H3.51: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.51 when preparing the next iteration of the Local Plan.

Policy H3.52 Storage building and land at Quarry Road

Policy H3.52: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.52 when preparing the next iteration of the Local Plan.

Policy H3.53 Land at Campbell Park Road

Policy H3.53: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.53 when preparing the next iteration of the Local Plan.

Policy H3.54 Land at Beresford Avenue

Policy H3.54: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.54 when preparing the next iteration of the Local Plan.

Policy H3.55 Land at South Tyneside College, Hebburn Campus

Policy H3.55: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The site would be classified by Sport England as a playing field and/or pitch; and
- The potential impact on trees;

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space.

Next Steps

The Council will review Policy H3.55 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.55 when preparing the next iteration of the Local Plan.

Policy H3.56 Land south-west of Prince Consort Road

Policy H3.56: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.56 when preparing the next iteration of the Local Plan.

Policy H3.57 Father James Walsh Day Centre, Hedgeley Rd

Policy H3.57: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.57 when preparing the next iteration of the Local Plan.

Policy H3.58 Land at Southend Parade

Policy H3.58: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.58 when preparing the next iteration of the Local Plan.

Policy H3.59 Land at North Farm

Policy H3.59: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- It is green space;
- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- the site is within an area for further investigation in relation to contamination due to it being a former landfill site;
- The perceived loss of biodiversity and wildlife;
- Loss of mature trees and hedgerows;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;

- The perceived blurring of boundaries between neighbouring towns and villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- Objection to the Level Crossing Scheme;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response and Next Steps

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiledshed Level Crossing Closure Scheme. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.59 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted

Next Steps

The Council will review Policy H3.59 when preparing the next iteration of the Local Plan.

Policy H3.60 The Disco Field, Henley Way

Policy H3.60: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- It is green space;
- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- the perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and

- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.60 when preparing the next iteration of the Local Plan.

Policy H3.61 Land south of St. John's Terrace and Natley Avenue

Policy H3.61: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived blurring of boundaries between neighbouring towns and villages
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.61 when preparing the next iteration of the Local Plan.

Policy H3.62 Land to North of Town end Farm

Policy H3.62: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived blurring of boundaries between neighbouring towns and villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.62 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.62 when preparing the next iteration of the Local Plan.

Policy H3.63 Former CE Primary School

Policy H3.63: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- the loss of trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;

- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.63 when preparing the next iteration of the Local Plan.

Policy H3.64 The Paddock, Glebe Farm, Newcastle Road

Policy H3.64: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently greenfield;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.64 when preparing the next iteration of the Local Plan.

Policy H3.65 Land West of Boldon Cemetery

Policy H3.65: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.65 when preparing the next iteration of the Local Plan

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted

Next Steps

The Council will review Policy H3.65 when preparing the next iteration of the Local Plan.

Policy H3.66 Former storage yard Hardie Drive

Policy H3.66: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;
- The perceived impact on the character and distinctiveness of the villages;

- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.66 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support noted

Next Steps

The Council will review Policy H3.66 when preparing the next iteration of the Local Plan.

Policy H3.67 Former garage site Hindmarch Drive

Policy H3.67: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.67 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.67 when preparing the next iteration of the Local Plan.

Policy H3.68 Land to the North of New Road

Policy H3.68: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived potential for air, light and noise pollution;

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.68 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Next Steps

The Council will review Policy H3.68 when preparing the next iteration of the Local Plan.

Policy H3.69 Open space at Dipe Lane/Avondale Gardens

Policy H3.69: Council Response and next Steps

- It is currently a children's play park;
- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- It is listed in the Council's Open Space Addendum as high value open space;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.69 when preparing the next iteration of the Local Plan.

Policy H3.70 Land at West Hall Farm

Policy H3.70: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The land is in agricultural use;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- the perceived potential for air, light and noise pollution

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.70 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Next Steps

The Council will review Policy H3.70 when preparing the next iteration of the Local Plan.

Policy H3.71 Land at Wellands Farm

Policy H3.71: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The land is in agricultural use;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife
- The housing will be of an 'executive type' which is not required within Whitburn;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.71 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Next Steps

The Council will review Policy H3.71 when preparing the next iteration of the Local Plan.

Policy H3.72 Land north of Cleadon Lane

Policy H3.72: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The site would be classified by Sport England as a playing field and/or pitch;
- The impact on trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.72 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.72 when preparing the next iteration of the Local Plan.

Policy H3.73 Land at Whitburn Lodge

Policy H3.73: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The impact on trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.73 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.73 when preparing the next iteration of the Local Plan.

Policy H3.74 Land to North of Shearwater

Policy H3.74 Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The impact on trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- the perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.74 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.74 when preparing the next iteration of the Local Plan.

Policy H3.75 Land to North of Shearwater and East of Mill Lane

Policy H3.75 Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;

- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.75 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.75 when preparing the next iteration of the Local Plan.

Policy H4: Windfall Housing Proposals (Strategic Policy)

Policy H4: Council Response and next Steps

Lack of flexibility

The Council received a handful of responses based on the perceived lack of flexibility in the policy. Concerns were raised of the wording of the policy which seemingly limits windfall opportunities to small sites and infill sites and that the policy should focus on a site's overall sustainability of sites rather than size. There were also 2 comments in support of the Policy.

Council response

The Council recognises the need for policies to include a degree of flexibility and to be positively prepared and that Policy H4 should include more flexibility to ensure sustainable sites can come forward for development.

Next Steps

The Council welcomes comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan and the Policy will be reviewed to ensure it is positively prepared and allows for flexibility.

Policy H5: Efficient use of Land and Housing Density

Policy H5: Council Response and next Steps

Flexibility of the Policy

The Council received a number of comments which objected to the limited flexibility within the policy. Objections state that the policy should consider the impact of other policies within the Plan including consideration of the local and site characteristics, market demand and aspirations and viability.

Council Response

It is considered that the policy is consistent with the NPPF, paragraph 123 b) which encourages the use of minimum density standards in planning policies.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan and the Policy will be reviewed to ensure it is adequately flexible to allow high quality developments which meet all the relevant policies within the Plan.

Wording of the Policy

Concerns were raised over the wording of the policy particularly the use of the phrase 'optimum densities' which is perceived to be ambiguous. Comments also found the policy to be generally unclearly worded.

Council Response & Next Steps

The council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Indicative dwelling yields

Some comments raised concerns that densities in the Borough are already seemingly high and concerns whether or not the new proposed developments take into account flood risk. There were also concerns that the Plan deviates from the standard densities in certain areas, such as sites close to the metro station in East Boldon.

Council Response

The evidence base for the draft Local Plan comprises of a number of different studies and reports that have been produced to support and justify the policies and proposals. Part of the evidence base is the Strategic Flood Risk Assessment which assesses the flood risk across all potential development sites in the Borough.

Policy NE6 requires applicants to submit a site-specific flood risk assessment to demonstrate that the development is not at risk from flooding and does not increase flood risk elsewhere. As set out in Policy H5, the density applied to sites depends on their proximity to town, district or local centres or metro stations. It is considered that this is consistent with the National Planning Policy Framework, Paragraph 123 which encourages setting minimum density standards for town and city centres and other locations that are well served by public transport.

Next Steps

None required.

Policy H6: Our Existing Stock

Policy H6: Council Response and next Steps

Comments queried what the Council is doing to bring empty properties back into use given that long term empty properties account for around 0.7% of the Borough's housing stock. Comments also questioned when the Council's Enforced Sale Policy would be adopted.

Council Response

The homes included in the statistics for empty homes can include properties whose former residents have been decanted as they await demolition i.e. are not available for re-use, it is a normal and healthy feature of a housing market to have a certain percentage of empty home sowing to churn in the housing market, really long-term empty homes are traditionally low in South Tyneside and the reason that many empty homes are empty is that they are in areas of very low housing market demand and also are often flatted accommodation and therefore unlikely to meet the primary need which is for family housing. In addition, the Government's Planning Practice Guidance states that 'to be included as a contribution to completions it would be necessary for the authority to ensure that empty homes had not already been counted as part of the existing dwelling stock'. Due to resource constraints the authority no longer has an Empty Homes Team. Some empty homes were brought back into use when more resources to do so were available to the authority. However, the numbers were very modest and it is not possible to ensure that they had not already been counted as part of the existing dwelling stock. For these reasons it is not considered feasible to plan for the meeting of housing need based on bringing empty homes back into use.

The Enforced Sale Policy has been approved and the Council can now use the policy as a mechanism for bringing long term empty properties and land back into use.

Next Steps

The Council will continue to review opportunities to bring empty properties back into use and continue working with landlords to ascertain why properties are empty.

Policy H7: Houses in Multiple Occupation

Policy H7: Council Response and next Steps

Council response

The Council welcomes the support for this policy.

Next steps

None required.

Policy H8: Specialist Housing- Extra Care & Supported Housing (Strategic Policy)

Policy H8: Council Response and next Steps

Wording of the Policy

Comments received objecting to the policy wording which does not clarify exactly how much accommodation is required to meet the needs of the elderly and which sites allocated in the Plan are for elderly/specialist accommodation.

Council Response

Policy H10 promotes a mix of housing, including affordable housing, housing that meets the needs of the elderly population as well as housing that meets household aspirations. The Policy provides flexibility by requiring proposals to have regard to the SHMA, its successor documents or other appropriate evidence as requirements will change over the life of the Plan. The evidence base will be kept under review so proposals will have up to date evidence to draw from and should reflect the most up to date evidence. Several sites in the Draft Local Plan are allocated for supported accommodation however it is considered that Policy H10 will ensure proposals address the identified need for different house types.

Next steps

The Council will update the Strategic Housing Market Assessment which will provide more up to date evidence on the need for extra care and supported housing.

New site

One response put forward a currently unallocated site, outlining its potential suitability for Extra Care/Supported Housing

Council Response

The Council will be reviewing sites as part of the SHLAA process including the site put forward for an elderly care village.

Next steps

Review all sites put forward through the Local Plan process for their development potential.

Policy H9: Affordable Housing

Policy H9: Council Response and next Steps

Definition of Affordable Housing.

Comments were raised regarding the perceived vagueness of the term 'affordable' and, given this, how would the Council ensure that affordable housing units are genuinely affordable.

Council Response

'Affordable housing' is defined in the National Planning Policy Framework as 'housing for sale or rent, for those whose needs are not met by the market' and defines the various types of affordable housing product that exists. Based on evidence of need and viability, the Plan would secure up to 18% of affordable homes from new developments above 10 homes. Proposals would be judged against this definition.

Next Steps

The Council will review Policy H9 when preparing the next iteration of the Local Plan.

Viability and the Strategic Housing Market Assessment.

Most comments support the need to address affordable housing requirements of the Borough as well as supporting the flexibility provided in relation to tenure mix. However concerns were raised over the evidence base which supports the policy, namely the Strategic Housing Market Assessment (2015) and lack of a viability report. In line with the NPPF, affordable housing provision should not undermine the deliverability and viability of the Plan. Comments were received suggesting a range of affordable housing requirements may be more appropriate given the different market characteristics across the Borough.

Council response

Support for the flexibility with regards to tenure mix welcomed. The Council is undertaking a viability assessment which will accompany the next iteration of the Plan. The Council is also updating the Strategic Housing Market Assessment to provide a more up to date evidence base for the policy. The policy will be reviewed in line with new evidence.

Next Steps

Review the policy when new evidence is available to ensure the policy does not undermine deliverability of the Plan and to ensure the affordable housing requirement is justified.

Policy H10: Housing Mix

Policy H10: Council Response and next Steps

Support for the Policy

Several comments were received in support of the Policy, welcoming the flexibility that the Policy provides particularly in respect of increasing the number of detached/ 'executive' homes.

Council Response

Support for the policy welcomed

Next Steps

The Council will review Policy H9 when preparing the next iteration of the Local Plan.

Concerns over the inclusion of 'executive homes' and the need for affordable housing/housing for the elderly

In contrast to the representations outlined above, the Council received objections to the reference to 'executive homes' in the Policy. Objections raised concerns that this would lead to the provision of homes which do not meet local needs and that the Plan should focus on delivering affordable homes and homes for the elderly. Objections were also concerned that the policy doesn't recognise that housing needs vary around the Borough.

Council Response

It is considered that Policy H10 is flexible and promotes a mix of housing, including affordable housing, housing that meets the needs of the elderly population as well as housing that meets household aspirations. The Policy provides flexibility by requiring proposals to have regard to the Strategic Housing Market Assessment, its successor documents or other appropriate evidence as requirements will change over the life of the Plan. The evidence base will be kept under review so proposals will have up to date evidence to draw from and should reflect the most up to date evidence.

Next steps

Review the Policy to ensure it is clear that proposals should reflect the housing needs identified in the most up to date evidence available.

Policy H11: Technical Design Standards for New Homes

Policy H11: Council Response and next Steps

Lack of evidence to support the policy

Comments were received which pointed to a lack of appropriate evidence to support the Policy. Comments stated that the Policy should acknowledge Planning Practice Guidance which identifies the type of evidence required to introduce a Policy like this. Concerns were raised about the potential impact of the Policy on build costs, affordability and viability.

Council response

It is acknowledged that the Policy is ambitious and currently exceeds the policy approach in other parts of the region.

Next Steps

The Council will review Policy H11 when preparing the next iteration of the Local Plan.

Shortage of housing for the elderly

Comments were also received pointing to a shortage of housing suitable for the elderly, using the London Plan as an example of how to address this.

Council Response

The Policy currently goes beyond the requirements in the London Plan and requires all new dwellings to be compliant with M4(2) and 15% of new build housing to be compliant with M4(3). However this will be reviewed when the new SHMA data is available.

Next Steps

The Council will review Policy H11 when preparing the next iteration of the Local Plan.

Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)

Policy H12: Council Response and next Steps

Transport Assessment

A comment was received requesting that Policy includes a requirement for a Transport Assessment to be undertaken ahead of the release of the site at Whitemare Pool to ensure the continued safe and efficient operation of the Strategic Route Network.

Council Response

The policy will be reviewed regarding the requirement for a Transport Assessment

Outdated Gypsy and Traveller Accommodation Assessment

Concerns were raised that the Gypsy and Traveller Accommodation Assessment is out of date and predates the latest planning policy for Traveller Sites. The Gypsy and Traveller Accommodation Assessment shows a need which is not currently being met by the policy.

Council Response

The Gypsy and Traveller Accommodation Assessment will be updated alongside the Strategic Housing Market Assessment and the policy will be updated accordingly.

Next Steps

The Council will review Policy H9 when preparing the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 6: Planning for Jobs

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 6 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 6 Planning for Jobs received 51 comments of which 20 were objections to policies, 16 were in support and 15 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 6: Planning For Jobs				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy ED1: Strategic Economic Development (Strategic Policy)	10	4	4	2
Policy ED2: Provision of Land for General Economic Development (Strategic Policy)	10	4	2	4
Policy ED2.1 Wardley Colliery (Strategic Policy)	5	1	1	3
Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)	15	4	1	10
Policy ED4: Protecting Employment Uses (Strategic Policy)	3	0	2	1
Policy ED5: Employment Development Beyond Our Employment Allocations	2	1	1	0
Policy ED6: Leisure and Tourism	4	1	3	0
Policy ED7: Tourist and Visitor Accommodation	2	0	2	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy ED1: Strategic Economic Development (Strategic Policy)	<ul style="list-style-type: none"> Is the need to release land in the Green Belt driven by an unrealistic employment land requirement? Job creation and the number of houses required Future proofing for environmental and technological targets

	<ul style="list-style-type: none"> • Amendments/ wording considerations /support for the policy
Policy ED2: Provision of Land for General Economic Development (Strategic Policy)	<ul style="list-style-type: none"> • The potential of the Wardley Colliery site • Support for the policy
Policy ED2.1 Wardley Colliery (Strategic Policy)	<ul style="list-style-type: none"> • Local Wildlife Site • Re-opening the Leamside line • The Sustainability Appraisal of the policy does not support the allocation • Flexibility regarding the Wardley Colliery allocation
Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)	<ul style="list-style-type: none"> • There is no need for employment land to be protected for specialist uses • The housing potential of the employment allocations should be assessed • Land allocated for employment is heavily 'forested' • Amendments/ wording considerations /support for the policy
Policy ED4: Protecting Employment Uses (Strategic Policy)	<ul style="list-style-type: none"> • Amendments/ wording considerations /support for the policy
Policy ED5: Employment Development Beyond Our Employment Allocations	<ul style="list-style-type: none"> • Support for the policy
Policy ED6: Leisure and Tourism	<ul style="list-style-type: none"> • Support for the policy
Policy ED7: Tourist and Visitor Accommodation	<ul style="list-style-type: none"> • Support for the policy

Policy ED1: Strategic Economic Development (Strategic Policy)

Policy ED1: Council response and next steps

Is the need to release land in the Green Belt driven by an unrealistic employment land requirement?

There are two aspects to the representations; firstly whether the extent of employment land need, particularly specialist employment need, identified in Policy ED1[ai] is realistic and robust. Secondly whether there is an opportunity to re-allocate employment land for housing, with the Former Hawthorne Leslie Shipyard and the Rohm and Hass sites both being specifically referenced, and thereby reducing the need to release land from the Green Belt for housing.

Council Response

The North East Local Enterprise Partnership's Strategic Economic Plan sets out a clear vision to increase the number of jobs in the North East by 100,000 between 2014 and 2024. However, this target has not been disaggregated to the local authority level.

The Employment Land Review (2019) set out a range of options regarding the scale of need for employment land. These options were Baseline Labour Demand, Policy-On Labour Demand and Past (Net) Completions. For more information on these options see the Employment Land Review. Our preferred approach uses an Experian (an independent information services company) forecast of jobs growth over the period 2020 to 2035 as a baseline and then adds in an allowance for the potential impact of the IAMP proposals. To be clear, the Employment Land Review does not assess the need for the IAMP as it came forward separately through the Adopted Area Action Plan. Also to be clear, although the Experian jobs growth forecasts provided a baseline for assessing the scale of need for employment land in the Local Plan, no jobs target has been set in the Local Plan.

Policy ED1[a] distinguishes between land for general economic development and land for specialist port and marine economic development. The distinction is a qualitative one based on the assessment that River Tyne is well placed to take advantage of future growth in the offshore energy sector, including offshore wind, oil and gas. This has the potential to present considerable inward investment opportunities for South Tyneside - a key element of the River Tyne offer to the offshore energy sector are four riverside sites located on the south bank of the Tyne. These key riverside assets should be protected for future employment / industrial uses over the longer term, ultimately resulting in local investment and job creation. This assessment has been informed by the Employment Land Review. It includes a section 'Demand for sites with river access' which states 'There is clear evidence that demand for riverside sites is increasing and importantly will strengthen further over the period of the Local Plan' (Paragraph 6.52).

Regarding the Former Hawthorne Leslie Shipyard, the previous South Tyneside Employment Land Review (2013) stated 'The site adjoins A&P Tyne which makes the introduction of alternative uses such as housing problematic' and that the site includes rare intertidal mudflat and saltmarsh habitats. The industrial legacy of the site would also be a very challenging obstacle to overcome in the context of the economic viability of any proposed residential development. Property particulars advertising the availability of the Rohm and Hass site were published in 2016. They stated, 'No housing development will be permitted on the site.' The Local Planning Authority has verified with representatives of the site owners that this remains the case. The site is therefore categorically unavailable for housing development.

Next Steps

The Council will review policies S1, H1[a], ED1 and ED3 when preparing the next iteration of the Local Plan.

Job creation and the number of houses required

The Council has received a representation stating that North East Local Enterprise Partnership Strategic Economic Plan is underperforming and that Local Plan is based on overambitious policies which are not delivering jobs in South Tyneside.

Council Response

The North East Local Enterprise Partnership's Strategic Economic Plan sets out a clear vision to increase the number of jobs in the North East by 100,000 between 2014 and 2024. However, this target has not been disaggregated to the local authority level.

The Employment Land Review (ELR) (2019) set out a range of options regarding the scale of need for employment land. These options were Baseline Labour Demand, Policy-On Labour Demand and Past (Net) Completions. For more information on these options see the ELR. Our preferred approach uses an Experian (an independent information services company) forecast of jobs growth over the period 2020 to 2035 as a baseline and then adds in an allowance for the potential impact of the IAMP proposals. To be clear, the ELR does not assess the need for the IAMP as it came forward separately through the Adopted Area Action Plan. Also to be clear, although the Experian jobs growth forecasts provided a baseline for assessing the scale of need for employment land in the Local Plan, no jobs target has been set in the Local Plan.

Next Steps

None required.

Future proofing for environmental and technological targets

The Council received a representation asking how the Borough will be future proofed for environmental and technological targets.

Council Response

Please refer to the Council's Economic Recovery Plan (September 2020)
<https://www.southtyneside.gov.uk/article/71042/Economic-Recovery-Plan>

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy ED2: Provision of Land for General Economic Development (Strategic Policy)

Policy ED2: Council response and next steps

The potential of the Wardley Colliery site

The Council received a representation stating that Policy ED2 should make provision for a larger employment allocation at Wardley.

Council Response

The Council is in discussions with the owners regarding the development potential of the site and how this can best be balanced with constraints such as the Local Wildlife Site designation.

Next Steps

The Council will review Policy ED2 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received a representation supporting the reference to 2.1 ha at Cleadon Industrial Estate.

Council Response

Support for the reference noted

Next Steps

The Council will review Policy ED2 when preparing the next iteration of the Local Plan.

ED2.1 Wardley Colliery (Strategic Policy)

Policy ED2.1: Council response and next steps

Local Wildlife Site

The Council received a representation which stated that the site is of important biodiversity importance and it is adjacent to a Local Wildlife Site and that this cannot be reconciled with the allocation.

Council Response

It is acknowledged that the allocated site includes some land that is within the Local Wildlife Site. However, this land is also within the boundary of planning application ST/1051/12/FUL which granted planning permission on 01/12/2014 for change of use from coal disposal point including the demolition of mechanised rail loading bunker and associated structures, retention of rail loading head and alteration/extension of rail loading pad to use of the site for transportation and storage of coal and minerals, and continued use of the site for the storage of containers. The wider Local Wildlife Site is not allocated for economic development. It should also be noted that criteria [c] of Policy ED2.1 state 'Ensure that, in accordance with Policy NE2, adverse ecological impacts are dealt with through the mitigation hierarchy, and any compensation measures and measurable net gain is delivered within Wardley Colliery Wildlife Site'.

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Re-opening the Leamside Line

The Council received a representation which stated the existing use of the line as a cycle path should be protected.

Council Response

Regarding the Council's in-principle support for the re-opening of the Leamside Lane, discussions are ongoing.

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

The Sustainability Appraisal of the policy does not support the allocation

The Council received a representation which stated that the allocation of Wardley Colliery (ED2.1) is not supported by the Sustainability Appraisal.

Council Response

Regarding the Sustainability Appraisal, Policy ED2.1 was positively assessed within the South Tyneside Sustainability Appraisal – Draft Local Plan Policies Draft Local Plan Interim Sustainability Appraisal: Appendix J (August 2019).

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Flexibility regarding the Wardley Colliery allocation

The Council received a representation regarding the Wardley Colliery allocation which stated that flexibility is required in the approach to the protection of areas of ecological value as a rigid approach would damage the ability to deliver employment land.

Council Response

The Council is in discussions with the owners regarding the development potential of the site and how this can best be balanced with constraints such as the Local Wildlife Site designation

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received a representation that welcomed the retention of most of the Local Wildlife Site within the Green Belt.

Council Response

Support for the retention of most of the Local Wildlife Site within the Green Belt noted.

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)

Policy ED3: Council response and next steps

There is no need for employment land to be protected for specialist uses

The Council received a representation stating that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries.

Council Response

The comments are based on a report commissioned by the objector. The objection will therefore be referred to in this response as the Report.

The Report appears to dismiss South Tyneside as a location for offshore businesses and suggests we do not have a strong manufacturing base. The Borough has a cluster of offshore businesses and a large number of our 3,000+ businesses are involved in the manufacturing/ engineering sectors.

The River Tyne is well placed to take advantage of future growth in the offshore energy sector, including offshore wind, oil and gas. This has the potential to present considerable inward investment opportunities for South Tyneside - a key element of the River Tyne offer to the offshore energy sector are four riverside sites located on the south bank of the Tyne. These key riverside assets should be protected for future employment / industrial uses over the longer term, ultimately resulting in local investment and job creation. It is acknowledged that some of these sites could require gap funding or incentives from the public sector to enable end users in the offshore energy sector to invest in them.

The Borough is home to a deep water Port which has available land and matching ambitions to develop the offshore sector in South Tyneside. Equinor and SSE Renewables, the two companies behind the Dogger Bank offshore wind farm, have recently (May 2020) announced plans to build a new Operations and Maintenance Base at the Port of Tyne .

The Tyne Dock Enterprise Park is situated only 2km from the harbour entrance into the North Sea. It has a river frontage of 550m and a 250m quay with a water depth at the quayside varying between 8.6 to 11.2m LAT to a maximum of 13.5m to 15.5m. This provides deep water access for larger vessels that cannot be accommodated elsewhere on the North East coast.

With a heritage for engineering excellence, South Tyneside is home to a highly skilled, available workforce, benefitting from labour costs for an engineer almost 15% lower than that of Aberdeen. For the reasons stated, it is not accepted that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries.

With specific regard to the Hawthorne Leslie site, Appendix 3: Site Assessment Matrix to the South Tyneside Employment Land Review - Final Report (July 2019) recommends that with regard to the Hawthorne Leslie site there is 'substantial investment required to bring the site back into use. Past demand for riverside sites weak but during the plan period this demand to grow strongly as offshore sectors expand e.g. vessel fabrication and maintenance of turbines. This recommendation, together with the relevant sections of the Employment Land Review - Final Report, supports the decision to allocate the site for port and marine use in the Pre-Publication Draft Local Plan.

Next Steps

The Council will review Policy ED3 when preparing the next iteration of the Local Plan.

The housing potential of the employment allocations should be assessed

The Council received a representation which stated the sites allocated for economic development in the policy should be assessed to see if they are suitable for housing.

Council Response

The Strategic Housing Land Availability Assessment (2019) assesses the suitability of sites for housing and is comprehensive in its scope. This will be updated for the next iteration of the emerging Local Plan.

Next Steps

Continue to update the Strategic Housing Land Availability Assessment.

Land allocated for employment is heavily 'forested'

The Council received a representation which stated 'Objection to the site 'nearest the River Don and Bedes World. Touching the Nissan car storage yard at the Port of Tyne) This site is heavily forested and must be protected'

Council Response

It is acknowledged that the land designated ED3.2 includes trees and vegetation. However, the land within the allocation that is available for development is not forested.

Next Steps

The Council will review Policy ED3.2 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy ED4: Protecting Employment Uses (Strategic Policy)

Policy ED4: Council response and next steps

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy ED5: Employment Development Beyond Our Employment Allocations, Policy ED6: Leisure and Tourism and Policy ED7: Tourist and Visitor Accommodation

Policies ED5, ED6 & ED7: Council response and next steps

Support for the policy

The Council received an expression of support for Policy ED5 and expressions of support for policies ED6 and ED7.

Council Response

Support for the policies welcomed

Next Steps

The Council will review policies ED5, ED6 and ED7 when preparing the next iteration of the Local Plan.

Chapter 7: Planning for our Town Centres

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 7 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 7: Planning for our Town Centres received 27 comments of which 6 were objections to policies, 17 were in support and 4 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 7: Planning for our Town centres				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy R1: The Hierarchy of our Centres (Strategic Policy)	9	3	3	3
Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)	4	1	2	1
Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)	2	0	1	1
Policy R4: South Shields Market	1	0	1	0
Policy R5: Prioritising Centres Sequentially	3	0	2	1
Policy R6: Proposals Requiring an Impact Assessment	2	0	2	0
Policy R7: Evening and Night-time Economy in South Shields Town Centre	3	0	3	0
Policy R8: Hot Food Takeaways	2	0	2	0
Policy R9: Local Neighbourhood Hubs	1	0	1	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy R1: The Hierarchy of our Centres (Strategic Policy)	<ul style="list-style-type: none"> • The definition of Cleadon and East Boldon Local Centres • The units at Calf Close Lane and Lincoln Way/Leicester Way • The status of Jarrow and Hebburn in the retail hierarchy • Support for the policy

Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)	<ul style="list-style-type: none"> • Re-use of empty retail premises in South Shields Town Centre • Inclusion of certain properties within the Primary Shopping Area of South Shields • Support for the policy
Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)	<ul style="list-style-type: none"> • Impact of Phase 3 of the South Shields 365 Town Centre Vision • Support for the policy
Policy R4: South Shields Market	<ul style="list-style-type: none"> • Support for the policy
Policy R5: Prioritising Centres Sequentially	<ul style="list-style-type: none"> • Evidence should be provided of discussion with owners • Support for the policy
Policy R6: Proposals Requiring an Impact Assessment	<ul style="list-style-type: none"> • Support for the policy
Policy R7: Evening and Night-time Economy in South Shields Town Centre	<ul style="list-style-type: none"> • Support for the policy
Policy R8: Hot Food Takeaways	<ul style="list-style-type: none"> • Support for the policy
Policy R9: Local Neighbourhood Hubs	<ul style="list-style-type: none"> • Support for the policy

Policy R1: The Hierarchy of our Centres (Strategic Policy)

Policy R1: Council response and next steps

The definition of Cleadon and East Boldon Local Centres

The Council received representations stating that the definition of Cleadon Local Centre should be expanded to include the shops on the south side of Front Street in Cleadon and those on Langholm Road, Station Road, Front Street and Grange Terrace in East Boldon.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy R1 when preparing the next iteration of the Local Plan.

The units at Calf Close Lane and Lincoln Way/Leicester Way

The Council received a representation stating that the units at Calf Close Lane and Lincoln Way/Leicester Way should be recognised in the policy.

Council Response

Local Centres have a specific role in the retail hierarchy. It is considered that the units referenced in the representation do not warrant inclusion in a Local Centre. Whilst Local Neighbourhood Hubs do not form part of the retail hierarchy, the Town and District Use Needs Study (2018) did not consider that the units referenced in the representation should be identified as Local Neighbourhood Hubs.

Next Steps

None required.

The status of Jarrow and Hebburn in the retail hierarchy

The Council received a representation stating that the Council is focused on South Shields and that Jarrow and Hebburn are neglected by the Council for investment.

Council Response

It is considered that the role and function of the respective town centres as identified in Policy R1 is appropriate.

Next Steps

None required.

Support for the policy

The Council received representations supporting the policy.

Council Response

Support welcomed

Next Steps

None required.

Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)

Policy R2: Council response and next steps

Re-use of empty retail premises in South Shields Town Centre

The Council received representations including stating that the upper stories of many retail premises in South Shields Town Centre have been empty, unused or underutilised and that the Local Plan provides an opportunity to bring these upper floors back into use, for residential purposes.

Council Response

The policy is supportive of proposals for upper floor mixed-use development including residential development. The Council is supportive in principle of residential development forming one of the options for the re-use of empty, unused or underutilised upper stories of retail premises in King Street, but the Council does not own the properties.

Next Steps

None required

Inclusion of certain properties within the Primary Shopping Area of South Shields

The Council received an objection to inclusion of certain properties in King Street, South Shields within the primary shopping area of South Shields Town Centre.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy R2 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support for the policy welcomed

Next Steps

None required

Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)

Policy R3: Council response and next steps

Impact of Phase 3 of the South Shields 365 Town Centre Vision

The Council received a representation expressing concern as to the impact of Phase 3 of the South Shields 365 Town centre Vision on the wider town centre in terms of these long-term vacant retail units and their potential to find end users.

Council Response

Phase 3 of the South Shields 365 Town Centre Vision is intended to deliver modern purpose build floorplates which will represent a new offer in the Town Centre and therefore not directly comparable with the current situation regarding vacant units. Comment questioning that a small requirement for additional convenience retail floorspace will occur by 2033 noted. However, the policy is not predicated on this.

Next Steps

The Council will review Policy R3 when preparing the next iteration of the Local Plan.

None required

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support for the policy welcomed

Next Steps

None required

Policy R4: South Shields Market

Policy R4: Council response and next steps

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support for the policy welcomed.

Next Steps

None required

Policy R5: Prioritising Centres Sequentially

Policy R5: Council response and next steps

Evidence should be provided of discussion with owners

The Council received a representation stating that any applications should provide the necessary evidence that discussions have been held with the owners of properties in town centre to demonstrate that properties are not available.

Council Response

The supporting text to the policy includes that consideration will be given as to whether the suitability, availability and viability of sites has been considered, with regard to the need to be addressed (paragraph 7.26).

Next Steps

None required

Support for the policy

The Council has received expressions of support for the policy.

Council Response

Support for the policy welcomed

Policy R6: Proposals Requiring an Impact Assessment, Policy R7: Evening and Night-time Economy in South Shields Town Centre, Policy R8: Hot Food Takeaways and Policy R9: Local Neighbourhood Hubs

Policies R6, R7, R8 and R9: Council Response and Next Steps

Support for the policies

The Council has received an expression of support for policies R6, R7 and R9 and expressions of support for Policy R8.

Council Response

Support welcomed

Next Steps

None required

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 8: Regeneration

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 8 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 8: Regeneration received 77 comments of which 29 were objections to policies, 22 were in support and 26 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 8: Regeneration				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy RG1: South Shields Riverside (Strategic Policy)	10	3	1	6
Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)	4	0	1	3
Policy RG3 Winchester Street Housing-led Regeneration Site (Strategic Policy)	3	3	0	0
Policy RG4: Argyle Street Housing-led Regeneration Site (Strategic Policy)	3	3	0	0
Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)	54	16	18	20
Policy RG6: Fowler Street Improvement Area	1	0	1	0
Policy RG7: Foreshore Improvement Area	2	1	1	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy RG1: South Shields Riverside (Strategic Policy)	<ul style="list-style-type: none"> • The deliverability of the Holborn allocation • Amendments/ wording considerations /support for the policy
Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)	<ul style="list-style-type: none"> • Conflict with validation checklist • Protection for the trees on the site • Amendments/ wording considerations /support for the policy
Policy RG3 Winchester Street Housing-led Regeneration Site (Strategic Policy)	<ul style="list-style-type: none"> • Conflict with validation checklist • Support for the policy

Policy RG4: Argyle Street Housing-led Regeneration Site (Strategic Policy)	<ul style="list-style-type: none"> • The site is not suitable for development • Support for the policy
Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)	<ul style="list-style-type: none"> • Ground Conditions and Contamination • Flood Risk and Water Management • Priority for local housing needs • The need for comprehensive master planning • The deliverability of the allocation • Amendments/ wording considerations /support for the policy
Policy RG6: Fowler Street Improvement Area	<ul style="list-style-type: none"> • Support for the policy
Policy RG7: Foreshore Improvement Area	<ul style="list-style-type: none"> • The need for more explicit guidance • Support for the policy

Policy RG1: South Shields Riverside (Strategic Policy)

Policy RG1: Council response and next steps

The deliverability of the Holborn allocation

The Council has received representations questioning the deliverability of the Holborn site.

Council Response & Next Steps

It is accepted that the projected delivery of housing on the site needs to be realistic. The projected delivery has been informed by the Council's Regeneration Team and is based on up-to-date and robust information.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)

Policy RG2: Council response and next steps

Conflict with validation checklist

The Council received a representation which states 'This policy requires the submission of a Transport Assessment for a scheme of 65 and 48 dwellings. This conflicts with the South Tyneside Council Validation Checklist which suggests that a scheme of this size should only submit a Transport Statement.'

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy RG2 when preparing the next iteration of the Plan.

Protection for the trees on the site

The Council received a representation stating that mature trees on the site must be offered protection from developers.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy RG3 Winchester Street Housing-led Regeneration Site (Strategic Policy)

Policy RG3: Council response and next steps

Conflict with validation checklist

The Council received a representation which states 'This policy requires the submission of a Transport Assessment for a scheme of 65 and 48 dwellings. This conflicts with the South Tyneside Council Validation Checklist which suggests that a scheme of this size should only submit a Transport Statement.'

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy RG3 when preparing the next iteration of the Plan.

Support for the policy

The Council has received an expression of support for the policy

Council Response

Support welcomed

Next Steps

The Council will review Policy RG3 when preparing the next iteration of the Local Plan

Policy RG4: Argyle Street Housing-led Regeneration Site (Strategic Policy)

Policy RG4: Council response and next steps

The site is not suitable for development

The Council received a representation which stated that the site is not suitable for development. Reasons stated include that it has a good mix of tree species and the area has rich bird and insect life.

Council Response

Whilst it is accepted that the site includes significant wildlife value, the policy states that we will support development proposals that demonstrate how the impact of development on local wildlife will be mitigated. See Council responses for policies D2 and NE1 regarding loss of trees.

Support for the policy

The Council has received an expression of support for the policy.

Council Response

Support welcomed

Next Steps

None required

Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)

Policy RG5: Council response and next steps

Ground Conditions and Contamination

The Council received representations stating that developing the site for housing conflicts with Policy NE9 which focuses on contaminated land and ground stability.

Council Response

It is acknowledged that there is the potential for significant constraints due to ground conditions from the historic industrial uses. However, any development proposal in relation to Policy RG5: Cleadon Lane Mixed-Use Regeneration Site will need to be in accordance with Policy NE9: Contaminated Land and Ground Stability. The land is only suspected to contain contamination and without testing, there is no way of knowing the level of potential contamination. The site would

undergo a full intrusive site investigation which would look at potential organic and inorganic contaminants as well as metals and asbestos. Any de-culverting which is done at the site would take into consideration the ground conditions and determine whether or not the option is viable. It should be noted that there is the possibility to line channels as part of de-culverting works which would protect the river from any potential contamination in the area.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

Flood Risk and Water Management

The Council received representations stating that developing the site for housing conflicts with Policy NE6 which is concerned with flood risk and water management.

Council Response

Any planning application to develop the site will need to accord with policies NE6: Flood Risk and Water Management and Policy, NE7: Protecting Water Quality and NE11 Pollution. The levels of potential contaminants are unknown. Watercourse channels can be lined as part of remediation works which will prevent potential contamination from entering the river Don. There are also a range of remediation techniques available for “cleaning” contaminated soils which could be considered for the site should they be suitable and viable.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

The amount of employment land

The Council received a representation stating that in order to achieve the most appropriate masterplan, the amount of employment land should be referred to as ‘approximate’.

Council Response

It is important to retain local employment opportunities as part of the mix of uses and for this reason it is appropriate that 2.1 ha of employment land is a minimum.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

Priority for local housing needs

The Council received a representation expressing support for the allocation of some of the brown field land for housing with the proviso that the number and type of homes provided should be to meet local needs only.

Council Response

Policy H10 states that developments should include an appropriate mix of dwelling types and sizes to address measured needs over the long term considering the nature of the development and the character of the location.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

The need for comprehensive master planning

The Council received a representation which stated there should be a site-specific policy in the Local Plan for this site which requires development to be comprehensively masterplanned, a design code and the range, size, type and tenure of housing expected on site to meet housing needs.

Council Response

A comprehensive masterplan would not normally be required for a site of this size.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

The deliverability of the allocation

The Council has received a representation questioning the deliverability of the Cleadon Industrial Estate allocation. The representation includes the following points:

- There is no evidence on how the existing jobs will be relocated, if at all, when and to where.
- There is no evidence presented that all the land has been assembled
- There are known significant viability constraints due to ground conditions

Council Response

It is acknowledged that the housing-led development of the site would result in a reduction in employment land in the Borough. The site is available and there is active developer interest in the site.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy RG6: Fowler Street Improvement Area

Policy RG6: Council response and next steps

Support for the policy

The Council received an expression of support for the policy

Council Response & Next Steps

The Council welcomes support for the policy

Next Steps

The Council will review Policy RG6 when preparing the next iteration of the Local Plan.

Policy RG7: Foreshore Improvement Area

Policy RG7: Council response and next steps

The need for more explicit guidance

The Council received a representation stating that more explicit guidance should be included in the policy.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy RG6 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the principle of the allocation.

Council Response

The Council welcomes support for the policy

Next Steps

The Council will review Policy RG7 when preparing the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 9: Planning for our Built Environment

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 9 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 9: Planning for our Built Environment received 60 comments of which 47 were objections to policies, 9 were in support and 4 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 9: Planning for our Built Environment – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy D1: Our Strategic Approach for the Built Environment (Strategic Policy)	2	0	2	0
Policy D2 General Design Principles (Strategic Policy)	41	2	2	37
Policy D3: Promoting Good Design with new Residential Developments (Strategic Policy)	10	1	1	8
Policy D4: Alterations and Extensions to Residential Buildings	2	0	1	1
Policy D5: Shopfronts	3	0	3	0
Policy D6: Advertisements	2	1	0	1

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy:

Table 2. Summary of comments received	
Policy D1: Our Strategic Approach for the Built Environment (Strategic Policy)	<ul style="list-style-type: none"> • Support for the policy
Policy D2 General Design Principles (Strategic Policy)	<ul style="list-style-type: none"> • BREEAM requirements • The Policy does not go far enough • Carbon emissions • Loss of trees • Wording considerations
Policy D3: Promoting Good Design with new Residential Developments (Strategic Policy)	<ul style="list-style-type: none"> • Lifetime Homes/Building for Life • Support for the policy/Wording considerations
Policy D4: Alterations and Extensions to Residential Buildings	<ul style="list-style-type: none"> • Wording amendments/Support for the policy
Policy D5: Shopfronts	<ul style="list-style-type: none"> • Support for the policy
Policy D6: Advertisements	<ul style="list-style-type: none"> • Support for the policy/Wording Considerations

Policy D1: Our Strategic Approach to the Built Environment

Policy D1: Council response and next steps

Support for policy

Representations were received in support for the policy

Next Steps

Whilst no objections were received, the Council will review Policy D5 when preparing the next iteration of the Local Plan.

Policy D2: General Design Principles

Policy D2: Council response and next steps

BREEAM requirements

The Council received a number of objections to the policy based on the view that the BREEAM requirements are too demanding.

Council Response

The BREEAM Family is a suite of certification schemes which drive sustainability within the built environment, including the use of more resource efficient and responsible construction practices, protection and enhancements of our natural world, mitigating the impacts of climate change. BREEAM provides confidence in the delivery of sustainable outcomes and better quality places through the use of independently assessed certification models and assessment frameworks. The Council feels it is important that any requirements for BREEAM schemes are clearly outlined in at the strategic level. It is acknowledged that viability assessments will have a bearing on individual cases. Establishing a local evidence base and undertaking an assessment of viability can ensure that that potential targets can be achieved.

Next Steps

The Council will review Policy D2 when preparing the next iteration of the Local Plan.

The policy does not go far enough

The Council received criticism that the policy should be more detailed, specifically in terms of the introduction of design codes.

Council Response

The council welcomes comments regarding policy wording. More detailed design guidance is contained within the Council's suite of Supplementary Planning Documents.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Carbon emissions

The Council received a representation calling for the inclusion of carbon emission analysis throughout the Plan making process. The policy is insufficiently detailed to enable the council to secure any improvement over a business as usual construction approach and will not secure the radical reduction in carbon emissions demanded by national legislation and planning policy.

Council Response

The Council strongly supports the global, national and local imperative to mitigate the effects of climate change. Many of the emerging policies in the draft Plan are “designed to secure that the development and use of land contributes to the mitigation of and adaption to climate change”. Climate Change is a cross cutting theme which is central to the sustainability of the whole Plan itself. However, the Council does not agree that the Local Plan is required to include carbon emission targets. Please refer to the Council’s response to Policy S1 and NE1 for further information on this subject.

To ensure the consideration of carbon emissions is considered within the Plan preparation, the Council is undertaking a carbon audit of the strategic spatial options and reasonable options for development allocations. The carbon audit will provide further evidence and consideration in understanding the potential effects of development sites which will contribute to the SA and inform the next iteration of the Local Plan.

Next Steps

The draft Local Plan will be reviewed to ensure new Climate Change policies and policies contributing to Climate Change adaptation/mitigation are clearly identified within the Local Plan. Supporting documents will also be updated and produced to demonstrate how the council has complied with national Climate Change legislation.

Loss of Trees

The Council received an objection to the policy stating that development being a priority over trees is not acceptable.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

Wording Considerations.

The Council generally received support for the policy but there is concern that the flow of the supporting information is not ideal.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy D3: Promoting Good Design with new Residential Developments

Policy D3: Council response and next steps

Lifetime Homes/Building for Life

The Council received several objections to the policy in terms of cost implications to developers. Conversely a number of representations were received suggesting that the policy does not go far enough.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

The Council will review Policy D3 when preparing the next iteration of the Local Plan.

Support for the Policy/Wording Considerations

The Council generally received support for the policy but there is concern that the flow of the supporting information is not ideal.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy D4: Alterations and Extensions to Residential Buildings

Policy D4: Council response and next steps

Support for the Policy/Wording Considerations

The Council generally received support for the policy but there is concern that the flow of the supporting information is not ideal.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy D5: Shopfronts

Policy D5: Council response and next steps

The policy was well received.

Next Steps

Whilst no objections were received, the Council will review Policy D5 when preparing the next iteration of the Local Plan.

Policy D6: Advertising

Support for policy and wording considerations.

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 10: Planning for our Heritage Assets

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 10 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 10: Planning for our Heritage Assets received 32 comments of which 19 were objections to policies and 13 were in support. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 10: Planning for our Heritage Assets – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy HE1: Our Strategic Approach for our Heritage Assets (Strategic Policy)	12	0	4	8
Policy HE2: World Heritage Sites	5	0	2	1
Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)	0	0	2	0
Policy HE4: Archaeology	6	0	1	5
Policy HE5: Development Affecting Non-Designated Heritage Assets	7	0	2	5
Policy HE6: Heritage At Risk	2	0	2	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy:

Table 2. Summary of comments received	
Policy HE1: Our Strategic Approach for our Heritage Assets (Strategic Policy)	<ul style="list-style-type: none"> • Support for the policy/ Wording considerations • Lack of Clarity
Policy HE2: World Heritage Sites	<ul style="list-style-type: none"> • Support for the policy
Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)	<ul style="list-style-type: none"> • Support for the policy/Wording considerations.
Policy HE4: Archaeology	<ul style="list-style-type: none"> • Support for the policy • Objection to Historic Environment Record requirements
Policy HE5: Development Affecting Non-Designated Heritage Assets	<ul style="list-style-type: none"> • Support for the policy/Wording considerations.
Policy HE6: Heritage At Risk	<ul style="list-style-type: none"> • Support for the policy

Policy HE1: Our Strategic Approach for our Heritage Assets (Strategic Policy)

Policy HE1: Council response and next steps

Support for the policy/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the NPPF.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Lack of clarity

The Council received a representation in relation to the how the policy would be applied in relation to strengthening links between culture and the historic environment.

Council Response

Policy H1 is a Strategic Policy that should not be read in isolation but in conjunction with other policies within the emerging Local Plan as well as the Council's Cultural Strategy.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy HE2: World Heritage Sites

Policy HE2: Council response and next steps

Support for the policy/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the NPPF.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)

Policy HE3: Council response and next steps

Support for the policy/Wording considerations

The Council received support for the policy. However, it was noted that the Council's East Boldon Conservation Area Character Appraisal and Management Plan are in need of review.

Council Response

It is acknowledged that a number of the Council's Supplementary Planning Documents could benefit from being reviewed.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan. A review of Supplementary Planning Documents will be undertaken in due course.

Policy HE4: Archaeology

Policy HE4: Council response and next steps

Support for the policy/Wording considerations

The Council received support for the policy. However, it was noted that the Council's East Boldon Conservation Area Character Appraisal and Management Plan are in need of review.

Council Response

It is acknowledged that a number of the Council's Supplementary Planning Documents could benefit from being reviewed.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan. A review of Supplementary Planning Documents will be undertaken in due course.

Objection to Historic Environment Record requirements

The Council received objections to the policy stating that it is more onerous than National Policy.

Council Response

The inclusion of investigations in the Historic Environment Record should be a blanket requirement of archaeological investigations as it is a vital step involved in keeping the Historic Environment Record up-to-date, allowing the significance of heritage assets to be assessed and to predict the archaeological potential of sites. Sites where nothing is found are as important in assessing archaeological potential as sites where archaeology is found. The policy does not suggest that all archaeological sites require publication. However, including all archaeological investigations in the Historic Environment Record assists the Local Planning Authority in adhering to National Planning Policy Framework paragraphs 187 and 188.

Next Steps

None required

Policy HE5: Development Affecting Non-Designated Heritage Assets

Policy HE5: Council response and next steps

Support for the policy/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the NPPF. It was noted that the Council's East Boldon Conservation Area Character Appraisal and Management Plan are in need of review.

Council Response

The council welcomes comments regarding policy wording. It is acknowledged that a number of the Council's Supplementary Planning Documents could benefit from being reviewed.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan. A review of Supplementary Planning Documents will be undertaken in due course.

Policy HE6: Heritage At Risk

Policy HE6: Council response and next steps

Support for the policy

The Council received several representations in support of the policy.

Council Response

The council welcomes comments in support of the policy.

Next Steps

None required.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 11: Planning for our Natural Environment

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 11 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 11: Planning for the Natural Environment received 422 comments of which 349 were objections to policies, 62 were in support and 11 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 11: Planning for our Natural Environment – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)	253	4	3	246
Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)	22	1	6	15
Policy NE3: Green Infrastructure (Strategic Policy)	58	0	35	23
Policy NE4: Open Space & Green Infrastructure Provision	17	0	1	16
Policy NE5: Areas of High Landscape Value	13	1	7	5
Policy NE6: Flood Risk and Water Management	22	4	3	15
Policy NE7: Protecting Water Quality	4	1	2	1
Policy NE8: Coastal Change	2	0	1	1
Policy NE9: Contaminated Land and Ground Stability	2	0	1	1
Policy NE10: Air Quality	18	0	1	17
Policy NE11: Pollution	11	0	2	9

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)	<ul style="list-style-type: none"> • Climate Change • Impacts of development on trees and hedgerows • Implementation of Biodiversity Net Gain
Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)	<ul style="list-style-type: none"> • Inappropriate level of protection afforded to designated sites • Loss of Green Belt is contrary to Policy NE2 • Habitat Regulations Assessment /

	<p>Appropriate Assessment requirements</p> <ul style="list-style-type: none"> • Inappropriate policy requirement to consider alternative sites • Amendments/ wording considerations /Support for the policy
Policy NE3: Green Infrastructure (Strategic Policy)	<ul style="list-style-type: none"> • Impacts of the loss of Green Belt on green infrastructure corridors and Climate Change • Amendments/ wording considerations /Support for the policy
Policy NE4: Open Space & Green Infrastructure Provision	<ul style="list-style-type: none"> • Loss of Green Belt and open space is contrary to Policy NE4 • Uncertainty with regard to requirements for developer contributions and viability concerns. • Amendments/ wording considerations /Support for the policy
Policy NE5: Areas of High Landscape Value	<ul style="list-style-type: none"> • Support for Policy NE5 and designation of the coastal area of High Landscape Value. • Evidence for landscape designations is out of date and amendments to designation boundaries suggested.
Policy NE6: Flood Risk and Water Management	<ul style="list-style-type: none"> • Impacts of development on flood risk within villages and concerns regarding flood risk evidence base. • Concerns with the proposed use of Sustainable urban drainage systems (SUDs) as mitigation. • Sequential and Exception Test not undertaken. • Policy NE6 does not promote a coordinated approach to managing flood risk. • Support for policy and wording considerations.
Policy NE7: Protecting Water Quality	<ul style="list-style-type: none"> • Support for policy
Policy NE8: Coastal Change	<ul style="list-style-type: none"> • Support for policy • Concern on impacts on number of housing development and sewage treatment from villages effecting the coast.
Policy NE9: Contaminated Land and Ground Stability	<ul style="list-style-type: none"> • Support for the policy • How does the Policy fit with South Tyneside's Validation checklist
Policy NE10: Air Quality	<ul style="list-style-type: none"> • Proposed developments in the Local Plan will have a negative impact on Air Quality • Proposed change of wording to NE10g
Policy NE11: Pollution	<ul style="list-style-type: none"> • Support for the Policy • Impacts of traffic and congestion as a result of proposals in the Draft Local Plan • Adverse impact the Draft Local Plan could have on coastal pollution

Policy NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)

Policy NE1: Council response and next steps

South Tyneside Council Climate Change emergency declaration

Representations were received which objected to or referenced the South Tyneside Climate Change Emergency Declaration and the absence of the commitments of the declaration within the Local Plan.

Council Response

The Council declared a Climate Emergency on the 18th July 2019. The declaration requires all council strategic decisions, policies and strategies are in line with the shift towards carbon neutral by 2030. On 7 August 2019, the Council's Cabinet considered and approved the Pre-Publication Draft Local Plan for consultation. There were practical constraints associated with updating the draft Local Plan to reflect the declaration and therefore, the council acknowledges that the draft Local Plan did not reflect the climate change emergency declaration. It is noted that a number of representations quote the actions of the declaration. It should be noted that these actions are for South Tyneside Council as a whole and not to be specifically addressed in Local Plan policies. It is the role of the Local Plan and its policies to assist in delivering the aims of the declaration.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they are in line with the Climate Change Emergency as far as possible.

Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits

Representations were made which object to the Local Plan on the basis that it is non-compliant with national legislation, specifically, the Planning and Compulsory Purchase Act 2004, Climate Change Act 2008 and the National Planning Policy Framework (NPPF). Objections state that the Local Plan has failed to demonstrate how policies will reduce emissions in line with the Climate Change Act 2008. Objections also suggest that the Local Plan is also non-compliant as it does not set carbon emission targets and suggest the Local Plan is required to undertake an emissions/ carbon audit.

Council Response

The Council strongly supports the global, national and local imperative to mitigate the effects of climate change. The Council fully agrees that addressing climate change is one of the core land use planning principles to be addressed and that this should underpin both plan making and decision taking. With regard to noncompliance with national policy the council considers that the draft Local Plan policies and supporting documents comply with national legislation and section 149 of the National Planning Policy Framework by including policies which mitigate and adapt to the impacts of climate change. The council do not agree that it is a legal requirement to include carbon emission targets within the Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 states that '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'. This section does not provide an express statutory obligation to include carbon reduction targets within Local Plans. The obligation is a much broader one — to “include policies designed to secure that the development and use of land contribute to the mitigation of, and adaption to, climate change”. Furthermore, the National Planning Policy Framework does not include a specific obligation to include a carbon reduction target which tracks national and international obligations in a local development plan. Furthermore, the Local Plan is not required through the National Planning Policy Framework to provide SMART targets. The Local Plan and its policies are subject to monitoring through specific performance indicators as specified in Policy IM1.

Footnote 48 of the National Planning Policy Framework states that local planning authorities should address rising temperatures “in line with the objectives and provisions of the Climate Change Act 2008”, those provisions do not place local planning authorities under a specific obligation in respect of carbon reduction; obligations are placed on the Secretary of State. The objectives of the Climate Change Act 2008 are plainly the reduction of greenhouse gas emissions. However, footnote 48 of the National Planning Policy Framework does not support the proposition that a specific carbon reduction target which tracks national and international obligations must be included in local development plans.

Next Steps

Many of the emerging policies in the draft Plan are “designed to secure that the development and use of land contributes to the mitigation of and adaption to climate change”. Climate Change is a cross cutting theme which is central to the sustainability of the whole Plan itself. To reflect the importance of this, the draft Local Plan will be reviewed to ensure new Climate Change policies and policies contributing to Climate Change adaptation/mitigation are clearly identified within the Local Plan. Supporting documents will also be updated and produced to demonstrate how the council has complied with national Climate Change legislation.

The next stage of the Local Plan will be informed by the most up to date baseline information in regard to Climate Change. Local Plans are supported by a Sustainability Appraisal which assesses the environmental, social and economic effects of the Local Plan; the Sustainability Appraisal includes a Scoping Report, which considers the baseline information for the Strategic Environmental Assessment (SEA) objectives which are assessed within the Sustainability Appraisal. The Council are also undertaking a carbon audit of the strategic spatial options and reasonable options for development allocations. The carbon audit will provide further evidence and consideration in understanding the potential effects of development sites which will contribute to the Sustainability Appraisal and inform the next iteration of the Local Plan.

Loss of Green Belt and effects on Climate Change

A number of representations argue that the loss of land from the Green Belt would be contradictory to the Local Plans commitment to mitigating and adapting the effects of climate change.

Council Response

It is acknowledged that undeveloped land within the Green Belt can contribute to mitigating the effects of climate change. It is considered that the Council has adopted a sustainable approach to development and through Plan policies seeks to mitigate and adapt to the impacts of climate change. In addition, the governments Planning Practice Guidance: Green Belt (Paragraph: 002

Reference ID: 64-002-20190722) requires local authorities where Green Belt boundaries are to be amended to 'set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt'. These improvements could include new and enhanced green infrastructure, woodland planting, new and enhanced cycle routes and habitat improvements. It is considered that these compensatory measures would also play an important role in mitigating the effects of climate change and in some cases may provide opportunities to enhance the contribution to climate change mitigation. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The Council will continue to review our strategic approach to development to ensure the Local Plan delivers sustainable patterns of development.

Impacts of development on trees and hedgerows

A number of comments raise the issue of trees and hedgerows being felled to facilitate development, despite the policy stating it will protect trees; and also the negative effect of losing vegetation with regard to mitigating Climate Change impacts.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The Council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

Implementation of Biodiversity Net Gain

Comments received called for greater emphasis regarding Biodiversity Net Gain within policy NE1 and questioned the methodology and delivery of Net Gain for development sites within the Green Belt.

Council Response

The concept of Biodiversity Net Gain is set out in the Governments 'Environment Bill' which requires developments to deliver a mandatory, minimum 10% improvement in biodiversity value. The Environment Bill is yet to gain Royal Assent and therefore there are no mandatory requirements for Net Gain at this time. However, the Council is preparing for the introduction of the requirement and any allocation in the Local Plan brought forward for development would be subject to delivering mandatory net gain in accordance with the Environment Bill once it becomes law. The National Planning Policy Framework (2019) encourages net gains for biodiversity to be sought through planning policies and decisions. Policy NE2 sets out the requirement for measurable net gain in

accordance with the National Planning Policy Framework. Biodiversity net gain can be achieved by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. Off-site measures can have significant benefits in the delivery of strategic biodiversity net gain; it can include areas of enhanced or created habitats which could have wider benefits to the ecological networks in the area.

Next Steps

The concept of Biodiversity Net Gain is addressed in Local Plan Policy NE2 rather than NE1. The Council will review NE1 and consider the contents of the policy. The Council will also continue to prepare for the introduction of the Environment Bill and mandatory 10% Biodiversity Net Gain.

Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)

Policy NE2: Council Response and next Steps

Inappropriate level of protection afforded to designated sites

Comments were received which suggested that policy wording in NE2 weakens or offers too much protection to different levels of designated sites (local sites, national sites and international sites).

Council Response

The Council does not agree that the policy weakens protection for designated sites within the Borough and Policy NE2 provides adequate protection to all our designated assets. Planning proposals effecting national designations would be required to fully comply with criteria G-I.

Furthermore, the Council is confident that the use of term 'likely to have an adverse impact' will not result in more protection being given to national sites than to international sites. The term 'likely to have an adverse impact' is derived from the National Planning Policy Framework. The term 'likely significant effects' is derived from national and European legislation in regard to the Habitat Regulations Assessment; this legislation also endorses the application of the 'precautionary principle' in the assessment of effects on Natura 2000 sites, therefore, where a potentially negative effect may arise and the impacts on the protected site cannot be ruled out, an Appropriate Assessment would be required.

Comments were received which suggest that locally important sites are afforded the same level of protection as nationally important sites as the policy requires consideration of alternative sites and mitigation. The PPG states that Local Wildlife Sites are 'areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery'. It also states that local planning authorities should 'include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks' (Paragraph: 013 Reference ID: 8-013-20190721). The Council believes that Policy NE2 offers adequate protection for these sites.

Next Steps

Where appropriate, review policy wording to ensure clarity in levels of protection required for each designation.

Loss of Green Belt is contrary to Policy NE2

Comments were received which argued that the loss of Green Belt areas would be contrary to Policy NE2 due to negative impacts on designated sites and the wider wildlife corridor.

Council Response

Please see the Council's responses to Chapter 4: Delivering the Strategy which sets out how 'exceptional circumstances' has been demonstrated for alterations to Green Belt boundaries in order to meet the development needs of the Borough.

The Council acknowledges the role open space and the Green Belt in contributing to wider aspects of biodiversity and ecological networks within South Tyneside and is committed to protecting our most valuable assets and improving the networks in the Borough. Impacts on the ecological designations have been considered through the site-selection process and documented in the Site-Selection Topic Paper (2019). Policy NE2 is in accordance with the National Planning Policy Framework and the government's Planning Practice Guidance mitigation hierarchy which seeks to protect the natural environment from the harmful effects of development. The policy states that appropriate mitigation should be incorporated into the design of development at an early stage and also provide measurable net gains for biodiversity; with specific mitigation measures set out for the most valuable designations. Any development proposed through the draft Local Plan should be in accordance with policy NE2 and any specific policies setting out mitigation measures, which will contribute to and enhance the ecological networks in South Tyneside.

Next Steps

None required.

Habitat Regulation Assessment/ Appropriate Assessment

Comments were raised which suggest that Policy NE2 only refers to the need for an appropriate assessment at the design stage and questions the suitability and requirements of the existing Mitigation Strategy (SPD 23).

Council Response

The Council does not agree that the policy only refers to the need for appropriate assessment at the design stage. The policy clearly states that development which is 'considered to result in a likely significant effect' on internationally important sites, will be subject to an Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations (2017). The policy references that 'development will only be allowed' where individual proposals would not result in adverse effects on the site's integrity, when this can be 'determined through Appropriate Assessment at the design stage'. This section of the policy is to ensure that all proposed development (allocations within the Local Plan and speculative development proposals), which may impact upon the internationally protected sites are considered appropriately with regard to their potential impacts on the integrity of these sites.

Comments relating to the validity and application of the exiting interim Mitigation Strategy SPD: 23 are noted by the Council. It is the intention of the Council to update the SPD to support the mitigation requirements of the forthcoming Local Plan and for it to be informed by the next iteration of the Local Plan HRA.

Next Steps

The Council will review and update the Mitigation Strategy to support the emerging Local Plan.

Inappropriate policy requirement to consider alternative sites

Comments were received that Policy NE2 requires that proposals which will have an impact on a habitat comply with various criteria, including that there are no reasonable alternatives.

Representation stated that the National Planning Policy Framework (para. 175) does not refer to the need to consider alternatives, instead it seeks adequate mitigation, or, as a last resort, compensation.

Council Response

Policy NE2 requires applications which could impact upon designated sites to consider whether reasonable alternatives are available. With regard to internationally protected sites, Section 6(4) of the Habitats Directive requires the identification of alternative sites through Appropriate Assessment (AA) where negative effects have been identified and are unable to be mitigated. Therefore, the identification of alternatives is a requirement of the AA process.

Paragraph 175 of the National Planning Policy Framework, states:

‘When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;’. Furthermore, the ‘mitigation hierarchy’ as identified in Paragraph: 019 Reference ID: 8-019-20190721 of the PPG, relates to Para 175 of the National Planning Policy Framework. The Para 019, states ‘Avoidance: Can significant harm to wildlife species and habitats be avoided; for example by locating on an alternative site with less harmful impacts?’ The Council considers that applicants demonstrating that there are no reasonable alternatives is an application of the ‘mitigation hierarchy’ and in accordance with Para 019 of the PPG and Para 174 of the National Planning Policy Framework.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE3: Green Infrastructure (Strategic Policy)

Policy NE3: Council Response and next Steps

Impacts of the loss of Green Belt on green infrastructure corridors and Climate Change

Comments were received which stated that the loss of Green Belt land would be contrary to the principles of NE3 and would be harmful to green infrastructure corridors. Furthermore, development within the Green Belt would contribute to Climate Change impacts.

Council Response

Please see the Council's responses to Chapter 4: Delivering the Strategy which sets out how 'exceptional circumstances' has been demonstrated for alterations to Green Belt boundaries in order to meet the development needs of the Borough.

The Council acknowledges that the Green Belt contributes to the green infrastructure network and has identified the Green Belt corridor within the policy. The Green Belt deletions within the draft Local Plan do not compromise the Green Belt corridor. Furthermore, mitigation opportunities from development will help to strengthen the Green Belt corridor and the wider green infrastructure network. Please refer to the Climate Change response for Policy NE1 with regard to concerns on Climate Change impacts.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE4: Green Infrastructure (Strategic Policy) (Strategic Policy)

Policy NE4: Council Response and next Steps

Loss of Green Belt and open space is contrary to Policy NE4

Comments were received which stated that developing sites with currently within the Green Belt would result in the loss of green infrastructure assets would be contrary to Policy NE4

Council Response

Please see the Council's responses to Chapter 4: Delivering the Strategy which sets out how 'exceptional circumstances' has been demonstrated for alterations to Green Belt boundaries in order to meet the development needs of the Borough.

The principle of Policy NE4 is to protect designated areas of open space and the wider green infrastructure network and is in line with the requirements of Paragraph 97 of the National Planning Policy Framework. The Council acknowledges that the Green Belt forms a green infrastructure corridor and that the Green Belt and the natural environment can have in encouraging healthy lifestyle choices and supporting physical and mental wellbeing. Where sites are allocated for development in the Green Belt, they would be assessed against policy NE4 which would require the development contribute to enhancing the green infrastructure network and provide new areas of open space on new developments or through contributions to existing green infrastructure assets. Furthermore, should any site specific mitigation be required i.e. rerouting public footpaths, this would be addressed at the planning application stage and in accordance with local and national policies.

Next Steps

None required.

Uncertainty with developer contributions requirement and viability concerns.

Several comments were received which called for amendments to the wording of Policy NE4 to provide greater clarity as to what developers would be expected to provide financial contributions and for greater flexibility in the policy wording. Further comments noted that Policy NE4 makes reference to an existing SPD, this raised concern that the policy was giving additional weight to SPD guidance. In addition, concerns were raised that the SPD and or its successor documents would not be fully considered in the Local Plan viability assessment.

Councils Response

Open space and green infrastructure provision is integral to ensuring that major housing developments provide sustainable communities. Viability work has been undertaken which includes site specific assessments and which takes into account open space provision. Whilst successor SPD documents have obviously not been prepared at this stage, in order to be consistent with the role of SPDs, they will need to amplify existing policy in the Local Plan rather than introduce new policy requirements and the documents will be subject to a statutory consultation exercise whilst still in draft form. It is considered therefore that the policy is consistent with the National Planning Policy Framework. Comments noted with regard to clarity over contribution requirements.

Next Steps

Review Policy NE4 with to further clarifying wording and contribution requirements.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE5: Areas of High Landscape Value

Support for Policy NE5 and designation of the coastal Area of High Landscape Value.

Comments were received which supported Policy NE5 and the designation of the coastal area of High Landscape Value.

Council Response

The Council welcomes support for the policy.

Next Steps

None required

Evidence for landscape designations is out of date and amendments to designation boundaries suggested.

Comments were received which suggested that the Landscape Character Study (2012) which underpins NE5 and the Area of High Landscape Value (AHLV) designations is out of date. Furthermore, some comments suggested amendments to the boundaries of the AHLV.

Council Response

The Council believes that the 2012 Landscape Character Study continues to be fit for purpose and a reliable evidence source to support the emerging Local Plan. It is considered that most areas in the Plan have not been subject to development which would significantly change the outcomes of the current report. The AHLV as proposed in the draft Local Plan have been informed by the 2012 Landscape Character Study: Part III: Application of the Character Assessment. The study provides reasoning for the amended boundaries for the designations, which are to provide more recognisable and robust boundaries. The Council supports the reasoning for the proposed boundaries.

Next Steps

None required

Policy NE6: Flood Risk and Water Management

Impacts of development on flood risk within villages and concerns regarding flood risk evidence base.

Concerns regarding the impact of housing development proposed within the Local Plan on flood risk were raised during the consultation. There was concern that development would exacerbate existing flood risk problems within the villages. Comments also suggested that sites H3.59 and H3.61 are located within recognised flood risk zones and that flood risk had not been fully considered in identifying sites for development.

Council Response

The Council are aware of existing flooding concerns and has an active programme to address flood risk issues within the Borough including the installation of SUDS ponds and detention basins. The Council has considered flood risk issues throughout the plan preparation. The Local Plan is supported by a Strategic Flood Risk Assessment (SFRA) (2018) and the consideration of flood risk issues is documented in the Site Selection Topic Paper and Sustainability Appraisal. The SFRA identifies that a small area of sites H3.59 and H3.61 do fall within Flood Risk Zone 3b. The SFRA recommends that these issues can be overcome through considering site layout and design, therefore, the site have not been discounted on flood risk concerns. Policy NE6 provides detailed guidance to assess flood risk from new developments and seeks to reduce flood risk within the Borough. Any development proposal will be subject to assessment against Policy NE6. Policy NE6 states that flood risk will be considered at all stages of the planning process to avoid inappropriate development. Policy NE6 requires applicants to submit site specific flood risk assessments to demonstrate that proposals are not at risk or does not increase flood risk elsewhere. Where flood risk measures are required the appropriate mitigation will be agreed with the Council.

Next Steps

None required

Concerns with the proposed use of Sustainable urban drainage systems (SuDs) as mitigation.

Several comments were received relating the use of SuDs as set out in Policy NE6. Concerns included:

- SuDs implementation and maintenance;
- SuDs do not prevent river (fluvial) flooding;

- Health and safety concerns.

Council Response

The installation of SuDS features as a method of surface water management is highlighted as key in the Government's 25 Year Environment Plan. This will be strengthened through new planning guidance as well as improving existing arrangements for the management of surface water flooding and the outcomes delivered by Lead Local Flood Authorities (LLFA), Risk Management Authorities and water companies.

The implementation of SuDS is managed through the stringent development control process. Developers are encouraged to engage to discuss drainage plans at an early stage. This means that we have an opportunity to discuss the design and raise any concerns or queries during the design phase. The application will be reviewed by the relevant consultee within the LLFA and adequate conditions attached. This not only provides assurance that the development will be carried out in accordance with the approved designs, it also provides detail on the maintenance regime and verification of installation of the SuDS feature.

With regards to fluvial flooding, we do understand in some circumstances SuDS within a new development can help return the site to its pre-development state through a reduction in discharge rates. For example, there may be a site which is currently hard standing and close to a river. Development of that site to include SuDS could slow the flow through utilising these features as well as offering some small improvements to watercourses and preventing them from being inundated with run off from impermeable areas. They also have the added benefit of providing a level of water treatment and helping remove some pollutants. On a site by site basis these improvements may offer small improvements which can overall have a larger positive impact. In addition, the River Don is a main river and maintained by the Environment Agency therefore any methods of preventing fluvial flooding to this watercourse directly, would be the responsibility of the EA.

South Tyneside Council do have SuDS ponds/detention basins which have been installed within the last few years and although there were initial concerns from residents with regards to water safety, following detailed consultation prior to and during construction they have been widely accepted by local residents. Awareness of water safety will continue for future SuDS installations where appropriate.

Next Steps

None required

Sequential and Exception Test not undertaken.

Comments were received which identified that the Sequential and Exception Test had not been undertaken to support the draft Local Plan.

Council Response

The Council acknowledges that the Sequential and Exception tests were not carried out in time to support the draft Local Plan. This work is ongoing and will be produced to support the next iteration of the Local Plan.

Next Steps

Produce a Sequential and Exception test to support the Local Plan.

Policy NE6 does not promote a coordinated approach to managing flood risk.

Representations were made which stated that Policy NE6 does not promote a co-ordinated approach in managing flood risk from numerous sites and SuDs. The policy leaves this consideration for each developer to adopt their own approach.

Council Response

Criterion F of Policy NE6 states:

‘Taking, where appropriate, a coordinated approach to flood risk management as this can increase the viability of creating new infrastructure to a surface water body or existing surface water sewer to avoid discharge to a combined sewer’.

The above statement sets out the principle of coordinating water management mitigation. This is applicable to individual development site and existing water management schemes as well as multiple development sites. The Council will work with developers to achieve a strategic approach to flood risk management.

Next Steps

Amend wording to ensure clarity regarding principles of criteria F.

Support for policy and wording considerations.

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE7: Protecting Water Quality

Support for policy and wording considerations.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording.

Policy NE8: Coastal Change

Support for policy.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording.

Concern on impacts on number of housing development and sewage treatment from villages effecting the coast.

Concern was raised regarding the impact for 950 new homes in the villages could have upon the South Tyneside coast. The issue of sewage treatment capacity was also raised amid concerns that untreated sewage is being released into the North Sea at Whitburn.

Council Response

Policy NE6 identifies the Coastal Change Management Area, as defined on the Proposals Map, and sets considerations for development within this area. There are no allocations identified within the Local Plan which fall within this area. Impacts from increased recreational pressure on the coast, within the context the European designations; from new housing, is considered in the Habitat Regulations Assessment (HRA) of the Local Plan.

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

Next Steps

Continue to work with Northumbrian Water in the preparation of the Local Plan.

Policy NE9: Contaminated Land and Ground Stability

Support for policy.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy

Validation Checklist

A comment queried how Part A of the policy, a requirement to carry out investigations to assess the nature and extent of contamination, would correspond with South Tyneside's Validation Checklist.

Council Response and Next Steps

The Policy will be reviewed to ensure consistency with the Validation Checklist.

Policy NE10: Air Quality

Impacts from the Local Plan on Air Quality

Comments were received outlining the perception that air quality is already poor and close to exceeding Government recommended high levels in congested areas like Boldon and Cleadon and that proposals in the Plan will exacerbate air quality issues and the associated health and wellbeing issues.

The Policy allows for proposals which may increase pollution to be approved where satisfactory mitigation measures are implemented. Responses describe this as a 'get out clause' for striving for good air quality.

Council Response

Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required and proposals will only be approved where satisfactory mitigation measures can be implemented.

In line with the National Planning Policy Framework, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity.

Both policies specify that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Any developments proposed in the Plan would have to adhere to the Policies within the Plan.

Next Steps

None Required

Proposed change of wording to NE10g

The wording of the policy should also be flexible to ensure that mitigation measures are only suggested where appropriate.

Council Response and next steps

The Council welcomes comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE11: Pollution

Support for policy.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy.

Impacts from the Local Plan on Air Quality

Concerns were raised regarding traffic levels in East Boldon which are perceived to be high already. Comments raised concerns about the impacts of traffic and congestion on air quality and how this can negatively effect residents and children attending East Boldon Infants School. Comments recognised the intention of the Policy to ensure air quality is not worsened; however the Plan should strive to improve air quality rather than maintain current levels.

Council Response

Air Quality assessments will be required as part of the planning application process as and when proposals come forward. A Traffic assessment will form part of the evidence base for the next draft of the Local Plan.

Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required and proposals will only be approved where satisfactory mitigation measures can be implemented.

In line with the National Planning Policy Framework paragraph, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity.

Both policies specify that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Coastal Pollution

Comments were received regarding potential adverse impacts from the Draft Local Plan on existing coastal pollution problems. Local evidence suggests overflow events from Northumbrian Water's pumping station at Whitburn has resulted in coastal pollution; concerns were raised how additional housing development might exacerbate this issue.

Council Response

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were

introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

Next Steps

Continue to work with Northumbrian Water in the preparation of the Local Plan.

Chapter 12: Infrastructure

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 12 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 12: Infrastructure received 188 comments of which 116 were objections to policies, 35 were in support and 37 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 12: Infrastructure – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)	27	6	6	15
Policy IN2: Developer Contributions, Infrastructure Funding and Viability	18	1	5	12
Policy IN3: Social and Community Infrastructure	34	10	7	17
Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)	26	4	1	21
Policy IN5: Telecommunication and Utilities	4	0	1	3
Policy IN6: Travel - New Development (Strategic Policy)	16	2	5	9
Policy IN7: Accessible and Sustainable Travel (Strategic Policy)	47	8	4	35
Policy IN8: Airport and Aircraft Safety	1	0	1	0
Policy IN9: Waste Facilities (Strategic Policy)	3	2	1	0
Policy IN10: Protection of Existing Waste Facilities (Strategic Policy)	2	0	2	0
Policy IN11: Minerals Safeguarding and Extraction (Strategic Policy)	10	4	2	4

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)	<ul style="list-style-type: none"> • The policy refers to deficiencies in existing provision. It would be unreasonable to expect a developer to rectify this. • The policy refers to world class digital infrastructure the cost and implications of which are unclear. • Comments that the level of detail in the Infrastructure Delivery Plan is not sufficient • Comments that sewerage and drainage provision is not adequate.
Policy IN2: Developer Contributions, Infrastructure Funding and Viability	<ul style="list-style-type: none"> • Lack of detail for highway impacts in Whitburn • Viability evidence should be published • Phasing developer contributions through the development period • The Community Infrastructure Levy is essential for the implementation of Neighbourhood Plans • Amendments/ wording considerations /support for the policy
Policy IN3: Social and Community Infrastructure	<ul style="list-style-type: none"> • The Status of Neighbourhood Plans • Provision for surgeries and schools • Amendments/ wording considerations /support for the policy
Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)	<ul style="list-style-type: none"> • Renewable energy / Onshore wind development - policy should be more ambitious • Amendments/ wording considerations /support for the policy
Policy IN5: Telecommunication and Utilities	<ul style="list-style-type: none"> • The policy is not deliverable • Support for the policy
Policy IN6: Travel - New Development (Strategic Policy)	<ul style="list-style-type: none"> • Charging infrastructure for low-emission vehicles • Parking in the villages • The Parking Standards Supplementary Planning Document • Secure storage with charging points should be a requirement • Amendments/ wording considerations /support for the policy
Policy IN7: Accessible and Sustainable Travel (Strategic Policy)	<ul style="list-style-type: none"> • The Boldon and Tilesdeds proposed Level Crossings Scheme • Proposed new Metro Station at East Boldon • The Parking Capacity at the existing East Boldon Metro Station • Modal Shift

	<ul style="list-style-type: none"> • Potential conflict between equestrian and cycle use • Protecting strategically significant land at sites where new Metro stations may be developed • Application of a 5m buffer to each side of alignments proposed in Policy IN7 • Highways Deliverability • Amendments/ wording considerations /support for the policy
Policy IN8: Airport and Aircraft Safety	<ul style="list-style-type: none"> • Support for the policy
Policy IN9: Waste Facilities (Strategic Policy)	<ul style="list-style-type: none"> • Comments generally support the Policy. Some amendments to supporting text suggested.
Policy IN10: Protection of Existing Waste Facilities (Strategic Policy)	<ul style="list-style-type: none"> • Two comments were received in support of the Policy.
Policy IN11: Minerals Safeguarding and Extraction (Strategic Policy)	<ul style="list-style-type: none"> • Minerals and minerals infrastructure safeguarding should be addressed in a dedicated policy • Amendments/ wording considerations /support for the policy

Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)

Policy IN1: Council response and next steps

The policy refers to deficiencies in existing provision

Representations were received that contended that it would be unreasonable for a development to have to rectify / improve existing deficiencies in provision in an area. Such an approach would conflict with the tests for planning obligations as set out in the Community Infrastructure Regulations (Regulation 122(2)) and the NPPF (para. 56). To ensure a sound Plan that is consistent with national legislation and policy, it is requested that this text is deleted from the policy.

Council response

The requirement to improve any deficiencies in existing provision is only 'where appropriate'. This is considered to be consistent with the tests for planning obligations as set out in the Community Infrastructure Regulations (Regulation 122(2)) and the NPPF (para. 56).

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

The policy refers to world class digital infrastructure

Representations were received contending that the exact definition and the cost implications of providing 'world class' infrastructure is unclear. It is therefore suggested that this word is deleted from the policy.

Council response

Whilst it is acknowledged that 'world class' does not have an exact definition, it is considered that it conveys the Council's aspiration for high-quality digital infrastructure which is integral to achieving economic prosperity, ensuring that communities are fully able to benefit from the opportunities offered by digital connectivity and reducing the need to travel.

Next Steps

None required.

The link between infrastructure and viability / publication of viability evidence

Representations were received contending that the link between infrastructure and viability needs to be much clearer in order for Policy IN1 to be found sound.

Council Response

It is intended to publish the South Tyneside Council Local Plan Viability Evidence Base: Final Report as part of the evidence base for the next consultation stage for the Local Plan. This will make the link between infrastructure and viability clearer

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

Comment regarding the Infrastructure Delivery Plan (IDP)

The Council received representations that the level of detail in the IDP is not sufficient.

Council Response

At the time the Pre-Publication Draft Local Plan was published, highway modelling work was ongoing and subject to change but interim findings provided the basis for an indicative assessment of the potential impacts of the draft housing allocations on the strategic highway and local transport network and this was published in the Infrastructure Delivery Plan.

It is intended that information regarding health and education provision will be available when the next iteration of the Local Plan is published and that this will include reference to dental provision.

The Infrastructure Delivery Plan is a summary document. It is considered that the level of detail provided is appropriate in this context. It is also a live document; that is to say that it will be updated in due course and more detail will be available as it progresses.

Next Steps

Update the Infrastructure Delivery Plan as appropriate.

Sewerage and drainage provision

The Council received a representation which can be summarised as below. The Council will respond to each of these points.

- The foul pumping station at Whitburn serves 4 communities. If the proposed release of a further 1,871 houses in the STC draft local plan for Whitburn, Cleadon and Boldon is approved it will increase the serving population by a further 27%.

- Recent case law demonstrating the duty of planning authorities is outlined in Barratt Homes Limited v Dwr Cymru Cyfyngedig (Welsh Water) [2009] UKSC13
- Decisions on the viability of the sewerage system should not be left to Northumbrian Water
- Any new developments in South Tyneside should be subject to independent scrutiny regarding sewerage and drainage systems.

Council Response

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

Regarding the reference to the grant of planning permission by Sunderland City Council for 64 homes in South Bents, we are advised by Northumbrian Water that an error was made in naming the manhole that this development could make a foul connection to. Northumbrian Water's sewer records were coloured up wrongly after some capital works had been carried out on the network, which meant they had to find an alternative connection point to the one named in the Flood Risk Assessment. This had nothing to do with any capacity issues in Northumbrian Water's existing sewerage network to support this development.

In respect of the reference to Barratt Homes Limited (Respondents) v Dwr Cymru Cyfyngedig (Welsh Water) (Appellants), the key point in this context is that it confirmed that development cannot be refused a sewer connection by a sewerage undertaker on capacity issues and if any upgrades are required to ensure that the undertaker will still be complying to their legal duties under Sec94 of the Water Industry Act 1991 then they have to deliver these at their expense in a timely manner. In the context therefore of the emerging South Tyneside Local Plan, Northumbrian Water cannot refuse connections and would have to upgrade the existing sewerage network and treatment facilities to ensure that they continue to remain in compliance with the measures imposed on them by their regulators (the Environment Agency and Ofwat). Northumbrian Water has advised that for this

catchment they can accommodate all the development without the need for any significant investment.

To summarise and to be absolutely clear, Northumbrian Water holds an Appointment under the Water Act 1989 as a water and sewerage undertaker. South Tyneside Council does not have any legislative remit whatsoever to act as a surrogate for Northumbrian Water in its statutory role. Nor is it the responsibility of South Tyneside Council to comment on how Northumbrian Water responds to requests for information. In respect of the emerging Local Plan, Northumbrian Water has advised that the development proposed in the emerging Local Plan do not present any critical capacity issues and that any investment necessary in water and sewerage capacity will be undertaken when required to do so.

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

Policy IN2: Developer Contributions, Infrastructure Funding and Viability

Policy IN2: Council response and next steps

Lack of detail for highway impacts in Whitburn

The Council received an objection regarding highway impacts and viability. This can be summarised as follows:

- Junctions in Whitburn are all currently facing high levels of congestion without the added stresses that more development in Whitburn will provide but no further details are available in the Local Plan.
- To rely on the costs of these required improvements to be borne by developers would make the developments no longer viable. No other solutions have been provided in the draft Local Plan.

Council Response

Allocations establish the principle of development but they do not provide the same level of detail regarding the mitigation of highway impacts that would be required for a planning application when mitigation is required. Our Infrastructure Delivery Plan (August 2019) and the Infrastructure Delivery Schedule which are available on-line at www.southtyneside.gov.uk/localplan details the position as to what the transport modelling told us at the time the Pre-Publication draft Local Plan (August 2019) was consulted on. The Infrastructure Delivery Plan is in draft format and subject to change. The next iteration of the Infrastructure Delivery Plan will be published alongside the next iteration of the Local Plan.

Viability is a key consideration for the Local Plan process which has informed and will continue to inform both draft policies and development allocations.

Next Steps

None required

Viability evidence should be published

The Council received a number of objections stating that viability evidence should be published.

Council Response

It is intended to publish the South Tyneside Council Local Plan Viability Evidence Base: Final Report as part of the evidence base for the next consultation stage for the Local Plan.

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

Phasing developer contributions through the development period

The Council received a number of objections stating that part 2(b) of this policy which advises that the council may “consider alternative phasing, through the development period, of any contributions where to do so would sufficiently improve the viability of the scheme to enable payment” is not sound.

Council Response

The intention of Policy IN2.2 [b] is to enable the mitigation of viability through phasing where the developer is contending that the development would not otherwise be viable. It is considered that this is consistent with national policy and is effective as currently worded.

Next Steps

None required

The Community Infrastructure Levy is essential for the implementation of Neighbourhood Plans

The Council has received a representation stating this levy is essential for the implementation of Neighbourhood Plans.

Council Response

The introduction of the Community Infrastructure Levy (CIL) would need to be supported by viability evidence i.e. evidence that there is sufficient ‘headroom’ for CIL as well as policy requirements. The Council is therefore considering whether viability evidence would support the introduction of the Community Infrastructure Levy.

Next Steps

Determine whether viability evidence would support the introduction of the Community Infrastructure Levy.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN3: Social and Community Infrastructure

Policy IN3: Council response and next steps

The Status of Neighbourhood Plans

The Council received several objections regarding the status of Neighbourhood Plans in the planning system. It was suggested that the policies contained within Neighbourhood Plans ought to be considered first and foremost when housing is allocated.

Council Response

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development. Whilst neighbourhood planning cannot be used to block the building of the homes and businesses considered to be necessary to meet the borough's current and future needs, they can be used to influence the type, design, location and mix of new development. Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development. They should be about local rather than strategic issues. If adopted, they will form part of the development plan for the Borough and used to assist in the determination of all planning applications in that area.

When the Pre-Publication Draft Local Plan was prepared, the emerging Whitburn and East Boldon Neighbourhood Plans had not been published.

Next Steps

The Council will continue to work with the Neighbourhood Forums.

Provision for surgeries and schools

The Council received a representation stating that more surgeries and schools will be needed to accommodate growth.

Council Response

The Spatial Planning team liaises with the South Tyneside Clinical Commissioning Group, the Council's Public Health team and with the Council's school places planning managers regarding all proposed housing allocations in the Borough and will continue to do so.

Next Steps

The Council will review Policy IN3 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)

Policy IN4: Council response and next steps

Renewable energy / Onshore wind development

The Council received representations questioning whether Policy IN4 could be extended in ambition to identify suitable areas for onshore wind development. Similarly representations were received calling for surveying work to be done to determine renewable energy capacity in the Borough / the regeneration capacity of different renewable technologies in the Borough in order to facilitate identifying suitable sites for energy generation to be identified in the plan.

Council Response

With regard to renewable energy, the Council supports the use of renewable and low energy carbon within the Borough. Policy IN4 is in support of section 148 of the NPPF as it supports renewable and low carbon energy and associated infrastructure provision. The policy has been informed by a recent heat mapping exercise, identifying three locations for district energy schemes supported in the Local Plan and also the 'South Tyneside Landscape Character Study Part III: Application of the Character Assessment' (2012), assess landscape sensitivity of wind energy within the Borough, but identifies constraints within the Borough. The Council will continue to support opportunities for low carbon energy production through the Local Plan, particularly in response to the Climate Change emergency declaration.

Next Steps

The Council will review Policy IN4 and the associated evidence to support renewable energy when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN5: Telecommunication and Utilities

Policy IN5: Council response and next steps

The policy is not deliverable

The Council received a representation which stated that the policy as currently worded is overly onerous and inflexible. To ensure a sound Plan that accords with the NPPF (paragraphs 35 and 112), it is requested that this policy is diluted to be more flexible and to recognise that seeking such the

submission of an ultrafast/gigabit-capable Statement as part of any application with evidence of consultation with a number of broadband providers/networks, requires not only the buy in of developers but utility companies as well.

Similarly, the Council also received 2 representations highlighting that the ability to provide fibre to the premises connectivity is not in the direct control of housebuilders. These 2 representations also stated that it is not considered appropriate for the Council to seek additional local technical standards over and above Part R of the Building Regulations.

Council Response

The policy is considered to be effective as written and consistent with national planning policy. Paragraph 12.27 of the supporting text states 'Policy IN5 does not require developers to deliver ultrafast/gigabit-capable solutions themselves. Instead it focuses on the need to conduct early dialogue with telecom providers in order to best understand what their infrastructure specifications are and how these can be accommodated as part of the development'.

This approach is consistent with Part R of the Building Regulations. In respect of the comment that NPPF paragraph 112 does not seek to prevent development that does not have access to such networks, point 3 of the policy states 'Exceptions to the approach outlined above could be justified in circumstances where it is not practical, viable, or feasible to deliver ultrafast/gigabit-capable connectivity. In such cases evidence will be needed from the applicant to demonstrate that a departure from the policy is justified'.

Regarding the comment that 'securing the Statement pre-application would require third party input much earlier than providers would normally engage with us' and that the policy 'as currently worded is overly onerous and inflexible', we worked with a provider when drafting the policy and they were wholly supportive of it.

Next Steps

The Council will review Policy IN5 when preparing the next iteration of the Local Plan.

Support for the Policy

The Council received a representation supporting the policy.

Council Response

The Council welcomes support for the policy

Next Steps

The Council will review Policy IN5 when preparing the next iteration of the Local Plan.

Policy IN6: Travel - New Development (Strategic Policy)

Policy IN6: Council response and next steps

Charging infrastructure for low-emission vehicles

The Council received a representation regarding this topic which can be summarised as follows:

Has the Council have been in discussion with the National Grid to determine if the policy requirement all major developments to incorporate charging infrastructure for ultra-low emission vehicles is achievable and can be supported?

Has viability testing been carried out to ensure that the implementation of this policy would not overly burden developments and potentially render them unviable?

The Council also received representations stating the requirement to provide charging facilities for vehicles in all major developments requires justification as to whether there is need without which this element of the policy is unsound. Such requirements should also be tested in terms of viability.

Conversely, the Council also received a representation stating, 'by not quantifying requirements for the installation of charging infrastructure, within the Emerging Local Plan, the policy can be adhered to by installing the minimal amount of charging points that developers can get away with'.

Council Response

The Council's Highway and Transport department have worked pro-actively with the National Grid to assess future demand and ensure that it can be met. The South Tyneside Local Plan Viability Evidence Base: Final Report will be published as part of the evidence base documents for the next iteration of the Local Plan.

NPPF Paragraph 105 states that 'if setting local parking standards for residential and non-residential development, policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles'. This is consistent with the policy.

Next Steps

The Council will review Policy IN6 when preparing the next iteration of the Local Plan.

Parking in the villages

The Council received a representation stating that the scale of the proposals set out within the Draft Local Plan exacerbate the pressures on parking capacity in the villages.

Council Response

The Council acknowledges that there are parking issues in certain areas of the Borough

Next Steps

The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

The Parking Standards Supplementary Planning Document

The Council received representations challenging the validity of the reference to an SPD in the policy stating that 'it effectively gives the SPD development plan status. Reference to this SPD should therefore be removed from the policy text.'

Council Response

Whilst successor SPD documents have obviously not been prepared at this stage, in order to be consistent with the role of SPDs, they will need to amplify existing policy in the Local Plan rather than introduce new policy requirements and the documents will be subject to a statutory consultation exercise whilst still in draft form. It is considered therefore that the policy is consistent with the NPPF.

Next Steps

The Council will review Policy IN6 when preparing the next iteration of the Local Plan.

Secure storage with charging points should be a requirement

The Council received a representation stating that secure storage with charging points should be a requirement and not just “considered” in areas of high density housing, flats etc.

Council Response

Comments regarding secure storage for cycles appear to be a reference to the Parking Standards SPD. This is in the Parking Standards SPD which is in the process of being reviewed and updated. This will be the subject of public consultation in due course.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN7: Accessible and Sustainable Travel (Strategic Policy)

Policy IN7: Council response and next steps

The Boldon and Tilesheds proposed Level Crossings Scheme

A significant number of representations have raised concerns over the proposed Boldon and Tilesheds Level Crossings Scheme. This is referenced in policies H3.1, H3.12, H3.59, RG5 and IN7k. Grounds of objection include the following:

- The impact of the proposal on the Green Belt, visual amenity and the natural environment. Similarly the relationship of the proposal to flood risk issues and to the Council’s Climate Change Strategy has also been referenced;
- Whether the proposal is needed in a highway safety context;
- The lack of public consultation / detailed information in the draft Local Plan about the proposal;

- The impact of the proposal on the operation of the highway network.; and
- How will the proposal be funded?

Council Response

The Council will continue to work with partners such as Network Rail in considering the options for addressing this highway safety issue.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan

Proposed new Metro Station at East Boldon

A number of representations have raised concerns over the inclusion of a new Metro station for East Boldon in the delivery schedule for the Infrastructure Delivery Plan.

Council Response

These representations will be considered in the preparation of the next iterations of the Infrastructure Delivery Plan and the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

The Parking Capacity at the existing East Boldon Metro Station

The Council received representations expressing concerns regarding the parking capacity at the existing East Boldon Metro Station.

Council Response

These representations will be considered in the preparation of the next iterations of the Infrastructure Delivery Plan and the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Modal Shift

The Council received a representation stating that the policies contained in the Emerging Local Plan are not detailed enough nor large enough in scope to trigger and support a modal shift on the scale National Policy requires. The representation also stated that the pedestrian, cyclist and horse-riders section of the policy should be strengthened.

Council Response

The Local Plan is one tool to contribute towards the attainment of modal shift objectives. It is considered that the appropriate location for the level of detail requested is the Cycling and Walking Strategy.

Next Steps

None required

Protecting strategically significant land at sites where new Metro stations may be developed

The Council received a representation which stated the policy should commit to protecting strategically significant land at sites where new Metro stations may be developed on alignments identified as potential network extensions.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Application of a 5m buffer to each side of alignments

The Council received a representation which stated that a 5m buffer should be applied to each side of the alignments proposed in point “a” of Policy IN7 to restrict any development that may inhibit the future expansion of the Metro network including the construction of the line and any new stations.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Highways Deliverability

The Council received a representation stating that cumulative impact assessment work will determine whether improvements may be required to junctions that are additional to those identified in Policy IN7 and that the feasibility of the widening of the northbound approach to the White Mare Pool junction to 3 lanes will require further appraisal.

Council Response

The Council will continue to work with Highways England to ensure the deliverability of the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN8: Airport and Aircraft Safety

Policy IN7: Council response and next steps

Support for the policy

The Council received a representation expressing support for the policy.

Council Response

Support for the policy welcomed

Next Steps

None required

Policy IN9 Waste Facilities (Strategic Policy)

Policy IN9: Council response and next steps

Comments were generally in support of the Policy and some minor amendments to the supporting text were suggested. This included reference to the regionally important role of Marsden Quarry in accommodating inert/construction and demolition waste and reference to the Model of Waste Arisings and Waste Management Capacity 2012 by Urban Mines and Production and Disposal of Low-Level Radioactive Waste in the North East of England in 2013 by Urban Mines.

Council Response

Comments accepted.

Next Steps

Amend the supporting text of the Policy to include reference to Marsden Quarry and the two Urban Mines studies.

Policy IN10 Protection of Existing Waste Facilities (Strategic Policy)

Policy IN10: Council response and next steps

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support welcomed.

Next Steps

None required.

Policy IN11 Minerals Safeguarding and Extraction (Strategic Policy)

Policy IN11: Council response and next steps

Minerals and minerals infrastructure safeguarding

It was suggested that this should be a standalone policy. Consideration should be given to the actual mechanism to safeguard sites/infrastructure.

Council Response

The Council will consider whether to Separate the Policy into two policies; Minerals and Minerals Infrastructure Safeguarding and Proposals for Minerals Extraction.

Next Steps

The Council will review Policy IN11 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Chapter 13: Implementation and Monitoring

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 3 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 13 Implementation and Monitoring received one objection.

Table 1. Chapter 3: Spatial Vision and Strategic Objectives– breakdown of representations				
	Number of comments			
	Total	Comment	Support	Objection
Representations	1	0	0	1

Implementation and Monitoring: Council Response and Next Steps

Objection/Wording considerations

Whilst the only representation received was generally supportive in terms of the Council's position on ensuring housing delivery over the Plan period, it was suggested that the provision of annual monitoring ought to be more explicit. In addition, the methodology used to calculate the Council's housing land supply position ought to be included in this section.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

South Tyneside

Pre-Publication Draft Local Plan Consultation

Council Responses to Representations Received: Sustainability Appraisal and Habitats Regulations Assessment

(March 2021)



South Tyneside Council

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Local Plan: Sustainability Appraisal and Habitat Regulations Assessment

This document provides an overview of the responses submitted as part of the Regulation 18 consultation the draft Local Plan (August 2019). Due to the high number of responses the Council has not been able to provide individual responses to comments received but has summarised the key issues for each chapter and sought to provide responses and details of next steps to inform the preparation of the Local Plan. In many cases comments made against the Sustainability Appraisal are objecting to a Local Plan policy or site allocation, in such cases this paper will address the comments directly relating to the Sustainability Appraisal report and assessment and will signpost readers to the relevant council responses to Local Plan policies and sites.

Overview of Consultation Responses

The Sustainability Appraisal and Habitat Regulations Assessment were produced to support the draft Local Plan (2019). Both documents were also subject to consultation alongside the Local Plan document itself.

The Sustainability Appraisal and Habitat Regulations Assessment documents received 3598 comments of which 3009 were objections to policies, 8 were in support and 581 were comments.

The Habitat Regulations Assessment received 2 comments both of which were objections.

Table 1. Sustainability Appraisal – breakdown of representations				
Chapter	Number of comments			
	Total	Comment	Support	Objection
1 & 2. Non-Technical Summary & Introduction	3	2	1	0
3. Sustainability Appraisal – Previous Steps Summary: Stage A & B	0	-	-	-
4. Sustainability Appraisal Objectives & Methodology	2	0	0	2
5. Stage B1 – Testing the Plan Objectives	0	-	-	-
6. Stage B2 – Developing and Refining Alternatives and Assessing Effects – Housing and Employment Growth Options	0	-	-	-
7. Stage B2 – Developing and Refining Alternatives and Assessing Effects – Spatial Options – Housing	21	2	0	19
8. Stage B2 – Developing and Refining Alternatives and Assessing Effects- Spatial Options – Employment Sites	4	1	3	3
9. Stage B2 – Developing and Refining Alternatives and Assessing Effects – Strategic Site Selection	7	0	0	7

Housing and Employment Allocations				
10. Stage B3-B5 – Developing and Refining Alternatives and Assessing Effects - Assessment of Local Plan Policies	0	-	-	-
11. Stage B3-B5 – Total and Cumulative Effects	1	0	0	1
12 & 13. Conclusions & Recommendations/ Next Steps & Monitoring	0	-	-	-
APPENDIX A & B: Strategic Environmental Assessment Quality Assurance Checklist / Sustainability Appraisal Vision & Objectives	0	-	-	-
APPENDIX C & D: Sustainability Appraisals – Housing Growth Figure & Employment Land Growth Options	0	-	-	-
APPENDIX E: Sustainability Appraisals – Housing Spatial Options	11	0	0	11
APPENDIX F: Green Belt Area of Search – Housing Growth	0	-	-	-
APPENDIX G: Sustainability Appraisals – General Employment Land Strategic Spatial Options	0	-	-	-
APPENDIX H: Site Specific Sustainability Appraisals Summary: Allocations – Baseline and Mitigation	3	1	0	2
APPENDIX I: Site Specific Sustainability Appraisals	3541	576	4	2961
APPENDIX J: Sustainability Appraisal - Draft Local Plan Policies	0	-	-	-
APPENDIX K: Total Effects Summary Tables	0	-	-	-
Habitat Regulation Assessment	3	0	0	3

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy:

Table 2. Summary of comments received	
1 & 2. Non-Technical Summary & Introduction	<ul style="list-style-type: none"> • Comments from statutory consultees. • The Sustainability Appraisal is inadequate.
4. Sustainability Appraisal Objectives & Methodology	<ul style="list-style-type: none"> • Comments relating to Policy S1
7. Stage B2 – Developing and Refining Alternatives and Assessing Effects – Spatial Options – Housing	<ul style="list-style-type: none"> • Failure to assess all spatial reasonable options. • Failure to consider mitigation effects within SA assessment. • Failure to consider highways modelling in Sustainability Appraisal assessment. • Failure to direct development to brownfield site/Unclear justification for the rejection of sites • Strategic Environmental Assessment/ Procedural

	<ul style="list-style-type: none"> failings. • Support for Sustainability Appraisal methodology.
8. Stage B2 – Developing and Refining Alternatives and Assessing Effects- Spatial Options – Employment Sites	<ul style="list-style-type: none"> • Support for Wardley Colliery allocation.
9. Stage B2 – Developing and Refining Alternatives and Assessing Effects – Strategic Site Selection Housing and Employment Allocations	<ul style="list-style-type: none"> • Objection to application of Local Plan mitigation to site- specific assessments in regard to Objective 4: Protecting our Green Belt.
11. Stage B3-B5 – Total and Cumulative Effects	<ul style="list-style-type: none"> • Cumulative impacts to Whitburn have not been considered.
APPENDIX E: Sustainability Appraisals – Housing Spatial Options	<ul style="list-style-type: none"> • Failure to consider highways assessments and mitigation in Sustainability Appraisal assessments.
APPENDIX H: Site Specific Sustainability Appraisals Summary: Allocations – Baseline and Mitigation	<ul style="list-style-type: none"> • Failure to assess sites in the manner they were submitted.
APPENDIX I: Site Specific Sustainability Appraisals	<ul style="list-style-type: none"> • Site-Specific Sustainability Appraisal assessment outcomes / methodology • Comments of support / individual site assessments/ errors and discrepancies in assessments
Habitat Regulations Assessment	<ul style="list-style-type: none"> • The Habitat Regulations Assessment does not inform the Sustainability Appraisal. • Habitat Regulations Assessment is not fit for purpose.

Chapters 1 & 2: Non-Technical Summary & Introduction

Comments from statutory consultees

Consultation responses were received from Natural England and Historic England in regard to the Sustainability Appraisal. Natural England commented that the Sustainability Appraisal ‘provides a good framework for assessing impacts’ and should consider the effects of biodiversity net gain. Historic England were unable to provide comments at this stage.

Council Response and Next Steps

Comments from the statutory bodies are welcomed and noted. No next steps required.

Chapter 4: Sustainability Appraisal Objectives & Methodology

Comments relating to Policy S1

Comments were received which referenced Table 4.1 of the Sustainability Appraisal report. These comments refer to climate change and Policy S1.

Council Response and Next Steps

The comments raised relate to the objection of Policy rather than the Sustainability Appraisal chapter. Please refer to the Local Plan responses for Policy S1 where these issues have been addressed further.

Chapter 7: Stage B2 – Developing and Refining Alternatives and Assessing Effects – Spatial Options – Housing

Failure to assess all spatial reasonable options

Representations have been made which state that the Interim Sustainability Appraisal (2019) did not assess all reasonable spatial options and therefore the methodology of the Sustainability Appraisal its conclusions are flawed. The three main criticisms received to the selection and identification of spatial options are:

- Failure to consider non-Green Belt options – no option was considered which did not depend on the release of Green Belt sites.
- Failure to assess a spatial option which focuses on large-scale Green Belt release alongside smaller Green Belt releases.
- Failure to consider a spatial option which goes beyond the housing need of the Local Plan.

Council Response

Chapter 7 of the Interim Sustainability Appraisal document sets out the identification, appraisal and selection of four reasonable alternative strategic spatial options. The spatial options which were considered

1. Urban areas only – i.e. a no Green Belt Option.
2. Neighbouring authorities taking our need which necessitates no or fewer GB releases.
3. Sustainable Urban Area Growth and Large-scale Green Belt release.
4. Sustainable Urban Area Growth and dispersed Green Belt releases.

The council does not agree that the Reg-18 Sustainability Appraisal fails to consider a Non-Green Belt option. As explained at paragraph 7.7 of the Sustainability Appraisal Report, the Strategic Housing Land Availability Assessment (2019) identified an insufficient supply of additional land to meet the development requirement (7,000 homes) over the Plan period from non-Green Belt sources. This Local Plan evidence base identified the limitations of this spatial option as the outset. Table 7.2 notes that the 'urban areas only' option (Option 1) was included in the Sustainability Appraisal assessment for completeness to demonstrate the sustainability effects of this spatial outcome. This contradicts the point raised by consultees that no consideration was given to the spatial strategy option of not releasing land from the Green Belt.

The council acknowledges the comments that a reasonable option which considered a large-scale Green Belt release alongside smaller Green Belt releases was not considered in the Regulation 18 Sustainability Appraisal. As identified previously the Council has considered the option of a larger-scale Green Belt release alongside sustainable urban area growth (Option 3) which would continue to prioritise the development of smaller brownfield sites over the identification of alternative smaller Green Belt sites, which would limit impacts on the Green Belt.

With regard to considering a spatial option greater than the housing need for the Local Plan, as stated in Section 6, para 6.6 – 6.14 of the Interim Sustainability Appraisal, the Council does not consider that there are any exceptional circumstances which would support a level of growth above

that of the standard methodology; and therefore does not consider an option which goes beyond Local Plan housing numbers to be a reasonable option for South Tyneside.

Next Steps

The Council will undertake a review of the reasonable spatial options to inform the next iteration of the Local Plan and Sustainability Appraisal.

Failure to consider mitigation effects within Sustainability Appraisal assessment

Comments were received which supported the rejection of Spatial Options 1 & 2; however, the Sustainability Appraisal assessment of Spatial Option 3 had not taken into account potential mitigation for specific proposals for the Laverick Park scheme which would have resulted in different sustainability outcomes for Option 3. Therefore, the Council's preference for Option 4 cannot be relied upon.

Council Response

The council welcomes the comments with regard to Spatial Options 1 and 2; however, the council believes that the approach to assessing Options 3 & 4 are justified at this stage. The reasons for selecting the preferred option for the spatial distribution of housing growth are summarised in Table 7.4. The findings of the appraisal work have been drawn on to justify the selection of the preferred option (Option 4 - Sustainable Urban Area Growth and smaller multiple Green Belt releases) and the justification given for the approach selected is considered to be reasonable.

The comments state the Interim Sustainability Appraisal has not considered the potential mitigation that would be delivered alongside the developments. The council acknowledges that the representation is supported by the developers own assessments; however, detailed site-level mitigation proposals can reasonably be left out of the Sustainability Appraisal at the Regulation 18 stage when appraising reasonable alternative site options on a consistent basis (i.e. before sites are selected for inclusion in the draft plan), as the same level of detail is not available for all site options. Therefore, the council considers that the approach taken at this stage is also reasonable.

Next Steps

None Required.

Failure to direct development to brownfield site/Unclear justification for the rejection of sites

Comments were received which queried that clarity of the Council's process for rejecting discounted sites as this is not documented in the Sustainability Appraisal report itself. Specific comments were received which stated that 194 brownfield sites assessed in the Strategic Housing Land Availability Assessment had not been carried forward into the draft Local Plan. The representation queries whether the Sustainability Appraisal actually assessed the 194 brownfield sites against the full Sustainability Appraisal objectives.

Council Response

Paragraph 4.7 of the Interim Sustainability Appraisal identifies that all sites considered through the plan preparation process and identified through background documents (Strategic Housing Land Availability Assessment/ Strategic Land Review and Employment Land Review) have been subject to an individual site-specific Sustainability Appraisal. All assessments were presented by area in Appendix I of the Interim Sustainability Appraisal. These baseline assessments will include the 194

brownfield sites commented upon in the representations. The rejection of these sites is documented in the Site Selection Topic Paper Appendix 2 – Discounted Sites. The Site Selection Topic Paper was informed by the Site-specific Sustainability Appraisal assessments, along with other considerations to identify sites to be allocated within the draft Local Plan. The Topic Paper was considered to be in support of the Sustainability Appraisal, however, It is acknowledged that for clarity the rejection reasons for these sites should have been included in the Sustainability Appraisal environmental report.

Next Steps

The council will review its approach to documenting reasons for rejecting and selecting sites to create greater transparency in the next iteration of the Sustainability Appraisal.

Strategic Environmental Assessment Regulations/ Procedural failings

Representations were made which claimed that the Strategic Environmental Assessment did not fulfil its legal requirements under the Strategic Environmental Assessment Directive (2001/42/EC).

Reasons given for the Sustainability Appraisal's failure to comply include:

- There is no objective comparative assessment undertaken since the Sustainability Appraisal scoring relies on removal of Boldon allocations from the Green Belt as “mitigation” to reduce the adverse environmental consequence.
- The Sustainability Appraisal /Strategic Environmental Assessment report fails to consider the consequences of not reviewing the boundaries to the Green Belt, there is no comparator option by which consultees are able to understand how adoption of a plan with less housing or greater urban brownfield land use than identified through the Strategic Housing Land Availability Assessment process, would balance competing harms to the other aspects of sustainable development, including social and economic harms to that of loss of the Green Belt.
- The council has not considered all reasonable alternatives for spatial options.
- The council has not considered Laverick Park in the manner that it was submitted.

Council Response

The Sustainability Appraisal is an iterative process which is repeated throughout the preparation of the Local Plan. The council acknowledges that there are areas of the Reg-18 Sustainability Appraisal which need to be revised and updated in the next iteration of the Sustainability Appraisal to ensure full Strategic Environmental Assessment compliance.

Please refer to the council response provided for Chapter 9 regarding Sustainability Appraisal scoring for Green Belt sites.

With regard to the assertion that the Sustainability Appraisal fails to consider reviewing the boundaries of the Green Belt; as stated Table 7.2 of the Sustainability Appraisal notes that the ‘urban areas only’ option (Option 1) has been included in the Sustainability Appraisal for completeness. This contradicts the point raised by consultees that no consideration was given to the spatial strategy option of not releasing land from the Green Belt.

With regard to the comments that no comparator option of less housing was assessed; Chapter 6 of the 2019 Interim Sustainability Appraisal Report explains that the application of the National Planning Policy Framework standard methodology results in a housing figure for South Tyneside over the Local Plan period of 7,000 homes. Consideration has been given within the Sustainability Appraisal as to whether there are exceptional circumstances that apply to South Tyneside, which justify an alternative growth option including a lower housing number. It was concluded that this was not a reasonable option and the reasoning behind the rejection of a lower growth option is set out in Para 6.11-6.13.

With regard to an option considering a higher level of brownfield sites; Para 7.15 sets out that housing spatial Option 1: Urban Area Only, included all sites considered to be available (though not necessarily suitable against other plan policies) in the Strategic Housing Land Availability Assessment (2019) in order to meet the housing shortfall. The council considers that Option 1: Urban Area does consider an option which contains the highest amount of brownfield sites which can be considered to be a reasonable option.

Please refer to the Councils earlier responses with regard to alternative spatial options and consideration of mitigation in assessments.

Next Steps

The council will review the Sustainability Appraisal to ensure it fully meets its legal obligations in terms of the STRATEGIC ENVIRONMENTAL ASSESSMENT regulations.

Support for Sustainability Appraisal methodology

Representations were received in support of the council approach to identifying and selecting spatial options.

Council Response and Next Steps

The Council welcomes the support received for the Sustainability Appraisal. No next steps required.

Chapter 8: Stage B2 – Developing and Refining Alternatives and Assessing Effects- Spatial Options – Employment Sites

Support for Wardley Colliery Allocation

Comments were received which offered support for the selection of Wardley Colliery as an employment land allocation.

Council Response and Next Steps

The Council welcomes the support received for the Wardley Colliery employment land allocation. No next steps required.

Chapter 9: Stage B2 – Developing and Refining Alternatives and Assessing Effects – Strategic Site Selection Housing and Employment Allocations

Objection to application of Local Plan mitigation for Policy H3 to site- specific assessments in regard to Objective 4: Protecting our Green Belt.

Comments were received which highlighted the application of Local Plan mitigation identified in Policy H3 to the site-specific Sustainability Appraisal assessments. Concern was raised with regard to Objective 4: 'Protecting our Green Belt'. The application of Local Plan policy mitigation means that Green Belt sites allocated in the Local Plan "will be deallocated and no longer Green Belt sites." Representation state that the effects removing of site or changing boundaries cannot be mitigated by the reliance on Green Belt removal and therefore, the Sustainability Appraisal scoring is materially flawed and does not allow for non-Green Belt to Green Belt allocation comparison. It is stated that this approach does not reflect the NATIONAL PLANNING POLICY FRAMEWORK's priority to protect the Green Belt.

Council Response

Chapter 9 of the Sustainability Appraisal report summarises the likely effects of the sites that have been selected for inclusion in the Draft Local Plan from paragraph 9.12 onwards in relation to each Sustainability Appraisal objective. This commentary details the baseline effects and also identifies effects taking into account mitigation that may be achieved through Draft Local Plan policies.

The council acknowledges the above points raised in these representations and notes that Policy H3 mitigation proposals for Objective 4 do not provide adequate justification for the Sustainability Appraisal scores.

Notwithstanding the above, all sites which have been considered in the preparation of the Local Plan have been subject to a site-specific baseline assessment which can be found in Appendix I of the Sustainability Appraisal report. A comparison of non-Green Belt and Green Belt baseline site options is therefore provided. The application of Policy H3 mitigation has only been applied to sites allocated within the draft Local Plan, following the rejection of alternative sites. The justification for site selection is provided in the Site-Specific Topic Paper – Discounted sites (2019). As stated previously, for clarity this process should have been included within the Sustainability Appraisal report.

Next Steps

The council will review its approach to site- selection and site-specific assessments to ensure clarity in the assessment process. Consideration will also be given to application of Local Plan mitigation within the Sustainability Appraisal.

Chapter 11: Stage B3-B5 – Total and Cumulative Effects

Cumulative impacts to Whitburn have not been considered

Representation was made which states that site allocations are disproportionate to Whitburn and the cumulative impacts upon biodiversity, Green Belt and landscape have not been considered.

Council Response

The cumulative effects of the Draft Local Plan have been described from Paragraph 11.1 of the 2019 Interim Sustainability Appraisal Report. A summary of the total effects of the Draft Plan is provided in Table 11.1, which also details the temporal effects of each section of the plan. The description of

the cumulative effects of the various chapters of the plan has been informed by the summary tables in Appendix K. Within these assessments' cumulative effects on biodiversity, Green Belt and landscape have been provided within the relevant Sustainability Objective summary. Assessments of specific area based cumulative effects have not been undertaken.

Next Steps

None required.

APPENDIX E: Sustainability Appraisals – Housing Spatial Options

Failure to consider highways assessments and mitigation in Sustainability Appraisal assessments.

Comments were received which stated that the Sustainability Appraisals assessment of housing Options 3 & 4 did not consider a detailed highways assessment which sets out the scale of impact anticipated, or the scale of mitigation that 'could' be required to address transport impacts. The comments state that the conclusions seem to have been drawn on simplistic assumptions and therefore the Council's approach is flawed. Furthermore, comments were received which queried the assessment of the options against a variety of objectives.

Council Response

The council acknowledges that there is a lack of evidence to support some of the Sustainability Appraisal conclusions for the spatial options, for example detailed highways assessment work that could mitigate effects, and that the appraisal is based on assumptions about scale of development and scale of effects. At the time the Interim Sustainability Appraisal for the Local Plan was undertaken, the highway modelling work was ongoing and subject to change. However, there is a requirement for the Sustainability Appraisal to be undertaken in a proportionate manner, and it is considered to be a reasonable approach for the appraisal of high level 'in principle' spatial options to be undertaken in a similarly high-level manner.

With regard to comments on the assessment of Spatial Options. The assessment undertaken for each Spatial Option has been undertaken in a consistent and fair manner. As stated previously, for consistency the Sustainability Appraisal has not considered that mitigation measures submitted as part of the Laverick Park proposal. Therefore, it is considered that the development of a large Green Belt release would result in effects as stated in the Sustainability Appraisal report.

Next Steps

The next iteration of the Sustainability Appraisal will be informed by the most up to date evidence available to the Council at that time. The Council will continue to assess options in a manner which is proportionate and consistent.

APPENDIX H: Site Specific Sustainability Appraisals Summary: Allocations – Baseline and Mitigation

Failure to assess sites in the manner they were submitted

Comments were received querying the Councils approach to assessing some sites which have been assessed differently to how they have been submitted by site promoters. The comments pointed out that the Council had assessed the Laverick Park site as 13 individual sites in the Strategic Housing Land Availability Assessment and subsequent Sustainability Appraisal and had not considered the site as one whole site as it had been previously submitted. Furthermore, comments were received which identified a smaller site within BC51a, which had been considered within a wider assessment. The comments also highlight sites allocated within the draft Local Plan which have different Sustainability Appraisal outcomes.

Council Response

It is acknowledged that the sites allocated within the draft Local Plan have varying assessment outcomes. The Sustainability Appraisal is a tool to identify baseline positive and negative factors in relation to site options in order to determine whether their allocation will promote sustainable development. The identification of negative factors a form part of a balanced appraisal and does not mean that a site should be rejected. The 13 sites identified within the wider Laverick Park site, have been identified through the Strategic Housing Land Availability Assessment and Strategic Land Review. However, the council acknowledges that this approach has not provided a site-specific assessment of the wider Laverick Park site in the same manner as other reasonable options. Furthermore, the smaller site within BC51a has not been subject to the same level of assessment.

Next Steps

The next iteration of the Sustainability Appraisal will include an assessment of the above-mentioned sites in line with the other reasonable options considered as part of the Local Plan.

APPENDIX I: Site Specific Sustainability Appraisals

Site-Specific Sustainability Appraisal assessment outcomes / methodology

A large number of responses were received with regard to the Site-Specific Sustainability Appraisals, with many comments questioning the outcome of the Sustainability Appraisal assessments and raised objections to the Site-Specific Sustainability Appraisal framework.

Council Response

The effects attributed to each site and sustainability objective have been determined by the Site-Specific Sustainability Appraisal methodology. Table 3.1 of the Draft Local Plan Interim Sustainability Appraisal: Appendix I details the links between the sustainability objectives and qualitative criteria used within the Site-Specific Sustainability Appraisal framework. It also identifies assumptions which have been considered through the process.

The Council will address the key points raised for each Sustainability Objective below. In many cases the comments made against the Sustainability Appraisal are objecting to a Local Plan policy or site allocation, in such cases this paper will address the comments directly relating to the Sustainability Appraisal report. Further responses for site specific comments can be found in the Council's response paper to Chapter 5: Planning for Homes.

Table 3: Summary of Key Issues raised against Site Specific Sustainability Appraisal assessments

Sustainability Objective	Key Issues	Council Response
Objective 1: Adapt to and mitigate the impacts of climate change in South Tyneside	Incorrect Sustainability Appraisal assessment outcome as sites are considered to be a flood risk	The effect attributed to sites was determined using the Sustainability Appraisal site specific methodology for this objective and informed by the Strategic Flood Risk Assessment (SFRA 2019). Sites identified as being a risk of surface water flooding; are not classed as being within a flood risk zone but may require mitigation. It is acknowledged that climate change may exacerbate flooding issues.
	The only factor considered for this objective refers to surface water flooding and does not consider wider impacts.	The council acknowledges the wider aspects of climate change. Other factors that are relevant to this objective are covered by other Sustainability Appraisal objectives within the framework e.g. access to sustainable transport (which would influence transport-related greenhouse gas emissions) is assessed under Sustainability Appraisal objective 7. Access to green infrastructure is addressed through Sustainability Appraisal objective (objective 5). It is reasonable not to have considered these other factors as part of Sustainability Appraisal objective 1 as this could lead to 'double counting'.
	No reflection of the Climate Change Emergency Declaration.	The Sustainability Appraisal does not directly reference the Councils Climate Change Emergency declaration, however 'Objective 1: Adapt to and mitigate the impacts of climate change in South Tyneside', considers these effects.
Objective 2: Conserve and Enhance Biodiversity	Sustainability Appraisal outcome does not reflect potential impacts of development upon biodiversity.	The Sustainability Appraisal outcome is determined by the distance the site is from a wildlife designation. The council acknowledges the benefits of Green Belt and wildlife corridors in supporting the natural environment. The Sustainability Appraisal assessment will help to inform any mitigation measures required to offset any effects on neighbouring designations and enhance wildlife corridors.
	Habitat Regulation Assessment has not been undertaken.	Habitat Regulation Assessment for the draft Local Plan was undertaken and consulted upon alongside the draft Local Plan in 2019. Habitat Regulation Assessments assess likely significant effects on designated European Sites which may occur from the implementation of a plan or project. Within South Tyneside, there are two European Sites: Durham Coast Special Area of Conservation (SAC) and the Northumberland Coast Special Protection Area (SPA) and Ramsar site. Housing development may result in 'recreational disturbance' i.e. increased visitors to the coast which may impact upon these sites. This has been considered within the Sustainability Appraisal Site-Specific Framework.
	The Sustainability Appraisal has not been informed by an	It is acknowledged in the 2019 Sustainability Appraisal Report that the Habitat Regulations Assessment was not available at the time of preparing the report. At the next

	Habitat Regulations Assessment.	stage, the Habitat Regulations Assessment findings should be incorporated into the Sustainability Appraisal in relation to Sustainability Appraisal objective 2: biodiversity. However, it should be noted that impacts upon protected sites have been considered through the site-specific Sustainability Appraisal framework.
Objective 3: Safeguarding our environmental assets and natural resources	Sustainability Appraisal assessment does not acknowledge food production of agricultural sites.	The Council acknowledges that the current framework does not provide a clear assessment on the effect upon soils. The Council will review the assessment for this objective in the next iteration of the Sustainability Appraisal.
	Sustainability Appraisal outcome of neutral does not fully reflect the effect of development upon this objective.	The outcome to this sustainability objective has been determined by the site-specific framework methodology and the proximity of the site to designations. The Sustainability Appraisal assessment will help to inform any mitigation measures required to offset any negative effects.
Objective 4: Protecting our Green Belt	Sustainability Appraisal outcomes do not reflect the severity of the effect developing in the Green Belt would have on this objective.	The effect attributed this objective was determined by the Sustainability Appraisal Site-Specific framework and was also informed by the Green Belt Review.
	The Sustainability Appraisal 'deallocates' sites from the Green Belt.	The comments refer to the Sustainability Appraisal assessment which considers the application of Local Plan policies and mitigation to assess the potential effects which could result from the development. This acts as a comparison to the baseline assessment which did not consider policies within the Local Plan from which a negative effect was identified for this objective. The Sustainability Appraisal does not attempt to deallocate land, this can only be done through the Local Plan being found sound by a planning inspector and being adopted by the council. Please see the Council's response to Chapter 9.
	Allocated Green Belt sites have been assessed more favourably than non-allocated Green Belt sites.	The Council does not agree that sites have been unfairly assessed. The effect attributed this objective was determined by the Sustainability Appraisal Site-Specific framework and was also informed by the Green Belt Review.
	The Sustainability Appraisal incorrectly uses 'deallocation' of Green Belt land as a form of mitigation.	Please see the Council's response to Chapter 9 for further comment on this issue.
Objective 5: Enhancing our	Sustainability Appraisal outcomes	It is acknowledged that Green Belt sites can contribute to the wider green infrastructure network; however, for

Green Infrastructure	do not reflect the effect of developing in the Green Belt and impacting upon green infrastructure corridors.	sites is not an identified green infrastructure asset (i.e. playing field, park, designed open space) development is considered to have a lesser effect. The effect attributed to this sustainability objective has been determined by the Site Sustainability Appraisal methodology.
Objective 6: Protect, enhance and promote South Tyneside's heritage and cultural assets	Sustainability Appraisal outcomes do not fully consider the effect of development on historical landscapes.	The effect attributed to this sustainability objective has been determined by the Site-Specific methodology and the distance the site is from heritage assets and conservation areas. Impacts upon landscape are also considered within Objective 3: Safeguarding our environmental assets and natural resources.
Objective 7: Promote sustainable transport and accessibility	Sustainability Appraisal outcomes do not reflect full effect of development upon traffic congestion.	The assessment of this objective considered the distance of the site from the existing public transport network; 400m is widely accepted as the threshold distance that public transport networks should be located from built development. Infrastructure concerns with regard to traffic congestion, please see the Council's response to Chapter 12: Infrastructure. Also please see the Council's response to Appendix E with regard to the consideration of highway assessment modelling.
Objective 8: Ensure the vitality of out town centres and villages	Positive assessments are misleading as development is likely to result in more traffic congestion and parking issues which will deter people from visiting local shopping areas.	The effect this site has been attributed has been determined by the Sustainability Appraisal site specific methodology. Sites within close proximity to existing centres are considered to have a positive effect in supporting the vitality and viability of these areas. The site is considered to have a positive effect as it is within 1km of an existing centre. With regard to parking concerns please see the Council's response to Chapter 12: Infrastructure.
Objective 9: Encourage and support economic growth within South Tyneside	The Sustainability Appraisal assessment does not recognise the effects upon farming in terms of employment.	The Sustainability Appraisal methodology considers whether the sites are suitable for economic development (i.e. offices, commercial premises etc.). This site is not considered suitable for economic development and therefore is not considered to have an effect against this objective.
Objective 10: Increase opportunities for employment & education & improve living standards	The Sustainability Appraisal assessment does not recognise the effects upon farming jobs.	The Council acknowledges that development of agricultural land could impact upon those currently employed within the sector, however, development can also create new job opportunities. However, the Sustainability Appraisal methodology considers whether the sites are suitable for economic development and how many jobs it could provide. This site is not considered suitable for economic development and therefore is not considered to have an effect against this objective.
	The Sustainability Appraisal framework	Section 3.3 of the Draft Local Plan Interim Sustainability Appraisal: Appendix I states that 'The final Sustainability

	does not allow for the consideration of education effects and site-specific opportunities for school expansion.	Appraisal impact assessment for each objective considers the results from the identified criteria and also considers that potential wider effects against this objective. The comments section of the framework provides scope for consideration of other issues and justification to support the final impact assessment'. Therefore, opportunities to consider education effects can be considered. The Council has not considered potential mitigation measures supported by developers to ensure a consistent approach to assessing sites.
Objective 11: Promote equality of opportunity and access and promote good relations between diverse communities	No key issues raised	
Objective 12: Provide better housing, neighbourhoods and good design	Criticism of Sustainability Appraisal assessment which suggest development would lead to 'better' housing and neighbourhoods.	Due to the lack of information with regard to development specifics of each site at this stage of the plan process, it is considered that the assessment as to whether the site is suitable for housing and the number of units it could support is the best criteria to use in this assessment. It is considered that the more houses a site could provide, the more positive the overall effect, as it would contribute to meeting the housing need of the Local Plan. As the site could provide over 200+ homes, the site has a very positive effect against this sustainability objective. Should this site be developed, proposals would need to comply with Plan policies which promote high quality design and would consider the setting of the area.
	This objective should not be included in the Sustainability Appraisal as it would a positive response.	"Objective 12 'Provide better, housing, neighbourhood and good design' is a sustainability objective which is required to assess the environmental effects of the Local Plan. The sustainability objectives reflect the key environmental, social and economic sustainability issues present in the borough. These objectives have also been developed to consider key messages and objectives from the National Planning Policy Framework and the South Tyneside's corporate strategies 'South Tyneside Vision 2011-31' and 'Shaping our Future 2011-16'. Further information regarding the identification of sustainability objectives can be found in the 'South Tyneside Sustainability Appraisal Scoping Report (2018)'.
Objective 13. Promote healthier people	Sustainability Appraisal assessment does not consider	This objective considers the proximity of the development site to facilities to support healthy lifestyles of residents of the proposed development site.

and communities	full negative effects of development on health and wellbeing particularly for Green Belt sites.	The council acknowledges the impacts of developing within the Green Belt and that the effects have been considered via other Sustainability Appraisal objectives within the assessment.
	Criticism that building new homes will not have a positive effect on health and wellbeing.	The provision of good quality housing can help to reduce health inequalities. Housing can have an influence on an individual's physical and mental wellbeing, via the affordability and security of housing, quality of housing and the ability to engage in community life. Providing good quality housing to meet the needs of Borough can have a positive health effect.
	Framework only considers distance from healthcare facilities in the assessment.	The council acknowledges the concerns raised in regard to accessing healthcare, however the extent to which the Sustainability Appraisal is able to assess impacts is dependent upon that data being consistently available for all facilities throughout the borough. Unfortunately, the data to support this consideration is not available and therefore those effects are unknown at this stage.
Site-specific assessment summary	Summary comments were received which for a variety of sites suggesting that the Sustainability Appraisal assessment does not justify allocation within the draft Local Plan.	All sites have been assessed against the Sustainability Appraisal objectives to establish the sustainability credentials of the site. This assessment has contributed to the selection of appropriate sites to be taken forward through the Local Plan. Further information can be found in the South Tyneside Site Selection Topic Paper (2019).

Comments of support / errors and discrepancies in assessments

Comments were received which offered support for and highlighted errors and discrepancies within the site-specific Sustainability Appraisal assessments.

Council Response and Next Steps

The council welcomes the comments and support which was received. The Council will review the points raised to help inform the next stage of the Sustainability Appraisal.

Habitat Regulations Assessment

The Habitat Regulations Assessment does not inform the Sustainability Appraisal or Local Plan.

Comments received stated that the Habitat Regulations Assessment did not inform the Local Plan preparation or the Sustainability Appraisal. It is argued that the Sustainability Appraisal site assessments are flawed as the Habitat Regulations Assessment does not attempt to assess whether mitigation is possible for the site allocations.

Council Response

It is acknowledged in the Interim Sustainability Appraisal (2019) that the Habitat Regulations Assessment was not available at the time of preparing the report. However, it should be noted that

impacts upon protected sites have been considered through the Site-Specific Sustainability Appraisal framework.

Next Steps

The Council will seek to ensure the Habitat Regulations Assessment findings are available to fully inform the next stage of the Sustainability Appraisal and Plan preparation process.

The Habitat Regulations Assessment is not fit for purpose.

The Council received comments that the Habitat Regulations Assessment undertaken to support the draft Local Plan is not fit for purpose. The response outlined the following criticisms of the report:

- The Habitat Regulations Assessment does not consider impacts caused by the proximity of a site to the designations and only considers the average increase in the level of visits. This is based on the Strategic Land Review which makes the Habitat Regulations Assessment out of date.
- The Habitat Regulations Assessment does not make clear what the impacts will be from development and whether mitigation can overcome impacts.
- The Habitat Regulations Assessment also makes no effort to discuss the option of avoiding impacts by placing development farther away from the coast.
- The Habitat Regulations Assessment lacks any consideration of how an increase in traffic and air pollution could impact on protected sites.
- The Habitat Regulations Assessment makes no attempt to consider potential impacts caused by sewage and water pollution.
- The Habitat Regulations Assessment postpones assessment to later stages of Plan preparation reducing potential for avoidance and mitigation.

Council Response

Comments are noted with regard to the Regulation 18 Habitat Regulations Assessment; however, the Council considers that the document produced is fit for purpose and meets the legal requirements at this stage in the plan process. It should also be noted that the production of the Habitat Regulations Assessment is an iterative process which will be reviewed as the Plan progresses.

The council acknowledges and recognises that the housing sites in close proximity to protected sites are likely to have a greater effect. Section 8 of the Habitat Regulations Assessment identifies those allocations which are in close proximity to the European Sites. The Habitat Regulations Assessment states that: 'Further analysis of access and sensitive features in closest proximity needs to be undertaken for these allocations, and this will be undertaken to inform the next iteration of the Habitat Regulations Assessment'. The next iteration of the Habitat Regulations Assessment will further assess the effects of potential housing sites in close proximity to the coast and will be informed by the latest evidence work to support the undertaking of the Habitat Regulations Assessment.

The Reg-18 Habitat Regulations Assessment clearly sets out in section 7.13- 7.14 the reason behind using the Strategic Land Review housing data to predict the increase in visitors to European Sites i.e. the coast. The Habitat Regulations Assessment assumes that the recreational impact between what

was assessed in the Strategic Land Review would be similar as to the impacts of the Local Plan. Furthermore, the Strategic Land Review data considers a much higher housing number compared to that proposed in the draft Local Plan; therefore, the Habitat Regulations Assessment at this stage is considering a higher level of recreational impact than it would considering the draft Local Plan figures. The Habitat Regulations Assessment also states that once the allocations are refined at Reg-19 stage the exercise would be repeated to 'ensure the final Habitat Regulations Assessment gives a prediction based on allocations'.

Comments regarding mitigation are also noted; however, the council intend to produce and updated mitigation strategy to support the Local Plan.

With regard to the comment that the Habitat Regulations Assessment makes no effort to avoid impacts by placing development further away from the coast; the Habitat Regulations Assessment considers the impacts of the whole housing need across the borough and will consider the impacts of sites closer to the coast in the next iteration of the Habitat Regulations Assessment.

With regard to air pollution and traffic levels. At the time of writing the Habitat Regulations Assessment, traffic modelling had not been finalised and was not available to inform the writing of the Habitat Regulations Assessment. The next stage of the Habitat Regulations Assessment will be informed by the traffic modelling reports and other evidence base documents produced to support the Local Plan. The comments relating to water pollution; Para 9.9 states that the council has certainty required from Northumberland Water to have confidence in the delivery of growth set out in the Local Plan. As stated in the Habitat Regulations Assessment, these issues will be further considered in the next iteration of the Habitat Regulations Assessment.

As previously states, the Habitat Regulations Assessment and the preparation of the Local Plan is an iterative process which is repeated and developed to accommodate changes in the Plan and also to reflect updates in the evidence base. The postponement of assessments to a later stage does not reduce the opportunity for mitigation.

Next Steps

The Council will produce a new Habitat Regulations Assessment to support the next stage of the Local Plan. As stated above, the next stage of the Habitat Regulations Assessment will further consider effects and mitigation.

APPENDIX B: CONSULTATION STATEMENT REGULATION 18 (2022)

This document can be viewed on the Council website here:

<https://www.southtyneside.gov.uk/article/21144/Regulation-18-Consultation-Statement>

APPENDIX C: KEY CHANGES MADE TO THE SOUTH TYNESIDE LOCAL PLAN BETWEEN REGUALTION 18 CONSULTATION (2022) AND PUBLICATION DRAFT REGULATION 19 CONSULTATION (2024)

Key Changes made to the South Tyneside Local Plan between Regulation 18 Consultation (2022) and Publication draft Regulation 19 Consultation (2024)		
Chapter	Policy	Changes made
Chapter 1 - Introduction		<ul style="list-style-type: none"> • Additional text added to strengthen links between the Local Plan, Neighbourhood Plans and North East Marine Plan (2021). • Factual updates to wording.
Chapter 2 – South Tyneside		<ul style="list-style-type: none"> • Factual updates to reflect latest data and updated evidence base.
Chapter 3 – Spatial Vision and Strategic Objectives		<ul style="list-style-type: none"> • References made to South Tyneside Council Vision 2023 – 2040 and South Tyneside Joint Health and Wellbeing Strategy (2022). • Review of Local Plan Spatial Vision and Strategic Objectives to reflect South Tyneside Vision 2023 – 2040. • Amendments to Spatial Vision and Strategic Objectives in response to comments made at Regulation 18. • Wording amendments to Strategic Objectives. • Climate Change and Renewable Energy objectives reviewed and updated. • ‘Building a strong, competitive economy’ theme added. • ‘Transport’ added to ‘Infrastructure’ theme. • Updated Plan period.
Chapter 4 – Strategy for Sustainable Development	SP1: Presumption in favour of Sustainable Development	<ul style="list-style-type: none"> • Additional reference made to Neighbourhood Plans in supporting text.
	SP2: Strategy for Sustainable Development to meet identified needs	<ul style="list-style-type: none"> • Factual updates to reflect change in Plan period, employment requirement and housing numbers. • Policy refined to address identified needs identified for the Borough.

	SP3: Spatial Strategy for sustainable development	<ul style="list-style-type: none"> • Clarity added in defining strategic hierarchy for development.
Chapter 5 – Strategic Allocations	SP4: Housing Allocations in the Main Urban Area	<ul style="list-style-type: none"> • Sites removed due to changes to availability, suitability and/or achievability or because planning permission has been granted: <ul style="list-style-type: none"> ○ The Disco Park (45 dwellings) ○ Land at Dipe Lane/Avondale Gardens (17 dwellings) ○ Land at Kings Meadow (25 dwellings) ○ Land at Heathway (3 dwellings) ○ Land at Heathway/Greenlands (10 dwellings) ○ Land at Calf Close Walk (33 dwellings) ○ Land to North and East of Holland Park Drive (35 dwellings) ○ Land at previously Nolan Hall (15 dwellings) ○ Ashworth Frazer Industrial Estate (100 dwellings) ○ Land to North of former day care centre (4 dwellings) ○ Land at Mountbatten Ave (12 dwellings) ○ Land at Lilac Walk (8 dwellings) ○ Land off Prince Georg Square (15 dwellings) ○ Land at Salcombe Ave (36 dwellings) ○ Land at Leamside (10 dwellings) ○ Land at Peel Gardens (6 dwellings) ○ South Shields and Westoe Sports Club (79 dwellings) ○ Land at Bradley Ave (44 dwellings) ○ Land at Essex Gardens (6 dwellings) ○ Land at Brockley Ave (2 dwellings) ○ Father James Walsh Day Centre (12 dwellings) ○ Land at Cleadon Lane Industrial Estate (212 dwellings). • Brinkburn and Chuter Ede removed and given their own policies (now SP5 and SP6). • Land at Associated Creameries and Land at former St Aidan's Church were previously identified as commitments, however, given that the planning permissions for these sites had lapsed, they are now included as proposed allocations. • Land off Burrow Street Housing-led Regeneration site renamed Land to the rear of Fowler Street.

		<ul style="list-style-type: none"> • Housing sites within Regeneration Areas incorporated into main table. • Estimated capacities amended on some sites.
	SP5: Urban and Village Sustainable Growth Areas	<ul style="list-style-type: none"> • Sites removed to reflect updated Green Belt Study, a reassessment of the housing requirement, and removal of a buffer resulting in a housing need reduction: <ul style="list-style-type: none"> ○ Land south of Cleadon Park (90 dwellings) ○ Land west of Sunnyside Farm (156 dwellings) ○ Former MoD bunkers, medical stores and associated land (120 dwellings) ○ Land south of St John's Terrace and Natley Ave (63 dwellings) ○ Land at Wellands Farm (250 dwellings) ○ Land west of Cleadon Lane (75 dwellings).
	SP6: Fellgate Sustainable Growth Area	<ul style="list-style-type: none"> • Wording amendments and additional criteria added. • Clarification of the requirement for a planning application to adhere to the Fellgate Sustainable Growth Area SPD. • Amendment to the affordable housing requirement. • Strengthened wording in relation to sustainable and active travel.
	SP7: South Shields Riverside Regeneration Area	<ul style="list-style-type: none"> • Factual updates to reflect housing number changes and wording amendments.
	SP8: Tyne Dock Estate Regeneration Site	<ul style="list-style-type: none"> • Policy removed and incorporated into SP4: Housing Allocations in the Main Urban Area.
	SP9: South Shields Town Centre College Regeneration Site	<ul style="list-style-type: none"> • Policy reworded and additional criteria added.
	SP10: Salem Street Housing-led Regeneration Site	<ul style="list-style-type: none"> • Policy removed and incorporated into SP4: Housing Allocations in the Main Urban Area.
	SP11: Queen Street Housing-led Regeneration Site	<ul style="list-style-type: none"> • Policy removed and incorporated into SP4: Housing Allocations in the Main Urban Area.
	SP12: Hebburn New Town Housing-led Regeneration site	<ul style="list-style-type: none"> • Policy removed and incorporated into SP4: Housing Allocations in the Main Urban Area.
	SP13: Policy SP13: Regeneration Improvement Areas	<ul style="list-style-type: none"> • Policy split into 3 new policies: SP9: Strategic Vision for South Shields Town Centre Regeneration, SP12: Fowler Street Improvement Area and SP13: Foreshore Improvement Area.

	SP14: Employment Land for General Economic Development	<ul style="list-style-type: none"> Factual amendments made to reflect the Employment Land Review (2023). Policy moved to Economic Development chapter.
	Policy SP15: Wardley Colliery	<ul style="list-style-type: none"> Clarification of the amount of land to be allocated for development. New point added to cover the need for compensatory improvements to the Green Belt. Safeguarding land for a new Metro/Rail Station moved to new Policy 52: Safeguarding Land for Metro and Rail development.
	Policy SP16: Provision of Land for Port and River-Related Development	<ul style="list-style-type: none"> Factual amendments made to reflect the Employment Land Review (2023). Policy Moved to Economic Development chapter.
Chapter 6 – Promoting Healthy Communities	Policy 1: Promoting Healthy Communities	<ul style="list-style-type: none"> Wording amendments. Threshold for Health Impact Assessments clarified and revised.
	Policy 2: Air Quality	<ul style="list-style-type: none"> Wording amendments. Part 2 split into two separate criteria.
	Policy 3: Pollution	<ul style="list-style-type: none"> Wording amendments and additional wording added to require Construction Environmental Management Plans in certain circumstances.
	Policy 4: Contaminated Land and Ground Stability	<ul style="list-style-type: none"> No changes to the policy.
Chapter 7 – Meeting the challenge of climate change, flooding and coastal change	Policy SP17: Climate Change	<ul style="list-style-type: none"> Additional criteria added to support urban and peri-urban agriculture.
	Policy 5: Reducing energy consumption and carbon emissions	<ul style="list-style-type: none"> Wording added to clarify the requirements of major developments. Wording added to introduce the forthcoming Future Homes Standard.
	Policy 6: Renewables and Low Carbon Energy Generation	<ul style="list-style-type: none"> Clarification of the range of technologies used in energy networks. Additional supporting text explaining how the policy will be implemented.
	Policy 7: Flood Risk and Water Management	<ul style="list-style-type: none"> Wording amendments.
	Policy 8: Flood Risk Assessment (FRA) and Drainage Strategy	<ul style="list-style-type: none"> Wording simplified to avoid NPPF repetition.

	Policy 9: Sustainable Drainage Systems	<ul style="list-style-type: none"> Increased emphasis on blue and green infrastructure and ecological enhancement added. Wording added to ensure that the maintenance and management of SuDS schemes is provided for.
	Policy 10: Disposal of Foul Water	<ul style="list-style-type: none"> No changes to the policy.
	Policy 11: Protecting Water Quality	<ul style="list-style-type: none"> Wording added to clarify that SuDS should meet the 4 pillars of SuDS design.
	Policy 12: Coastal Change	<ul style="list-style-type: none"> Wording amendments to part 1 of the policy. Part 4 removed to avoid repetition of other policies.
Chapter 8 – Delivering a mix of homes	SP18: Housing Supply and Delivery	<ul style="list-style-type: none"> Updates to housing figures. Tables in supporting text updated. Housing trajectory figures updated.
	Policy 13: Windfall and Backland sites	<ul style="list-style-type: none"> Wording amendments to clarify that development must meet all points under part 1. Wording amendment made to clarify point 2i.
	Policy 14: Housing Density	<ul style="list-style-type: none"> Wording amendment made to add clarification.
	Policy 15: Existing Homes	<ul style="list-style-type: none"> No amendments to policy.
	Policy 16: Houses in Multiple Occupation	<ul style="list-style-type: none"> Additional ‘sandwiching effect’ criteria added. Consideration of additional Article 4 Directions removed from policy wording. Additional threshold criteria added to the Lawe Top Article 4 area to ensure the number of HMO dwellings does not exceed 10% of the total number of properties, within 100 metres from the application site.
	Policy 17: Specialist Housing – Extra Care & Supported Housing	<ul style="list-style-type: none"> No amendments to policy.
	Policy 18: Affordable Housing	<ul style="list-style-type: none"> Amendment to require affordable housing on sites of 0.5ha or more instead of developments with a gross internal area of more than 1,000m². Amendments to part 3 of the policy to reflect updated viability evidence.

		<ul style="list-style-type: none"> • Wording amendment made to part 4 to clarify First Homes requirement.
	Policy 19: Housing Mix	<ul style="list-style-type: none"> • Wording and layout amendments.
	Policy 20: Technical Design Standards for New Homes	<ul style="list-style-type: none"> • Amendment to requirements of M4(3) and M4(2) dwellings to reflect updated SHMA and viability evidence.
	Policy 21: Gypsies, Travellers and Travelling Showpeople	<ul style="list-style-type: none"> • Wording amendments and additional criteria added.
Chapter 9 – Building a strong, competitive economy	Policy SP19: Strategic Economic Development	<ul style="list-style-type: none"> • Employment land figures updated to reflect updated Employment Land Review (2023).
	Policy 22: Protecting Employment Uses	<ul style="list-style-type: none"> • Factual updates to policy references.
	Policy 23: Employment Development Beyond Employment Allocations	<ul style="list-style-type: none"> • Factual updates to policy references.
	Policy 24: Safeguarding land at CEMEX Jarrow Aggregates Wharf	<ul style="list-style-type: none"> • No changes to this policy.
	Policy 25: Leisure and Tourism	<ul style="list-style-type: none"> • Reference to visitor accommodation added.
Chapter 10 – Ensuring the vitality of centres	SP20: The Hierarchy of Centres	<ul style="list-style-type: none"> • Wording regarding the sequential test strengthened.
	Policy 26: Ensuring Vitality and Viability in Town, district and Local Centres	<ul style="list-style-type: none"> • New point added to link to the recommendation of the Town, District and Local Centres Study that there is merit in identifying primary shopping areas.
	Policy 27: Prioritising Centres Sequentially	<ul style="list-style-type: none"> • Wording amended to provide greater clarity as to how the sequential test will be applied.
	Policy 28: Impact Assessment	<ul style="list-style-type: none"> • Policy amended to reflect the recommendations of the Town, District and Local Centres Study regarding the application of an impact assessment.
	Policy 29: Local Neighbourhood Hubs	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 30: South Shields market	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 31: Evening and Night-Time Economy in South Shields Town Centre	<ul style="list-style-type: none"> • Reference to the Special Policy Area removed as this is no longer operative. Points 4 and 5 are new.
	Policy 32: Hot Food Takeaways	<ul style="list-style-type: none"> • No changes to the policy.

Chapter 11 - Conserving and enhancing the Natural environment	SP21: Natural environment	<ul style="list-style-type: none"> • Wording changes to provide clarity and reference to Policy 35: Biodiversity Net Gain. • Additional reference to South of Tyne and Wear Local Nature Recovery Strategy.
	Policy 33: Biodiversity, Geodiversity and Ecological Networks	<ul style="list-style-type: none"> • Additional reference to Priority Species. • Reference to Biodiversity Net Gain removed to avoid repletion of Policy 35.
	Policy 34: Internationally, Nationally and Locally Important Sites	<ul style="list-style-type: none"> • Recreational Disturbance section added to improve policy structure. • Clarification added with regard to strategic mitigation for residential and leisure developments.
	Policy 35: Delivering Biodiversity Net Gain	<ul style="list-style-type: none"> • Policy updated to reflect the biodiversity net gain statutory framework. • Addition of locally specific locational hierarchy for the delivery of off-site biodiversity net gain.
	Policy 36: Protecting Trees, Woodland and Hedgerows	<ul style="list-style-type: none"> • Wording amendments for clarification and to strengthen policy. • Wording added to include ancient and veteran trees to reflect NPPF.
	Policy SP22: Green Infrastructure	<ul style="list-style-type: none"> • Significant policy rewording to reflect the Green and Blue Infrastructure Strategy (2023).
	Policy 37: Protecting and enhancing Open Spaces	<ul style="list-style-type: none"> • Inclusion of playing fields, sport and recreational land added to policy. • Wording amendments to reflect the findings of the Open Space Study (2023).
	Policy SP23: Sports Provision and Playing Pitches	<ul style="list-style-type: none"> • Removal of Land south of South Shields Community School as an allocated site for new playing field land. • Removal of Gypsies Green from SP23 (4) to reflect aspirations in Policy SP13: Foreshore Improvement Area. • Addition of Epinay School and Land adjacent Monkton Stadium to Section 5.
	Policy 38: Providing for Cemeteries	<ul style="list-style-type: none"> • Wording amendments.
	Policy 39: Areas of High Landscape Value	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 40: Agricultural Land	<ul style="list-style-type: none"> • Wording amendments to part 1.

		<ul style="list-style-type: none"> • Introduction of criteria relating to farming and agri-environmental schemes and the sustainable use of soils.
	Policy 41: Green Belt	<ul style="list-style-type: none"> • No changes to the policy.
Chapter 12 - Conserving and enhancing the Historic environment	Policy SP24: Heritage Assets	<ul style="list-style-type: none"> • Wording amendments.
	Policy 42: World Heritage Sites	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 43: Development Affecting Designated Heritage Assets	<ul style="list-style-type: none"> • Wording amendments to strengthen policy.
	Policy 44: Archaeology	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 45: Development Affecting Non-Designated Heritage Assets	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 46: Heritage At Risk	<ul style="list-style-type: none"> • No changes to the policy.
Chapter 13 - Well Designed Places	Policy 47 Design Principles	<ul style="list-style-type: none"> • Wording amendments to strengthen policy and so that it better aligns with the characteristics set out in the National Design Guide.
	Policy 48: Promoting Good Design with New Residential Developments	<ul style="list-style-type: none"> • Deleted and merged with Policy 47.
	Policy 49: Shopfronts	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 50: Advertisements	<ul style="list-style-type: none"> • No changes to the policy.
Chapter 14 - Transport	Chapter title	<ul style="list-style-type: none"> • Chapter renamed Transport and Infrastructure to fully reflect chapter content.
	Policy SP25: Infrastructure	<ul style="list-style-type: none"> • Removal of wording relating to delivering the infrastructure identified in the IDP as this is covered by other wording in the policy. • Wording added in relation to taking climate change resilience in to account to link to Strategic Objectives 3 and 4. • Wording amendments relating to telecommunications wording.
	Policy 51: Social and community infrastructure	<ul style="list-style-type: none"> • Wording amendments. • Removal of wording relating to Assets of Community Value.
	Policy 52: Telecommunications	<ul style="list-style-type: none"> • Removal of policy as covered by Building Regulations.
	Policy 53: Accessible and Sustainable Travel	<ul style="list-style-type: none"> • Policy 53 subsumed within Policy SP26: Delivering sustainable transport.

		<ul style="list-style-type: none"> • New Policy 52: Safeguarding Land for Metro and Rail development
	Policy 54: Improving capacity on the road network	<ul style="list-style-type: none"> • Removal of completed local highway network project.
	Policy SP26: New Development	<ul style="list-style-type: none"> • Policy 53: Accessible and Sustainable Travel, subsumed within Regulation 19 Policy SP26. • Policy renamed Policy SP26: Delivering sustainable transport. • Wording in previous Policy 53 relating to non-land use matters removed.
	Policy 55: Airport and Aircraft Safety	<ul style="list-style-type: none"> • No changes to the policy.
Chapter 15 - Waste and Minerals	Policy 56: Waste Facilities	<ul style="list-style-type: none"> • Wording amendments to reflect Waste Capacity Study (2023).
	Policy 57: Existing Waste Facilities	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 58: Minerals Safeguarding	<ul style="list-style-type: none"> • Wording amendments to part 1. • Additional criteria added to part 2.
	Policy 59: Development Management Considerations for Minerals Extraction	<ul style="list-style-type: none"> • Additional criteria requiring the protection of water bodies added.
Chapter 16 - Implementation and Monitoring	Policy 60: Implementation and Monitoring	<ul style="list-style-type: none"> • No changes to the policy.
	Policy 61: Delivering Infrastructure	<ul style="list-style-type: none"> • Wording added to link to NPPF planning obligations tests.
	Policy 62: Developer Contributions, Infrastructure Funding and Viability	<ul style="list-style-type: none"> • New wording added to enable developer contributions to be secured retrospectively.
Appendices	Appendix 1 List of Superseded Policies	<ul style="list-style-type: none"> • No change.
	Appendix 2 List of SPDs	<ul style="list-style-type: none"> • No change.
	Appendix 3 Housing Allocation Requirements	<ul style="list-style-type: none"> • Integrated into Policy SP4: Key Considerations.
	Appendix 4 Implementation and Monitoring	<ul style="list-style-type: none"> • Updates to monitoring framework to reflect relevant policy changes and Sustainability Appraisal monitoring indicators.
	Appendix 5 Glossary	<ul style="list-style-type: none"> • Updates to wording and additional references added in response to representations received at Regulation 18 consultation.

APPENDIX D: REGULATION-19 STATEMENT OF REPRESENTATION PROCEDURE

Statement of Representations Procedure

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012 (Reg 19)

South Tyneside Publication Draft Local Plan 2023-2040

The Council is inviting comments, known as representations, on the Publication Draft Local Plan 2023-2040. This statement sets out the following information:

- When you can make representations
- The deadline for making representations
- How you can make representations
- How to view the Draft Local Plan and supporting evidence base documents

Plan Title

South Tyneside Publication Draft Local Plan 2023-2040.

Subject matter and geographical area covered

South Tyneside Council has prepared a Publication Draft Local Plan 2023-2040 for consultation. The document covers the administrative area of the Borough of South Tyneside. The Plan sets out the strategic spatial planning policy framework for South Tyneside and includes:

- The strategic challenges faced by the Borough
- The spatial vision, strategic objectives, and spatial development strategy for the Borough
- Strategic site allocations and policies
- A suite of strategic and development management policies to be used to determine planning applications within the Borough
- Implementation and delivery policies
- A monitoring and implementation framework
- A Policies Map.

Period for making Representations

Representations of support or objection are invited on the Plan. All representations must be submitted and received by the Council by no later than 11.59pm on Monday 26 February 2024.

Please note that only representations received by 11.59pm on Monday 26 February 2024 must be considered by the Planning Inspector at examination. Late representations may not be considered.

How to make representations

Representations on the Plan can be submitted to the Council in the following ways:

The quickest and easiest way for you to respond is online at www.southtyneside.gov.uk/haveyoursay

If you prefer, you can Email: local.plan@southtyneside.gov.uk. We would encourage you to use the comments form available on the local plan web pages, although we will accept email representations in any format.

Post to: Spatial Planning, Development Services, Regeneration and Environment, South Tyneside Council, Town Hall and Civic Offices, Westoe Road, South Shields, Tyne & Wear, NE33 2RL. If you are submitting by post, please note the Council's Offices close at [3pm] every day. Therefore, representations by post must be received by us no later than [3pm] on Monday 26 February 2024, at the aforementioned address.

Request for further notification

By submitting a representation, you will automatically be added to our database and kept informed of the next stage in the Local Plan process. You can opt out at any time.

Using the online system or representation form you can request to be notified at an address/email address of any of the following next steps:

- That the Publication Draft Local Plan 2023-2040 has been submitted to the Secretary of State for Levelling Up, Housing and Communities for examination

- The publication of the Planning Inspector's Report on the Publication Draft Local Plan 2023-2040

- The adoption of the Publication Draft Local Plan 2023-2040

The online system or representation form can also be used to notify us of your interest to appear at the Independent Examination.

How and where to view the proposed submission documents

The Local Plan and supporting documents are available to view on the consultation website at www.southtyneside.gov.uk/haveyoursay during the consultation period.

These are made up of:

- The Publication Draft Local Plan 2023-2040

- Policies Map

- Supporting documentation

 - Habitats Regulations Assessment (2024)

 - Sustainability Appraisal (2024)

 - Sustainability Appraisal Non-Technical Summary (2024)

 - Statement of Consultation (2024)

- Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report

- Additional supporting evidence base documents relevant to the Plan's preparation.

The proposed submission documents will also be available to view at the following locations:

South Tyneside Council, Town Hall and Civic Offices, Westoe Road, South Shields, Tyne & Wear, NE33 2RL (Opening Hours: 10am – 3pm Monday to Friday)

Jarrow Town Hall, Grange Road, Jarrow, NE32 3LE (Opening times: 10am -3pm Mon/Wed/Fri)

Paper copies of all documentation can be requested (for a charge) from the Spatial Planning Team on 0191 424 7692 or by emailing local.plan@southtyneside.gov.uk

APPENDIX E: REGULATION 19 CONSULTATION LETTER

Dear Sir / Madam

South Tyneside Publication Draft Local Plan (Regulation 19) public consultation

South Tyneside Council has prepared a Publication Draft Local Plan 2023-2040 for consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

A Local Plan sets out the vision and a spatial framework for the future development of a Local Authority area within a plan period. Local Plans address the needs and opportunities in relation to housing, the economy, community facilities and infrastructure. They also act as a basis for protecting and enhancing the natural environment, adapting to climate change, and securing good design.

As a statutory consultee or as someone who has previously requested your details are retained on our consultee database, I am writing to inform you that public consultation on our Local Plan will run for 6 weeks from **Monday 15 January to Sunday 25 February 2024**.

Representations at this stage should only be made on the legal compliance and soundness of the Local Plan. That is, has the Plan been prepared in accordance with all legal and procedural requirements, and does the Plan meet the prescribed tests of soundness.

As part of this consultation, copies of the Local Plan will be placed in South Shields Town Hall and Jarrow Town Hall. The Council will also be publishing the Local Plan, supporting documents and consultation material online at www.southtyneside.gov.uk/localplan

The following formal question and answer sessions are planned at the following locations where officers will be available to deliver a short presentation and answer any questions you might have.

Date	Venue	Time
Monday 15 th January	Hedworthfield Community Association, Cornhill, Jarrow, NE32 4QD	6pm – 8pm
Tuesday 16 th January	East Boldon Junior School, North Lane, East Boldon, NE36 0DL	6pm – 8pm
Wednesday 17 th January	Whitburn Parish Hall, North Guards, Whitburn, SR6 7JH	6pm – 8pm
Thursday 18 th January	Hedworthfield Community Association, Cornhill, Jarrow, NE32 4QD	10.30am – 12.30pm
Friday 19 th January	Cleadon Methodist Church, 8 Sunderland Road, Cleadon, SR6 7UT	6pm – 8pm
Monday 22 nd January	The Word, 45 Market Place, South Shields, NE33 1JF	4:30pm – 6:30pm

Tuesday 23rd January	Jarrow Focus, Cambrian Street, Jarrow, NE32 3QN	5pm – 7pm
Wednesday 24 th January	Hebburn Central, Glen Street, Hebburn, NE31 1AB	6pm – 8pm
Friday 26 th January	Boldon Community Association, New Road, Boldon Colliery, NE35 9DS	6pm – 8pm

Short presentations will also be given at your local Community Area Forum:

<https://southtyneside.gov.uk/article/15186/CAF-meetings>

From the start of the consultation, everyone will be able to access and download the Local Plan, supporting technical reports and evidence and response forms from our dedicated webpage.

This is also the quickest and easiest way for you to respond: haveyoursay.southtyneside.gov.uk/

The Statement of Representations Procedure for the Publication draft Local Plan can be found at:

www.southtyneside.gov.uk/localplan

Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report (2024) public consultation

The Fellgate Sustainable Growth Area will be allocated for up to 1200 new dwellings and supporting community infrastructure in the Publication draft Local Plan (2024). To ensure a comprehensive approach to the development of the site, a Masterplan, secured as part of a Supplementary Planning Document (SPD) will be required. The Scoping Report identifies the key objectives of the proposed SPD and is subject to consultation alongside the Publication draft Local Plan.

The purpose of the Scoping Report and consultation is to engage key stakeholders and the public in considering the key issues that the SPD could and should be addressing and the possible approaches, which the document can adopt to address those issues.

The Fellgate Sustainable Growth Area SPD Scoping Report can be accessed: www.southtyneside.gov.uk/localplan

We would like to receive your views on the Fellgate Sustainable Growth Area SPD Scoping Report. The consultation will also run for 6 weeks from **Monday 15 January to Sunday 25 February 2024**.

The quickest and easiest way for you to respond is via the Fellgate Sustainable Growth Area SPD Scoping Report online consultation platform: haveyoursay.southtyneside.gov.uk/

Submitting comments:

All comments made to the consultation for the Publication draft Local Plan and/ or Fellgate Sustainable Growth Area SPD Scoping Report **must be made in writing and returned by 11.59pm on Sunday 25 February 2024** in one of the following ways:

Consultation platform: haveyoursay.southtyneside.gov.uk/

Email: Local.plan@southtyneside.gov.uk

Post: Spatial Planning, Development Services, Economic Regeneration, South Tyneside Council, Town Hall and Civic Offices, Westoe Road, South Shields, NE33 2RL.

Following the public consultation, the Local Plan will be formally submitted to the Secretary of State for its formal public Examination before an independent Planning Inspector.

If you require any further information regarding this consultation, please do not hesitate to contact the Spatial Planning Team via telephone number 0191 424 7385.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Inch', with a stylized, flowing script.

Andrew Inch

Senior Manager - Planning

REGULATION 19 CONSULTATION EXTENSION LETTER

Dear Sir / Madam

South Tyneside Publication Draft Local Plan (Regulation 19) public consultation

South Tyneside Council has prepared a Publication Draft Local Plan 2023-2040 for consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

A Local Plan sets out the vision and a spatial framework for the future development of a Local Authority area within a plan period. Local Plans address the needs and opportunities in relation to housing, the economy, community facilities and infrastructure. They also act as a basis for protecting and enhancing the natural environment, adapting to climate change, and securing good design.

As a statutory consultee or as someone who has previously requested your details are retained on our consultee database, I am writing to inform you that public consultation on our Local Plan has been extended by **1 week**.

The consultation will now run for 7 weeks from **15th January – Sunday 3rd March 2024**.

Representations at this stage should only be made on the legal compliance and soundness of the Local Plan. That is, has the Plan been prepared in accordance with all legal and procedural requirements, and does the Plan meet the prescribed tests of soundness.

As part of this consultation, copies of the Local Plan will be placed in South Shields Town Hall and Jarrow Town Hall. The Council will also be publishing the Local Plan, supporting documents and consultation material online at www.southtyneside.gov.uk/localplan

The following formal question and answer sessions are planned at the following locations where officers will be available to deliver a short presentation and answer any questions you might have.

Date	Venue	Time
Tuesday 23rd January	Jarrow Focus, Cambrian Street, Jarrow, NE32 3QN	5pm – 7pm
Wednesday 24 th January	Hebburn Central, Glen Street, Hebburn, NE31 1AB	6pm – 8pm
Friday 26 th January	Boldon Community Association, New Road, Boldon Colliery, NE35 9DS	6pm – 8pm

Short presentations will also be given at your local Community Area Forum:

<https://southtyneside.gov.uk/article/15186/CAF-meetings>

From the start of the consultation, everyone will be able to access and download the Local Plan, supporting technical reports and evidence and response forms from our dedicated webpage.

This is also the quickest and easiest way for you to respond: haveyoursay.southtyneside.gov.uk/

The Statement of Representations Procedure for the Publication draft Local Plan can be found at:
www.southtyneside.gov.uk/localplan

Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report (2024) public consultation

The Fellgate Sustainable Growth Area will be allocated for up to 1200 new dwellings and supporting community infrastructure in the Publication draft Local Plan (2024). To ensure a comprehensive approach to the development of the site, a Masterplan, secured as part of a Supplementary Planning Document (SPD) will be required. The Scoping Report identifies the key objectives of the proposed SPD and is subject to consultation alongside the Publication draft Local Plan.

The purpose of the Scoping Report and consultation is to engage key stakeholders and the public in considering the key issues that the SPD could and should be addressing and the possible approaches, which the document can adopt to address those issues. The Fellgate Sustainable Growth Area SPD Scoping Report can be accessed:
www.southtyneside.gov.uk/localplan

We would like to receive your views on the Fellgate Sustainable Growth Area SPD Scoping Report. The consultation will also run for 7 weeks from **Monday 15 January to Sunday 3rd March 2024**.

The quickest and easiest way for you to respond is via the Fellgate Sustainable Growth Area SPD Scoping Report online consultation platform: haveyoursay.southtyneside.gov.uk/

Submitting comments:

All comments made to the consultation for the Publication draft Local Plan and/ or Fellgate Sustainable Growth Area SPD Scoping Report **must be made in writing and returned by 11.59pm on Sunday 3rd March 2024** in one of the following ways:

Consultation platform: haveyoursay.southtyneside.gov.uk/

Email: Local.plan@southtyneside.gov.uk

Post: Spatial Planning, Development Services, Economic Regeneration, South Tyneside Council, Town Hall and Civic Offices, Westoe Road, South Shields, NE33 2RL.

Following the public consultation, the Local Plan will be formally submitted to the Secretary of State for its formal public Examination before an independent Planning Inspector.

If you require any further information regarding this consultation, please do not hesitate to contact the Spatial Planning Team via telephone number 0191 424 7385.

Yours faithfully



Andrew Inch

Senior Manager - Planning

APPENDIX F: REGULATION 19 STATUTORY CONSULTEES AND OTHER ORGANISATIONS

List A – Statutory Consultees List (2024)

- Active Travel England
- Arqiva
- Avonline
- Briskona
- City Fibre
- Coal Authority
- Civil Aviation Authority
- CTIL
- Department for Education
- Department for Transport
- Durham County Council
- EE
- Environment Agency
- Gateshead Council
- Historic England
- Homes England
- Marine Management Organisation
- National Grid
- Natural England
- NECA
- Network Rail
- Newcastle City Council
- Nexus
- NHS
- North Tyneside Council
- Northern Gas Networks
- Northern Powergrid
- Northumberland County Council
- Northumbrian Water
- NTW Solutions (NHS Foundation Trust)
- National Highways
- Office for Road and Rail Regulation
- Openreach
- South Tyneside and Sunderland Healthcare Group
- Sport England
- Sunderland City Council
- THREE
- Virgin Media

List B - Other Organisations and Stakeholders – Regulation 19 (2024)

- Alzheimers Society
- Anton Lang Planning Services
- Avant Homes
- Avison Young
- Banks Property
- Barratt Homes
- Barton Willmore
- Bellway Homes
- BHPD
- BLISS=Ability
- BNP
- Boyer Planning
- British sign and graphics association
- CCG
- Centre for sustainable energy
- CLA
- Cleadon and East Boldon Labour Party
- Client Earth
- Countryside Properties
- CPRE
- CT Planning
- Cundall
- Cushman and Wakefield
- Cussins (North East) Limited
- D2 Planning Limited
- Dere Street Homes
- Dow Chemicals
- DPDS
- DPP Planning
- DTZKLR Planning
- Durham Bird Club
- Durham Cathedral
- Durham Wildlife Trust
- East Boldon Neighbourhood Forum
- ELG Planning
- Engie
- England Golf
- E-Planning
- Fairhurst

- Friends of Environmental Issues kin South Tyneside
- Friends of the Disco Field
- Galliford Try
- Garden History Society
- George F White
- Gleeson Regeneration
- Go North East
- Grange Road West Dental Practice
- H&H Land
- Harworth Estates
- Hebburn Iona Club
- Hedley Planning
- Hellens
- HH Land
- Homegroup
- House Builders Federation
- Husband and Brown
- ID Partnership
- Indigo Planning
- Jon Twedell Planning
- Keep Boldon Green
- Legion Community Club
- Lichfields
- LSH
- Marrons Planning
- Miller Homes
- Mineral Products Association
- My Dentist
- National Farmers Union
- National Federation of Gypsy Liaison Groups
- National Gas Transmission
- National Grid (Avison Young OBO)
- National Grid (Wood PLC OBO)
- Nelson Petcare Ltd
- NLP Planning
- North East Maritime Trust
- Northumbria Police
- O'Brien Demolition
- Outdoor Advertising Consultant (for British Sign and Graphics Association)
- Paribas

- Pegasus Group
- Persimmon Homes
- Plainview Planning Ltd
- PlanInfo
- Rapleys Youngs RPS
- RichBorough Estates
- Rise
- RK Wood Planning
- RP Wood Planning
- Savills
- SITA
- Spaweforths
- SSA Planning
- STEP
- Stephenson Halliday
- Story Homes
- SSTAG
- Taylor Wimpey
- Tetlow King
- The British Horse Society
- The Sirius Group
- Turvey Westgarth
- Tyne & Wear Archives & Museums
- Urban River
- Walton
- Ward Hadaway
- West Boldon Residents Association
- Whitburn Golf Club
- Whitburn Neighbourhood Forum
- Whitburn Village Residents Association
- White Young Green
- Wildcard Network
- Women's Health in South Tyneside
- Wood plc
- WYG

APPENDIX G: REGULATION 19 PRESS ARTICLES AND SOCIAL MEDIA

PRESS ARTICLES

Title	Date	Publication	Weblink
South Tyneside Council reveals its latest draft 'local plan' for the Borough	22/12/23	Shields Gazette	South Tyneside Council reveals its latest draft 'local plan' for the Borough (shieldsgazette.com)

South Tyneside Council reveals its latest draft 'local plan' for the Borough

By [Chris Binding](#)

Published 22nd Dec 2023, 06:00 BST

South Tyneside Council has revealed its latest draft 'local plan' for the Borough, ahead of a key decision by senior Councillors in the new year. The local authority's ruling cabinet will be asked to approve an updated blueprint for development in the Borough at a meeting in January so that further public consultation can begin.

The local plan provides a framework for where new homes, businesses and leisure facilities will be built up until 2040, to help ensure that the right infrastructure, such as roads and schools, is in place to support growth. Council officers have stressed local authorities need to adopt local plans by the end of 2026 and that failing to have an up-to-date plan can leave the Council in a "weaker position" when negotiating on planning applications. The latest 'Regulation 19' publication draft is one of several formal stages that a local plan must pass, prior to adoption by the Council.

In summer, 2022, an eight-week public consultation was held on the Regulation 18 draft plan with 1,887 individual responses received. Since then, the plan has been refined to reflect the feedback received, as well as further work being undertaken to build an updated evidence base to support Regulation 19. As a result, a number of sites, both in the Green Belt and in the 'main urban area', which were previously identified as housing sites in the previous local plan, have been removed and are no longer allocated for housing. This includes housing plans for the Disco Field in Boldon which had sparked opposition from members of the public.

Sites removed from the urban area represent allocations of around 300 homes, while the Green Belt sites removed following the Regulation 18 consultation were once allocated for around 750 homes. This included land south of Cleadon Park, land west of Sunnyside Farm, land at the former MoD bunkers, land south of St John's Terrace and Natley Avenue, land at Wellands Farm and land west of Cleadon Lane, Whitburn. There has also been a reduction in the amount of housing required for the plan period, due to changes in a formula used to calculate 'local housing need', and several planning permissions being granted for housing development since the Regulation 18 consultation.

In addition, the 15 per cent buffer proposed at Regulation 18 will now no longer be included as this would require more land in the Green Belt to be allocated for development. The changes have resulted in the local plan's residual housing number decreasing by around 1,000 homes, with a drop from 4,471 to 3,443 over the plan period. The percentage of South Tyneside's Green Belt proposed for development has also dropped from seven per cent to five per cent.

Councillor Margaret Meling, cabinet member for economic growth and transport, said: “It’s vital that we have an up-to-date plan so that we maintain control over development in the Borough; without one, we are vulnerable to speculative development proposals. “We have listened to what our residents told us during the Regulation 18 consultation, particularly around some Council-owned sites, and this version of the plan reflects people’s views as much as possible. “We continue to prioritise and actively promote the development of brownfield sites first, but there is an acute undersupply of land from non-Green Belt sources, so we have had to look at all options to accommodate sustainable development. “In this version of the plan, it is proposed that just 5% of land is removed from the Green Belt.”

The latest version of the local plan allocates 27 sites which would accommodate 1,190 homes in the main urban area, with a further 2,253 houses to be accommodated outside this area. This includes six sites being ‘removed’ from the Green Belt to accommodate around 1,000 homes, with individual sites across the Whitburn, Cleadon, East Boldon and Hebburn areas. Land at South Tyneside College’s Hebburn campus is allocated for development, as well as land at North Farm, land to the north of Town End Farm, land at West Hall Farm, land at Whitburn Lodge and land to the north of Shearwater. In addition, the local plan has also identified land south of Fellgate as a Sustainable Growth Area, which will be allocated for up to 1,200 new homes and supporting community infrastructure.

At a cabinet meeting next year, senior Councillors will be asked to approve consultation on an initial scoping report which would help inform a future masterplan for this specific site. South Tyneside Council has been working on its local plan for years, with the plan being taken back to the drawing board in 2021, before a new ‘Regulation 18’ draft went out to public consultation in 2022. Cllr Meling acknowledged the local plan had been “delayed and delayed” and said it was “now time to move forward”. The cabinet member added: “A local plan isn’t just about building houses; it’s about making the Borough a thriving and prosperous place. “It gives us the opportunity to enhance and protect our natural and historic environment and embed policies that mitigate the effects of climate change. “We want people who grow up in South Tyneside to be able to stay here, with access to affordable housing and skilled jobs. “We want to create well-designed, sustainable neighbourhoods that last a lifetime.”

As well as housing, the local plan includes a range of policies looking at key issues across the Borough, from health and economic growth, to climate change and transport. There is also a focus on design standards for new developments, affordable housing and specialist housing types.

3.81 Councillor Jim Foreman, cabinet member for housing and community safety, said it was important for the local plan to “match the needs of the residents” and to “keep communities together”. Council planning officers added that the scoping report for the biggest site in the local plan, which proposes up to 1,200 homes south of Fellgate, aims to ensure that it is “the best it possibly can be”.

Future proposals include a masterplan and design code, with the site also expected to include a new ‘local centre’, primary school and the transport and green infrastructure needed to “deliver a new community”.

3.82 Subject to cabinet approval of the latest draft local plan, a six-week public consultation period will follow. Consultation at the Regulation 19 stage is specific in its remit, and provides the opportunity to comment on whether the plan has been prepared lawfully and whether the policies within it are ‘sound’.

Ultimately, the local plan will be submitted to the Secretary of State for a Public Examination before an independent planning inspector. Council bosses hope this will happen in early-2025 with the plan being formally adopted later the same year.

Cllr Foreman added: “We’re looking to the future because it’s not myself that will benefit from the local plan, it’s going to be my children and grandchildren. “We want to make sure that the local plan is right, to get the right developments for the future of the residents of this Borough. “It’s important to make sure that we do get it right”.

Information on the latest draft local plan can be found via South Tyneside Council’s website.

The next steps for the local plan are set to be discussed by cabinet on January 3, 2024, at South Shields Town Hall.

Title	Date	Publication	Weblink
Cabinet to Consider New Blueprint for Borough	22/12/23	South Tyneside Council website	Cabinet to consider new Blueprint for Borough

Cabinet to Consider New Blueprint for Borough

Friday 22 December 2023

A new draft Local Plan will be put before South Tyneside Council's Cabinet in the New Year.

Members will be asked to approve the updated blueprint for development in the Borough, so that further public consultation can begin.

The Local Plan will provide a framework for where new homes, businesses, shops and leisure facilities will be built up until 2040, and ensure that the right infrastructure, such as roads and schools, is in place to support growth.

The latest 'Regulation 19' publication draft is one of several formal stages that a Local Plan must pass, prior to adoption by the Council.

In summer 2022, an eight-week consultation was held on the Regulation 18 draft plan. In total, 1887 individual responses were received. Since then, the plan has been refined to reflect the feedback received, as well as further work being undertaken to build an updated and robust evidence base to support Regulation 19.

As a result, a number of sites, both in the Green Belt, and in the Main Urban Area, identified as potential residential sites in the Regulation 18 draft plan, have been removed and are no longer allocated for housing.

There has also been a reduction in the amount of housing required for the plan period, this is due to changes to the standard method formula used to calculate Local Housing Need and planning permissions granted for housing development since the Regulation 18 consultation.

This has resulted in the residual housing number decreasing from 4,471 to 3,443 over the plan period. In addition, the 15% buffer proposed at Regulation 18 will now no longer be included as this would require more land in the Green Belt to be allocated for development.

Cllr Margaret Meling, Lead Member for Economic Growth and Transport, "It's vital that we have an up-to-date plan so that we maintain control over development in the Borough; without one, we are vulnerable to speculative development proposals.

"We have listened to what our residents told us during the Regulation 18 consultation, particularly around some Council-owned sites, and this version of the plan reflects people's views as much as possible.

"We continue to prioritise and actively promote the development of brownfield sites first, but there is an acute undersupply of land from non-Green Belt sources, so we have had to look at all options to accommodate sustainable development. In this version of the plan, it is proposed that just five per cent of land is removed from the Green Belt."

The latest version of the plan allocates 27 sites which would accommodate 1190 homes in the Main Urban Area, leaving a further 2253 houses to be accommodated outside this area. The plan has also identified land south of Fellgate as a Sustainable Growth Area, which will be allocated for up to 1,200 new homes and supporting community infrastructure. Cabinet will also be asked to approve consultation on an initial scoping report which would help inform a future masterplan.

Cllr Meling added: "A local plan isn't just about building houses; it's about making the Borough a thriving and prosperous place.

"It gives us the opportunity to enhance and protect our natural and historic environment and embed policies that mitigate the effects of climate change.

"We want people who grow up in South Tyneside to be able to stay here, with access to affordable housing and skilled jobs. We want to create well designed, sustainable neighbourhoods that last a lifetime."

Subject to cabinet approval of the draft, a six-week public consultation period will follow.

Consultation at Regulation 19 stage is very specific in its remit and provides the opportunity to comment on whether the plan has been prepared lawfully and whether the policies within it are sound.

Ultimately, the Plan will be submitted to the Secretary of State for a Public Examination before an independent Planning Inspector.

Title	Date	Publication	Weblink
South Tyneside Council reveals latest 'local plan' development blueprint for Borough	25/12/23	Chronicle	South Tyneside Council reveals latest 'local plan' development blueprint for Borough

South Tyneside Council reveals latest 'local plan' development blueprint for Borough

The local plan provides a framework for where new homes, businesses and leisure facilities will be built up until 2040

[South Tyneside Council](#) has revealed its latest draft 'local plan' for the Borough, ahead of a key decision by senior Councillors in the new year. The local authority's ruling cabinet will be asked to approve an updated blueprint for development in the Borough at a meeting in January so that further public consultation can begin.

The local plan provides a framework for where new homes, businesses and leisure facilities will be built up until 2040, to help ensure that the right infrastructure, such as roads and schools, is in place to support growth. Council officers have stressed local authorities need to adopt local plans by the end of 2026 and that failing to have an up-to-date plan can leave the Council in a “weaker position” when negotiating on planning applications.

The latest ‘Regulation 19’ publication draft is one of several formal stages that a local plan must pass, prior to adoption by the Council. In summer, 2022, an eight-week public consultation was held on the Regulation 18 draft plan with 1,887 individual responses received.

Since then, the plan has been refined to reflect the feedback received, as well as further work being undertaken to build an updated evidence base to support Regulation 19. As a result, a number of sites, both in the Green Belt and in the ‘main urban area’, which were previously identified as housing sites in the previous local plan, have been removed and are no longer allocated for housing.

This includes housing plans for the Disco Field in Boldon which had sparked opposition from members of the public. Sites removed from the urban area represent allocations of around 300 homes, while the Green Belt sites removed following the Regulation 18 consultation were once allocated for around 750 homes.

This included land south of Cleadon Park, land west of Sunnyside Farm, land at the former MoD bunkers, land south of St John’s Terrace and Natley Avenue, land at Wellands Farm and land west of Cleadon Lane, Whitburn. There has also been a reduction in the amount of housing required for the plan period, due to changes in a formula used to calculate ‘local housing need’, and several planning permissions being granted for housing development since the Regulation 18 consultation.

In addition, the 15 per cent buffer proposed at Regulation 18 will now no longer be included as this would require more land in the Green Belt to be allocated for development. The changes have resulted in the local plan’s residual housing number decreasing by around 1,000 homes, with a drop from 4,471 to 3,443 over the plan period.

The percentage of [South Tyneside](#)’s Green Belt proposed for development has also dropped from seven per cent to five per cent. Councillor Margaret Meling, cabinet member for economic growth and transport, said: “It’s vital that we have an up-to-date plan so that we maintain control over development in the Borough; without one, we are vulnerable to speculative development proposals.

“We have listened to what our residents told us during the Regulation 18 consultation, particularly around some Council-owned sites, and this version of the plan reflects people’s views as much as possible. We continue to prioritise and actively promote the development of brownfield sites first, but there is an acute undersupply of land from non-Green Belt sources, so we have had to look at all options to accommodate sustainable development.

“In this version of the plan, it is proposed that just 5% of land is removed from the Green Belt.” The latest version of the local plan allocates 27 sites which would accommodate 1,190 homes in the main urban area, with a further 2,253 houses to be accommodated outside this area.

This includes six sites being ‘removed’ from the Green Belt to accommodate around 1,000 homes, with individual sites across the Whitburn, Cleadon, East Boldon and Hebburn areas. Land at South Tyneside College’s Hebburn campus is allocated for development, as well as land at North Farm, land to the north of Town End Farm, land at West Hall Farm, land at Whitburn Lodge and land to the north of Shearwater.

In addition, the local plan has also identified land south of Fellgate as a Sustainable Growth Area, which will be allocated for up to 1,200 new homes and supporting community infrastructure. At a cabinet meeting next year, senior Councillors will be asked to approve consultation on an initial scoping report which would help inform a future masterplan for this specific site.

South Tyneside Council has been working on its local plan for years, with the plan being taken back to the drawing board in 2021, before a new 'Regulation 18' draft went out to public consultation in 2022. Cllr Meling acknowledged the local plan had been "delayed and delayed" and said it was "now time to move forward".

The cabinet member added: "A local plan isn't just about building houses; it's about making the Borough a thriving and prosperous place. It gives us the opportunity to enhance and protect our natural and historic environment and embed policies that mitigate the effects of climate change.

"We want people who grow up in South Tyneside to be able to stay here, with access to affordable housing and skilled jobs. We want to create well-designed, sustainable neighbourhoods that last a lifetime."

As well as housing, the local plan includes a range of policies looking at key issues across the Borough, from health and economic growth, to climate change and transport. There is also a focus on design standards for new developments, affordable housing and specialist housing types.

Councillor Jim Foreman, cabinet member for housing and community safety, said it was important for the local plan to "match the needs of the residents" and to "keep communities together". Council planning officers added that the scoping report for the biggest site in the local plan, which proposes up to 1,200 homes south of Fellgate, aims to ensure that it is "the best it possibly can be".

Future proposals include a masterplan and design code, with the site also expected to include a new 'local centre', primary school and the transport and green infrastructure needed to "deliver a new community". Subject to cabinet approval of the latest draft local plan, a six-week public consultation period will follow.

Consultation at the Regulation 19 stage is specific in its remit, and provides the opportunity to comment on whether the plan has been prepared lawfully and whether the policies within it are 'sound'. Ultimately, the local plan will be submitted to the Secretary of State for a Public Examination before an independent planning inspector.

Council bosses hope this will happen in early-2025 with the plan being formally adopted later the same year. Cllr Foreman added: "We're looking to the future because it's not myself that will benefit from the local plan, it's going to be my children and grandchildren.

"We want to make sure that the local plan is right, to get the right developments for the future of the residents of this Borough. It's important to make sure that we do get it right".

Information on the latest draft local plan can be found via South Tyneside Council's website. The next steps for the local plan are set to be discussed by cabinet on January 3, 2024, at [South Shields](#) Town Hall.

Title	Date	Publication	Weblink
Consultation to Begin on Blueprint for Borough	09/01/24	South Tyneside Council website	Consultation to Begin on Blueprint for Borough
Consultation to Begin on Blueprint for Borough			

Tuesday 09 January 2024

Public consultation on the latest version of the Borough's Local Plan will get underway next Monday.

Last week, Cabinet gave the go-ahead to consult on the 'Regulation 19' publication draft, which will provide a blueprint for development up until 2040.

Regulation 19 is one of several formal stages that a Local Plan must pass, prior to adoption by the Council.

The Local Plan will provide a framework for where new homes, businesses, shops and leisure facilities will be built, and ensure that the right infrastructure, such as roads and schools, is in place to support growth.

Consultation at Regulation 19 stage is very specific in its remit; it will provide the opportunity to comment on whether the plan has been prepared lawfully, whether the policies within it are sound and whether it is compliant with the Duty to Cooperate with other local authorities and other relevant organisations in its preparation.

Cllr Margaret Meling, Lead Member for Economic Growth and Transport, "It's vital that we have an up-to-date plan so that we maintain control over development in the Borough.

"We have repeatedly failed the housing delivery test and are the only authority in the region whose housing delivery has fallen below 75 per cent; this makes us extremely vulnerable to speculative development proposals.

"We received almost 1,900 responses during our consultation at the Regulation 18 stage and we have taken that feedback on board. This version of the plan reflects people's views wherever possible.

"Now we're asking people for their input again, so that together we can put in strong local policies that support the kind of places local people want.

The latest version of the plan allocates 27 sites which would accommodate 1190 homes in the Main Urban Area, leaving a further 2253 houses to be accommodated outside this area.

The plan has also identified land south of Fellgate as a Sustainable Growth Area, which will be allocated for up to 1,200 new homes and supporting community infrastructure. Cabinet also approved consultation on an initial scoping report on this, which would help inform a future masterplan.

A number of sites, both in the Green Belt, and in the Main Urban Area, identified as potential residential sites in the Regulation 18 draft plan, have been removed and are no longer allocated for housing.

There has also been a reduction in the amount of housing required for the plan period, this is due to changes to the standard method formula used to calculate Local Housing Need and planning permissions granted for housing development since the Regulation 18 consultation.

This has resulted in the residual housing number decreasing from 4,471 to 3,443 over the plan period. In addition, the 15% buffer proposed at Regulation 18 will now no longer be included as this would require more land in the Green Belt to be allocated for development.

Cllr Meling added: "This version of the plan seeks to meet our housing need, which is the right thing to do for the Borough.

"We continue to prioritise and actively promote the development of brownfield sites first, but there is an acute undersupply of land from non-Green Belt sources, so we have had to look at all options to accommodate sustainable development. In this version of the plan, it is proposed that just five per cent of land is removed from the Green Belt.

"But a local plan isn't just about building houses; it's about making the Borough a thriving and prosperous place.

"It gives us the opportunity to enhance and protect our natural and historic environment and embed policies that mitigate the effects of climate change.

"We want people who grow up in South Tyneside to be able to stay here, with access to a range of homes to rent and buy, and skilled jobs. We want to create well designed, sustainable neighbourhoods that last a lifetime."

Consultation will run from Monday 15 January to midnight on Sunday 25 February.

There will be a number of information sessions (see NTE) and a presentation will be taken to each of the Borough's Community Area Forums.

To view the draft Plan and for details of how to give your views, visit www.southtyneside.gov.uk/localplan

Title	Date	Publication	Weblink
'Have say on homes'	10/01/24	Shields Gazette	Paper version only



Title	Date	Publication	Weblink
South Tyneside local plan – strategy published	08/02/24	Planning Resource	South Tyneside local plan – strategy published

PLANNING

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South Tyneside local plan - strategy published

South Tyneside Council has published its local plan for consultation.

8 February 2024



South Tyneside Council has published its draft local plan for a consultation that takes place between 15 January and 3 March 2024.

Title	Date	Publication	Weblink
Residents urged to share views	22/02/2024	South Tyneside Council website	Residents Urged to-Share Their Views

Residents Urged to Share Their Views

Thursday 22 February 2024

Residents are reminded that time is running out to give their views on the latest version of the Borough's Local Plan.

Consultation on the 'Regulation 19' publication draft, which will provide a blueprint for development up until 2040, will end on March 3.

Regulation 19 is one of several formal stages that a Local Plan must pass, prior to adoption by the Council.

The Local Plan will provide a framework for where new homes, businesses, shops and leisure facilities could be built, and ensure that the right infrastructure, such as roads and schools, is in place to support growth.

Already 125 representations have been received providing feedback to the Publication draft Local Plan and the Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report. Consultation at Regulation 19 stage is very specific in its remit; it will provide the opportunity to comment on whether the plan has been prepared lawfully, whether the policies within it are sound and whether it is compliant with the Duty to Cooperate with other local authorities and other relevant organisations in its preparation.

Cllr Margaret Meling, Lead Member for Economic Growth and Transport, "We'd like to thank all those residents who've taken the time to give us their views, and for anyone who hasn't yet done so, we'd love to hear from you.

"We're asking people for their input so that together we can put in strong local policies that support the kind of places local people want.

"It's vital that we have an up-to-date plan so that we maintain control over development in the Borough.

"We have repeatedly failed the housing delivery test and are the only authority in the region whose housing delivery has fallen below 75 per cent; this makes us extremely vulnerable to speculative development proposals.

The latest version of the plan allocates 27 sites which would accommodate 1190 homes in the Main Urban Area, leaving a further 2253 houses to be accommodated outside this area.

The plan has also identified land south of Fellgate as a Sustainable Growth Area, which will be allocated for up to 1,200 new homes and supporting community infrastructure. Cabinet also approved consultation on an initial scoping report on this, which would help inform a future masterplan. Consultation on the Scoping Report also ends on March 3.

A number of sites, both in the Green Belt, and in the Main Urban Area, identified as potential residential sites in the Regulation 18 draft plan, have been removed and are no longer allocated for housing.

There has also been a reduction in the amount of housing required for the plan period, this is due to changes to the standard method formula used to calculate Local Housing Need and planning permissions granted for housing development since the Regulation 18 consultation.

This has resulted in the residual housing number decreasing from 4,471 to 3,443 over the plan period. In addition, the 15% buffer proposed at Regulation 18 will now no longer be included as this would require more land in the Green Belt to be allocated for development.

Cllr Meling added: "This version of the plan seeks to meet our housing need, which is the right thing to do for the Borough.

"We continue to prioritise and actively promote the development of brownfield sites first, but there is an acute undersupply of land from non-Green Belt sources, so we have had to look at all options to accommodate sustainable development. In this version of the plan, it is proposed that just five per cent of land is removed from the Green Belt.

"But a local plan isn't just about building houses; it's about making the Borough a thriving and prosperous place.

"It gives us the opportunity to enhance and protect our natural and historic environment and embed policies that mitigate the effects of climate change.



"We want people who grow up in South Tyneside to be able to stay here, with access to a range of homes to rent and buy, and skilled jobs. We want to create well designed, sustainable neighbourhoods that last a lifetime."

To view the Publication draft Local Plan, Fellgate Sustainable Growth Area Scoping Report and for details of how to give your views, visit www.southtyneside.gov.uk/localplan

SOCIAL MEDIA REACH

Social media post	Date	Social Media reach		Total
Have Your Say on Local Plan	9 th January	Facebook	2,278	4,126
		X	704	
		Next Door	1,144	
Local Plan Consultation events	17 th January	Facebook	2,303	3,153
		X	330	
		Next Door	520	
Local Plan Consultation events	22 nd January	Facebook	3,291	4,973
		X	951	
		Next Door	731	
Local Plan- date extension	25 th January	Facebook	1,311	1,616*
		X	305	
		NextDoor	TBC	
Local Plan Consultation events	2 nd February	Facebook	2,131	3,675
		X	431	
		NextDoor	1,113	
Have Your Say on Local Plan	10 th February	Facebook	4,525	5,870
		X	395	
		Next Door	950	
Have Your Say on Local Plan	17 th February	Facebook	2,692	4,487
		X	929	
		Next Door	866	
Time is running out to share views on the Local Plan	23 rd February	Facebook	2,227	4,008
		X	503	
		Next Door	718	
Don't miss out on having your say	28th February	Facebook	2,229	4,419
		X	476	
		Next Door	1,714	
Last chance to have your say	2 nd March	Facebook	2,871	5,043
		X	615	
		Next Door	1,557	
Local Plan consultation closes at midnight	3 rd March	Facebook	2,414	3,094
		X	680	
		Next Door	N/A	
Total				44,464

SOCIAL MEDIA POSTS

Date	Social Media Post	
	X (Twitter)	Facebook
09/01/2024	<p>Official South Tyneside Council @STyneCouncil</p> <p>Public consultation on the latest version of the Borough's Local Plan will run from Mon 15 Jan- midnight on Sun 25 Feb</p> <p>There will be a number of information sessions and a presentation taken to each of the Borough's Community Area Forums</p> <p>southtyneside.gov.uk/localplan</p> <p>#SouthTyneside</p>  <p>The poster for the South Tyneside Local Plan features a blue header with the title 'South Tyneside Local Plan' and the dates 'Mon 15 Jan - Sun 25 Feb'. Below the title, it states: 'The Local Plan will determine where new homes, businesses, shops and leisure facilities will be built until 2040. How do you, a lot of INFORMATION! 12:00PM and to have your say visit Q www.southtyneside.gov.uk/localplan'. At the bottom, a red banner reads 'ALL INFORMATION ENDS SUNDAY 25 FEB 2024'.</p>	<p>South Tyneside Council 55 m · G</p> <p>Public consultation on the latest version of the Borough's Local Plan will start next Monday.</p> <p>Last week, Cabinet gave the go-ahead to consult on the 'Regulation 19' publication draft, which will provide a blueprint for development up until 2040.</p> <p>The Local Plan will provide a framework for where new homes, businesses, shops and leisure facilities will be built, and ensure that the right infrastructure, such as roads and schools, is in place to support growth.</p> <p>Consultation will run from Monday 15 January to midnight on Sunday 25 February.</p> <p>There will be a number of information sessions and a presentation will be taken to each of the Borough's Community Area Forums.</p> <p>To view the draft Plan and for details of how to give your views, visit www.southtyneside.gov.uk/localplan</p>  <p>The poster for the South Tyneside Local Plan features a blue header with the title 'South Tyneside Local Plan' and the dates 'Mon 15 Jan - Sun 25 Feb'. Below the title, it states: 'The Local Plan will determine where new homes, businesses, shops and leisure facilities will be built until 2040. How do you, a lot of INFORMATION! 12:00PM and to have your say visit Q www.southtyneside.gov.uk/localplan'. At the bottom, a red banner reads 'CONSULTATION ENDS SUNDAY 25 FEB 2024'.</p>

17/01/2024

Official South Tyneside Council
@STYMCouncil

Follow

Local Plan-Have Your Say

We are currently developing a new Local Plan for [#SouthTyneside](#). Consultation (Reg 19 Publication draft) is open until Sun 25 Feb 2024. We have organised some info sessions where you can find out more about this consultation.

southtyneside.gov.uk/localplan

South Tyneside Council
33m · 45

Local Plan- Have Your Say

We are currently developing a new Local Plan for South Tyneside. Consultation (Regulation 19 Publication draft) is open until midnight Sunday 25 February 2024.

This consultation is different to previous times we've asked you about the Local Plan. These questions are set by government, and require your comments specifically around legal compliance, soundness and how it's been prepared.

We have organised some information sessions where you can find out more about the Local Plan and this consultation.

The sessions will start with a short presentation, followed by time for questions and answers. We would advise you to arrive for the start time.

Have Your Say : www.haveyoursay.southtyneside.gov.uk
Find out more information: www.southtyneside.gov.uk/localplan

The poster for the South Tyneside Local Plan consultation sessions. It features a blue header with the title 'South Tyneside Local Plan Mon 15 January - Sun 25 February'. Below the title, it says 'Below is a list of INFORMATION SESSIONS taking place across South Tyneside.' There is a table with columns for Venue, Date, and Time. To the right of the table is a photograph of two people walking in a park. At the bottom, there is a blue banner with the ALT logo and the website 'www.southtyneside.gov.uk/localplan'.

Venue	Date	Time
South Tyneside Council	15th Jan	10:00am - 12:00pm
Leam Road, South Shields	15th Jan	12:00pm - 2:00pm
Whitburn Village Community Centre	16th Jan	10:00am - 12:00pm
Whitburn Village	16th Jan	12:00pm - 2:00pm
Whitburn Community Centre	17th Jan	10:00am - 12:00pm
Whitburn	17th Jan	12:00pm - 2:00pm
Whitburn Community Centre	18th Jan	10:00am - 12:00pm
Whitburn	18th Jan	12:00pm - 2:00pm
Whitburn Community Centre	19th Jan	10:00am - 12:00pm
Whitburn	19th Jan	12:00pm - 2:00pm
Whitburn Community Centre	20th Jan	10:00am - 12:00pm
Whitburn	20th Jan	12:00pm - 2:00pm
Whitburn Community Centre	21st Jan	10:00am - 12:00pm
Whitburn	21st Jan	12:00pm - 2:00pm
Whitburn Community Centre	22nd Jan	10:00am - 12:00pm
Whitburn	22nd Jan	12:00pm - 2:00pm
Whitburn Community Centre	23rd Jan	10:00am - 12:00pm
Whitburn	23rd Jan	12:00pm - 2:00pm
Whitburn Community Centre	24th Jan	10:00am - 12:00pm
Whitburn	24th Jan	12:00pm - 2:00pm
Whitburn Community Centre	25th Jan	10:00am - 12:00pm
Whitburn	25th Jan	12:00pm - 2:00pm

22/01/2024









Official South Tyneside Council
@STyne_Council





Follow

The Local Plan-Have Your Say
We are currently developing a new Local Plan for #SouthTyneside
This sets out how we will meet the area's future social, economic and environmental needs. We have organised Info sessions where you can find out more
For full info southtyneside.gov.uk/localplan

South Tyneside Council
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The Local Plan- Have Your Say
We are currently developing a new Local Plan for South Tyneside.
This is an important document as it will set out how we will meet the area's future social, economic and environmental needs.
We have organised some information sessions where you can find out more about the Local Plan and this consultation.
Find out more at www.southtyneside.gov.uk/localplan

<p>25/01/2024</p>	<div data-bbox="451 226 909 273">  Official South Tyneside Council @STyneCouncil Follow </div> <p>The Local Plan has started and has been extended by one week. Consultation will now run until Sun 3 March.</p> <p>The 'Reg 19' publication draft, which will provide a blueprint for development up until 2040. #SouthTyneside For further information, visit southtyneside.gov.uk/localplan.</p> <div data-bbox="451 556 909 814">  </div> <p>18:39 · 25/01/2024 from Earth · 306 views</p>	<div data-bbox="974 216 1206 262">  South Tyneside Council 16 h · 0 </div> <p>Have Your Say - The Local Plan (Reg 19)</p> <p>The Local Plan is already underway, and we'd like to thank residents who have took the time to respond. The consultation has been extended by one week.</p> <p>Consultation will now run until Sunday 3 March.</p> <p>The 'Regulation 19' publication draft, which will provide a blueprint for development up until 2040, is one of several formal stages that a Local Plan must pass, prior to adoption by the council.</p> <p>For further information, visit www.southtyneside.gov.uk/localplan</p> <div data-bbox="963 577 1502 913">  </div>
<p>02/02/2024</p>	<div data-bbox="451 972 909 1018">  Official South Tyneside Council @STyneCouncil Follow </div> <p>The Local Plan Consultation on a new draft Local Plan (the Regulation 19 Publication draft) is open until Sun 3 March 2024.</p> <p>Find out more and Have Your Say at: southtyneside.gov.uk/localplan #SouthTyneside</p> <div data-bbox="443 1283 917 1577">  </div>	<div data-bbox="974 970 1263 1016">  South Tyneside Council 2 Feb · 0 </div> <p>The Local Plan Consultation on a new draft Local Plan (the Regulation 19 Publication draft) is open until Sunday 3 March 2024.</p> <p>This consultation is different to previous times we've asked you about the Local Plan,</p> <p>During previous consultations we asked for your views on the location of new housing, individual sites and potential policy directions,</p> <p>This time we need to ask you specific questions about the draft Plan. Find out more and Have Your Say at www.southtyneside.gov.uk/localplan</p> <p>These questions are set by government, and require your comments specifically around legal compliance, soundness and how it's been prepared.</p> <div data-bbox="951 1411 1507 1675">  </div>

<p>10/02/2024</p>	<p>Official South Tyneside Council @STyneCouncil</p> <p>We would like to hear your views on the new draft version of the Local Plan.</p> <p>Consultation takes place until Sunday 3 March 2024.</p> <p>Find out more and Have Your Say at southtyneside.gov.uk/localplan</p> 	<p>South Tyneside Council 10 Feb · G</p> <p>We would like to hear your views on the new draft version of the Local Plan.</p> <p>Consultation takes place until Sunday 3 March 2024.</p> <p>Find out more and Have Your Say at www.southtyneside.gov.uk/localplan</p> 
<p>16/02/2024</p>	<p>Official South Tyneside Council @STyneCouncil</p> <p>Have you had your say on the Local Plan? We would like to hear your views. Time is running out with the consultation ending on Sun 3 March. We welcome feedback from local businesses, local and national interest groups and service providers. Find out more southtyneside.gov.uk/localplan</p> 	<p>South Tyneside Council 16 Feb · G</p> <p>Have you had your say on the Local Plan?</p> <p>We would like to hear your views on the new draft version of the Local Plan. Time is running out. The consultation ends on Sunday 3 March.</p> <p>We also welcome feedback from local businesses, local and national interest groups and service providers.</p> <p>Find out more and have your say today! www.southtyneside.gov.uk/localplan</p> 

<p>23/02/2024</p>	<div data-bbox="427 205 935 262">  <div> Official South Tyneside Council @STynsCouncil </div> <div>Follow</div> </div> <p>Time is running out to share your views on the Local Plan</p> <p>Consultation on the 'Regulation 19' publication draft, will end on Sun 3 March. To view the Publication draft Local Plan and for details of how to give your views, visit southtyneside.gov.uk/localplan #SouthTyneside</p> 	<div data-bbox="979 205 1521 262">  <div> South Tyneside Council 23 Feb - G </div> <div>...</div> </div> <p>Time is running out to share your views on the Local Plan</p> <p>Consultation on the 'Regulation 19' publication draft, will end on Sunday 3 March.</p> <p>The Local Plan will provide a framework for where new homes, businesses, shops and leisure facilities could be built, and ensure that the right infrastructure, such as roads and schools, is in place to support growth.</p> <p>To view the Publication draft Local Plan, Felgate Sustainable Growth Area Scoping Report and for details of how to give your views, visit www.southtyneside.gov.uk/localplan</p> 
<p>02/03/2024</p>	<div data-bbox="427 850 935 907">  <div> Official South Tyneside Council @STynsCouncil </div> <div>Follow</div> </div> <p>Last chance to have your say on the #SouthTyneside Local Plan</p> <p>Consultation ends tomorrow (Sun 3 March). We would like to hear your views. Find out more and have your say at southtyneside.gov.uk/localplan</p> 	<div data-bbox="979 850 1521 907">  <div> South Tyneside Council 7 h - G </div> <div>...</div> </div> <p>Time is running out to have your say on the South Tyneside Local Plan. Consultation closes this Sunday (3 March) on Regulation 19 of the Local Plan.</p> <p>This is an important document as it will set out how we will meet the area's future social, economic and environmental needs. It will be used to assess development proposals. Find out more and have your say at www.southtyneside.gov.uk/localplan</p> 

03/03/2024



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Follow

Last day to have your say on the South Tyneside Local Plan

The Local plan consultation ends today (Sun 3 March) at 12 midnight.

The Local Plan, when adopted, will be used for assessing all development proposals in South Tyneside.

Find out more at [southtyneside.gov.uk/localplan](https://www.southtyneside.gov.uk/localplan)



South Tyneside Council

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Last chance to have your say on the South Tyneside Local Plan

Consultation ends tomorrow (Sun 3 March).

We would like to hear your views. The Local Plan is an important document that will set out how we will meet the area's future social, economic and environmental needs.

Find out more and have your say at www.southtyneside.gov.uk/localplan



APPENDIX H: REGULATION 19 REPRESENTATION GUIDANCE

South Tyneside Local Plan: how to respond

These guidance notes are intended to help you in completing your formal response.

This Regulation 19 consultation differs from previous consultations the Council has held on the Local Plan preparation. Previous consultations have been set by the Council, to help inform the strategy and content of the emerging plan. This has included members of the public being asked for views on the location of new housing, individual sites and potential policy directions. That stage is now complete, and the Council is ready to submit the draft plan to the Secretary of State who will then appoint an Inspector to examine the Plan.

This consultation is not an opportunity for people to submit comments with the intention that the Council will make changes to the Plan before it is submitted to the Secretary of State; that stage has passed.

In order to submit to the Secretary of State, the Council must carry out public consultation as prescribed by Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2019. Unlike previous stages, this consultation is not set by the Council. Instead, the consultation questions are set by the Planning Inspectorate and require representations to reference a specific element(s) of the Plan, and to refer to the statutory tests of Legal Compliance, Soundness or Duty to Cooperate:

Legally compliant - relating to the way in which we have prepared the Plan:

- Does the Plan comply with national planning policy and legislation issued by the Government?
- Does the Plan include a Sustainability Appraisal?
- Has the Plan been prepared in cooperation with other local authorities and prescribed bodies?
- Has the Plan been prepared in-line with our Local Development Scheme?
- Have appropriate bodies been consulted during the plan making process in line with our Statement of Community Involvement?
- Have the appropriate notifications been made of publication of the Pre-Submission Plan?

Sound – relating to the content of the Plan

- Has the Plan been positively prepared to meet the objectively assessed need for homes, jobs, services and infrastructure and deliver sustainable development?
- Is the Plan justified by a robust evidence base?
- Is the Plan effective in delivering sustainable development?
- Is the Plan consistent with the National Planning Policy Framework (NPPF) for sustainable development?

Complies with the Duty to Cooperate – relating to how we have worked with other local authorities or other relevant bodies in developing the Plan:

- Have we satisfied the requirements for working with other local authorities and statutory organisations to address strategic issues in the preparation of the Plan?

Using the online questionnaire:

We would encourage all responders to use the online questionnaire at <https://haveyoursay.southtyneside.gov.uk/>

The online form has been designed so that anyone wishing to make representations can attribute their comments against a specific section of the Plan. This will ensure the Inspector understands which section of the Plan the representations relate to, and how the comments relate to **Legal Compliance, Soundness, or Duty to Cooperate**.

You can submit as many representations as you want.



If you have any attachments you wish to submit then please email these separately to local.plan@southtyneside.gov.uk

Alternatives – responding via email or post:

If a member of the public is unable to use the online form, they are instead able to download and fill out a word version response form. This response form is provided by the Planning Inspectorate and sets out how they want the public to respond. It requires the responder to manually fill out the element of the Plan

their representation relates to as well as reference Legal Compliance, Soundness, or Duty to Cooperate.

Completed forms can be emailed to Local.plan@southtyneside.gov.uk

Part A – Personal details (only needs to be completed once)

Part B - A separate form must be filled out for each representation made Representations can be made relating to any part of the Pre-Submission Plan

To comply with the Regulations:

- Please reference the relevant paragraph/ policy/ Policies Map

- Please indicate whether you consider this part of the Plan to be Legally compliant/ Sound/ Complies with the Duty to co-operate
- Please provide details of why you think the Plan supports or fails any of the above tests
- Please set out the modifications necessary to make the Pre-Submission Plan legally compliant or sound
- Please put forward suggested revised wording of any policy or text

Please email any supporting documents ensuring each document is no larger than 10mb. Please don't send more than 20mb of supporting documents per email. You may submit more than one email but please label clearly e.g. email 1 of 2. If you need to submit more than 60mb of material, please get in touch and we will facilitate a file transfer.

Please indicate if you would like to participate in the hearing session and why you consider this to be necessary.

Please sign and date your representation.

Please complete a new Part B form for each representation made.

If a member of the public has no access to email they may:

- print out the word version form; or
- respond by letter, replicating the questions set out above.

Post to: Spatial Planning Team, South Tyneside Council, Town Hall & Civic Offices, Westoe Road, South Shields, NE33 2RL

If a member of the public is unable to use any of the above formats, please phone the Spatial Planning Team on 0191 424 7692 and they will tailor a method of response appropriate to that individual's needs. No one will be left unable to comment or respond.

The Council will still forward all representations received, regardless of format or content if they are clearly made in response to this consultation and will consider them valid. However, the Council would strongly advise that anyone not using the recommended format clearly states which part of the Plan the representation relates to and is as clear and succinct as possible. If the Inspector is unable to fully understand what the representation relates to, as the responder has chosen not to respond to the questions set by the Planning Inspectorate, this is outside of the Council's control. It is therefore in responders' best interests to use the format as provided by the Planning Inspectorate, even if they are responding by email or letter.

If you are aware of anyone who is struggling to access documents or make representations, please advise them to contact the Spatial Planning Team on 0191 424 7692 and they will be offered assistance.

The consultation will end at midnight on Sunday 3 March 2024.

APPENDIX I: REGULATION 19 RESPONSE FORMS



South Tyneside Council

Regulation 19 Local Plan Consultation Representation Form

Please return this form by midnight on Sunday 25 February 2024.

Data Protection and Freedom of Information

All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments will also be available to view on request. By submitting this response you are agreeing to these conditions.

This form has two parts:

- Part A - Personal details (need only be completed once)
- Part B – Your representation(s).
Please fill in a separate sheet for each representation you wish to make.

This form can also be completed online at www.haveyoursay.southtyneside.gov.uk

If you are having difficulty submitting representations, please contact
local.plan@southtyneside.gov.uk or call 0191 424 7692

Part A: Your Details

	Personal Details*	Agent's Details (if applicable)
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Telephone		
Email		

** If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) but complete the full details of the agent.*

D&P_1155

Part B

Please fill in a separate form for each representation

Name or organisation	
Client (if relevant)	

Section 1: To which section of the Local Plan does this representation relate?

Paragraph	
Policy	
Policies Map	

Section 2: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is (tick as appropriate)	Yes	No
1. Legally compliant		
2. Sound		
3. In Compliance with the Duty to Cooperate		

Section 3: Details of Representation

<p>If you wish to support or object to the legal compliance or soundness of the Local Plan, please use this box to set out and explain your comments. Please be as precise as possible. As a guide, we would recommend no more than a 100 word summary of each point.</p>

Section 4: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. *Please be as precise as possible.*

(Continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the Regulation 19 consultation has closed, further submissions will only be at the request /invitation of the Inspector, based on the matters and issues debated at the examination.

Section 5: Participation at the Examination


If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (Please select one answer with a tick)

Yes		No	
-----	--	----	--

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 6:

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Local Plan through to adoption?
(Please select one answer with a tick)

Yes		No	
-----	--	----	--

By submitting a representation, you will also automatically be added to our database and kept informed of the next stage in the Local Plan process. You can opt out any time.

APPENDIX J: REGULATION 19 REPRESENTATIONS SUMMARIES AND COUNCIL RESPONSES

Appendix J – Chapter 1 – Introduction

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
LP1890	Geoffrey Careless	0001		The Plan is unsound as it is proposed to remove Green Belt.	The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP0078	Peter Oneil	0003		The Plan is not legally compliant or sound and is not compliant with the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1891	Douglas Shearer	0004		The Plan is unsound as it is proposed to remove Green Belt.	The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1895	Carol Robson	0005		The Plan is considered to be unsound.	We believe the Plan to be sound.
LP1896	Christopher Horne	0006		Concern new development will increase traffic congestion.	The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further

Appendix J – Chapter 1 – Introduction

					detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1906	Environment Agency	0329		Considers the Plan to be sound.	Support for the soundness of the Plan is noted.
LP1907	The Marine Management Organisation	0330		Considers the Plan to be sound.	Support for the soundness of the Plan is noted.
LP1912	National Gas Transmission	0331		Welcomes the opportunity to provide advice and guidance to the Council concerning their networks.	Noted.
LP1912	National Grid	0332		Welcomes the opportunity to provide advice on Plan making.	Noted.
LP1915	Sport England	0333		Detailed comments are provided under various policies throughout the Plan.	Noted.
LP0744	Eric Mason	0009		The Plan has not been positively prepared or justified. Objection to Green Belt development and Fellgate Sustainable Growth Area including impact on traffic, flooding and wildlife. Local Plan consultation was poorly managed.	We believe the plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development. A Supplementary Planning Document is being produced for the site which will be subject to further consultation. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.
LP1926	Nexus	0011		Considers the Plan to be sound.	Support for the soundness of the Plan is noted.

Appendix J – Chapter 1 – Introduction

LP1164	Gateshead Council	0012		Welcomes the opportunity to comment on the Plan, and to agree a Statement of Common Ground.	South Tyneside are committed to continue to work with Gateshead on strategic cross boundary matters as set out in the Statement of Common Ground between the parties.
LP0645	Delia McNally	0013		Objection to Local Plan policies including housing need figure and development of Green Belt (GA2- North Farm).	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base.
LP1938	Alan Howard Becke and Susan Shilling	0014		Objection to Green Belt development and GA2- North Farm including infrastructure concerns.	The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure

Appendix J – Chapter 1 – Introduction

					Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to. We believe the plan to be sound and no change is needed.
LP1939	Janet Cook	0335		Objection to Green Belt development and raises infrastructure concerns in East Boldon.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP0628	Keith Humphreys	0015		Proposed development in East Boldon is not sound. The Local Plan does not comply with the Duty to Co-operate in terms of	We believe the plan to be sound and no change is needed. The Duty to Cooperate Statement (2024) (SUB5) outlines how the Council has complied with

Appendix J – Chapter 1 – Introduction

				engagement with the East Boldon Neighbourhood Forum.	the Duty to Cooperate. Following the consultation on the Regulation 18 draft Local Plan (2022), the council worked with the EBNF to strengthen links between the Local Plan and the Neighbourhood Plan. This work informed the Regulation 19 Publication draft Local Plan (2024).
LP1940	S Mason	0016		The Plan is not positively prepared and is not sound. There is no justification for building on Green Belt. Brownfield first. The consultation was poorly managed. Object to SP8: loss of wildlife, increased risk of flooding, and a road network that is already at full capacity.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP1941	A Mason	0017			
LP1942	B Mason	0018			
LP1943	Paul Crompton	0019		The Plan should consider providing more affordable houses, preferably on brownfield rather than Green Belt.	We believe the plan to be sound and no change is needed. Policy 18 sets out the requirement for developments to provide affordable housing.

Appendix J – Chapter 1 – Introduction

LP1944	Avant Homes North East	0336		Avant Homes put forward a number of proposed modifications that would make the Plan sound.	Proposed modifications are noted. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP1945	Petition objecting to Fellgate	0337		Petition objecting to development on the Green Belt at Fellgate.	Objection to Policy SP8 noted. The council consider the plan to be sound and no change is needed. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP1946	Barratt Homes	0020		Chapter 1 is considered to be legally compliant, sound and comply with the Duty to Cooperate.	Support for the legal compliance, soundness and compliance with the Duty to Cooperate noted.
LP1952	Taylor Wimpey	0338		The Plan is not considered to be sound as it will not deliver enough housing for local residents, will stifle local economic growth and restrict wider environmental and social benefits.	We believe Plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.
LP1953	Bellway Homes	0339		The Plan is considered to be unsound.	We believe the Plan to be sound.
LP1417	Bellway Homes	0340		The Plan is considered to be unsound.	We believe the Plan to be sound.
LP1958	Sunderland City Council	0341		Welcomes the opportunity to comment on the Plan, and to agree a Statement of Common Ground.	Noted.
LP1959	Northumbrian Water	0342		No further comments are made at this stage.	Noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	0343		Representation made to GA3: a detailed response is made under Policy SP7.	Noted.
LP1961	Cleadon Property Investments	0344		New site allocation proposed: SHLAA ref: SBC063.	The council considers that the Plan is sound and no change is needed.

Appendix J – Chapter 1 – Introduction

LP1962	Adderstone Living Ltd	0345		The Plan is not considered to be sound as it will not deliver enough housing.	We believe Plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.
LP1963	Stonebridge Homes	0346		The Plan is not considered to be sound. Proposed modifications are made under specific policies.	Proposed modifications are noted. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP1964	Persimmon Homes	0347		The Plan is not considered to be sound as it will not deliver enough housing.	We believe Plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.
LP1965	William Leech Limited	0348		Comments are provided under specific policies including SP8.	Noted.
LP1966	NHS Property Services Ltd	0349		New development should make a proportionate contribution to funding the healthcare needs arising from new development.	The plan is considered to be sound, and no change is needed. Policy SP25 outlines the expectation for new development to contribute towards the delivery of essential infrastructure.
LP1149	Banks Group	0350		New site allocation proposed: SHLAA ref: SWH009.	The council considers that the Plan is sound, and no change is needed.
LP1967	Port of Tyne	0021		Considers the Plan to be sound. Minor modifications proposed.	Proposed modifications are noted. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP1969	Sunderland AFC	0351		Proposed modifications are made under specific policies.	Proposed modifications are noted. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP0270	Neil Johnson	0022		The Plan is not considered to be legally compliant or sound and does not meet the	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The

Appendix J – Chapter 1 – Introduction

				Duty to Cooperate. The consultation made it difficult for some people to respond.	council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP1988	Doreen Green	0023		The Plan is not considered to be legally compliant or sound and does not meet the Duty to Cooperate. The consultation made it difficult for some people to respond.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP1997	T P Duffy	0024		The Plan is not considered to be legally compliant or sound and does not meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP2005	Rachael Milne	0025		The Plan is not considered to be legally compliant or sound and does not meet the Duty to Cooperate. The consultation was not user friendly. Detailed comments made in relation to SP8.	We believe the plan to be sound, legally compliant and prepared in accordance with the Duty to Co-operate. No change is needed. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.

Appendix J – Chapter 1 – Introduction

LP0585	David Milne	0026		The Plan is considered to be legally compliant but not sound. The consultation was not user friendly. Green Belt should not be built on.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1920	Margaret Milne	0027			
LP2010	Lindsey Grievson	0028		The Plan is considered to be legally compliant but not sound. The consultation is not user friendly.	We believe the plan to be sound and no change is needed. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2012	Janet Ramm	0352		Objection to the Plan.	Objection to the Plan noted. The council considers the plan to be sound.
LP2020	Lawrence Taylor	0029		The Plan is considered to be unsound. The consultation is not user friendly.	We believe the Plan to be sound and no change is needed. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and

Appendix J – Chapter 1 – Introduction

					the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2025	Anthony Pollock	0353		Agrees with points raised in the Green Party representation.	Noted.
LP2033	Toni Sambridge	0354		Proposed allocations must be supported by improvements to the Strategic Road Network.	The council considers the plan to be sound and no changes are needed. The Local Plan includes policies which seek to mitigate the impacts of development and which development proposals will need to comply, this includes Policy SP26: Delivering sustainable transport which the council considers to be robust and sound policies. Further detail is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan.
LP2039	Ron Forbister	0355		The consultation was not user friendly.	The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2048	Jennie and Ann West	0356		The infrastructure in Cleadon can't cope with more development and will lead to an increase in pollution.	The council considers the plan to be sound and no changes are needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to pollution, transport and infrastructure,
LP2049	Nicola, David and Megan West	1863			
LP2050	Bev, Jon and Robyn Olds	1864			
LP2051	Joyce and Bill Hills	1865			
LP2052	Hilary, Mammed and Alex Bagher	1866			
LP2053	Joanne, Christopher, Jack and Harry West	1867			
LP0088	Andrew Davison	1868			

Appendix J – Chapter 1 – Introduction

LP2054	Lauren and Nicholas Bagher	1869			which any proposal coming forward for a development would need to adhere to.
LP1334	Keep Boldon Green	0357		The Plan is not considered to be sound or to meet the Duty to Cooperate. Exceptional circumstances for Green Belt removal have not been demonstrated. The consultation is not user friendly. The Plan process does not comply with the Localism Act. The infrastructure in East Boldon can't cope with more development.	<p>We believe to Plan to be sound and compliant with the Duty to Cooperate. No changes are needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to pollution, transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP2186	Natural England	0030		Supportive of Sustainability Appraisal Objectives.	Support for the Sustainability Appraisal Objectives noted.

Appendix J – Chapter 1 – Introduction

LP2187	Gillian Johnston	0358		The Plan is not considered to be legally compliant or sound and does not meet the Duty to Cooperate. Existing sewerage infrastructure is unable to cope, and additional development will make the situation worse.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations
LP1867	Church Commissioners for England			Support for GA2, GA3, GA4, GA5, GA6 and SP8. Proposed modifications to SP2, SP3, SP7, SP8 and Policy 41. Object to SP16.	Support for GA2, GA3, GA4, GA5, GA6 and SP8 noted. Proposed modifications are noted. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.

Appendix J – Chapter 2 – South Tyneside Context

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
LP1890	Geoffrey Careless	0031		Chapter 2 is not considered to be sound as it does not sufficiently support retail investment within the borough. Removing green belt land raises concerns for the effect on the existing poor health in the borough.	We believe Chapter 2 to be sound and no change is required. The Local Plan seek to protect and support retail development within South Tyneside and seek to ensure health and wellbeing are central to the Local Plan objectives.
LP0078	Peter Oneil	0033		Chapter 2 is not considered to be sound, legally compliant, or compliant with the Duty to Cooperate.	We believe Chapter 2 to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
LP1896	Christopher Horne	0035			
LP1895	Carol Robson	0034		Chapter 2 is considered to be sound, legally compliant, or compliant with the Duty to Cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
LP1922	Peter Rooney	0037		<p>The Plan must be revised to reduce the number of homes being planned for, in order to meet the requirement to be sound on the basis of being positively prepared, so that it meets the area's objectively assessed needs and is consistent with achieving sustainable development. Key Points include:</p> <ul style="list-style-type: none"> The Local Plan is based on inaccurate population projections. Use of 2014 population projections results in more housing needed than 2021 Census. 	We believe the Plan to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP1234	Mineral Products Association	0038	Paragraph 2.73	There is a lack of clarity on the number of Mineral Planning Authorities (MPAs) which operate within the North-East. The evidence base within the Local Aggregate Assessment must fully assess how the demand of resources will meet the aspirations of the Local Plan.	We believe the plan to be sound but would be willing to consider some minor modifications to correct typographical errors and add clarity. We believe that the Local Aggregates Assessment is an up to date and proportionate evidence document.

Appendix J – Chapter 2 – South Tyneside Context

LP0645	Delia McNally	0039		Chapter 2 is not considered to be sound. The Plan does not set out how additional infrastructure needs in the East Boldon area will be met, including school places, healthcare provision and traffic congestion.	We believe Chapter 2 to be sound. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1938	Alan Howard Becke and Susan Shilling	0040		<p>This policy must be revised to reduce the number of homes being planned for, in order to meet the requirement to be sound on the basis of being positively prepared, so that it meets the area's objectively assessed needs and is consistent with achieving sustainable development. Key Points include:</p> <ul style="list-style-type: none"> • The Local Plan is based on inaccurate population projections. • Use of 2014 population projections results in more housing needed than 2021 Census. 	We believe the Plan to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0628	Keith Humphreys	0041		This plan is not considered to be legally compliant, sound or compliant with Duty to Cooperate. The Plan is contrary to the East Boldon Neighbourhood Plan. The allocation of GA2 is not justified and is not effective in delivering sustainable development. The allocation undermines the importance of the Green Belt and will lead to increased flooding, loss of wildlife and put pressure on existing infrastructure.	<p>We believe the Plan to be legally complaint, sound and compliant with the Duty to Cooperate and no change is required. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development</p>

Appendix J – Chapter 2 – South Tyneside Context

					<p>needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. Following the consultation on the Regulation 18 Draft Local Plan (2022) (PRE1), the Spatial Planning team worked with the East Boldon Neighbourhood Forum to strengthen links between the Local Plan and the Neighbourhood Plan, and this work informed the Regulation 19 Publication Draft Local Plan (2024) (SUB1).</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP1943	Paul Crompton	0042		Chapter 2 is considered to be legally compliant, sound and compliant with the Duty to Cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted
LP1946	Barratt Homes	0043		Chapter 2 is considered to be legally compliant, sound and compliant with the Duty to Cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted

Appendix J – Chapter 2 – South Tyneside Context

LP0949	Lesley Younger	0044		<p>The Plan must be revised to reduce the number of homes being planned for, in order to meet the requirement to be sound on the basis of being positively prepared, so that it meets the area's objectively assessed needs and is consistent with achieving sustainable development. Key Points include:</p> <ul style="list-style-type: none"> • The Local Plan is based on inaccurate population projections. • Use of 2014 population projections results in more housing needed than 2021 Census. 	<p>We believe the Plan to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p>
LP1980	David Green	0045		<p>The Plan is not considered to be legally compliant or compliant with the Duty to Cooperate. Evidence set out in traffic modelling is flawed and traffic congestion will worsen. Exceptional circumstances for Green Belt release have not been demonstrated.</p>	<p>We believe the plan to be legally compliant and compliant with the Duty to Cooperate and no change is required. The council considers that the Traffic Assessment (2023) (INV5) and the Strategic Road Network Forecast Report (2024) (INV2) has been conducted using a robust methodology to support the South Tyneside Local Plan. The council believe that the traffic modelling evidence is relevant, robust and up to date. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP1997	T P Duffy	0046		<p>Chapter 2 is not considered to be sound, legally compliant, or compliant with the Duty to Cooperate. Reference made to GA2 and GA4.</p>	<p>We believe Chapter 2 to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required. Site allocations GA2 North Farm and GA4 Land at West Hall Farm has been robustly</p>

Appendix J – Chapter 2 – South Tyneside Context

					considered through the plan preparation process and supporting Evidence base.
LP0585	David Milne	0047		Chapter 2 is not considered to be sound or compliant with the Duty to Cooperate. The consultation strategy was flawed and exceptional circumstances for Green Belt release have not been demonstrated (SP8: Fellgate Sustainable Growth Area).	<p>We believe the plan to be sound and compliant with the Duty to Cooperate. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP1920	Margaret Milne	1870		Chapter 2 is not considered to be sound, legally compliant, or compliant with the Duty to Cooperate. Objection to building on the Green Belt.	<p>We believe Chapter 2 to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP2020	Lawrence Taylor	0050		Chapter 2 is not considered to be sound or compliant with the Duty to Cooperate. The Plan does not comply with national policy or planning legislation. The evidence base is	<p>We believe Chapter 2 to be sound and compliant with the Duty to Cooperate and complaint with national policy and no change is required.</p>

Appendix J – Chapter 2 – South Tyneside Context

				<p>flawed and outdated. The Consultation Strategy is flawed and makes it difficult for members of the public to comment on the Plan's legal compliance. Sites in the Greenbelt should not be released.</p>	<p>The Council is confident that the evidence base that has informed the preparation of the Plan is relevant, robust, up to date and proportionate.</p> <p>The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP1867	Gillian Johnson	1877		<p>Chapter 2 is not considered to be sound, legally compliant or compliant with the duty to cooperate. Exceptional circumstances for Green Belt deletion have not been demonstrated.</p>	<p>We believe Chapter 2 to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
LP1890	Geoffrey Careless	0051		Chapter 3 is not considered to be sound or to comply with the duty to cooperate. Objects to SP8 Fellgate Sustainable Growth Area as it will not attract business and will be detrimental to residents wellbeing.	We believe the chapter to be sound and compliant with the Duty to Cooperate and no change is required. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP0078	Peter Oneil	0052		Chapter 3 is not considered to be sound or to comply with the duty to cooperate. Green belt should be safeguarded. Concern raised regarding impacts on sewerage infrastructure and green infrastructure in Whitburn.	<p>We believe the chapter to be sound and compliant with the Duty to Cooperate and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p> <p>The Council has published a Green and Blue Infrastructure (GBI) Strategy (2023) (NAT1) which provides an overarching framework for the delivery of an integrated approach to GI across the borough and</p>

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

					catalogues GI projects. Policy SP22 sets out the requirements for the enhancement and incorporation of new and/or existing GBI within new proposals.
LP1895	Carol Robson	0053		Supports Chapter 3.	Support for Chapter 3 noted.
LP1896	Christopher Horne	0054		Objects to Chapter 3.	Objection to Chapter 3 noted. We believe the Plan to be sound and no change is required.
LP1897	Ashley Westall	0055		Chapter 3 is inconsistent with the National Planning Policy Framework (NPPF). Concerns raised about infrastructure capacity in East Boldon.	We believe the chapter is consistent with national policy and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan.
LP1910	Lisa Johnson	0056	Para 3.2	The policy has not been positively prepared. Concerns raised about infrastructure capacity in East Boldon.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan.
LP1922	Peter Rooney	0058		The policy has not been positively prepared to deliver sustainable development in the East Boldon Neighbourhood Plan area. The policy is not justified, uses out of date evidence and exceptional circumstances case to amend the Green Belt boundary has not been made.	We believe the Plan to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1926	Nexus	0059	Vision and Spatial Objectives	Supports Vision and Objectives.	Support for the Vision and Objectives noted.

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

LP1164	Gateshead Council	0060	Strategic Objectives 1 and 14.	Supports Strategic Objectives 1 and 14.	Support for Objectives 1 and 14 noted.
LP1931	Historic England	0061		Chapter 3 is considered to be partially sound. Amendments proposed relating to renewable energy, criteria within site allocations policies and policy wording.	We believe the chapter to be sound but are willing to consider minor modifications in accordance with some of the suggestions made.
LP1234	Mineral Products Association	0062	Para 3.1 and 3.2 Strategic Objectives	Clarity sought on the plan's vision period. Suggests greater acknowledgment of Policy 56 in Strategic Objectives.	The council can clarify that the Local Plan Spatial Vision referred to in Para 3.2 covers the period from 2023 – 2024. The South Tyneside Vision 2023 -2043 referred to in Para 3.1 is the councils corporate Vision document.
LP1933	Howard Lawrence	0063	Strategic Objective 5	Chapter 3 is not considered to be sound as SP2 will not deliver Strategic Objective 5. Strategic allocations should identify sites for older persons' homes.	We believe the chapter to be sound and no change is required. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, taking into account site specific circumstances and the Strategic Housing Market Assessment (2023) (HOU4).
LP0645	Delia McNally	0064	Strategic Objective 5		
LP0905	Joe Thompson	0069	Strategic Objective 5		
LP1996	Kirstin Richardson	0083	Strategic Objective 5		
LP0685 / LP1616	Roy Wilburn	0065	Spatial Vision	Chapter 3 is not considered to be sound. Proposed development is country to Spatial Vision. GA2 should be withdrawn.	We believe the chapter to be sound and no change is required. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting evidence base.
LP1938	Alan Howard Becke and Susan Shilling	0066		Chapter 3 is not considered to be sound as the Plan will not deliver the number of affordable homes needed.	We believe the chapter to be sound and no change is required. Policy 18: Affordable Housing will ensure affordable housing is delivered.
LP0749	Peter Youll	0067	Para 3.2	The policy has not been positively prepared. Concerns raised about	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

				<p>infrastructure capacity in East Boldon.</p> <p>Exceptional circumstances for Green Belt deletion have not been demonstrated.</p>	<p>and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP1946	Barratt Homes	0068	Vision and Spatial Objectives	Supports the Vision and Objectives.	Support for the Vision and Objectives noted.
LP0916	Eileen Thompson	0070	Para 3.2	<p>The policy has not been positively prepared. Concerns raised about infrastructure capacity in East Boldon. Exceptional circumstances for Green Belt deletion have not been demonstrated.</p>	<p>We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP1952	Taylor Wimpey	0071	Spatial Vision and Strategic Objectives	Proposed Spatial Vision and Strategic Objectives could be strengthened with references to working collaboratively with local employers.	We believe the Spatial Vision and Strategic Objectives makes sufficient reference to local employers and skilled employment opportunities.

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

LP1953	Bellway Homes	0072	Strategic Objective 6	Considers the link between economic and jobs growth (Strategic Objective 6) and housing growth needs to be explicitly made in order to ensure sustainable patterns of development are maintained.	It is considered the strategic vision and objectives are reflective of the spatial strategy and growth needs identified in the Local Plan.
LP1417	Bellway Homes	0075	Strategic Objective 6		
LP1954	East Boldon Neighbourhood Forum	0073		Chapter 3 is not considered to be sound. The plan does not reflect evidence set out in the Strategic Housing Marketing Assessment 2023 and will not provide enough affordable homes or homes for older people. Strategic allocations should identify sites for older persons' homes.	We believe the chapter to be sound and no change is required. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, taking into account site specific circumstances and the Strategic Housing Market Assessment (2023) (HOU4).
LP1138	Home Builders Federation	0074	Strategic Objective 5	Supports Strategic Objective 5.	Support for Strategic Objective 5 noted.
LP0949	Lesley Younger	0076		Chapter 3 is not considered to be sound, legally compliant or has the duty to cooperate.	We believe the chapter to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
LP1962	Adderstone Living Ltd	0077	Strategic Objectives 5, 6 and 7	Supports Strategic Objective 5. Link between housing and Strategic Objectives 6 and 7 should be strengthened.	We believe the Plan to be sound and no change is required. Support for Strategic Objective 5 noted. The council considers that the priority to deliver a range of housing opportunities and meeting our needs is clearly set out in the Spatial Vision and considered equally to other aims set out in the vision.
LP1963	Stonebridge Homes	0078		Support for Chapter 3. The plan does not reflect evidence and will not provide enough affordable homes or homes for older people and is contrary to Section 3 of the NPPF. Considers need represents	We believe the Plan to be sound and no change is required. Support for Chapter 3 noted. The Council considers that the Plan takes into account evidence in the Strategic Housing Market Assessment (2023) (HOU4), however policies in the Plan also take into account viability evidence. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, taking into account site specific

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

				exceptional circumstances for higher housing need.	circumstances and the SHMA. The SHMA does not recommend an uplift to the housing requirement.
LP1965	William Leech Limited	0079	Strategic Objective 5	Supports Strategic Objective 5.	Support for Strategic Objective 5 noted.
LP1967	Port of Tyne	0080	Spatial Vision Strategic Objectives	Chapter 3 is considered to be sound. Port requests acknowledgement of its role and contribution within the Spatial Vision. Strategic Objective 6 should include a new subsection relating to river and port activity to reflect the provisions within SP3.	We believe the Plan to be sound and no change is required. Support for the soundness of Chapter 3 noted. The Port of Tyne is specifically referenced in the Local Plan Spatial Vision. It is not considered necessary to sub-divide Strategic Objective 6 to include a specific Port and River objective.
LP1969	Sunderland AFC	0081		Support for Spatial Vision for South Tyneside. Further clarity required on the role of solar energy in the Green Belt.	The Council does not consider it necessary to amend the Spatial Vision. The matter is addressed through other specific policies across this Plan and the NPPF which are taken as a whole. We believe the Plan to be sound and no change is required.
LP1993	Georgina Scott	0082		Chapter 3 is considered to conflict with SP8 and its negative impacts on existing residents. Secondary schools and nursery provision are not being planned for.	We believe the Plan to be sound and no change is required. The Council does not consider SP8 to be in conflict with Chapter 3. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan.
LP1997	T P Duffy	0084		Objects to Chapter 3.	Objection to Chapter 3 noted. We believe the Plan to be sound and no change is required.
LP0585	David Milne	0085		Chapter 3 is not considered to be sound. SP8 will have negative impacts on transport. Brownfield sites have been dismissed too quickly and would be more	We believe the chapter to be sound and no change is required. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. The Local Plan is also supported by a robust transport

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

				suitable for housing development than Green Belt release.	evidence base. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.
LP1920	Margaret Milne	1871		Chapter 3 is not considered to be sound, legally compliant or has the duty to cooperate. Development will worsen traffic, pollution, flooding and crime.	We believe the chapter to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to transport, flooding, pollution and infrastructure, which any proposal coming forward for a development would need to adhere to which accompanies this local plan.
LP2020	Lawrence Taylor	0088		Chapter 3 is not considered to be sound nor has the duty to co-operate. SP8 should be removed from the Plan and brownfield sites allocated instead. The supporting Traffic Assessment studies are flawed. Increased dependence on car use will impact environmental objectives.	We believe the chapter to be sound and compliant with the Duty to Cooperate and no change is required. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development. The council considers that the Traffic Assessment (2023) (INV5) and the Strategic Road Network Forecast Report (2024) (INV2) has been conducted using a robust methodology to support the South Tyneside Local Plan.
LP1334	Keep Boldon Green	0090		Chapter 3 is not considered to be sound. The plan does not reflect evidence set out in the Strategic	We believe the chapter to be sound and no change is required. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing,

Appendix J – Chapter 3 – Spatial Vision and Strategic Objectives

				Housing Marketing Assessment 2023 and will not provide enough affordable homes or homes for older people. Strategic allocations should identify sites for older persons' homes.	taking into account site specific circumstances and the Strategic Housing Market Assessment (2023) (HOU4).
LP2187	Gillian Johnston	1878		Considers the Plan is not sound as it fails to meet the objectively assessed needs of the area in terms of housing. Exceptional Circumstances for Greenbelt release have not been demonstrated. There is sufficient brownfield land available.	We believe the Plan to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.
LP1867	Church Commissioners for England	1879		Generally supportive. Modifications proposed for some development management policies.	Support for the chapter noted. We believe the Plan to be sound but are willing to consider some minor modifications in accordance with some of the suggestions raised.
LP1867	Church Commissioners for England	1880	Spatial Vision	Supports the intention and aspirations of the Spatial Vision.	Support for the Spatial Vision noted.

Appendix J – Chapter 4 – Strategy for Sustainable Development

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP1					
LP1890	Geoffrey Careless	0091	SP1	The Plan is not considered to be legally compliant, sound or to comply with the Duty to Cooperate as it does not support healthy communities. The council should consider investing in healthcare provision.	We believe the plan to be sound and no change is needed. The Local Plan includes objectives and policies which seek to support health and wellbeing.
LP0078	Peter Oneil	0092	SP1	SP1 is not considered to be legally compliant, sound or compliant with the duty to cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1896	Christopher Horne	0093	SP1	SP1 is not considered to be legally compliant, sound or compliant with the duty to cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1931	Historic England	0095	SP1	SP1 is considered to be sound.	Support noted and welcomed.
LP2188	Mervyn Butler	0096	SP1	SP1 is considered to be sound.	Support noted and welcomed.
LP0645	Delia McNally	0097	SP1	The Plan is not considered to be sound as the number of homes proposed in East Boldon is not sustainable and infrastructure is inadequate.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1938	Alan Howard Becke and Susan Shilling	0098	SP1	Policy SP1 is not considered to be sound or legally compliant as the housing projections have been overestimated.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0749	Peter Youll	0099	SP1	GA2 is not considered to be sound as it contradicts the East Boldon Neighbourhood Plan and negatively affect the character of East Boldon. Concerns raised regarding impact of new development on flooding biodiversity, infrastructure and traffic.	<p>We believe the plan to be sound and no change is needed. GA2 has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The Local Plan acknowledges the relationship between the Local Plan and Neighbourhood Plans and regard has been had to these Plan in the preparation of the Local Plan.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1946	Barratt Homes	0100	SP1	SP1 is not considered to be justified as it repeats national policy.	We believe the plan to be sound and no change is needed. The policy and supporting text set the local context for implementing the presumption in favour of sustainable development.
LP1952	Taylor Wimpey	0103	SP1		
LP1953	Bellway Homes	0104	SP1		
LP1138	Home Builders Federation	0105	SP1		
LP1417	Bellway Homes	0106	SP1		
LP1962	Adderstone Living Ltd	0107	SP1		
LP1964	Persimmon Homes	0109	SP1		
LP1948	Philip Payne	0101	SP1	SP1 is not considered to be sound.	We believe the plan to be sound and no change is needed. The policy and supporting text set the local context for implementing the presumption in favour of sustainable development.
LP1963	Stonebridge Homes	0108	SP1	Support for the policy.	Support noted and welcomed.
LP1969	Sunderland AFC	0110	SP1	The policy should include specific reference to solar energy.	We believe the policy to be sound and no change is needed. The Council does not consider it necessary to amend the strategic policy as requested. The matter is addressed through other specific policies across this Plan and the NPPF which are taken as a whole.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1975	Sonia Ali	0111	SP1	The Plan is not considered to be sound as exceptional circumstances for Green Belt release have not been demonstrated. This Policy does not reflect the housing need in this borough and is not based on reliable evidence or the objectively assessed needs of the community. SP1 is not compatible with Policy 2.	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p>
LP1997	T P Duffy	0112	SP1	SP1 is not considered to be legally compliant, sound or compliant with the duty to cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0585	David Milne	0113	SP1	Policy SP1 is not considered to be sound or to comply with the Duty to Cooperate. Exceptional circumstances for Green Belt release have not been demonstrated and brownfield sites should be allocated instead.	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated however the SHLAA concludes that there is insufficient brownfield land to meet the borough's housing requirement.
LP1920	Margaret Milne	1872	SP1	SP1 is not considered to be legally compliant, sound or compliant with the Duty to Cooperate. Development will worsen traffic congestion and flooding.	We believe the plan to be sound and no change is needed. A Strategic Flood Risk Assessment supports the Plan and there is no evidence to suggest there will be an increase in flood events due to the development proposed in the Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP0905	Joe Thompson	0116	SP1	<p>The Plan does not reflect the evidence set out in the SHMA (2023) and will not provide homes for older people and affordable housing.</p> <p>The policy should reduce the number of homes so that it meets the area's OAN and is consistent with achieving sustainable development. Concerns include:</p>	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<ul style="list-style-type: none"> • The Plan is based on inaccurate population projections. • The Plan does not consider Written Ministerial Statements and NPPF (December 2023) that the outcome of the standard method is an advisory starting point for housing requirements take account of land constraints including Green 	<p>justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances.</p> <p>Whilst the Plan considers evidence from the SHMA (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.</p> <p>The Local Plan has been produced in accordance with the NPPF (September 2023) and subsequent transitional arrangements set out in the NPPF (December 2023).</p>
LP2061	South Tyneside Environment Protection	0117	SP1	Is not considered to be positively prepared as it is not consistent with achieving sustainable development. Concerns include:	<p>We believe the plan to be sound, prepared based on robust evidence and no change is needed.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has</p>
LP2187	Gillian Johnston	1881	SP1	<ul style="list-style-type: none"> • The Plan is based on inaccurate population projections. • SP1 is not compatible with Policy 2: Air Pollution. • Negative impacts of development on air quality, sewerage infrastructure, and traffic congestion. 	

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<ul style="list-style-type: none"> The Plan is not justified as it is not based on based on appropriate evidence. The plan fails to reference the Green Belt land released for the IAMP allocation. The Plan does not comply with the Duty to Cooperate. 	<p>advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p> <p>The Plan does refer to the International Advanced Manufacturing Park (IAMP). However, the IAMP is allocated through a separate cross-boundary Area Action Plan.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate, as set out in national planning policy and legislation.</p> <p>The Council has produced a Duty to Co-operate Statement (SUB5) that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate.</p>
LP1867	Church Commissioners for England	1882	SP1	Supportive of SP1.	Support noted and welcomed.
Policy SP2					
LP1890	Geoffrey Careless	0118	SP2	<p>The Plan is not considered to be legally compliant, sound or to comply with the Duty to Cooperate as it does not support healthy communities.</p> <p>The council should consider investing in healthcare provision.</p>	<p>We believe the plan to be sound and no change is needed. The Local Plan includes objectives and policies which seek to support health and wellbeing.</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP0078	Peter Oneil	0119	SP2	<p>The Plan is not considered to be legally compliant, sound or to comply with the Duty to Cooperate. Green Belt should be safeguarded. Development at GA5 will have a negative impact on green infrastructure and wildlife. Existing sewerage infrastructure needs investment.</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA5 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1896	Christopher Horne	0120	SP2	The policy is not considered to be legally compliant, sound or compliant with the duty to cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1898	Steve Wilson	0121	SP2	SP2 is not considered to be legally compliant, sound or compliant with the duty to cooperate as housing numbers have been based on inaccurate population projections.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP1812	Rachel Adamson-Brown	0122	SP2		
LP1910	Lisa Johnson	0123	SP2		
LP0692	Paul Bradbury	0125	SP2		
LP0155	Zilla Rees	0126	SP2		
LP0303	National Highways	0124	SP2	Clarification required for the number of dwellings and the proposed employment land contained within the Strategic Road Network Forecast report.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP1914	Thomas and Lynn Elves	0127	SP2	<p>The policy should reduce the number of homes to meets the area's OAN and is consistent with achieving sustainable development. Concerns include:</p> <ul style="list-style-type: none"> •The Local Plan is based on inaccurate population projections. • The Plan does not consider Written Ministerial Statements and NPPF 	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to
LP1916	Dennis Grieves	0128	SP2		
LP1688	Susan Ridge	0129	SP2		
LP0520	Alex Air	0131	SP2		
LP1917	Angela Beattie	0132	SP2		
LP1679	David Todd	0133	SP2		

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1678	Joyce Todd	0134	SP2	(December 2023) that the outcome of the standard method is an advisory starting point for housing requirements take account of land constraints including Green Belt.	justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances. The Local Plan has been produced in accordance with the NPPF (September 2023) and subsequent transitional arrangements set out in the NPPF (December 2023).
LP2188	Mervyn Butler	0140	SP2		
LP0945	Grahame Tobin	0182	SP2		
LP1983	Dave Hutchinson	0183	SP2		
LP1847	Andrea George	0194	SP2		
LP2019	Helen and Brian Hudson	0195	SP2		
LP2022	Matthew Johnson	0196	SP2		
LP2023	Jacqueline Johnson	0197	SP2		
LP2024	Christopher Johnson	0198	SP2		
LP0636	Kevin Tindle	0199	SP2		
LP2025	Anthony Pollock	0200	SP2		
LP1440	Emma Thompson	0201	SP2		
LP1756	Ian Hudson	0202	SP2		
LP2037	Brenda Forrest	0203	SP2		
LP2048	Jennie and Ann West	0206	SP2		

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP2049	Nicola, David and Megan West	0207	SP2		
LP2050	Bev, Jon and Robyn Olds	0208	SP2		
LP2051	Joyce and Bill Hills	0209	SP2		
LP2052	Hilary, Mammed and Alex Bagher	0210	SP2		
LP2053	Joanne, Christopher, Jack and Harry West	0211	SP2		
LP0088	Andrew Davison	0212	SP2		
LP2054	Lauren and Nicholas Bagher	0213	SP2		
LP1771	Russell Hewitson	0214	SP2		
LP1767	Andrea Hewitson	0215	SP2		
LP1769	Moyra Fairweather	0218	SP2		
LP2064	South Tyneside Green Party	0221	SP2		
LP2065	Christopher Davies	0222	SP2		
LP2185	G and J Shepherd	0223	SP2		

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1680 / LP1689	Keith Ward	0130	SP2	<p>The policy should reduce the number of homes to meets the area's OAN and is consistent with achieving sustainable development. The Local Plan is based on inaccurate population projections.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p>
LP0609	Ian Beattie	0135	SP2	<p>The policy should reduce the number of homes to meets the area's OAN and is consistent with achieving sustainable development. Concerns include:</p> <ul style="list-style-type: none"> •The Local Plan is based on inaccurate population projections. • The Plan does not consider Written Ministerial Statements and NPPF (December 2023) that the outcome of the standard method is an advisory starting point for housing requirements take account of land constraints including Green Belt • Need for affordable housing elderly peoples and accessible housing is not met., • The sewerage system cannot cope with further development. 	<p>We believe the plan to be sound and supported by a robust evidence base. No change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances.</p> <p>The Local Plan has been produced in accordance with the NPPF (September 2023) and subsequent transitional arrangements set out in the NPPF (December 2023).</p> <p>The Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4),. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>Infrastructure concerns have not been addressed.</p> <ul style="list-style-type: none"> • The Plan is not justified by the evidence provided. 	<p>Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p>
LP1928	Garry McCauley	0137	SP2	<p>The basis for the calculation of the number of new homes proposed is not sound or credible as it uses out of date statistics.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p>
LP1933	Howard Lawrence	0141	SP2		
LP0645	Delia McNally	0142	SP2		
LP0685 / LP1616	Roy Wilburn	0143	SP2		
LP0628	Keith Humphreys	0147	SP2		
LP0749	Peter Youll	0149	SP2		
LP1948	Philip Payne	0154	SP2		
LP1185	Miriam Hardie	0156	SP2		

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP0916	Eileen Thompson	0157	SP2		
LP1950	George Tisseman	0158	SP2		
LP0949	Lesley Younger	0164	SP2		
LP1978	Ruth Rees	0180	SP2		
LP1929	Robert and Ellen Smith	0138	SP2	<p>The Plan is not considered to be sound as it is not consistent with national policy or the Climate Change Act 2008. Housing numbers are based on out of date projections. Concerns raised include impacts on air quality, road congestion and sewerage infrastructure.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p>
LP1931	Historic England	0139	SP2	SP2 is considered to be sound and wording is supported.	Support noted and welcomed.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1049 / LP1663	Laverick Hall Farm Ltd and the Dean & Chapter of Durham Cathedral (jointly)	0144	SP2	SP2 is not considered to be sound. The housing requirement should be expressed as a minimum 'at least' figure. At present there is a lack of evidence which demonstrates that the Council's economic growth aspirations and housing provision levels set by the Plan are aligned and this may justify a higher housing requirement than set by SP2. wording should be modified to make clear that the housing requirement represents "net additional" new homes. This makes the policy clear and avoids any ambiguity between net and gross housing completions.	<p>We believe the plan to be sound and no change is needed. Policy SP2 is considered to be sufficiently clear.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances for a higher level of housing growth.</p>
LP0703	Cleadon and East Boldon Branch Labour Party	0145	SP2	The plan is not considered to be sound as the basis for the calculation of the number of new homes proposed is not sound or credible. Using 2021 Census data could result in GA2 and GA4 not being needed as housing allocations.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Market Assessment (2023) (HOU4) does not identify exceptional circumstances.
LP1938	Alan Howard Becke and Susan Shilling	0146	SP2	SP2 is not considered to be sound or to comply with the Duty to Cooperate.	We believe the plan to be sound and no change is needed.
LP1943	Paul Crompton	0148	SP2	More evidence is needed to prove that housing numbers are correct and sustainable.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP1944	Avant Homes North East	0150	SP2	Policy SP2 is not considered to be sound as it is not consistent with national policy in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA). The council should look at an uplift in the overall housing numbers for the Borough to assist in addressing the net affordable housing requirement in line with the provisions of the PPG.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances for a higher level of housing growth.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1946	Barratt Homes	0151	SP2	Policy SP2 is not considered to be legally compliant or sound as it does not comply with national policy. The council should consider a higher housing figure on the basis that this requirement is not ambitious, and should plan for a more ambitious economic strategy, supported by greater housing numbers. The Plan does not meet the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023.	<p>We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate and no change is needed.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement</p>
LP1947	Story Homes	0152	SP2	SP2 is not considered to be sound because it has not been positively prepared, is not justified and is not consistent with national policy. The council has failed the Housing Delivery Test for six consecutive years and the Plan does not meet the housing needs identified in the Strategic Housing Market Assessment	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances for a higher level of housing growth.</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				(SHMA) 2023. The evidence would support the need to increase the buffer to 20%, given the chronic historic under-delivery and reliance on a large strategic allocation to deliver a significant part of the planned housing supply over the plan period.	Although the Council has failed the Housing Delivery Test, we believe that policies and allocations in the Plan will significantly increase delivery once the Plan is adopted.
LP0147	Stewart Miller	0153	SP2	The policy should reduce the number of homes to meets the area's OAN and is consistent with achieving sustainable development.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0905	Joe Thompson	0102	SP2	The Plan is not sounds as it does not comply with the NPPF and uses out of date statistics to calculate the number of homes needed has been used. Using 2021 Census data could result in GA2 and GA4 not being needed as housing allocations. Development will have a negative impact on character and distinctiveness of East Boldon and Cleadon and existing services and infrastructure will be unable to cope.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 and GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					<p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP1952	Taylor Wimpey	1886	SP2	<p>SP2 is not considered to be sound because it has not been positively prepared, is not justified and is not consistent with national policy. The council has failed the Housing Delivery Test for six consecutive years and the Plan does not meet the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023. The evidence would support the need to increase the buffer to 20%, given historic under-delivery and reliance on a large strategic allocation to deliver a significant part of the planned housing supply over the plan period.</p> <p>There is a lack of evidence demonstrating that the council's</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances for a higher level of housing growth. Although the Council has failed the Housing Delivery Test, we believe that policies and allocations in the Plan will significantly increase delivery once the Plan is adopted. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				economic growth aspirations and housing provision levels are aligned and may justify a higher housing requirement	allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
LP1953	Bellway Homes	0160	SP2	Object to policy and consider it unsound, not positively prepared, being unjustified and being inconsistent with national policy. At present there is a lack of evidence which demonstrates that the council's economic growth aspirations and housing provision levels set by the Plan are aligned and this may justify an uplift in housing numbers.	We believe the plan to be sound and no change is needed. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
LP1417	Bellway Homes	0163	SP2		
LP1954	East Boldon Neighbourhood Forum	0161	SP2	SP2 is sound as it does not comply with national policy or Strategic Objective 5 of the Plan. The Plan does not meet need identified in the	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>Strategic Housing Market Assessment for older people and affordable housing. The Plan should allocate suitable sites for older people's homes and provide more affordable housing.</p> <p>The Plan is based on out-of-date population projections. Using data from the 2021 Census could remove the need to allocate Green Belt land in the East Boldon area. There is a case for a much lower housing requirement figure based on local circumstances and Green Belt constraint.</p>	<p>housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances.</p> <p>Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.</p>
LP1138	Home Builders Federation	0162	SP2	<p>Policy SP2 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. An increase in the housing figure would support the findings from the SHMA (2023) which suggest a significant shortfall in affordable homes.</p> <p>At present there is a lack of evidence which demonstrates that the council's economic growth</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				aspirations and housing provision levels set by the Plan are aligned and this may also justify an uplift in housing numbers.	Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The SHMA (HOU4) did not recommend an uplift to the housing requirement.
LP1958	Sunderland City Council	0165	SP2	Support for housing requirement calculated using the 'Standard Method'.	Support noted and welcomed.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	0166	SP2	At present there is a lack of evidence which demonstrates that the council's economic growth aspirations and housing provision levels set by the Plan are aligned and this may justify an uplift in housing numbers.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The North East Local Enterprise Partnership

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
LP1961	Cleadon Property Investments	0167	SP2	At present there is a lack of evidence which demonstrates that the council's economic growth aspirations and housing provision levels set by the Plan are aligned and this may justify an uplift in housing numbers.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
LP1962	Adderstone Living Ltd	0168	SP2	An increase in the housing figure would support the findings from the SHMA (2023) which suggest a significant shortfall in affordable homes. There is a lack of evidence which demonstrates that the council's economic growth aspirations and housing provision levels are aligned and this may justify an uplift in housing numbers. Object to this policy and consider it unsound for not being positively prepared, being unjustified and being inconsistent with national policy.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The SHMA (HOU4) did not recommend an uplift to the housing requirement.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1963	Stonebridge Homes	0169	SP2	<p>SP2 is not considered to be sound based on housing numbers. An uplift is required to the housing requirements to account for older person housing, additional housing to attract an economically active population to meet the economic growth aspirations, and affordable housing provision. A full review of the SHLAA is required to assess the sites chosen and apply a realistic rate of delivery and viability.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The SHMA (HOU4) did not recommend an uplift to the housing requirement.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) (2023) (HOU5) is reviewed on an annual basis.</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

					The council considers that the assessment of timescales for delivery in the SHLAA is realistic and robust.
LP1964	Persimmon Homes	0170	SP2	<p>SP2 is not considered to be sound as it is not consistent with national policy. There is a lack of evidence which demonstrates that the council's economic growth aspirations and housing provision levels set by the Plan are aligned and this may justify an uplift in housing numbers.</p> <p>There is too much reliance on a small number of large sites, with no flexibility for slippage.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.</p> <p>The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period.</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1965	William Leech Limited	0171	SP2	The Plan fails to demonstrate supply that ensures sufficient delivery across the plan period and further evidence to ensure an uplift over and above the number identified through the Standard Method is required.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.</p> <p>The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. We believe that the Plan allocates sufficient sites to support delivery across the Plan period. The Strategic Housing Market Assessment (2023) (HOU4) does not identify exceptional circumstances for a higher level of housing growth.</p>
LP1149	Banks Group	0172	SP2	Policy SP2 is not considered to be sound as it is not positively prepared, justified or consistent with national planning policy. Historic housing under delivery should be accommodated in the Plan's housing requirement. The housing figure should also be increased to reflect the economic development the Plan aspires to deliver. An increase in the housing figure would also support the findings from the SHMA (2023) which suggest a significant shortfall in affordable homes.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.
LP1967	Port of Tyne	0173	SP2	Support for SP2, however para 6.74 in the ELR is not accurate. The Port is keen to understand the implications of the Employment Land Review 2023 on the Draft Local Plan and how the 49.41 ha figure has been informed.	Support noted and welcomed. How the 49.41ha figure has been informed is set out in the Summary and Conclusions Chapter of the Employment Land Technical Paper (EMP2).
LP1969	Sunderland AFC	0174	SP2	Support for SP2. Specific reference should be made for the role of the Green Belt in providing opportunities to utilise renewable energy s, specifically solar energy. Modifications to policy wording suggested to reflect these comments.	Support noted and welcomed. The council does not consider it necessary to amend the strategic policy as requested. The matter is addressed through other specific policies across this Plan and the NPPF which are taken as a whole.
LP1972	Dave Tunstall	0175	SP2	Opposed to building on Green Belt. Trees, hedgerows and must be protected. Brownfield first.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and
LP1973	Julie Tunstall	0176	SP2		

Appendix J – Chapter 4 – Strategy for Sustainable Development

					achievable in the SHLAA have been allocated. The Local Plan includes policies which seek to protect the natural environment.
LP1409	Jean Eckert	0177	SP2	<p>This policy is not justified by the evidence as it proposes an unsustainable level of growth of housing development and is not consistent with national policy.</p> <p>The Plan uses out of date data to inform housing need. Exceptional circumstances for Green Belt release have not been demonstrated.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP1975	Sonia Ali	0178	SP2	<p>SP2 is not considered to be sound as it has not been positively prepared. It does not meet the boroughs objectively assessed needs and is not consistent with achieving sustainable development. Existing infrastructure is unable to support proposed allocations in the villages, including roads, school places, health care provision and sewerage.</p>	<p>We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				Development will also have a detrimental impact on the character of the villages and goes against the purposes of the Green Belt. Car dependency will have negative effects on climate change.	any concerns regarding the proposed development allocations. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP0912	Susan Balmer	0179	SP2	Objects to SP2 and agree with the response submitted by East Boldon Neighbourhood forum.	Comments noted. We believe the plan to be sound and no change is needed.
LP1979	Emma Johnston	0181	SP2	The basis for the calculation of the number of new homes proposed is not sound or credible as it uses out of date statistics. Less Green Belt land would need to be released if up to date Census data was used. GA2 and GA3 will have a major negative impact on residents of East Boldon and Cleadon as well as wildlife.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 and GA3 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP1986	Andrew Burnett (Buckley Burnett)	0184	SP2	An increase in the housing figure would support the findings from the SHMA (2023) which suggest a	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>significant shortfall in affordable homes. There is also a lack of evidence which demonstrates that the council's economic growth aspirations and housing provision levels set by the Plan are aligned and this may justify an uplift in housing numbers. As such we object to this policy and consider it unsound for not being positively prepared.</p>	<p>the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.</p>
LP0797	Iain Calderwood	0185	SP2	<p>The Plan is not sound because exceptional circumstances for release of Green Belt land at GA2 have not been demonstrated.</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1993	Georgina Scott	0186	SP2	SP2 is not considered to be sound as it is based on inaccurate housing data. The release of Green Belt land is not justified.	We believe the plan to be sound and no change is needed. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1996	Kirstin Richardson	0187	SP2	The basis for the calculation of the number of new homes proposed is not sound or credible as it is based on out of date statistics. Object to development in East Boldon.	We believe the plan to be sound and no change is needed. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP2004	Mr and Mrs A Wheatman	0188	SP2	Development will have a negative impact on school places, health care provision and congestion. Development on Green Belt Is not supported.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in

Appendix J – Chapter 4 – Strategy for Sustainable Development

					considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP2005	Rachael Milne	0189	SP2	The Plan is not considered to be legally compliant, sounds or to comply with the Duty to Cooperate. Notes the ongoing discussions between STC and Gateshead Council regarding the impact of SP14 on the highway network as well as and the wider strategic highways implications of the proposed allocations in the Plan.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. Comments regarding ongoing discussions between South Tyneside Council and Gateshead Council noted.
LP0585	David Milne	0190	SP2	Object to loss of farm land and associated jobs. Brownfield should be developed instead.	We believe the plan to be sound and no change is needed. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP1920	Margaret Milne	1873	SP2	Existing surface water flooding will be made worse.	We believe the plan to be sound and no change is needed. A Strategic Flood Risk Assessment supports the Plan and there is no evidence to suggest there will be an increase in surface water flooding.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP2011	ED and FM Williams	0193	SP2	SP2 is not considered to be sound as the use of inaccurate population projections mean the housing figure is not accurate.	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0668 / LP1738	Beryl Massam	0216		The Local Plan is based on inaccurate population projections	We believe the plan to be sound and no change is needed. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP2061	South Tyneside Environmental Protection	0217	SP2	SP2 is not considered to be sound, legally compliant or compliant with the duty to cooperate. This Plan is not sustainable because it fails to meet the objectively assessed needs of the area in terms of housing. Many of the policies are disjointed and fail to deliver the strategic objectives. The sustainability and vitality of the villages are ignored as the proposed development does not respect the distinctive character of each village. Brownfield sites that were included in previous drafts have been removed. There is a lack of infrastructure to support the development.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP2062	Avant Homes North East	0219	SP2	SP2 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. The Plan period should be extended to cover at least 30 years to take in account the likely timescale for delivery. The housing figure should be increased to account for the economic growth The Plan seeks to achieve. An increase in the housing figure would support the findings from the SHMA (2023) which suggest a significant shortfall in affordable homes.	<p>We believe the plan to be sound and no change is needed. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The SHMA does not identify exceptional circumstances. The SHMA does not recommend an uplift to the housing requirement. The Council is confident that the housing requirement is in accordance with national planning policy and guidance.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need.</p>
LP1334	Keep Boldon Green	0220	SP2	SP2 is not considered to be sound and does not comply with national policy or strategic Objective 5 of the Local Plan. The Plan does not adequately meet the need of older people within	We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing

Appendix J – Chapter 4 – Strategy for Sustainable Development

				the borough. EBNF request that the identification of suitable sites for accommodation for the elderly including site GA2. The Local Plan is based on inaccurate population projections.	<p>requirement for the Plan in line with Planning Practice Guidance.</p> <p>Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.</p>
LP2187	Gillian Johnston	1883	SP2	<p>SP2 is not considered to be sound as it has not been positively prepared. It is not justified as it is based on inaccurate population projections and discounts previous permissions granted. The sustainability and vitality of the villages have been ignored. Previously allocated brownfield sites have been removed yet Green Belt sites have stayed in the Plan. The Plan will not provide the infrastructure to support the proposed development. Car dependency will negatively affect climate change.</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The Site Selection Topic Paper (2024) (HOU3) provides justification as to why site have or have not been allocated in the Plan.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>Policy SP26: Delivering sustainable transport, requires development to meet the need of public transport users</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					and links to the Local Cycling and Walking Infrastructure Plan 2021-2036 (INV6) by prioritising active travel to reduce the need to travel by private vehicle.
LP1867	Church Commissioners for England	1884	SP2	SP2 is not sound as it does not comply with national policy. The omission of a housing buffer to provide flexibility completely ignores the recent track record of South Tyneside's housing delivery.	We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Although the Council has failed the Housing Delivery Test, we believe that policies and allocations in the Plan will significantly increase delivery once the Plan is adopted.
LP1867	Church Commissioners for England	1885	SP2	The Plan does not comply with national policy as it does not support the government ambition to boost the housing supply. The removal of the buffer ignores the previous under delivery with regards to the housing delivery test and the amount of affordable housing required. The Plan does not identify how the housing needs requirements supports economic growth. SP2 will not deliver sufficient housing to suit the needs of the borough. The proposed developments will not be enough to support the economic growth the plan aspires for.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Although the Council has failed the Housing Delivery Test, we believe that policies and allocations in the Plan will significantly increase delivery once the Plan is adopted. The SHMA recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
Policy SP3					
LP1890	Geoffrey Careless	0224	SP3	Considers the removal of green belt land will have a detrimental effect on the continued sustainability of the area.	The council considers that the plan is sound and no change is needed. It is considered that the spatial strategy and Local Plan policies will deliver sustainable development in South Tyneside.
LP0078	Peter Oneil	0225	SP3	The Plan is not considered to be legally compliant, sound or to comply with the Duty to Cooperate. Green Belt should be safeguarded. Development at GA5 will have a negative impact on green infrastructure and wildlife. Existing sewerage infrastructure needs investment.	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA5 in Policy SP7 sets out clear criteria to address and mitigate impacts of development</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.
LP1511	Phil Clow	0226	SP3	The Plan does not comply with national policy and is not justified as reasonable alternative sites have not been taken into consideration. It has not been developed in line with the statement of community involvement and does not comply with the duty to cooperate as the council have not worked with the East Boldon Neighbourhood Forum to address known issues.	<p>We believe the plan to be sound and no change is needed. The Sustainability Appraisal (2024) (SUB3) sets out how reasonable alternatives have been considered.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Council has produced a Duty to Co-operate Statement (SUB5) that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate.</p>
LP1896	Christopher Horne	0227	SP3	SP3 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1812	Rachel Adamson-Brown	0229	SP3	SP3 is not considered to be sound as it has not been positively prepared to	We believe the plan to be sound and no change is needed. The council works closely with infrastructure

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1910	Lisa Johnson	0232	SP3	deliver sustainable development in the EBNF area. This will have a detrimental impact on the local infrastructure and the character of the village. SP3 is not justified as it uses out of date evidence and exceptional circumstances for green belt release have not been demonstrated.	providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP0692	Paul Bradbury	0233	SP3		
LP0155	Zilla Rees	0234	SP3		
LP1928	Garry McCauley	0249	SP3		
LP2188	Mervyn Butler	0252	SP3		
LP1933	Howard Lawrence	0253	SP3		
LP0645	Delia McNally	0254	SP3		
LP0685 / LP1616	Roy Wilburn	0255	SP3		
LP0703	Cleadon and East Boldon Branch Labour Party	0257	SP3		
LP0628	Keith Humphreys	0260	SP3		
LP1943	Paul Crompton	0261	SP3		
LP0749	Peter Youll	0262	SP3		
LP0147	Stewart Miller	0266	SP3		
LP1948	Philip Payne	0267	SP3		
LP0905	Joe Thompson	0155	SP3		
LP1185	Miriam Hardie	0268	SP3		
LP1950	George Tisseman	0269	SP3		

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1978	Ruth Rees	0285	SP3		
LP1979	Emma Johnson	1283	SP3		
LP0945	Grahame Tobin	0286	SP3		
LP1983	Dave Hutchinson	0287	SP3		
LP1992	Julie Richardson	0289	SP3		
LP1814	Caroline Attanayake	0230	SP3	SP3 is not sustainable as it will cause urban sprawl within the villages. Green belt must be protected. Infrastructure cannot handle the scale of development.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1905	Peter Dewar	0231	SP3	Concerns raised regarding impacts of new development on road capacity and healthcare provision in the Boldons.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the

Appendix J – Chapter 4 – Strategy for Sustainable Development

					Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1914	Thomas and Lynn Elves	0235	SP3	No justification for Green Belt development and exceptional circumstances have not been established. No evidence housing requirement requires Green Belt development. It has not been proven that all brownfield sites have been considered and reasons why sites have been rejected are not clear.	We believe the plan to be sound and no change is needed. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land. The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan.
LP1688	Susan Ridge	0237	SP3		
LP1680 / LP1689	Keith Ward	0238	SP3		
LP1916	Dennis Grieves	0236	SP3	<p>Key points raised include:</p> <ul style="list-style-type: none"> • No justification for Green Belt development and exceptional circumstances have not been established. 	<p>We believe the plan to be sound and no change is needed.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<ul style="list-style-type: none"> •No evidence housing requirement requires Green Belt development. •Duty to Co-operate has not been evidenced. No co-operation with neighbouring authorities to meet housing need. •Local Plan fails to be consistent with national policy to protect the Green Belt. •It has not been proven that all brownfield sites have been considered and reasons why sites have been rejected are not clear. •Local Plan fails to be consistent with national policy to protect the Green Belt – NPPF para 11. <p>Infrastructure to support the proposed developments does not exist.</p>	<p>are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p> <p>NPPF Para 11 requires Local Plan to promote sustainable development and meet the needs of their area. The council considers the plan has been prepared in accordance with this requirement.</p> <p>The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

					services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0520	Alex Air	0239	SP3	<p>Local Plan should be revised to remove amendments to Green Belt boundary and withdraw all proposed Green Belt sites. Key points raised include:</p> <ul style="list-style-type: none"> •No justification for Green Belt development and exceptional circumstances have not been established. •No evidence housing requirement requires Green Belt development. •Duty to Co-operate has not been evidenced. No co-operation with neighbouring authorities to meet housing need. •Local Plan fails to be consistent with national policy to protect the Green Belt – NPPF para 11. •It has not been proven that all brownfield sites have been considered and reasons why sites have been rejected are not clear. 	<p>We believe the plan to be sound and no change is needed.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement</p>
LP1917	Angela Beattie	0240	SP3		
LP0609	Ian Beattie	0244	SP3		
LP2022	Matthew Johnson	0296	SP3		
LP2023	Jacqueline Johnson	0297	SP3		
LP2024	Christopher Johnson	0298	SP3		
LP0636	Kevin Tindle	0299	SP3		
LP2025	Anthony Pollock	0300	SP3		

Appendix J – Chapter 4 – Strategy for Sustainable Development

					<p>including engagement with neighbouring authorities to meet our housing need.</p> <p>NPPF Para 11 requires Local Plan to promote sustainable development and meet the needs of their area. The council considers the plan has been prepared in accordance with this requirement.</p> <p>The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan.</p>
LP1679	David Todd	0241	SP3	<p>SP3 is not considered to be sound as it is not consistent with national policy. Objection to proposed Green Belt development. The amount of affordable housing required does not reflect the needs of the borough as evidenced in the Strategic Housing Market Assessment.</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.</p>
LP1678	Joyce Todd	0242	SP3		

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1919	Annette Brown	0243	SP3	SP3 is not consistent with national policy. Concern the plan has not secured appropriate infrastructure for the villages. Proposed development will have a negative impact on the character of the villages and the Green Belt.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP0621	Kevin Barnes	0245	SP3		
LP1164	Gateshead Council	0248	SP3	The area designated to be released from the green belt contains 2 designated nature conservation sites which are of cross boundary importance. The identified green infrastructure connections have the potential to result in increased recreational access and disturbance of existing ecological features including habitats and species. To ensure continued strategic cross boundary connectivity, adequate/appropriate mitigation and compensation should be required.	We believe the plan to be sound and no change is needed. The council has responded in the Statement of Common Ground with Gateshead Council.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1929	Robert and Ellen Smith	0250	SP3	SP3 is not considered to be sound. The plan needs to address the sustainability of the villages with respect to the protection of their distinctive character. SP3 does not comply with national policy and exception circumstances for the release of green belt land have not been demonstrated.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1931	Historic England	0251	SP3	We support the wording of this policy.	Support noted and welcomed.
LP1049 / LP1663	Laverick Hall Farm Ltd and the Dean & Chapter of Durham Cathedral (jointly)	0256	SP3	SP3 is not considered to be sound and the overall strategy is at high risk of failure with no flexibility due to the use of the minimum housing figure produced through the standard method. SP3 is not consistent with national policy. The removal of the 15% buffer exposes the Plan to the risks. The decrease in size of the land allocated for SP8 is a missed opportunity and the Safeguarded Land designation should be reinstated. Agree that exceptional circumstances exist to alter Green Belt boundaries to meet housing need.	We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Given the inherent uncertainty in determining housing needs into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt. Moreover, there would be little practical benefit in this approach given that a new/reviewed plan would subsequently be required to allocate the safeguarded land for development.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1938	Alan Howard Becke and Susan Shilling	0258	SP3	The proposed developments in East Boldon will have a significant negative effect the character of the village, local services and infrastructure.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1939	Janet Cook	0259	SP3	The green belt must be maintained. Local schools, roads and car parking are already at capacity.	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1944	Avant Homes North East	0263	SP3	SP3 is not considered to be sound as it has not been positively prepared, is not justified, effective or consistent with national policy. Support for the spatial strategy and the release of green belt land however the use of the minimum figure from the standard method provides no flexibility in the delivery of these sites. Further release of green belt land is required to safeguard land for the future.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.</p> <p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt.</p>
LP1946	Barratt Homes	0264	SP3	SP3 is not considered to be sound as more land should be safeguarded for future development to provide more flexibility in the delivery of new homes. Support for the spatial strategy and the release of green belt land.	<p>We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.</p> <p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt.</p>
LP1947	Story Homes	0265	SP3	SP3 is not considered to be sound as The Plan does not accurately portray the amount of land available for	We believe the plan to be sound and no change is needed. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have

Appendix J – Chapter 4 – Strategy for Sustainable Development

				allocation. The land North of Cleadon Lane is a site that would be available for development and would be able to deliver good quality housing promptly. The spatial strategy needs updating to better clarify how the strategic aims will be delivered. SP3 has not been positively prepared, is not justified and is not consistent with national policy.	<p>been assessed as suitable, available and achievable in the SHLAA.</p> <p>The Plan makes adequate provision to meet the development needs of the Borough and incorporates sufficient flexibility.</p> <p>Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.</p>
LP1952	Taylor Wimpey	0271	SP3	Further intervention is required to ensure that the correct number of new homes will be delivered for local people and support the wider social, economic and environmental benefits that housebuilding delivers.	We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period.
LP1953	Bellway Homes	0272	SP3	<p>Considers SP3 to be unsound on the basis of it being unjustified. The deliverability of the strategy has not been robustly tested and the approach to viability is flawed. Concerns include:</p> <ul style="list-style-type: none"> • Overestimates sales values • Underestimates the cost of biodiversity net gain • Underestimates the cost of Future Homes Standard • Underestimates build costs 	<p>We consider the viability evidence to be robust and no change is needed. The viability modelling is evidence led and robust. The rationale for the adopted values is set out in detail in the Local Plan Viability Update (November 2023) (INV4). The approach to Biodiversity Net Gain (“BNG”) is set out in paras 2.19 and 2.20 (INV4). This is now a mandatory requirement and regarded as being equivalent to a site-specific infrastructure cost for the purposes of viability.</p> <p>The approach to Future Homes is set out in paragraph 2.8.11 (INV4). It is not considered appropriate to include the Future Homes standard at this stage of the viability</p>
LP1417	Bellway Homes	0275	SP3		

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<ul style="list-style-type: none"> Utilises an unrealistic assumption for Benchmark Land Values <p>Urban area sites may become unviable. The Council should seek an uplift in housing numbers. The spatial strategy places a strong reliance on SP8 to deliver housing growth. Such large sites are extremely difficult to deliver, and additional sites should therefore be allocated.</p>	<p>testing. It is reasonable for the purposes of the modelling, to assume the same building standards which are reflected by evidence when identifying the construction cost. Given that the final requirements of the Future Homes standard have yet to be finalised, the report stated that Future Homes cost should be excluded from the modelling at this stage.</p>
LP1954	East Boldon Neighbourhood Forum	0273	SP3	<p>SP3 has not been positively prepared to deliver sustainable development in the EBNF area. The policy is not justified, uses out of date evidence and the exceptional circumstances case to amend the Green Belt boundary has not been made. Remove GA2 or reduce housing numbers.</p>	<p>We believe the plan to be sound and no change is needed.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1138	Home Builders Federation	0274	SP3	SP3 is not considered to be sound as it has not been positively prepared, is not justified or consistent with national policy. Considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. There is no consideration of safeguarded land which would ensure that the Council can meet the longer-term development needs and maintain an appropriate spatial strategy. Plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.	We believe the plan to be sound and no change is needed. The Local Plan spatial strategy seeks to prioritise development in sustainable locations throughout borough. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period. Given the inherent uncertainty in determining housing needs into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt.
LP0949	Lesley Younger	0276	SP3	SP3 is not considered to be sound as it has not been positively prepared to deliver sustainable development in the EBNF area. This will have a detrimental impact on the local infrastructure and the character of the village. The proposed park and ride scheme will add to traffic congestion. Schools and healthcare facilities are already at capacity and	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.

Appendix J – Chapter 4 – Strategy for Sustainable Development

				cannot cope with development at GA2.	
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	0277	SP3	Considers the trend of underdelivering housing provides further justification for the need to release land from the Green Belt to meet needs and our clients remain supportive of this approach.	We believe the plan to be sound and no change is needed. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period.
LP1961	Cleadon Property Investments	0278	SP3	Considers the trend of underdelivering housing provides further justification for the need to release land from the Green Belt to meet needs and our clients remain supportive of this approach.	We believe the plan to be sound and no change is needed. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period.
LP1963	Stonebridge Homes	0279	SP3	Considers reference to Policy 13 should be made within the policy as it should allow for new housing to come forward beyond the allocations.	We believe the plan to be sound and no change is needed. The Plan should be read as a whole. Cross-referring to Policy 13 is not considered to be necessary. Policy 13 ensures that sites that have not been allocated through the Plan can still come forward in sustainable locations.
LP1964	Persimmon Homes	0280	SP3	SP3 is not considered to be sound as it is not consistent with national policy. The Green Belt review should be undertaken depending on the needs of each settlement. The lack of safeguarded land contradicts paragraph 148 of the NPPF. More	We believe the plan to be sound and no change is needed. We consider The Green Belt Study 2023 (GRB1) to be robust. GRB1 considers the progressive harm of releasing Green Belt land with increasing distance out from an inset settlement. Working out from these settlements, variations in harm to the Green Belt purposes are identified using a systematic analysis. All

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>housing will be required to support the economic growth the plan aspires for. Does not consider full growth options were considered from the outset in the SA, such as the option for a new settlement, and we therefore do not consider the plan to accord with Paragraph 16 of the NPPF.</p>	<p>analysis has been carried out without any consideration of specific development proposals, but with the assumption that openness would be lost if land were to be released. Proposals to safeguard and remove from the Green Belt land at South of Fellgate beyond the land to be allocated as a Sustainable Growth Area, are not now being taken forward. It is considered unlikely that exceptional circumstances exist now to identify this as land to be taken out of the Green Belt during a future Plan period.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan. The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

					We consider the approach to reasonable options assessed in the Sustainability Appraisal (SA) to be robust and proportionate. The SA should only consider options that would be likely to be chosen and secure the objectives of the plan proposed within the geographical area of the plan.
LP1965	William Leech Limited	0281	SP3	Support for SP8. SP3 is not considered to be sound as it has not been positively prepared, is not justified or effective. Inconsistencies between the South Tyneside Green Belt Study (2023) and subsequent supporting documents for the green belt release at Fellgate. The client's site (part of SP8) falls outside the LWS designation and should therefore be included as a housing allocation.	We believe the policy to be sound and no change is needed. We consider the Green Belt Study (2023) (GB1) to be robust. The council is developing a Masterplan for the Fellgate Sustainable Growth Area which will inform the development of a Supplementary Planning Document to support the allocation of SP8. The site referred to has been identified for open space provision through the master planning process. The council does not recognise any inconsistency between the Green Belt Study and subsequent supporting documents for the Green Belt release at Fellgate.
LP1149	Banks Group	0282	SP3	SP3 is not considered to be sound as it has not been positively prepared, is not justified or consistent with national policy. The policy does not identify a hierarchy for where new housing growth should be prioritised. Whitburn requires more allocations to support the sustainability and vitality of the area. The evidence in the SHLAA suggests that more Green Belt releases are necessary to achieve	<p>We believe the policy to be sound and no change is needed. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the SHLAA. The Plan makes adequate provision to meet the development needs of the borough and incorporates sufficient flexibility.</p> <p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				the housing requirement in South Tyneside. No consideration has been given to safeguarding land to ensure that the council can meet longer term housing needs.	necessary to remove safeguarded land from the green belt.
LP1967	Port of Tyne	0283	SP3	Supports SP3.	Support noted and welcomed.
LP1975	Sonia Ali	0284	SP3	SP3 is not considered to be sound as it is not justified. Exceptional circumstances for Green Belt release have not been demonstrated and housing targets are unrealistic. The proposed development will not secure the sustainability and vitality of the Villages. The proposed allocations will have a severe negative effect on infrastructure including traffic congestion, local facilities, school places and health services.	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP1982	Whitburn Neighbourhood forum	1889	SP3	SP3 is unsound. The approach to remove sites from Green Belt is unsound: it is not justified and not in line with national policy. Exceptional Circumstances to remove land from	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan and that the Green Belt Study (2023) (GRB1) is a robust document. The Green Belt

Appendix J – Chapter 4 – Strategy for Sustainable Development

				the Green Belt has not been justified and the Plan is therefore unsound. Green Belt Study (2023) is invalid and unreliable. Questions methodology applied and assessment of GA5 and GA6.	Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPE.
LP1986	Andrew Burnett (Buckley Burnett)	0288	SP3	Clarifications required to policy wording. The Plan does not release sufficient land to support its other policy objectives. Under delivery of housing provides justification for the need to release land from the Green Belt to meet needs.	We believe the plan to be sound and no change is needed. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.
LP1996	Kirstin Richardson	0290	SP3	SP3 is not considered to be sound as it has not been positively prepared to deliver sustainable development in the EBNF area. The proposed allocations will have a detrimental impact on infrastructure and the distinctive character of the village.	We believe the plan to be sound and no change is needed. The council considers that the policy will seek to deliver sustainable development in South Tyneside. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1997	T P Duffy	0291	SP3	SP3 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP2005	Rachael Milne	0292	SP3	<p>SP3 is not considered to be sound as exceptional circumstances for green belt release at SP7, SP8 and SP14 have not been demonstrated. There are brownfield sites within the borough that should be used instead for development. IAMP is not referred to in the Local Plan.</p> <p>The Plan does not stand up to scrutiny regarding carbon emission reduction.</p> <p>Stricter wording for retention of mature trees and mature hedgerows should be used. Weight must be given to made Neighbourhood Plan policies.</p>	<p>The council considers the policy to be sound and no change is needed. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The IAMP is referred to In Policy SP17: Strategic Economic Development. The Plan aims to balance protecting the environment and addressing the challenges of climate change, and growth to meet economic, housing and infrastructure needs.</p> <p>Policy 6 sets out a positive strategy and guidance for delivering energy from renewable and low carbon sources across the borough.</p> <p>The council considers that Policy 36: Trees, Woodland and Hedgerows offers protection in accordance with the NPPF.</p>
LP0585	David Milne	0293	SP3	Considers SP3 has not been positively prepared due to the release of green	We believe the plan to be sound and no change is needed. The council considers that a sound approach has

Appendix J – Chapter 4 – Strategy for Sustainable Development

				belt land. This will have a negative impact on the wellbeing of residents.	been undertaken in considering the Green Belt for release through the Local Plan.
LP1920	Margaret Milne	1874	SP3	Strongly objects to Green Belt release.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan.
LP2011	ED and FM Williams	0294	SP 3.2 SP3 .4	Concern raised with regard to impact on environment and Green Belt. The case to amend the green belt boundaries has not been made. Development would lead to a detrimental impact on local infrastructure and the distinctive character of Cleadon and East Boldon.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1847	Andrea George	0295	SP3	The Plan is not sound. Objects to SP3 and SP5. Objection to Green Belt development. These policies are not justified by the evidence and the case for exceptional circumstances to	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>amend the Green Belt boundary has not been made.</p> <p>It has not been proven that all brownfield sites have been considered. Questions raised over validity of the reasons for rejecting brownfield sites have not been answered.</p> <p>The Plan does not comply with the Duty to Cooperate in terms of whether neighbouring authorities could accommodate additional housing.</p>	<p>are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Cooperate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p> <p>NPPF Para 11 requires Local Plan to promote sustainable development and meet the needs of their area. The council considers the plan has been prepared in accordance with this requirement.</p> <p>The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan.</p>
LP0090	Ian Sturrock	0301	SP3	SP3 has not been positively prepared to deliver sustainable development	We believe the plan to be sound and no change is needed. The council works closely with infrastructure

Appendix J – Chapter 4 – Strategy for Sustainable Development

				and is not consistent with the NPPF. The plan has not secured the sustainability of the villages as the infrastructure including school places, healthcare provision, road capacity and risk of flooding. The car dependant developments will have a detrimental effect on the environment and climate change.	providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Policy 2: Air Quality requires that development would result in exposure to air pollution that exceeds national air quality. Policy SP26: Delivering sustainable transport, requires development to meet the need of public transport users and links to the Local Cycling and Walking Infrastructure Plan (INV6) by prioritising active travel to reduce the need to travel by private vehicle.
LP2027	Karen King	0302	SP3	Concerns around the legal compliance and soundness of the Local Plan. Exceptional circumstances for green belt release at Fellgate have not been demonstrated. The focus should be on introducing new industry and saving town centres instead of developing estates into towns that will be reliant on cars.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. Policies in the Plan seek to protect the vitality and viability of town centres.
LP2030	Tom Wilson	0303	SP3	SP3 has not been positively prepared to deliver sustainable development in the villages as the infrastructure to support the proposed developments does not exist and there are no viable	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>plans to improve them: school places, healthcare facilities, road capacity.</p> <p>GA4 shows a key consideration to be the exploration of opportunities of improving the existing staggered junction between the site and Sunderland Road. Improving the staggered junction will not reduce the volume of traffic attempting to travel to and from South Shields nor ease the flow of traffic.</p>	<p>growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p> <p>Traffic Capacity Assessment (2023) (INV5), will assist with the safe, efficient and balanced movement of all users through the junction.</p>
LP1756	Ian Hudson	0304	SP3	<p>SP3 is not considered to be sound, not been positively prepared and is not justified. It does not secure the sustainability of the villages, and the infrastructure required to support the proposed developments. This includes school places, medical facilities, road capacity, sewerage and flooding. SP3 does not prevent urban sprawl and car dependant developments will have a detrimental effect on the environment and climate change. Exceptional circumstances for greenbelt release have not been demonstrated. Duty to Co-operate has not been evidenced. It has not been proven that all</p>	<p>We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>brownfield sites have been considered and reasons why sites have been rejected are not clear.</p>	<p>Green Belt boundary. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Cooperate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p>
LP2037	Brenda Forrest	1895	SP3	<p>SP3 has not been positively prepared to deliver sustainable development. The local plan is based on inaccurate population projections. The infrastructure to support the proposed developments does not exist. Car dependent housing developments will increase air pollution. The proposed developments do not respect the character of the villages. Brownfield</p>	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>sites should be used before releasing land from the green belt. The proposed allocations are not consistent with national policy.</p>	<p>at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>Policy 2: Air Quality requires that development would result in exposure to air pollution that exceeds national air quality. Policy SP26: Delivering sustainable transport, requires development to meet the need of public transport users and links to the Local Cycling and Walking Infrastructure Plan (INV6) by prioritising active travel to reduce the need to travel by private vehicle.</p> <p>We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p>
LP2039	Ron Forbister	0305	SP3	<p>Green belt should not be built on. The plan does not respect the character of the villages. Infrastructure concerns raised as a result of new development including road capacity in East Boldon, impacts on sewerage systems and healthcare</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

					also not raised any concerns regarding the proposed development allocations.
LP1087	Cllr Ian Forster	0306	SP3	Building houses on farmland is not sustainable. The existing sewerage system cannot cope with present levels. Concerns include a lack of school places, healthcare provision, road capacity and air pollution. Farmland should be protected to ensure food supplies. Exceptional circumstances for green belt release have not been demonstrated.	<p>We believe the plan to be sound and no change is needed.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>
LP2043	Carole Forster	0307	SP3	Green Belt should be protected and farmland used to provide food security. Housing is only being allocated in Cleadon due to the revenue it will produce from high	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan.

Appendix J – Chapter 4 – Strategy for Sustainable Development

				council tax rates, this is not justification to build on Green Belt.	
LP2046	Peter W Taylor and Margaret D A Taylor	0308	SP3	SP3 is not considered to be sound as it has not been positively prepared. Plan has not secured the sustainability of the villages as the infrastructure to support the proposed developments does not exist including school places, healthcare facilities, road capacity, sewerage capacity and flood risk. Car dependent housing developments will increase air pollution. The proposed allocations do not respect the character of the villages and are not consistent with national policy.	<p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p> <p>A Strategic Flood Risk Assessment supports the Plan and there is no evidence to suggest there will be an increase in flood events in villages.</p> <p>Policy 2: Air Quality requires that development would result in exposure to air pollution that exceeds national air quality. Policy SP26: Delivering sustainable transport, requires development to meet the need of public transport users and links to the Local Cycling and Walking Infrastructure Plan (INV6) by prioritising active travel to reduce the need to travel by private vehicle.</p>
LP2048	Jennie and Ann West	0310	SP3		We believe the plan to be sound and no change is needed.

Appendix J – Chapter 4 – Strategy for Sustainable Development

LP2049	Nicola, David and Megan West	0311	SP3	<p>Existing infrastructure shortfalls in Cleadon will worsen. Key points raised include:</p> <p>Key points raised include:</p> <ul style="list-style-type: none"> •Exceptional circumstances for Green Belt removal have not been established. •No evidence housing requirement requires Green Belt development. •Duty to Co-operate has not been evidenced. No co-operation with neighbouring authorities to meet housing need. •Local Plan fails to be consistent with national policy to protect the Green Belt – NPPF para 11. •It has not been proven that all brownfield sites have been considered and reasons why sites have been rejected are not clear. 	<p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p> <p>NPPF Para 11 requires Local Plan to promote sustainable development and meet the needs of their area. The</p>
LP2050	Bev, Jon and Robyn Olds	0312	SP3		
LP2051	Joyce and Bill Hills	0313	SP3		
LP2052	Hilary, Mammed and Alex Bagher	0314	SP3		
LP2053	Joanne, Christopher, Jack and Harry West	0315	SP3		
LP0088	Andrew Davison	0316	SP3		
LP2054	Lauren and Nicholas Bagher	0317	SP3		
LP1771	Russell Hewitson	0318	SP3		
LP1767	Andrea Hewitson	0319	SP3		
LP1769	Moyra Fairweather	0322			
LP2064	South Tyneside Green Party	0326	SP3		
LP2065	Christopher Davies	0327	SP3		
LP2185	G and J Shepherd	0328	SP3		

Appendix J – Chapter 4 – Strategy for Sustainable Development

					<p>council considers the plan has been prepared in accordance with this requirement.</p> <p>The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan.</p>
LP0668 / LP1738	Beryl Massam	0320	SP3	<p>SP3 does not deliver sustainable development in the EBNF area. Proposals will have a detrimental impact on the local infrastructure and the character of the village. Green Belt should not be built on.</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>
LP2058	Janice Alderslade	1272	SP3	<p>The necessary change to make the Plan sound would require the removal of the proposed Fellgate Sustainable Growth Area.</p>	<p>We believe the plan to be sound and no change is needed.</p>
LP2061	STEP	0321	SP3	<p>SP3 is not considered to be sound as Exceptional Circumstances for the deletion of green belt have not been justified. SP3 fails to meet the objectively assessed needs of the area and is not consistent with supporting sustainable development. The character of the villages is not</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the</p>

Appendix J – Chapter 4 – Strategy for Sustainable Development

				being respected. Brownfield sites should be considered first. SP3 is based on inaccurate population figures. Consideration of trees, woodland and wildlife has not been demonstrated. Agricultural land should be protected.	<p>interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>An exhaustive search for brownfield sites has been undertaken through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. Local Plan includes policies which seek to protect the natural environment and agricultural land.</p>
LP2062	Avant Homes North East	0323	SP3	SP3 is not considered to be sound as it has not been positively prepared, is not justified or consistent with national policy. Support for the spatial strategy. However, it is considered that further housing allocations are required in Whitburn Village to enable it to secure the sustainability and vitality that policy seeks to do.	We believe the plan to be sound and no change is needed. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). The Plan makes adequate provision to meet the development needs of the Borough and incorporates sufficient flexibility. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.
LP2063	Geoff Alderslade	0324	SP3	SP3 is not considered to be sound as the level of development proposed is	We believe the plan to be sound and no change is needed. The council considers that a sound approach has

Appendix J – Chapter 4 – Strategy for Sustainable Development

				<p>not justified due to the adverse impacts on the green belt. SP3 and SP8 are not consistent with the NPPF. Brownfield redevelopment opportunities which should be explored first. The site at Fellgate is a wildlife corridor and has surface water issues which in turn negatively impact climate change, biodiversity and mineral working. No evidence of cross boundary discussions regarding housing need. The site is used as open space by residents and is used to accommodate 50 livery horses and this should be conserved. The site as existing provides a valuable resource toward open space access, and residential health and wellbeing.</p>	<p>been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate, as set out in national planning policy and legislation.</p> <p>The Council has produced a Duty to Co-operate Statement (SUB5) that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate.</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

LP1334	Keep Boldon Green	0325	SP3	<p>The Plan has not been positively prepared to deliver sustainable development in the EBNF area. The allocations will negatively impact the distinctive character of the village, infrastructure and local services. SP3 is not justified as it uses out of date evidence and exceptional circumstances for Green Belt release have not been demonstrated. GA2 should be removed from the Plan or housing numbers reduced.</p>	<p>We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

					clear criteria to address and mitigate impacts of development.
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Appendix J – Chapter 4 – Strategy for Sustainable Development

LP2187	Gillian Johnston	0359	SP3	<p>SP3 is not positively prepared as it fails to meet the objectively assessed needs of the area and is not consistent with supporting sustainable development. Brownfield sites have been disregarded in favour of Green Belt sites and no reasonable alternatives identified. The case for amending the Green Belt is not positively prepared or justified. Development in the villages will feed into the Whitburn sewage system which doesn't have the capacity to take the extra flows. There is no evidence of cross boundary strategic plans concerning 'green' matters or any statements of common ground concerning green infrastructure in this Plan. Housing targets are unrealistic. SP3 is not consistent with national policy.</p> <p>The Density Report 2024 underestimates housing densities achieved because two very large urban brownfield sites have been excluded from the assessment: Leslie Hawthorn and Holborn.</p>	<p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. An exhaustive search for brownfield sites has been undertaken through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p> <p>Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate, as set out in national planning policy and legislation.</p> <p>The Council has produced a Duty to Co-operate Statement (SUB5) that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement</p>
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Appendix J – Chapter 4 – Strategy for Sustainable Development

					<p>was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council is confident that the evidence set out in the Density Report 2024 (HOU6) to be robust and proportionate.</p>
LP1867	Church Commissioners for England	0360	SP3	Strongly object to the amendments to Policy SP3, in particular with respect to the removal of the amendment to the Green Belt boundary at Fellgate.	The boundary of the Fellgate Sustainable Growth Area reflects the findings of the South Tyneside Green Belt Study (2023) (GRB1) which was undertaken by independent consultants.
LP1867	Church Commissioners for England	0361	SP3	Object to the amendments to Policy SP3, in particular with respect to the removal of the amendment to the Green Belt boundary at Fellgate.	The boundary of the Fellgate Sustainable Growth Area reflects the findings of the South Tyneside Green Belt Study (2023) (GRB1) which was undertaken by independent consultants.

Appendix J – Chapter 5 – Strategic Allocations

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP4					
LP1890	Geoffrey Careless	0362	SP4	Considers SP4 to be legally compliant, sound and comply with the Duty to Cooperate.	Support for the legal compliance, soundness and compliance with the Duty to Cooperate noted.
LP0078	Peter Oneil	0363	SP4	SP4 is not sound or justified as Green Belt should be safeguarded. Sewerage infrastructure will not be able to cope with additional housing and wildlife corridors will be harmed.	We believe the policy is sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations
LP1511	Phil Clow	0364	SP4 – GA2	Considers that SP4 (GA2) does not comply with the Statement of Community Involvement or the NPPF.	We believe that the policy is sound, and no change is required. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting evidence base.
LP1896	Christopher Horne	0365	SP4	Objects to the policy.	Objection to the policy noted. We believe the Plan to be sound and no change is required.

Appendix J – Chapter 5 – Strategic Allocations

LP1914	Thomas and Lynn Elves	0366	SP4	Considers the plan must be revised because it is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA). There are no sites allocated to meet the type of need identified in paragraph 62 of the NPPF.	We believe the Plan to be sound and no change is required. We believe the policy is consistent with the NPPF and contributes to meeting the needs set out in Strategic Housing Market Assessment (2023) (HOU4). Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.
LP1847	Andrea George	0385	SP4		
LP2025	Anthony Pollock	0386	SP4		
LP1915	Sport England	0367	SP4 -H20	Objection to H20. There is no detail in either the Local Plan or the PPS identifying how the site's development will be squared with playing field policy.	We believe the Plan to be sound and no change is required. Acceptable mitigation for this site has been pursued via the planning application received for this and in discussion with Sport England.
LP1931	Historic England	0368	SP4 - H.4, H.5, H7 H.7, H.8, H.9 and H.18	Considers that sites H.4, H.5, H.7, H.8, H.9 and H.18 are sound. Considers that H6, H7 and H18 can be made sound with some minor amendments to the text.	We believe the policy to be sound but are willing to consider some minor amendments to H6, H7 and H18 in accordance with some of the suggestions raised.
LP0645	Delia McNally	0368	SP4	The Plan is not considered to be sound as it does not reflect the evidence set out in the SHLAA (2023). The plan will not provide housing for older people and affordable housing.	We believe the Plan to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5). Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most

Appendix J – Chapter 5 – Strategic Allocations

					appropriate mix of housing, considering site specific circumstances and the SHMA.
LP1938	Alan Howard Becke and Susan Shilling	0369	SP4	The Plan is not considered to be sound or to comply with the Duty to Cooperate.	We believe the Plan is sound and compliant with the Duty to Cooperate and no change is required.
LP1944	Avant Homes North East	0370	SP4 – H7	Considers that site H.7 can be made sound with amendments. Cleadon Lane Industrial Estate application ref: ST/1109/21/FUL should be included as an allocation under Policy SP4.	We believe the policy to be sound and no change is required. The site is subject to a live planning application with a resolution to approve so it is not considered necessary to include the site as an allocation.
LP1946	Barratt Homes	0371	SP4 (SP16)	SP4 is not considered to be sound. It is considered that there is a shortfall in the allocated number of sites against the housing target and additional land should be allocated for residential development.	We believe the policy to be sound and no change is needed. We believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.
LP1947	Story Homes	0372	SP4	SP4 is not considered to be sound. Concerns raised regarding the deliverability of sites within the plan period. More realistic indicative densities should be applied to proposed housing allocations. Considered that there is a need to release more land from the Green Belt and allocate more sites for housing in order to meet the housing requirement and to maintain a sufficient supply of housing.	We believe the policy to be sound. We believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.

Appendix J – Chapter 5 – Strategic Allocations

LP1949	Bellway Homes (North East)	0373	SP4	SP4 is not considered to be sound. There is no justification for the removal of SHLAA Ref. SOS001 Westoe Sports Club from Reg 18 to Reg 19. There is a need to release more land from the Green Belt and allocate more sites for housing as it is doubtful that the indicative capacities will be delivered.	We believe the policy to be sound and no change is needed. The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan. Justification for why each site have been rejected/ allocated are provide within the document. We believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period.
LP1138	Home Builders Federation	0374	SP4	Policies SP4-8 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. The plan should provide a sufficient range of sites to enable delivery to be maintained at the required levels throughout the plan period. The Council should also ensure it has identified at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.	We believe the policy to be sound and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period, and we believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13. We have undertaken an exhaustive search for sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP1961	Cleadow Property Investments	0375	SP4	The policy is not considered to be sound. There is an over reliance on smaller sites is a strategy that may bake in under delivery in respect of the housing allocations in the main urban area. More Green Belt sites should be allocated.	We believe the policy to be sound and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period and provision of sites to ensure delivery is maintained throughout the Plan period. We have undertaken an exhaustive search for sites through the Strategic Housing Land Availability Assessment (SHLAA)

Appendix J – Chapter 5 – Strategic Allocations

					(HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP1962	Adderstone Living Ltd	0376	SP4	SHLAA Ref. SJA021, SFG048, SOS050, SHB046, SHB045, SJA019 (Simonside View, Calf Close Walk, Owen Drive, Former Harton Infants School, Black Road, Prince Consort Road) should be allocated for residential development as they are deliverable within the Plan period.	We believe the Plan to be sound and no change is needed. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1964	Persimmon Homes	0377	SP4	Policy SP4 is not considered to be sound as it is not consistent with national policy. Failure to implement any of the sites in SP4 will have significant impacts on the housing delivery against the OAN.	We believe the policy to be sound and no change is required. We believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the. The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.
LP1966	NHS Property Services Ltd	0378	SP4	SHLAA Ref. SHB023 Monkton Hall Hospital should be included as an allocation with an indicative capacity of 20 dwellings.	We believe the Plan to be sound and no change is needed. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1975	Sonia Ali	0379	Policy 36 – H7	The proposed loss of trees at H.7 is not consistent with Policy 36.	We believe the Plan to be sound and no change is needed. Any proposals for development must be consistent with all relevant policies in the Plan.
LP1981	Lee Woolston	0380	SP4 – GA2	SP4 (GA2) is not considered to be sound as there is no access to services. The plan has no regard to the East Boldon Neighbourhood Plan and the East Boldon Design Code.	We believe the Plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.

Appendix J – Chapter 5 – Strategic Allocations

				Development will favour private development at the expense of affordable or social housing. The calculation for housing numbers is based on out-of-date census data.	Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base.
LP1986	Andrew Burnett (Buckley Burnett)	0381	SP4	The Plan is not considered to be legally compliant, sound or comply with the Duty to Cooperate. More sites must be allocated for the Plan. Suggested allocation SHLAA Ref: SBC111 Land at Hylton Lane, Boldon.	We believe the Plan to be legally compliant, sound and compliant with the Duty to Cooperate and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period, and we believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period.
LP1987	Brenda Horton	0382	SP4	The Plan is not considered to be legally compliant, sound or comply with the Duty to Cooperate. The Plan fails to set out how additional infrastructure needs will be met, including school places and healthcare provision, particularly in the Boldons area.	We believe the Plan to be legally compliant, sound and compliant with the Duty to Cooperate and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1997	T P Duffy	0383	SP4	SP4 is not considered to be legally compliant, sound or to comply with the Duty to Cooperate.	We believe the policy is legally compliant, sound and compliant with the Duty to Cooperate and no change is required.
LP1920	Margaret Milne	0384	SP4	SP4 is not considered to be legally compliant, sound or comply with the Duty to Cooperate. Fellgate is not the only land available, try other parts of South Tyneside.	We believe the policy is legally compliant, sound and compliant with the Duty to Cooperate and no change is required. The Plan allocates sites throughout the borough in accordance with the Spatial Strategy.

Appendix J – Chapter 5 – Strategic Allocations

LP2033	Toni Sambridge	0387	SP4	The allocation at Red House Road (SHLAA Ref. SHB107) already has houses built on it.	The site at Red House Road is not included as an allocation, however it is included in the commitments. No amendment needed.
LP2045	Cllr. Andrew Guy and Cllr. Jim Yare	0388	SP4 – H8	SP4 (H8) is not considered to be legally compliant or sound as it has not been positively prepared, is not justified or effective and it is not consistent with national policy. The Consultation Strategy was flawed.	The policy is considered to be legally compliant, and sound and no change is required. Site allocation H8 Land at Associated Creameries has been robustly considered through the plan preparation process and supporting Evidence base. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2062	Avant Homes North East	0389	SP4 SP5 SP6 SP7 SP8	Policies SP4-8 are not considered to be sound. The Plan is not positively prepared, justified or consistent with national policy. Land north of Cleadon Lane, Whitburn should be included as a residential allocation given the sites ability to meet the actual need of Whitburn throughout the plan period whilst also being deliverable and suitable.	We believe the policies to be sound and believe the Plan to be positively prepared, justified consistent with national policy and no change is required. The Publication Draft Local Plan meets the borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
Policy SP5					
LP1890	Geoffrey Careless	0390	SP5	Supports the policy	Support for the policy is noted
LP1896	Christopher Horne	0391	SP5	SP5 is not considered to be legally compliant, sound or to comply with the Duty to Cooperate.	We believe the policy is legally compliant, sounds and compliant with the Duty to Cooperate and no change is required.
LP1914	Thomas and Lynn Elves	0392	SP5	Considers the plan must be revised because it is not consistent with the	We believe the Plan to be sound and no change is required. The policy is consistent with the NPPF and

Appendix J – Chapter 5 – Strategic Allocations

LP1688	Susan Ridge	0395	SP3, SP5	<p>NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA). There are no sites allocated to meet the type of need identified in paragraph 62 of the NPPF. Exceptional circumstances for Green Belt release have not been demonstrated. Brownfield sites should instead be considered. Existing infrastructure in the villages is already under strain.</p>	<p>contributes to meeting the needs set out in Strategic Housing Market Assessment (2023) (HOU4). Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1) which accompanies this local plan.</p>
LP1680 / LP1689	Keith Ward	0396	SP3, SP5		
LP1847	Andrea George	0409	SP3 SP5		

Appendix J – Chapter 5 – Strategic Allocations

LP1915	Sport England	0393	SP5	Object to SP5 and SP6 as the Plan has not adequately demonstrated that playing field policy will be met.	South Tyneside are committed to continue to work with Sport England on playing pitch matters as set out in the Statement of Common Ground between the parties.
LP1916	Dennis Grieves	0394	SP5	<p>The Local Plan is not justified as policies will not ensure the Strategic Objectives for Promoting Healthy Communities will be achieved; and are not consistent with national policy. Key points include:</p> <ul style="list-style-type: none"> • Negative health impacts of development of several vital community open spaces. • The proposed allocations will exacerbate air pollution by generating additional car journeys. • The Local Plan has failed to identify opportunities to improve air quality or mitigate impacts adequately and therefore is not consistent with the NPPF. 	<p>We believe the Plan to be sound and no change is required.</p> <p>Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. It is considered that the Local Plan has a holistic approach to delivering this aim with many of the Local Plan policies contributing towards improving the wider environmental determinants of health.</p> <p>For all site allocations, development proposals will be required to comply with the policies in the Local Plan and ensure mitigation is provided where necessary including traffic impacts.</p> <p>SP5: Former Brinkburn School - the policy requires the delivery of community provision and the retention and enhancement of playing field land retain in the site and that any playing field land lost is fully mitigated.</p> <p>SP6: Land at former Chuter Ede Education Centre – the policy requires the provision of community facilities, enhancement of playing field to the south of Chuter Ede and the migration of any additional playing field lost to development.</p> <p>The council considers that the Local Plan is compliant with the NPPF. The Local Plan includes policies which seek to support a modal shift towards sustainable and active</p>
LP0520	Alex Air	0397	SP5		
LP1917	Angela Beattie	0398	SP5		
LP0609	Ian Beattie	0401	SP5		
LP2022	Matthew Johnson	0410	SP5		
LP2023	Jacqueline Johnson	0411	SP5		
LP2024	Christopher Johnson	0412	SP5		
LP0636	Kevin Tindle	0413	SP5		
LP2025	Anthony Pollock	0414	SP5		
LP1756	Ian Hudson	0415	SP5		
LP2048	Jennie and Ann West	0416	SP5		
LP2049	Nicola, David and Megan West	0417	SP5		
LP2050	Bev, Jon and Robyn Olds	0418	SP5		
LP2051	Joyce and Bill Hills	0419	SP5		
LP2052	Hilary, Mammed and Alex Bagher	0420	SP5		
LP2053	Joanne, Christopher,	0421	SP5		

Appendix J – Chapter 5 – Strategic Allocations

	Jack and Harry West				transport by supporting infrastructure improvements and reducing reliance on private vehicles.
LP0088	Andrew Davison	0422	SP5		
LP2054	Lauren and Nicholas Bagher	0423	SP5		
LP1771	Russell Hewitson	0424	SP5		
LP1767	Andrea Hewitson	0425	SP5		
LP1769	Moyra Fairweather	0426	SP5		
LP2064	South Tyneside Green Party	0428	SP5		
LP2065	Christopher Davies	0429	SP5		
LP2185	G and J Shepherd	0430	SP5		
LP0645	Delia McNally	0402	SP5	Supports the Policy	Support for the policy is noted
LP1946	Barratt Homes	0403	SP5	Supports the Policy	Support for the policy is noted
LP1947	Story Homes	0404	SP5	Concerns regarding delivery and viability of some of the sites allocated in policies SP4, SP5 and SP6. We consider that there is a clear need to release more land from the Green Belt and allocate more sites for housing in order to meet the housing requirement and to maintain a sufficient supply of housing.	We believe the policy to be sound and no change is needed. We believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.
LP1138	Home Builders Federation	0405	SP4 -SP8	Policies SP4-8 is not considered to be sound as it is not positively prepared, not justified and not consistent with	We believe the policy to be sound and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the

Appendix J – Chapter 5 – Strategic Allocations

				<p>national policy. The plan should provide a sufficient range of sites to enable delivery to be maintained at the required levels throughout the plan period.</p> <p>The Council should also ensure it has identified at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.</p>	<p>Plan period and we believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13. We have undertaken an exhaustive search for sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p>
LP1997	T P Duffy	0406	SP5	<p>SP5 is not considered to be legally compliant, sounds or to comply with the Duty to Cooperate.</p>	<p>We believe the policy is legally compliant, sound and compliant with the duty to cooperate and no change is required.</p>
LP1999	Lynne Nelson	0407	SP5	<p>Brinkburn Community Centre and sports facilities should not be used for housing development.</p>	<p>We believe the Plan to be sound and no change is required. Site allocation SP5 has been robustly considered through the plan preparation process and supporting Evidence base.</p>
LP2005	Rachael Milne	0408	SP5 SP6 SP8	<p>The proposed allocations will exacerbate air pollution by generating additional car journeys.</p>	<p>We believe the Plan to be sound and no change is required. There are a range of policies within the Local Plan in relation to air pollution, transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP2062	Avant Homes North East	0427	SP4 SP5 SP6 SP7 SP8	<p>Policies SP4-8 are not considered to be sound. The Plan is not positively prepared, justified or consistent with national policy. Land north of Cleadon Lane, Whitburn should be included as a residential allocation given the sites ability to meet the actual need of</p>	<p>We believe policies SP4-8 to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).</p>

Appendix J – Chapter 5 – Strategic Allocations

				Whitburn throughout the plan period whilst also being deliverable and suitable.	
Policy SP6					
LP1890	Geoffrey Careless	0431	SP6	SP6 is considered to be sound, legally compliant and compliant with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted
LP1896	Christopher Horne	0432	SP6	SP6 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy is sound, legally complaint and compliant with the Duty to Cooperate and no change is required.
LP1915	Sport England	0434	SP6	Object to SP5 and SP6 as the Plan has not adequately demonstrated that playing field policy will be met.	South Tyneside are committed to continue to work with Sport England on playing pitch matters as set out in the Statement of Common Ground between the parties.
LP1916	Dennis Grieves	0435	SP5 SP6	<p>The Local Plan is not justified as policies will not ensure the Strategic Objectives for Promoting Healthy Communities will be achieved; and are not consistent with national policy. Key points include:</p> <ul style="list-style-type: none"> Negative health impacts of development of several vital community open spaces. The proposed allocations will exacerbate air pollution by generating additional car journeys. The Local Plan has failed to identify opportunities to improve air quality or mitigate impacts adequately and therefore is not consistent with the NPPF. 	<p>We believe the Plan to be sound and no change is required.</p> <p>Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. It is considered that the Local Plan has a holistic approach to delivering this aim with many of the Local Plan policies contributing towards improving the wider environmental determinants of health.</p> <p>For all site allocations, development proposals will be required to comply with the policies in the Local Plan and ensure mitigation is provided where necessary including traffic impacts.</p> <p>SP5: Former Brinkburn School - the policy requires the delivery of community provision and the retention and enhancement of playing field land retain in the site and that any playing field land lost is fully mitigated.</p>
LP0520	Alex Air	0436	SP5 SP6		
LP1917	Angela Beattie	0437	SP5 SP6		
LP0609	Ian Beattie	0438	SP5 SP6		
LP2022	Matthew Johnson	0447	SP6		
LP2023	Jacqueline Johnson	0448	SP6		
LP2024	Christopher Johnson	0449	SP6		
LP0636	Kevin Tindle	0450	SP6		
LP2025	Anthony Pollock	0451	SP6		
LP1756	Ian Hudson	0452	SP6		

Appendix J – Chapter 5 – Strategic Allocations

LP2048	Jennie and Ann West	0453	SP6		<p>SP6: Land at former Chuter Ede Education Centre – the policy requires the provision of community facilities, enhancement of playing field to the south of Chuter Ede and the migration of any additional playing field lost to development.</p> <p>The council considers that the Local Plan is compliant with the NPPF. The Local Plan includes policies which seek to support a modal shift towards sustainable and active transport by supporting infrastructure improvements and reducing reliance on private vehicles.</p>
LP2049	Nicola, David and Megan West	0454	SP6		
LP2050	Bev, Jon and Robyn Olds	0455	SP6		
LP2051	Joyce and Bill Hills	0456	SP6		
LP2052	Hilary, Mammed and Alex Bagher	0457	SP6		
LP2053	Joanne, Christopher, Jack and Harry West	0458	SP6		
LP0088	Andrew Davison	0459	SP6		
LP2054	Lauren and Nicholas Bagher	0560	SP6		
LP1771	Russell Hewitson	0561	SP6		
LP1767	Andrea Hewitson	0562	SP6		
LP1769	Moyra Fairweather	0563	SP6		
LP2064	South Tyneside Green Party	0565	SP6		
LP2065	Christopher Davies	0566	SP6		

Appendix J – Chapter 5 – Strategic Allocations

LP2185	G and J Shepherd	0567	SP6		
LP0645	Delia McNally	0439	SP6	SP6 is considered to be sound, legally compliant and compliant with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
LP1946	Barratt Homes	0440	SP6	Support for policy.	Support for the policy noted.
LP1947	Story Homes	0441	SP4 SP5 SP6	We have doubts that the indicative capacities will actually be delivered. Concerns about the delivery and viability of some of the sites that have been included in relation to allocations in policies SP4, SP5 and SP6.	We believe the policy to be sound and no change is needed. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1138	Home Builders Federation	0442	SP4 -SP8	Policies SP4-8 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. The plan should provide a sufficient range of sites to enable delivery to be maintained at the required levels throughout the plan period. The Council should also ensure it has identified at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.	We believe the policy to be sound and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period, and we believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13. We have undertaken an exhaustive search for sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP1968	Network Rail	0443	SP6	Section 5 of the policy should include reference to Tiled level crossing. Based on the outcome of the	We believe the policy to be sound but are willing to consider minor modifications based on the suggested amendment.

Appendix J – Chapter 5 – Strategic Allocations

				transport assessment it is highly likely that Network Rail would be seeking funding for measures to mitigate against the increase in risk imported by this scheme.	
LP1997	T P Duffy	0444	SP6	SP6 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy is sound, legally complaint and compliant with the Duty to Cooperate and no change is required.
LP2005	Rachael Milne	0445	SP6	SP6 is not considered to be legally compliant or sound. Concerns raised regarding negative impact on wildlife corridor and air quality.	We believe the policy to be sound and no change is required. SP6 has been robustly considered through the plan preparation process and supporting Evidence base. The Local Plan includes policies which seek to protect the natural environment and air quality impacts.
LP2062	Avant Homes North East	0564	SP4 SP5 SP6 SP7 SP8	Policies SP4-8 are not considered to be sound. The Plan is not positively prepared, justified or consistent with national policy. Land north of Cleadon Lane, Whitburn should be included as a residential allocation given the sites ability to meet the actual need of Whitburn throughout the plan period whilst also being deliverable and suitable.	We believe policies SP4-8 to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP2187	Gillian Johnston	0568	SP6	Policy is not sound as more playing fields would be lost.	We believe the policy is sound and no change is required. Loss of playing pitches must be mitigated in line with Policy 37.
Policy SP7					
LP1890	Geoffrey Careless	0569	SP7	Support for the policy.	Support for the policy noted.
LP0078	Peter Oneil	0570	SP7	The Plan is not considered to be legally compliant, sound or to comply with the Duty to Cooperate. Green	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release

Appendix J – Chapter 5 – Strategic Allocations

				<p>Belt should be safeguarded. Development at GA5 will have a negative impact on green infrastructure and wildlife. Existing sewerage infrastructure needs investment.</p>	<p>through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA5 in Policy SP7 sets out clear criteria to address and mitigate impacts of development</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p>
LP1511	Phil Clow	0571	SP7	<p>SP7 has not been developed in line with the statement of community involvement and is not consistent with national policy.</p> <p>The plan does not comply with the 'duty to cooperate' as the plan has not taken on board the comments of the EBNF.</p>	<p>We believe the policy to be sound and no change is needed. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement (SCI) (SUB7) and is therefore legally compliant.</p> <p>The Council has produced a Duty to Co-operate Statement (SUB5) that provides a detailed account of how the Plan has been produced in accordance with the Duty to</p>

Appendix J – Chapter 5 – Strategic Allocations

					Cooperate. Following the consultation on the Regulation 18 Draft Local Plan (2022), the Spatial Planning team worked with the East Boldon Neighbourhood Forum to strengthen links between the Local Plan and the Neighbourhood Plan, and this work informed the Regulation 19 Publication Draft Local Plan (2024).
LP1896	Christopher Horne	0572	SP7	The policy is not considered to be legally compliant, sound or to meet the duty to cooperate.	We believe the policy to be legally compliant, sound and compliant with the Duty to Cooperate and no change is required.
LP1900	Malcolm Bawn	0573	SP7	The policy is not considered to be legally compliant, sound or to meet the duty to cooperate. A declining population means that GA2 is not needed for housing. Concern for the impact of development on an established wildlife corridor.	We believe the policy to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. The Local Plan includes policies which seek to protect the natural environment.
LP1902	Alison Donnison	0574	SP7	Services in the villages are already oversubscribed, including school places and healthcare provision. The Plan would not solve this in time for new housing.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1903	S H Gardner	0575	SP7	Existing residents will be detrimentally impacted by new housing, putting a strain on existing schools and healthcare provision and will increase traffic congestion.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the

Appendix J – Chapter 5 – Strategic Allocations

					Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1812	Rachel Adamson-Brown	0576	GA2	This proposal is not justified and is not effective in delivering sustainable development. GA2 contradicts the Neighbourhood Plan, it will reduce the gap between East Boldon and South Shields, increased flood risk, harm biodiversity, lead to loss of agricultural land and increase pressure on infrastructure and services.	We believe the Plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1904	A. Ball	0577	GA2		
LP1683	Anton Lang	0578	SP7	Proposed Omission site: SHLAA Ref. SFG067	We believe the Plan to be sound and no change is required. The Publication Draft Local Plan meets the Borough’s housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1910	Lisa Johnson	0579	GA2	The GA2 allocation is not justified and is not effective in delivering sustainable development. Conflicts	We believe the Plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base.
LP0692	Paul Bradbury	0580	GA2		
LP0155	Zilla Rees	0581	GA2		

Appendix J – Chapter 5 – Strategic Allocations

LP1922	Peter Rooney	0592	GA2	with the EBNP and will result in considerable impact on infrastructure.	The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP1915	Sport England	0583	SP5 SP6 H20 GA1	Objection to SP5, SP6, H20 and GA1. These sites are in whole or part, land used or last used as playing field. It is necessary for Sport England to object to each of the proposed allocations as the Plan has not demonstrated that playing field policy will be met.	We believe the Plan to be sound and no change is needed. The council’s response is set out in the Statement of Common Ground between South Tyneside Council and Sport England.
LP1916	Dennis Grieves	0584	SP3 SP7	Objection to Green Belt development, the Local Plan should withdraw all of the sites proposed for removal from the Green Belt: GA1-6 and SP8. These policies are not justified by the evidence and the case for exceptional circumstances to amend the Green Belt boundary has not been made. The duty to cooperate has not been evidenced. There has been no cooperation with neighbouring local authorities which have Local Plans that cumulatively build more than their respective ONS 2018 housing projections. The Local Plan fails to protect the Green Belt, as specified in paragraph 11 of the National Planning Policy Framework. It has not been proven that all brownfield sites have been	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land. The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement
LP1688	Susan Ridge	0585	SP3 SP5		
LP1680 / LP1689	Keith Ward	0586	SP3 SP5		
LP0520	Alex Air	0587	SP3 SP7		
LP2022	Matthew Johnson	0648	SP3, SP7, SP8		
LP2023	Jacqueline Johnson	0649	SP3, SP7, SP8		
LP2024	Christopher Johnson	0650	SP3, SP7, SP8		
LP0636	Kevin Tindle	0651	SP3, SP7, SP8		
LP2025	Anthony Pollock	0652	SP3, SP7, SP8		
LP1756	Ian Hudson	0660	SP3, SP7		

Appendix J – Chapter 5 – Strategic Allocations

LP2048	Jennie and Ann West	0664	SP3, SP7, SP8	considered and questions the validity of the reasons for rejection of some sites.	including engagement with neighbouring authorities to meet our housing need. NPPF Para 11 requires Local Plan to promote sustainable development and meet the needs of their area. The council considers the plan has been prepared in accordance with this requirement. The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan.
LP2049	Nicola, David and Megan West	0665	SP3, SP7, SP8		
LP2050	Bev, Jon and Robyn Olds	0667	SP3, SP7, SP8		
LP2051	Joyce and Bill Hills	0668	SP3, SP7, SP8		
LP2052	Hilary, Mammed and Alex Bagher	0669	SP3, SP7, SP8		
LP2053	Joanne, Christopher, Jack and Harry West	0670	SP3, SP7, SP8		
LP0088	Andrew Davison	0671	SP3, SP7, SP8		
LP2054	Lauren and Nicholas Bagher	0672	SP3, SP7, SP8		
LP1771	Russell Hewitson	0673	SP3, SP7, SP8		
LP1767	Andrea Hewitson	0674	SP3, SP7, SP8		
LP1769	Moyra Fairweather	0677	SP3, SP7, SP8		
LP2064	South Tyneside Green Party	0680	SP3, SP7, SP8		
LP2065	Christopher Davies	0681	SP3, SP7, SP8		

Appendix J – Chapter 5 – Strategic Allocations

LP2185	G and J Shepherd	0683	SP3, SP7, SP8		
LP2187	Gillian Johnston	0684	SP3, SP7, SP8		
LP1917	Angela Beattie	0589	SP7 – GA4	<p>Objection to Green Belt development and specifically Objection to GA4. The Local Plan should withdraw all of the sites proposed for removal from the Green Belt: GA1-6 and SP8.</p> <p>These policies are not justified by the evidence and the case for exceptional circumstances to amend the Green Belt boundary has not been made. The duty to cooperate has not been evidenced. There has been no cooperation with neighbouring local authorities which have Local Plans that cumulatively build more than their respective ONS 2018 housing projections.</p> <p>The Local Plan fails to protect the Green Belt, as specified in paragraph 11 of the National Planning Policy Framework.</p> <p>It has not been proven that all brownfield sites have been considered and questions the validity of the reasons for rejection of some sites.</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p> <p>NPPF Para 11 requires Local Plan to promote sustainable development and meet the needs of their area. The council considers the plan has been prepared in accordance with this requirement.</p>
LP0609	Ian Beattie	0591	GA4		

Appendix J – Chapter 5 – Strategic Allocations

				<p>The Local Plan is not justified in regard to flood risk and disposal of foul water.</p>	<p>The Site-Selection Topic Paper (2024) (HOU3) sets out how sites have been considered for employment and housing allocations in the preparation of the Local Plan. The allocation at GA4 has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p>
LP0617	Kathleen Ramm	0590	GA2	<p>Exceptional circumstances for Green Belt deletion have not been demonstrated.</p> <p>The ONS figures used to calculate housing need are out of date and overestimated.</p> <p>Development on GA2 will have negative impact on wildlife corridor.</p>	<p>We believe the Plan is sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon</p>

Appendix J – Chapter 5 – Strategic Allocations

					therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan.
LP1924	Jill Croft	0593	GA4,	Objection to GA4 concerns include potential harm to the Green Belt, wildlife and the character and identity of Cleadon village. Concern regarding inadequate to support new development.	<p>We believe the Plan is sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>
LP1925	Sue and Heather Hope	0594	GA2, GA4, GA5, GA6	The Plan has not been positively prepared to deliver sustainable development. The villages do not have the infrastructure to support more housing. Green Belt should not be released.	<p>We believe the Plan is sound and no change is needed. We believe the Plan is sound and no change is needed. Allocations have been robustly considered through the plan preparation process and supporting evidence base.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p>

Appendix J – Chapter 5 – Strategic Allocations

LP1928	Garry McCauley	0595	GA2	This proposal is not justified and is not effective in delivering sustainable development. GA2 contradicts the Neighbourhood Plan, it will reduce the gap between East Boldon and South Shields, increased flood risk, harm biodiversity, lead to loss of agricultural land and increase pressure on infrastructure and services.	<p>We believe the Plan is sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>
LP1930	Barbara Collins	0596	GA2	Objection to GA2. The proposal is not justified and is not effective in delivering sustainable development. Development at GA2 will worsen infrastructure capacity including traffic, healthcare provision and school places.	<p>We believe the Plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>

Appendix J – Chapter 5 – Strategic Allocations

LP1931	Historic England	0597	GA3	GA3 could benefit from clearer criteria relating to the protection of nearby Listed Buildings.	We believe the Plan to be sound and no change is needed. The council's response is set out in the Statement of Common Ground between South Tyneside Council and Historic England.
LP2188	Mervyn Butler	0598	GA2	GA2 is not justified and is not effective in delivering sustainable development. The Plan conflicts with the EBNP. Disagrees with the Green Belt site assessment rating. Development will worsen infrastructure capacity including traffic, healthcare provision and school places, result in loss of agricultural land, impact the wildlife corridor and biodiversity and increase surface water flooding.	<p>We believe the Plan to be sound and no change is needed. We believe the Green Belt Study (2023) (GRB1) to be robust. Regard has been had to Neighbourhood Plans in the preparation of the Local Plan. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP1933	Howard Lawrence	0599	GA2	The GA2 allocation is not justified and is not effective in delivering sustainable development. Conflicts with the EBNP and will lead to an increase in traffic congestion. The Green Belt rating for the site is incorrect.	We believe the Plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. Regard has been had to Neighbourhood Plans in the preparation of the Local Plan.
LP0685 / LP1616	Roy Wilburn	0601	GA2		
LP0628	Keith Humphreys	0604	GA2		
LP0749	Peter Youll	0606	GA2		
LP0147	Stewart Miller	0609	GA2		
LP1948	Philip Payne	0610	GA2		

Appendix J – Chapter 5 – Strategic Allocations

LP1185	Miriam Hardie	0612	GA2		The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. The Local Road Network - Traffic Capacity Assessment (2023) (INV5) identified that the impact of the Local Plan on the highway network can be satisfactorily mitigated. We consider the Green Belt Study (2023) (GRB1) to be robust.
LP1950	George Tisseman	0614	GA2		
LP0949	Lesley Younger	0620	GA2		
LP1978	Ruth Rees	0631	SP7, GA2		
LP0645	Delia McNally	0600	SP7 – GA2	. GA2 not justified and not effective in delivering sustainable development and is in conflict with the adopted EBNP. Exceptional circumstances for Green Belt development have not been met.	<p>We believe the Plan to be sound and no change is required. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Council does not consider the Plan to be contrary to the Neighbourhood Plan.</p>
LP0703	Cleadon and East Boldon Branch Labour Party	0602	GA2 and GA4	Objection to GA2 and GA4. Proposed allocations are not justified and would result in the loss of agricultural land in the Green Belt. Development will lead to an increase in traffic congestion.	<p>We believe the Plan to be sound and no change is required. The allocation at GA2 and GA4 have been robustly considered through the plan preparation process and supporting evidence base.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional</p>

Appendix J – Chapter 5 – Strategic Allocations

					Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1938	Alan Howard Becke and Susan Shilling	0603	GA2	The GA2 allocation is not justified and is not effective in delivering sustainable development. Conflicts with the EBNP and will lead to an increase in traffic congestion. Exceptional Circumstances have not been demonstrated.	We believe the Plan to be sound and no change is required. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP1943	Paul Crompton	0605	SP7 GA1 - 6	Objection to Green Belt development, the Local Plan should withdraw all of	We believe the plan to be sound and no change is needed.

Appendix J – Chapter 5 – Strategic Allocations

				<p>the sites proposed for removal from the Green Belt: GA1-6 and SP8. These policies are not justified by the evidence and the case for exceptional circumstances to amend the Green Belt boundary has not been made. The duty to cooperate has not been evidenced. There has been no cooperation with neighbouring local authorities which have Local Plans that cumulatively build more than their respective ONS 2018 housing projections.</p>	<p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p>
LP1946	Barratt Homes	0607	SP7	<p>SP7 is considered to be sound, legally compliant and compliant with the duty to cooperate.</p>	<p>Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.</p>
LP1947	Story Homes	0608	SP7	<p>Policy SP7 is not considered to be sound, positively prepared, and is not consistent with national policy. Suggests additional site allocations, including land north of Cleadon Lane, Whitburn. Detailed justifications for these omission sites have been submitted.</p>	<p>We believe the Plan to be sound and no change is needed. The Regulation 19 Publication Draft Local Plan (2024) (SUB1) meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the SHLAA.</p> <p>The Plan makes adequate provision to meet the development needs of the Borough and incorporates sufficient flexibility. Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.</p>
LP0905	Joe Thompson	0611	GA2	<p>Objection to GA2 Exceptional circumstances have not been met for Green Belt development. Does not believe that the number of houses proposed for the village of East Boldon is sustainable, and the</p>	<p>We believe the Plan to be sound and no change is needed. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p>

Appendix J – Chapter 5 – Strategic Allocations

				mitigation proposed for the site is inadequate and undeliverable. The proposal conflicts with the adopted EBNP. Development will worsen infrastructure capacity including traffic.	<p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the.</p> <p>The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>
LP0916	Eileen Thompson	0613	GA2	The GA2 allocation is not justified and is not effective in delivering sustainable development. Conflicts with the EBNP and will lead to an increase in traffic congestion. The Plan does not sufficiently protect wildlife. The Green Belt rating for the site is incorrect.	<p>We believe the Plan to be sound and no change is required.</p> <p>The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base.</p> <p>The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan.</p>

Appendix J – Chapter 5 – Strategic Allocations

					<p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>We consider the Green Belt Study (2023) (GRB1) to be robust.</p>
LP1951	Peter Sendall	0615	GA3	<p>Objection to the local plans specifically site GA3 land north of Town End Farm and the removal of land from the green belt.</p> <p>The Plan is not sound due to harm caused by loss of Green Belt land.</p> <p>Concerns raised with regard to development of GA3 on impact on Landscape, wildlife, increase in traffic, proximity of services, delivery of biodiversity net gain and lack of mitigation.</p>	<p>We believe the Plan is sound and no change is required.</p> <p>Site allocation GA3 Land North of Town End Farm has been robustly considered through the plan preparation process and supporting Evidence base.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>
LP1953	Bellway Homes	0616		<p>Supports the release of Green Belt land to assist in growth South Tyneside. Objects to this policy on the basis that their land interests, which have been excluded from these allocations. The total amount of new homes to be provided over the plan period needs to be upwardly adjusted to take into account:</p> <ul style="list-style-type: none"> • Economic growth aspirations. • flexibility in supply due to viability. • Additional growth to maintain 	<p>We believe the Plan to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the</p>

Appendix J – Chapter 5 – Strategic Allocations

				housing delivery and five years' worth of deliverable housing land. Omission site: SHLAA Ref. SBC004. No evidence to substantiate that the biodiversity impact would be 'substantial' and 'challenging' to secure BNG.	council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
LP1954	East Boldon Neighbourhood Forum	0617	SP7, GA2, Policy 19, Strategic Objective 5	Objects to policy as it does not reflect the evidence set out in the SHMA and will not provide the right mix of homes. Objective 5 and policy SP2 have not been met with regard to the needs of older people. Proposed modifications to SP7 and Policy 19 to identify sites and include provision for elderly people. GA2 should provide adequate affordable housing and accommodation for older people. Objects to GA2 is not justified and not effective in delivering sustainable development and is in conflict with the EBNP. The mitigation proposed is not deliverable or adequate to address its loss. Concerns include impact on the Wildlife Corridor, loss of agricultural land, increased traffic congestion and school places.	We believe the Plan to be sound and no change is needed. Plan policies take positive steps to address the range of needs identified in the Strategic Housing Market Assessment (2023) (HOU4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed.

Appendix J – Chapter 5 – Strategic Allocations

					Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1138	Home Builders Federation	0618	SP4-8	<p>Policies SP4-8 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. The plan should provide a sufficient range of sites to enable delivery to be maintained at the required levels throughout the plan period.</p> <p>The Council should also ensure it has identified at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.</p>	<p>We believe the policy to be sound and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period and we believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13. We have undertaken an exhaustive search for sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p>
LP1417	Bellway Homes	0619	GA1	<p>Supports the inclusion of South Tyneside College, Hebburn Campus (allocation GA1) and release of Green Belt to assist growth in South Tyneside. Objects to the boundaries of the allocation which is considered unsound for being ineffective.</p> <p>Consider that final layout/arrangement should be amended to include more land.</p>	<p>We believe the Plan to be sound and no change is needed. The boundary to the south has been determined with reference to maintaining the integrity of the Green Belt and biodiversity constraints.</p>
LP1958	Sunderland City Council	0621	GA3	<p>Support for reference to give consideration of the need to contribute to mitigating the impacts upon Sunderland; however, this</p>	<p>We consider the Plan to be sound but are willing to consider a minor amendment in accordance with the issues raised.</p>

Appendix J – Chapter 5 – Strategic Allocations

				should be strengthened to require any necessary contributions to be secured as part of the planning application process rather than simply given consideration.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Sunderland City Council.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	0622	GA3	Support for Town End Farm site allocation (GA3).	Support for the allocation at GA3 noted.
LP1961	Cleadon Property Investments	0623	SP7	Omission site - Request that the Council reappraise the site with a view to acknowledging the role that it can play in assisting the growth of Cleadon as a village: SHLAA Ref: SBC063.	We believe the Plan to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1963	Stonebridge Homes	0624	SP7	Considers the Council is not able to demonstrate a 4-year supply of deliverable housing sites. Omission site. SHLAA ref. SBC070 is considered to be suitable, available and achievable for residential development.	We believe the Plan to be sound and no change is needed. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Council is confident that the Regulation 19 Publication Draft Local Plan (2024) (SUB1) makes provision for a sufficient supply of housing land over the Plan period.
LP1964	Persimmon Homes	0625	SP7	SP7 is not considered to be sound as it is not consistent with national policy. Concerns raised with regard to delivery of number of homes identified in the SHLAA. Proposed omission site SHLAA ref: SBC063.	We believe the Plan to be sound and no change is needed. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Council is confident that the Regulation 19 Publication Draft Local Plan (2024)

Appendix J – Chapter 5 – Strategic Allocations

					(SUB1) makes provision for a sufficient supply of housing land over the Plan period.
LP1149	Banks Group	0626	SP7	Support the release of land from the Green Belt to aid sustainable growth across South Tyneside. However, there needs to be further Green Belt releases to ensure that South Tyneside's housing requirement can be met during the plan period through the allocation of additional housing sites and safeguarded land. Object to the removal of site GA10 – Land at Wellands Farm (Omission site from the draft local plan. Concerns raised regarding supporting evidence including Green Belt Study and Wading Birds Survey.	We believe the Plan to be sound and no change is needed. We consider the supporting evidence to the Local Plan to be robust. Although the Council has failed the Housing Delivery Test, we believe that policies and allocations in the Plan will significantly increase delivery once the Plan is adopted. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Council is confident that the Regulation 19 Publication Draft Local Plan (2024) (SUB1) makes provision for a sufficient supply of housing land over the Plan period.
LP1968	Network Rail	0627	SP7	Concerns relating to housing allocations and the potential impact upon operational railway safety, particularly where they are in proximity to railway level crossings.	We consider the Plan to be sound but are prepared to consider minor modifications to GA2 and GA4 to address the comments about operational safety.
LP1409	Jean Eckert	0628	SP7, GA4	Objection to GA4 and SP7 is not sustainable and is not justified. There is no cumulative assessment of the total loss of green Belt planned. The allocations show no respect for the distinctive character of each village.	We believe the Plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The Green Belt Study (2023) (GRB1) includes an assessment of the cumulative harm of releasing the sites in combination on the Green Belt.

Appendix J – Chapter 5 – Strategic Allocations

LP1974	Tim Duffy	0629	SP7, GA4	Does not support the policy as it is not considered to be sound and has not been produced in accordance with the Duty to Cooperate. Development will worsen flooding, harm wildlife and lead to increased traffic congestion. The evidence set out in the traffic modelling is flawed.	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The Publication Draft Local Plan has been produced in accordance with the Duty to Cooperate. The Duty to Co-operate Statement (SUB5) demonstrates how the Plan has been produced in accordance with this requirement including engagement with neighbouring authorities to meet our housing need.</p> <p>The Local Road Network - Traffic Capacity Assessment (2023) (INV5) identified that the impact of the Local Plan on the highway network can be satisfactorily mitigated. We consider this evidence to be robust.</p>
LP1975	Sonia Ali	0630	SP7, GA2	<p>Objection to SP7 and GA2 Land at North Farm.</p> <p>Policy SP7 is not sound or justified as the case for exceptional circumstances has not been proven. The plan should reduce the number of homes being planned. Concerns regarding GA2 include impact on infrastructure, air quality and flood risk and impact on Green Belt.</p>	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>

Appendix J – Chapter 5 – Strategic Allocations

LP1979	Emma Johnston	0632	SP7, GA2, GA3 and GA4	Objection to SP7 and GA2. The policy will not deliver sustainable development in the East Boldon area and is in conflict with the EBNP. The policy is not justified, uses out of date evidence and the exceptional circumstances case to amend the Green Belt boundary has not been made. Concern raised with regard to impact of development on in on infrastructure within East Boldon.	<p>We believe the plan to be sound and no change is needed. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2, GA3 and GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p> <p>The Council does not consider the Plan to be contrary to the Neighbourhood Plan. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP1982	Whitburn Neighbourhood Forum	0633	SP7	The Plan is not sound. The housing need needs to be based on the latest ONS or 2021 Census figures using an alternative approach to the standard method which reflects current and	<p>We believe the plan to be sound and no change is needed. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement</p>

Appendix J – Chapter 5 – Strategic Allocations

				future demographic trends and market signals. The housing need is not justified.	was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0945	Grahame Tobin	0634	SP7, GA2	GA2 is not justified and is not effective in delivering sustainable development. Disagrees with the Green Belt site assessment rating. Development will worsen infrastructure capacity including traffic, healthcare provision and school places, result in loss of agricultural land, impact the wildlife corridor and biodiversity and increase surface water flooding.	We believe the plan to be sound and no change is needed. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base. We consider the Green Belt Study (2023) (GRB1) to be robust. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to. The Local Plan includes policies which seek to protect the natural environment and agricultural land.
LP1983	Dave Hutchinson	0635	SP7, GA2	The GA2 allocation is not sound as it is in conflict with the adopted EBNP. Exceptional circumstances for Green Belt release have not been demonstrated. Development of the site is not sustainable, and the mitigation proposed for the site is not deliverable or adequate to address its loss.	We believe the plan to be sound and no change is needed. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan.
LP1986	Andrew Burnett (Buckley Burnett)	0636	SP7	Considers the Council is not releasing sufficient land to support either its minimum requirement for housing	We believe the plan to be sound and no change is needed.

Appendix J – Chapter 5 – Strategic Allocations

				<p>delivery over the plan period, or sufficient to support the wider economic objectives.</p> <p>Omission site SHLAA Ref. SBC111 could be delivered early in the Plan period, assisting with the shortage in housing delivery and helping to close the gap between the number of allocated sites and the minimum housing requirement over the plan period.</p>	<p>The Regulation 19 Publication Draft Local Plan (2024) (SUB1) meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability (SHLAA) (HOU5). The Council is confident that the Plan (SUB1) makes provision for a sufficient supply of housing land over the Plan period including a 5-year supply of deliverable housing sites. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need.</p>
LP0797	Iain Calderwood	0637	SP7, GA4	<p>The plan is not sound and has not secured the sustainability of Cleadon. Development will increase traffic congestion and pollution and lead to more flooding. There are not enough school places or healthcare provision. The council should be promoting the regeneration of urban, derelict or industrial land before considering Green Belt release.</p>	<p>We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2)</p>

Appendix J – Chapter 5 – Strategic Allocations

					concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.
LP1996	Kirstin Richardson	0638	SP7, GA2	This policy has not been positively prepared to deliver sustainable development in the East Boldon area and is in conflict with the EBNP. Development will destroy the distinctive character of the village, increase traffic congestion and pollution, and put a strain on infrastructure.	We believe the plan to be sound and no change is needed. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The provision of delivery for homes in the Neighbourhood Area has been determined based on the spatial strategy and the availability of suitable and sustainable sites. The Neighbourhood Plan does not set a housing requirement for East Boldon therefore the Council does not consider the Plan to be contrary to the Neighbourhood Plan. The Local Road Network - Traffic Capacity Assessment (2023) (INV5) identified that the impact of the Local Plan on the highway network can be satisfactorily mitigated.
LP1997	T P Duffy	0639	SP7	The Plan is not considered to be legally compliant, sound or to comply with the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP2001	Mrs Jackson	0640	SP7	Schools are oversubscribed, highways are at capacity. Development will lead	We believe the plan to be sound and no change is needed.

Appendix J – Chapter 5 – Strategic Allocations

				to worsening sewerage infrastructure capacity, loss of green belt, and loss of wildlife habitat.	The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP2006	CPRE Durham Branch	0641	SP7, GA3, GA5, GA6	Does not challenge the findings of the Green Belt Study, however, contends that a shortfall in land supply does not of itself amount to Exceptional Circumstances. GA3: the site is divorced from the built part of South Tyneside. It is more an extension of Sunderland. We are concerned that this is an unnecessary intrusion into the Green Belt. GA5: the developer has felled mature trees. contrary to Policy SP7. Considers policy should cross-reference to Policy 34 in regard to GA5 and GA6.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA3, GA5 and GA6 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The Plan should be read as a whole. Therefore, we do not consider that policies GA5 and GA6 should cross-refer to Policy 34.
LP0591	Marie Newton	0642	SP7, GA4	Object to GA4. The amenities in Cleadon Village, i.e. school is full to capacity, road networks will not cope, sewerage and drainage will be inadequate for development.	We believe the plan to be sound and no change is needed. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with

Appendix J – Chapter 5 – Strategic Allocations

					infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0585	David Milne	0643	SP7	SP7 has not been positively prepared. Disagrees with Green Belt development.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP2011	ED and FM Williams	0644	SP7, GA4	Objection to GA4. Development of would impact on wildlife corridors network, wildlife sites and lead to loss of Grade 3 agricultural land.	We believe the plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP2012	Janet Ramm	0645	SP7, GA2	Exceptional circumstances for Green Belt release have not been demonstrated. The housing requirement is too high as out-of-date ONS figures have been used. Objection to GA2. Concerns include impact on wildlife, infrastructure and flood risk.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the

Appendix J – Chapter 5 – Strategic Allocations

					Plan in line with Planning Practice Guidance. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP2014	Michele Ross	0646	SP7	Considers the Local Plan is not sustainable.	We believe the plan to be sound and no change is needed.
LP1847	Andrea George	0647	SP7, GA4	Sites in the Green Belt should not be released. The housing requirement is too high and there is no evidence the population is increasing. South Tyneside should be able to set its own targets. Development will adversely impact the environment, lead to more flooding, destroy wildlife habitat and impact climate change. The Plan does not reflect the evidence set out in the Strategic Housing Market Assessment 2023) and will not provide the right mix of homes.	<p>We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The Local Plan includes policies which seek to protect the natural environment.</p> <p>Plan policies take positive steps to address the range of needs identified in the Strategic Housing Market Assessment (2023) (HOU4).</p>
LP2027	Karen King	0653	SP7, GA4	Objects to GA4. Concerns include impact on wildlife, historic environment and flood risk.	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.

Appendix J – Chapter 5 – Strategic Allocations

LP2028	Emma Atkinson	0654	SP7, GA4	Objects to G4. Development of GA4 will increase traffic congestion and services such as dentists, schools and doctors will be difficult to access locally. Wildlife will be affected.	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP0306	Delia Orr	0655	SP7, GA4	Objects to GA4. Concerns raised include flood risk, traffic congestion and impact on wildlife.	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP2029	Deborah Pullen	0656	SP7, GA4	Objects to GA4. Concerns raised include flood risk, impact on wildlife,	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting

Appendix J – Chapter 5 – Strategic Allocations

				loss of Green Belt and impact on schools and infrastructure.	evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP2031	Judith Robinson	0657	SP7, GA4	Objects to GA4. Concerns raised include loss of Green Belt, flood risk, and impact on schools and infrastructure. The development will not address the need for affordable housing.	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Policy 18 identifies realistic targets for the delivery of affordable housing.
LP1440	Emma Thompson	0658	SP7, GA2	Objection to SP7 and GA2. The policy will not deliver sustainable development in the East Boldon area and is in conflict with the EBNP. The policy is not justified, uses out of date evidence and the exceptional circumstances case to amend the Green Belt boundary has not been made. Concern raised with regard to	We believe the plan to be sound and no change is needed. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2, GA3 and GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.

Appendix J – Chapter 5 – Strategic Allocations

				impact of development on in on infrastructure within East Boldon.	<p>The Council does not consider the Plan to be contrary to the Neighbourhood Plan. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p>
LP2034	Kirsty How	0659	SP7, GA4	Sites in the Green Belt should not be released. These green fields including the field proposed for development are an important part of the area and support wildlife. Brownfield sites should be revisited. This is an opportunity for South Tyneside Council to not negatively impact the local community and local environment and aid the wider climate crisis.	<p>We believe the Plan to be sound and no change is required.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p>

Appendix J – Chapter 5 – Strategic Allocations

					We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (2023) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2042	Cheryl Kennedy	0661	SP7	Objects to Green Belt development. .	We believe the Plan to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP2044	Janice Robertson	0662	SP7, GA4	Objects to the proposed building of houses on the Greenbelt at GA4. Development will worsen sewerage infrastructure capacity, school places and healthcare provision.	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA4 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0668 / LP1738	Beryl Massam	0675	SP7, GA2	Objects to GA2. Concerns raised include increase in traffic, impacts on existing overloaded infrastructure, loss of unique village identity of East Boldon, loss of agricultural land, impact on the wildlife corridor.	We believe the Plan to be sound and no change is required. The allocations have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of

Appendix J – Chapter 5 – Strategic Allocations

					housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP2061	STEP	0676	GA2, GA3, GA4, GA5, GA6	<p>Objection to Green Belt development and GA2, GA3, GA4, GA5 and GA6. Policy SP7 is not sustainable, and population figures do not warrant the removal of Green Belt land to support growth. The case for exceptional circumstances has not been proven. Concerns raised regarding impacts on infrastructure within villages including increased traffic congestion, air quality, pressure on local facilities, school places and health services. Concerns raised regarding impact on loss nature and biodiversity from Green Belt development. Policy SP7 is not consistent with national policy as this Regulation 19 draft of the Plan is to be guided by the principles set in the July 2021 version of the NPPF, as amended in September 2023, rather than the December 2023 version. Contends that a shortfall in land supply does not of itself amount to Exceptional Circumstances for Green Belt deletion. Object to GA2 Land at North Farm. The policy has not been positively prepared. The Green Belt Review Site Assessment undervalues the</p>	<p>We believe the Plan to be sound and no change is required.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The Local Plan has been produced in accordance with the NPPF (September 2023) and subsequent transitional arrangements set out in the NPPF (December 2023). The allocations at GA2, GA3, GA5 and GA6 have been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p>

Appendix J – Chapter 5 – Strategic Allocations

				<p>importance of the site. It is not based on appropriate evidence as developing this site will increase flood risk, impact on the environment and result in the loss of agricultural land. Concerns regarding impact on infrastructure, traffic and air quality.</p> <p>GA3: Land to the North of Town End Farm is not positively prepared. Concerns include flood risk, impact on road network, landscape impacts, proximity to Sunderland and Local Wildlife Site.</p> <p>GA4: Land at West Hall Farm. Is not positively prepared, concerns include flood risk, impact on wildlife and landscape and impact on road network.</p> <p>GA5: Land at Whitburn Lodge – concerns include impact on heritage, a need for guidance for developers to understand how to achieve the biodiversity net gain stated at this site as this is an important site for migrating birds.</p> <p>GA6: Land to North of Shearwater – concerns raised regarding SA assessment, loss of agricultural land, impact on wildlife and landscape.</p> <p>GA5 and GA6 will increase sewerage infrastructure issues.</p>	<p>Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p>
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Appendix J – Chapter 5 – Strategic Allocations

LP2062	Avant Homes North East	0678	SP7	Policies SP4-8 are not considered to be sound. The Plan is not positively prepared, justified or consistent with national policy. Land north of Cleadon Lane, Whitburn should be included as a residential allocation given the sites ability to meet the actual need of Whitburn throughout the plan period whilst also being deliverable and suitable.	We believe the policies to be sound and believe the Plan to be positively prepared, justified consistent with national policy and no change is required. The Publication Draft Local Plan meets the borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1334	Keep Boldon Green	0679	SP7, GA2	Object to policy SP7. Does not support the policy as it does not reflect the evidence set out in the SHMAA and will not provide the right mix of homes. Objective 5 and policy SP2 have not been met with regard to the needs of older people. Proposed modifications to SP7 and Policy 19 to identify sites and include provision for elderly people. GA2 should provide adequate affordable housing and accommodation for older people. Objects to GA2. Do not agree that the site represents sustainable development, concerns include loss of Green Belt, findings of the Green Belt Study Final Report, flood risk, impact on wildlife, loss of agricultural land and impacts on infrastructure and road network.	We believe the plan to be sound and no change is needed. GA2 has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development. Plan policies take positive steps to address the range of needs identified in the Strategic Housing Market Assessment (2023) (HOU4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.

Appendix J – Chapter 5 – Strategic Allocations

				Suggest that if the site is allocated reduction in the housing numbers should be implemented to reduce impacts on village and wildlife. Mitigation proposals suggested.	
LP2066	Gina Potts	0682	SP7, GA4	Development will worsen flooding.	We believe the Plan to be sound and no change is required.
LP1867	Church Commissioners for England	0685	SP7, GA3-6	Objects to SP7 which has removed several sustainable housing allocations, as a result of the above policy changes. Supports the inclusion of GA2, GA3, GA4, GA5, GA6.	Support for the inclusion of GA2, GA3, GA4, GA5 and GA6 noted. We believe the policy to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1867	Church Commissioners for England	0686	SP7	Strongly supports the strategic allocations contained in the Plan. Generally supports Policy SP7 but are of the view that amendments should be made to make the policy approach more effective (submitted as a separate report).	We believe the policy to be sound but are willing to consider some minor modifications in relation to the key considerations.
LP1867	Church Commissioners for England	0687	SP7, GA2	Strongly supports the allocation at GA2. However, key considerations do not provide sufficient guidance to decision-makers.	We believe the policy to be sound but are willing to consider some minor modifications in relation to the key considerations.
LP1867	Church Commissioners for England	0688	SP7, GA3	Strongly supports the allocation at GA3. However, key considerations do not provide sufficient guidance to decision-makers.	We believe the policy to be sound but are willing to consider some minor modifications in relation to the key considerations.
LP1867	Church Commissioners for England	0689	SP7, GA4	Strongly supports the allocation at GA4. However, key considerations do	We believe the policy to be sound but are willing to consider some minor modifications in relation to the key considerations.

Appendix J – Chapter 5 – Strategic Allocations

				not provide sufficient guidance to decision-makers.	
LP1867	Church Commissioners for England	0690	SP7, GA5, GA6	Strongly supports the allocation at GA5 and GA6 However, key considerations do not provide sufficient guidance to decision-makers.	We believe the policy to be sound but are willing to consider some minor modifications in relation to the key considerations.
LP1867	Church Commissioners for England	0691	SP7	CCE advocates that South of Cleadon Park, West of Sunnyside Farm and / or land south of St John's Terrace and Neatley Avenue should be reconsidered for allocation as a first priority. Omission sites: SHLAA Ref. SBC100, SBC101, SBC087, SBC120, SBC080, 081 & 085, SBC052, SBC053, SBC054 & SBC055.	We believe the policy to be sound and no change is required. Sites that are assessed as suitable, available, and achievable in the Strategic Housing Land Availability Assessment (SHLAA) (2023) (HOU5) have been allocated. The Council do not consider it necessary to allocate additional sites.
Policy SP8					
LP1890	Geoffrey Careless	0692	SP8	Objects to Green Belt development. Loss of Green Belt has severe environmental impacts and increases flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan.
LP0042	George Brian Pierce	0693	SP8	Objects to and considers SP8 to be unsound. Concerns include increased risk of flooding, insufficient infrastructure to handle extra traffic destruction of Green Belt and impact on wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan

Appendix J – Chapter 5 – Strategic Allocations

				Questions what has changed since the Strategic Land Review (2018).	(2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan.
LP1891	Douglas Shearer	0694	SP8	Objects to SP8 and Green Belt assessment. Policy fails to consider the needs of existing residents, including their vistas, traffic, increased pressure on public transport, flood prevention. If the site is allocated then plan is critical and compensatory works must be communicated and decided in conjunction with existing residents, planned in detail and rigorously imposed on the developers. Recommendations provided for use of green space, density, traffic alleviation and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We believe the Green Belt Study (2023) (GRB1) to be robust and no change is needed.
LP1892	Gavin Craig	0695	SP8	Objects to SP8. The road network is not fit for purpose. Move the site to land adjacent to the A184 with full access to testos.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1896	Christopher Horne	0696	SP8	SP8 is not considered to be legally compliant, sound or to comply with the Duty to Cooperate.	We believe the policy to be sound, legally compliant and compliant with the duty to cooperate.
LP1901	John & Linda Winter	0697	SP8	Sites in the Green Belt should not be released. Concerns include increased traffic congestion, increased flood risk, and loss of farmland. The SP8	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address

Appendix J – Chapter 5 – Strategic Allocations

				allocation should be moved toward the A184 to ensure a green buffer between new and existing residents.	and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
Lp1908	David and Kathleen Todd	0698	SP8	Objects to SP8. Concerns include loss of food producing land, traffic congestion, flood risk and putting Green Belt sites before brownfield. A further study should be undertaken with regards to the local population growth and whether such density of housing is necessary.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.
LP0299	Veronica Craig	0699	SP8	Objects to SP8. Concerns include loss of food producing land, traffic congestion, flooding, air pollution and impact on wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other

Appendix J – Chapter 5 – Strategic Allocations

					Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1890	Geoffrey Careless	0670	SP8	Objects to SP8. Concerns include loss of Green Belt, impact on the environment, and the wellbeing of existing residents.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP1911	Lee Steadman	0671	SP8	Objects to SP8. Concerns include flooding and traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1391	Kate Osborne MP	0672	SP8, Fellgate Sustainable Growth Area SPD	Objects to SP8. The Plan does not sufficiently take into account the economic and community value of the farm. Other concerns include impact on wildlife, loss of equestrian facilities, flooding, loss of Green Belt, and increased traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The future of existing business and land use within the allocation is a matter for the landowner.

Appendix J – Chapter 5 – Strategic Allocations

LP0303	National Highways	0673	SP8	Suggests that a quantifiable frequency for what it considers to be a high-quality bus service is provided and that policy wording changes are required to ensure that the allocation boundary with the SRN is appropriately maintained.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP0744	Eric Mason	0675	SP8	The plan has not been positively prepared. Exceptional circumstances for Green Belt release have not been demonstrated. The Consultation Strategy was flawed. Concerns include impact on wildlife, increased traffic congestion loss of a working farm, and increased air and noise pollution.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.
LP2923	Chloe Todd	0676	SP8	SP8 is not a sound plan as it will affect wildlife, it will make flooding issues worse, and it will negatively impact residents. Brownfield land should be used instead.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Strategic Housing Land Availability

Appendix J – Chapter 5 – Strategic Allocations

					Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land.
LP1926	Nexus	0677	SP8	Nexus would welcome bus penetration into the site and safe, well-lit, and accessible active travel routes towards existing and proposed Metro stations. Public transport improvements and proposed new Metro station at Follingsby Park means the southernmost area of the Fellgate Sustainable Growth Area may benefit from an enhanced level of connectivity.	We believe the policy to be sound and no change is required. The Council welcomes partnership working with Nexus to ensure maximum public transport connectivity for the site.
LP1927	Malcolm & Andrea Allen	0678	SP8	Objection to SP8. Questions what has changed since the Strategic Land Review (2018). Concerns include the loss of Green Belt land and environmental implications from development including impact on wildlife, flooding, air quality, traffic congestion loss of agricultural land and existing farm.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The future of existing business and land use within the allocation is a matter for the landowner.

Appendix J – Chapter 5 – Strategic Allocations

LP1164	Gateshead Council	0679	SP8	Considers SP8 to be legally compliant, sound and to comply with the Duty to Cooperate. Minor modifications proposed to strengthen biodiversity and ecological connectivity and giving priority to pedestrians and cycle movements. The policy should also refer to Gateshead's network.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Gateshead Council.
LP1932	Alistair Dickson	0680	SP8	Concerns raised regarding the impact of increased traffic congestion on existing residents. Suggests moving the site boundary to the south and accessing it from the A184.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The boundary of the Fellgate Sustainable Growth Area reflects the findings of the South Tyneside Green Belt Study (2023) (GRB1) which was undertaken by independent consultants.
LP1934	Norman Elliott	0681	SP8	Objects to loss of Green Belt and increased traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1936	Angie Samson	0682	SP8	Objects to SP8 due to impacts on existing residents, infrastructure and the road network.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP1937	Julia Hagan	0683	SP8	Objects to SP8 as it is not sustainable, will increase traffic congestion, and will fail to protect farmland birds.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1049 / LP1663	Laverick Hall Farm Ltd and the Dean & Chapter of Durham Cathedral (jointly)	0684	SP8	Support the principle of Policy SP8, master plan approach and the evidence which justifies it, to be soundly based. Broad agreement with the above site trajectory which is realistic and achievable. Policy SP8 requires modifications and further work through the FSGA Masterplan SPD to ensure the policy is effective. The Council must demonstrate how the land-use requirements of Policy SP8 will be achieved through the Masterplan SPD process. The SPD must provide confidence that what it depicts is deliverable and acceptable at the point of planning application determination. Proposes modifications to Criteria 1, Criteria 3, Criteria 5 iii, iv, vii, x	Support for the allocation is welcomed. We believe the policy to be sound but would be willing to consider some minor modifications to parts of the policy. The council is committed to producing a Fellgate Sustainable Growth Area SPD and the Master plan process to support the delivery of the allocation.
LP1940	S Mason	0685	SP8	Objection to SP8. Objects to SP8. Concerns raised include the use of brown field sites for development before Green Belt land, loss of	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address
LP1941	A Mason	0686	SP8		
LP1942	B Mason	0687	SP8		

Appendix J – Chapter 5 – Strategic Allocations

				existing farm, impact on wildlife, increased flood risk, traffic impacts. The Local Plan consultation was flawed.	and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.
LP1945	Petition objecting to Fellgate	0688	SP8	Objection to SP8: Concerns include destruction of Green Belt, environmental impact, destruction of wildlife habitat, loss of farmland, increased risk of flooding, and increased traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0984	Jill Doran	0689	SP8	Objects to SP8. The Consultation Strategy was flawed. Concerns include impacts on local habitats including farm birds, lack of robust environmental survey, loss of prime farmland, disruption to the wildlife	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation

Appendix J – Chapter 5 – Strategic Allocations

				corridor and increased traffic congestion and emissions.	19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement (SCI) (SUB7) and is therefore legally compliant.
LP1946	Barratt Homes	0690	SP8	Considers SP8 to be legally compliant, sound and to comply with the Duty to Cooperate.	Support for the legal compliance, soundness and compliance with the Duty to Cooperate noted.
LP1947	Story Homes	0691	SP8	SP8 is not considered to be sound because it has not been positively prepared, is not justified, and is not consistent with the requirements of national policy. The Council is reliant on delivery from this large strategic allocation. This reduction in the number of sites and greater focus on a single market location, significantly reduces flexibility and increases the risk that the plan will fail. Concerned that the evidence base, which includes the Fellgate Sustainable Growth Area Supplementary Planning Document (Fellgate SPD): Site Capacity and Opportunities Paper (2024), lacks any real substance and makes no reference to detailed supporting studies such as drainage, highways, viability, ground investigations and ecology.	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Council is confident that the plan allocates a range of sites and makes provision for a sufficient supply of housing land over the Plan period.</p> <p>The council will produce a comprehensive masterplan and Design Code through a Fellgate Sustainable Growth Area SPD.</p>

Appendix J – Chapter 5 – Strategic Allocations

LP1138	Home Builders Federation	0692	SP8	<p>Policies SP4-8 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. The plan should provide a sufficient range of sites to enable delivery to be maintained at the required levels throughout the plan period.</p> <p>The Council should also ensure it has identified at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements.</p>	<p>We believe the policy to be sound and no change is required. The Council is confident that the Plan makes provision for a sufficient supply of housing land over the Plan period and we believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13. We have undertaken an exhaustive search for sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p>
LP1955	Andrew Cockerill	0693	SP8	<p>Objects to Green Belt development. Concerns include additional traffic, increased risk of flooding and antisocial behaviour.</p>	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p>
LP1959	Northumbrian Water	0694	SP8	<p>Supports the emerging Supplementary Policy Document. Recommends that the emerging policy document recognises water resilience and includes clear policy wording that gives Northumbrian Water the opportunity to be part of key stakeholder discussions in the</p>	<p>The council's response is set out in the Statement of Common Ground between South Tyneside Council and Northumbrian Water.</p>

Appendix J – Chapter 5 – Strategic Allocations

				formulation of the masterplan and scheme design.	
LP1964	Persimmon Homes	0695	SP8	SP8 is not considered to be sound as it is not consistent with national policy. Questions the delivery rate of 150dpa during the majority of the delivery period.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The council is confident that the site is deliverable within the plan period.
LP1965	William Leech Limited	0696	SP8	Generally supportive of SP8 but consider the policy to be unsound. Proposes inclusion of additional land as part of the developable area instead of open space.	We believe the policy to be sound and no change is required. The policy does not specify which parts of the site should be part of the developable area. The council will produce a comprehensive masterplan through the Fellgate Sustainable Growth Area SPD.
LP1149	Banks Group	0697	SP8	Considers there is little evidence that 1,200 dwellings can be delivered on this site by 2040. Further sites and safeguarded land should be allocated for residential development to make up for the shortfall from delayed delivery and to provide certainty that the housing needs of the borough will be met in full.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Council is confident that the plan allocates a range of sites and makes provision for a sufficient supply of housing land over the Plan period.
LP1968	Network Rail	0698	SP8	SP8 must be supported by a robust Transport Assessment that includes an assessment of the impact upon Monkton footpath crossing and the broader rail network in this area.	We believe the policy to be sound but are willing to consider modifications based on the suggested amendment.
LP1980	David Green	0699	SP8	SP8 is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Concerns include the loss of an existing farm, Brownfield sites should be developed, vehicular access to the site, increased traffic	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan

Appendix J – Chapter 5 – Strategic Allocations

				congestion and road safety. The traffic modelling uses out of date information. The consultation strategy was flawed.	(2024) (INV1). The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need. The Efficient Use of Land paper (2024) (HOU7) considers how the council have sought to maximise densities on brownfield land to further minimise impact on Green Belt land. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant. The council considers that the Traffic Assessment (2023) (INV5) and the Strategic Road Network Forecast Report (2024) (INV2) has been conducted using a robust methodology to support the South Tyneside Local Plan. The future of existing business and land use within the allocation is a matter for the landowner.
LP1984	Kathryn Pino	0700	SP8	The Plan is not legally compliant or sound. Concerns include loss of Green Belt, impacts on the wildlife corridor and habitats and loss of farmland, loss of equestrian facilities, increased noise and air pollution, increased flood risk and increased traffic congestion. Questions what has changed since the Strategic Land Review.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to
LP1985	Mrs Angela Pino	0701	SP8		
LP1989	Julie Price	0705	SP8		

Appendix J – Chapter 5 – Strategic Allocations

					alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The future of existing business and land use within the allocation is a matter for the landowner.
LP1986	Andrew Burnett (Buckley Burnett)	0702	SP8	SP8 is not considered to be legally compliant, sound or to meet the Duty to Cooperate. The Plan is overly reliant on the delivery of Fellgate to achieve its objectives. More sites must be allocated to ensure the plan does not fail with any delay to the Fellgate site.	We believe the policy to be sound and no change is required. Site allocation SP8 has been robustly considered through the plan preparation process and supporting Evidence base and the council is confident that the site is deliverable within the plan period. The Council is confident that the plan allocates a range of sites and makes provision for a sufficient supply of housing land over the Plan period.
LP0270	Neil Johnson	0703	SP8	SP8 is not sound. Concerns include the use of out-of-date data for the traffic modelling, the Consultation Strategy was flawed, impact of development on existing residents.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Traffic Assessment (2023) (INV5) and the Strategic Road Network Forecast Report (2024) (INV2) are robust. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP1988	Doreen Green	0704	SP8	SP8 is neither legally compliant or sound. Concerns include loss of Green Belt, loss of a working farm and equestrian facilities, increased flood risk, significant increase in traffic	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other

Appendix J – Chapter 5 – Strategic Allocations

				congestion, and impact on existing residents.	Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The future of existing business and land use within the allocation is a matter for the landowner.
LP1990	John Bage	0706/ 0782	SP8	Objects to SP8. Concerns include loss of Green Belt, traffic impacts and air pollution impact for existing residents, increased flood risk, detrimental physical and mental effects on the wellbeing of existing residents.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1991	Irene Bage	0707	SP8		
LP1993	Georgina Scott	0708	SP8	Objects to SP8 it is not a sound, or credible plan. Previous evidence has not considered the site suitable for development. Concerns include impact on wildlife, air pollution, loss of Green Belt and agricultural land, use of out-of-date statistics to inform housing number, impacts on schools, increase in traffic congestion and insufficient public transport.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP1994	Karen Hunter	0709	SP8	Objects to SP8. Previous evidence has not considered the site suitable for development. Concerns include impact on wildlife, air pollution, loss of Green Belt and agricultural land, increased flood risk, increase in traffic congestion and insufficient public transport.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP1997	T P Duffy	0710	SP8	SP8 is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the policy to be legally compliant, sound and compliant with the Duty to Cooperate and no change is required.
LP1998	Brian Hunter	0711	SP8	Objects to SP8. Concerns include delivery of affordable housing, increased traffic congestion, highway safety, increased flood risk and impact on wildlife. Previous evidence has not considered the site suitable for development.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1999	Lynne Nelson	0712	SP8	SP8 is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the policy to be legally compliant, sound and compliant with the Duty to Cooperate and no change is required.
LP2000	Ian Ord	0713	SP8	The plan is not legally compliant or sound. The consultation strategy was flawed and requests for an extension were refused. Other concerns include impact on wildlife, increased traffic congestion, insufficient capacity on public transport, and a lack of school places and healthcare provision.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2002	Russell Bennett	0714	SP8	The Council's proposal to remove the Greenbelt from Fellgate is not legally compliant nor sound. Concerns include increase in traffic congestions, air pollution, loss of Green Belt and agricultural land, impacts on wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search

Appendix J – Chapter 5 – Strategic Allocations

				Other suitable brownfield sites should be considered.	for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (2023) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP1698	Michelle Cook	0716	SP8	Objects to SP8. Previous evidence has not considered the site suitable for development. Concerns include loss of agricultural land and ecology.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2005	Rachael Milne	0717	SP8	SP8 conflicts with the climate change policy. Increased vehicle uses to surrounding roads on these sites will have a huge impact on air quality too.	We believe the policy to be sound and no change is required. The Plan aims to balance protecting the environment and addressing the challenges of climate change, and growth to meet economic, housing and infrastructure needs. Policy SP8 sets out clear criteria to address and mitigate impacts of development along with other policies in the Plan like Policy 2: Air Quality.
LP2006	CPRE Durham Branch	0718	SP8	Contends that a shortfall in land supply does not amount to Exceptional Circumstances for Green Belt deletion. The Green Belt deletion via IAMP should also be considered.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.

Appendix J – Chapter 5 – Strategic Allocations

LP2007	Dan Parr	0719	SP8	The plan is not legally compliant or sound. The consultation strategy was flawed and requests for an extension were refused. Other concerns include impact on wildlife, increased traffic congestion, insufficient capacity on public transport, and a lack of school places and healthcare provision.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2008	Duncan Donnelly	0720	SP8		
LP2015	Lynda Kohberg	0724	SP8		
LP2016	Donna Ord	0725	SP8		
LP2021	Mr & Mrs A Metcalfe	0731	SP8		
LP2041	Judith Burford	0742	SP8		
LP2055	Steve Kingdon	0744	SP8		
LP2102	Lisa Finnigan	0860	SP8		
LP0585	David Milne	0721	SP8	Objects to Green Belt development. Concerns include increased flood risk, traffic congestion and pollution, and the impact of development on existing residents.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1920	Margaret Milne	0722	SP8	Objects to Green Belt development. Concerns include increased flood risk, traffic congestion and impact on wildlife. .	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1937	Julia Hagan	0723	SP8	Development at SP8 will disrupt the wildlife network and fragment habitats. Increased traffic will lead to more pollution.	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria

Appendix J – Chapter 5 – Strategic Allocations

					to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2017	Frances O'Neil	0727	SP8	Objects to SP8. The plan is not sound. The consultation strategy was flawed. The plan uses out of date statistics to calculate housing need. Concerns include impact on wildlife, lack of school places, and increased traffic congestion, pollution and risk of flooding. Previous evidence did not identify the site suitable for development.	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2018	Colleen Anderson	0728	SP8	Objects to SP8. Concerns include loss of Green Belt, increase in traffic, pollution and flooding, and will harm wildlife. Brownfield sites should be considered instead.	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2019	Helen and Brian Hudson	0729	SP8	Considers the Plan to be unsound and not legally compliant. Concerns include the impact of SP8 on the	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly

Appendix J – Chapter 5 – Strategic Allocations

				<p>health of residents, increased traffic, negative effects on wildlife and flooding.</p> <p>The Plan is based on out-of-date population information and so should be withdrawn.</p> <p>Brownfield sites are not being used.</p>	<p>considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p>
LP2020	Lawrence Taylor	0730	SP8	<p>SP8 is not sound because of the use of the 2014 household projections, there is insufficient evidence accessible concerning the establishment of a sustainable transport service, the data used in the traffic modelling is incorrect, and exceptional circumstances for Green Belt deletion have not been demonstrated. Other concerns include impact on the wildlife corridor and landscape. Development could also increase the risk of flooding.</p>	<p>We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there</p>
LP2026	Ian & Martha Gowens	0733	SP8		
LP0780	William Harvey	0743	SP8		
LP2056	Janice Lupton	0745	SP8		
LP2057	Kenneth Lupton	0746	SP8		
LP2060	Kay Blue Oliver	0750	SP8		
LP1314	Valerie Harvey	0751	SP8		
LP1659	Christine Oliver	0882	SP8		

Appendix J – Chapter 5 – Strategic Allocations

					are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP2027	Karen King	0734	SP8	It is not sound or complies with the duty to cooperate Legally compliant. Traffic is already a significant problem without building 1,200 houses at Fellgate and conflicts with Policy 51 and Policy 2. Traffic modelling is out of date. Brownfield sites should be used wherever possible.	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Traffic Assessment (2023) (INV5) and the Strategic Road Network Forecast Report (2024) (INV2) has been conducted using a robust methodology to support the South Tyneside Local Plan.</p> <p>We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p>
LP2030	Tom Wilson	0735	SP8	Objects to SP8. The consultation strategy is flawed. Concerns include heavily congested roads in the local area, loss of Green Belt land, have a negative impact on the wildlife corridor, and will lead to increased flooding.	<p>We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.</p>

Appendix J – Chapter 5 – Strategic Allocations

LP2032	Dave King	0736	SP8	<p>Objects to SP8. The consultation strategy is flawed. brownfield development should be prioritised. Exceptional circumstances for Green Belt release have not been demonstrated. Development will worsen infrastructure capacity including sewerage, traffic, healthcare provision and increase risk of flooding. The Plan does not sufficiently protect wildlife.</p>	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p>
LP2035	Cllr Audrey Huntley and Cllr Jay Potts	0737	SP8	<p>SP8 will not provide affordable homes, homes for older or disabled persons, or supported living accommodation. Concerns include loss of farmland, increased flood risk, traffic congestion and pollution.</p>	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p> <p>Policy SP8 sets out clear affordable housing requirements. Other policies in the Plan require development to provide</p>

Appendix J – Chapter 5 – Strategic Allocations

					homes for older and disabled people and support the provision of supported accommodation.
LP2036	Mr & Mrs Ritchie	0738	SP8	Development on SP8 is not considered to be sustainable. It will cause traffic congestion, harm farmland birds and disrupt the wildlife corridor. No evidence of physical compensation for land lost.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2040	Mr & Mrs Armstrong	0741	SP8		
LP2038	Pat and David Mellish	0739	SP8	Objects to loss of Green Belt at Fellgate. Concerns include loss of farmland, increased traffic congestion and pollution, increased flood risk, impact on wildlife. Brownfield should be developed instead.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). Policy SP8 sets out clear criteria to address and mitigate impacts of development. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP0299	Veronica Craig	0740	SP8	The housing requirement is based on out-of-date birth rate figures. Concerns include loss of farmland, impact on biodiversity, increased risk of flooding, noise, air and light pollution.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
				The plan is not legally compliant or sound. The consultation strategy was flawed and requests for an extension	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting

Appendix J – Chapter 5 – Strategic Allocations

				were refused. Other concerns include impact on wildlife, increased traffic congestion, insufficient capacity on public transport, and a lack of school places and healthcare provision.	evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2058	Janice Alderslade	0747	SP8	Does not consider the plan to be sound and objects to SP8. The plan disregards using brownfield sites before Green Belt. The consultation strategy was flawed and extension to the consultation period refused. No evidence that the council have co-operated with neighbouring authorities. Previous evidence identified the site as not suitable for development. Concerns regarding development of SP8 include impact on wildlife, loss of farm and agricultural land, infrastructure delivery and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. The future of existing business and land use within the allocation is a matter for the landowner. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2059	Andy Ritchie	0748	SP8	Objects to SP8 as previous evidence identified the site as not suitable for development. Concerns include the loss of Green Belt, impacts on	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other

Appendix J – Chapter 5 – Strategic Allocations

				biodiversity, infrastructure and increased risk of flooding.	Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0771	Elaine Bennett	0749	SP8	Objects to SP8. The plan is not legally compliant or sound. The consultation strategy was flawed and requests for an extension were refused. Previous evidence identified the site as not suitable for development. Other concerns include impact on wildlife, increased traffic congestion, insufficient capacity on public transport, and a lack of school places and healthcare provision.	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2061	STEP	0752	SP8	SP8 is not sustainable and is not positively prepared. Exceptional circumstances for Green Belt release have not been demonstrated. SP8 conflicts with Policy 40: Agricultural Land, SP21: Natural Environment, Policy 2: Air Quality, SP25: Infrastructure.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The Council does not consider SP8 to be in conflict with policies 40, 2, SP21 and SP25.
LP2062	Avant Homes North East	0753	SP8	Policies SP4-8 are not considered to be sound. The Plan is not positively prepared, justified or consistent with national policy. Land north of Cleadon Lane, Whitburn should be included as a residential allocation given the sites	We believe policies SP4-8 to be sound and no change is required. The Publication Draft Local Plan meets the Borough's housing needs by allocating sites that have been assessed as suitable, available and achievable in the Strategic Housing Land Availability Assessment (2023) (HOU5).

Appendix J – Chapter 5 – Strategic Allocations

				ability to meet the actual need of Whitburn throughout the plan period whilst also being deliverable and suitable.	
LP2063	Geoff Alderslade	0754	SP8	SP3 and SP8 are considered to be unsound. Exceptional circumstances for Green Belt release have not been demonstrated. The Plan does not sufficiently take into account the economic and community value of the farm. The council has not demonstrated it has met the Duty to Cooperate with neighbouring authorities. SP8 is contrary to Strategic Objective 13. Development will disrupt the wildlife corridor.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The Council has produced a Duty to Co-operate Statement (SUB5) that provides a detailed account of how the Plan has been produced in accordance with the Duty to Cooperate.
LP0556	Charles McBride	0755	SP8	Objects to SP8 due to concerns regarding flooding. The evidence set out in the Sequential Flood Test 2022 is flawed and development will increase flood risk. Other concerns include impact on wildlife, existing sewerage capacity.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development. The council considers that the Sequential Flood Test Report (2024) (NAT10) and the Level 1 Strategic Flood Risk Assessment (2022) (NAT8) have been conducted using a robust methodology to support the South Tyneside Local Plan.

Appendix J – Chapter 5 – Strategic Allocations

LP2067	Geraldine Kilgour	0756	SP8	SP8 is not sound. Strongly objects to development on Green Belt at Fellgate and loss of farmland. Previous evidence identified the site as not suitable for development. Questions how schools will be paid for, and healthcare facilities resourced. Existing traffic infrastructure is not fit for purpose and increased car usage will lead to highway safety concerns. The consultation strategy was flawed.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2068	Andrew Moore	0757	SP8	Strongly objects to building on Green Belt at Fellgate.	We consider the policy to be sound and no change is needed.
LP2069	Helen Towers	0758	SP8	Opposes a new school being built as it is not needed: there is capacity at the nearby Fellgate Primary School.	We believe the policy to be sound and no change is required.
LP2070	Lewis Rickman	0759	SP8	Objects to SP8. Concerns include increased traffic, disruption during construction of housing, loss of farmland, impact on existing services, and impact on wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2071	Christopher Grievson	0760	SP8	Objects to building on Green Belt. Brownfield should be used instead.	We believe the policy to be sound and no change is required. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However,

Appendix J – Chapter 5 – Strategic Allocations

					the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need.
LP2072	David Inskip	0761	SP8	Objects to Green Belt destruction, impact on wildlife, increased risk of flooding, and increased traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2073	Lisa Todd	0762	SP8	Strongly opposes development at Fellgate. Existing services can't cope. Green Belt should not be developed.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2074	Claire Murphy	0763	SP8	Strongly opposed development at Fellgate. Existing road infrastructure can't cope. More traffic will cause air and noise pollution. Green Belt should not be built on. Concerned about impact on wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2075	Stephen Rice	0764	SP8	Objects to SP8. Opposed to development on Green Belt. Concerned about increased traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2076	Julie-Anne Burdett	0765	SP8	Objects to SP8. Concerns include increased congestion, traffic safety,	We believe the policy to be sound and no change is required. The allocation has been robustly considered

Appendix J – Chapter 5 – Strategic Allocations

				noise pollution, increased risk of flooding, loss of Green Belt and impact on wildlife.	through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2077	Hannah Gray	0766	SP8	Opposed to development on Green Belt.	We believe the policy to be sound and no change is required
LP2078	Jennifer Watson	0767	SP8	Objects to SP8 as it will increase traffic. Green Belt should not be built on. There is no need for a new school.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2079	Joe Watson	0768	SP8	Objects to SP8. Development will massively increase traffic congestion around the Fellgate area. Green Belt should not be developed. Concern for increased flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2080	Andrea Hope	0769	SP8	Objects to SP8 and development on Green Belt. Concerns include impact on wildlife, increased traffic and pollution, and disruption to residents.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0186	Jamie Herrett	0770	SP8	Objects to SP8. Concerns include impacts on wildlife, increase flood risk and lead to worsening of traffic congestion and disruption to existing	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address

Appendix J – Chapter 5 – Strategic Allocations

				residents. Green Belt should not be built on.	and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2081	Nicholas McFarlane	0771	SP8	Concerned that SP8 will increase flood risk. Questions what other assessments will be undertaken in relation to the SPD Scoping Report.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0318	Jill Todd	0772	SP8	Objects to SP8. Disagrees with Green Belt development. SP8 will increase flood risk at Fellgate and lead to worsen traffic congestion. Schools are already oversubscribed.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2082	June Scammell	0773	SP8	Objects to SP8. Green Belt should not be built on. Development will increase flood risk, traffic congestion and parking problems.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2083	Carol Hall	0774	SP8	Objects to SP8. Development will increase traffic congestion and flood risk and will impact wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP2084	Richard Waters	0775	SP8	Objects to SP8. Existing traffic congestion will be made worse around Fellgate.	We believe the policy to be sound and change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2085	Tracey Watson	0776	SP8	Objects to SP8. Concerns include increased traffic congestion and loss of open spaces.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2086	Amy Hamilton	0777	SP8	Objects to SP8. Concerns include loss of Green Belt, increased traffic congestion and loss of open spaces	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2087	Barry Marshall	0778	SP8	Objects to SP8. Concerned about the impact of development on wildlife.	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2088	Ann Cochrane	0779	SP8	Objects to SP8. Development will increase flood risk and lead to loss of wildlife. Increased traffic will lead to extra pollution.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2089	Paula Cockerill	0780	SP8	Objects to SP8. Development will lead to more traffic congestion, air	We believe the policy to be sound and no change is required. The allocation has been robustly considered

Appendix J – Chapter 5 – Strategic Allocations

				pollution, harm to the environment, anti-social behaviour, noise pollution, increased flood risk and disturbance to existing residents.	through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2090	K Robinson	0781	SP8	SP8 is not sustainable growth. Roads are already overwhelmed by traffic and wildlife habitats will be lost. Existing residents will be disrupted by construction. Development will increase flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2092	Ray Mustard	0783	SP8	Objects to SP8. Concerns include increase traffic, flood risk, household waste generation, lack of teachers and healthcare providers, parking issues and lack of provision for play areas within the proposed allocation.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2093	Dennis Ball	0784	SP8	Objects to SP8. Fellgate already struggles with traffic congestion and flooding. More shops are not needed.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2094	Sharon McGaw	0785	SP8	Objects to SP8. Roads and facilities will not be able to cope. Development will cause environmental issues.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP2095	Martin Connell	0786	SP8	Supports SP8. The amount of new homes built in this ward in the last 20 years must be one of the lowest in the district and it seems to me the area is stagnating whilst it could have the potential to offer a lot to new families and professionals given the right upgrades to infrastructure.	Support for the policy noted.
LP2096	Mark Jackman	0787	SP8	Objects to SP8 due to loss of Green Belt, damage to the environment, impact on wildlife, existing flood risk, and increased traffic congestion and road safety.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2097	Kirsty Sinclair	0788	SP8	Objects to SP8. Development will lead to loss of scenery, wildlife, grazing land for horses and will impact existing residents.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2098	Allen Watson	0789	SP8	Objects to SP8. The estate already suffers from flooding and traffic congestion. Development will make the situation worse.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2099	Gillian Atkinson	0790	SP8	Objects to SP8. . Loss of Green Belt and wildlife seems unnecessary. Development will increase traffic congestion and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address

Appendix J – Chapter 5 – Strategic Allocations

					and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2100	Paul McGaw	0791	SP8	Objects to SP8 due to existing traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2101	Lindsey Wallace	0792	SP8	Objects to SP8 due to development on Green Belt and increased traffic congestion and pollution. Schools and healthcare facilities are already full to capacity.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2102	Lisa Finnigan	0793	SP8	Objects to SP8 as the road network already struggles to accommodate traffic.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0024	Rose Garvin	0794	SP8	Objects to SP8 due to concern with flooding , traffic congestion and impact on wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP2103	Keith Mills	0795	SP8	Objects to SP8. Concerns include loss of Green Belt and agricultural land . Construction will lead to disruption for existing residents. Roads around Fellgate are already heavily congested.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2104	Malcolm Gray	0796	SP8	Objects toSP8. Traffic congested will worsen and housing will impact wildlife and the environment.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2105	George Martin	0797	SP8	Objects to SP8. Development will impact existing residents, including increasing traffic. Green Belt should not be built on.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0288	Catherine Steele	0798	SP8	Disagrees with the Plan. Public transport can't cope with more residents. Impact on wildlife. Increased risk of crime.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2088	Ann Cochrane	0799	SP8	Objects to SP8. Development will increase flood risk and traffic congestion. Concern for impact on nature.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address

Appendix J – Chapter 5 – Strategic Allocations

					and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2083	Carol Hall	0800	SP8	Objects to SP8. Concerns include impact on traffic congestion, wildlife and increased flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2108	Antony Ball	0801	SP8	Objects to SP8 due to loss of Green Belt and wildlife impacts.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP0066	Margaret Fletcher	0802	SP8	Objects to Green Belt development.	We believe the policy to be sound and no change is required.
LP2109	Stephen Mensforth	0803	SP8	Objects to SP8. Development at Fellgate will increase traffic congestion at peak times and will lead to increased pollution.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2110	Carl Battista	0804	SP8	Objects to SP8.	We believe the policy to be sound and no change is required.
LP2111	Paul Walleth	0805	SP8	Does not object to new housing but is concerned at the number of vehicles, gridlocked traffic, lack of metro parking and road safety.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other

Appendix J – Chapter 5 – Strategic Allocations

					Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2112	Joe Crane	0806	SP8	Raises traffic congestion concerns from SP8.	We believe the policy to be sound and no change is required. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP2113	Jayde Young	0807	SP8	Objects to SP8.	We believe the policy to be sound and no change is required.
LP2114	Kimberly Crane	0808	SP8	Objects to SP8. Concerns include traffic problems entering/exiting fellgate estate and hedworth, flood risk, , parking at Fellgate metro.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0625	Robert Rowell	0809	SP8	Support for SP8. Opportunity to provide a modern and sustainable environment for future generations.	Support for the allocation noted.
LP2115	Michael Lister	0810	SP8	We need more houses built as the older generation is living longer and the working-class younger generation requires these houses to be built.	We believe the policy to be sound and no change is required.
LP2116	Kate McGhee	0811	SP8	Disappointed in the lack of unanswered questions.	We believe the policy to be sound and no change is required.
LP2117	A Welsh	0812	SP8	Objects to SP8. Sites in the Green Belt should not be developed. There are existing road issues and parking problems at Fellgate.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP2118	Gail Richardson	0813	SP8	Objects to SP8 due to traffic and flood risk concerns.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2119	Doreen Ward	0814	SP8	Objects to SP8. Concerned that development will increase traffic congestion, increase flood risk and destroy wildlife habitats. Additional shops are not needed. Bus services are already poor.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2120	Gordon Hope	0815	SP8	Objects to SP8. Development will have an impact on existing residents and local wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2121	Mr Robson-Laws	0816	SP8	Objects to Green Belt development, brownfield should be prioritised.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as

Appendix J – Chapter 5 – Strategic Allocations

					suitable, available, and achievable in the SHLAA have been allocated.
LP2122	Susan Ahmed	0817	SP8	Objects to SP8. Concerns include loss of Green Belt, impact on road network and infrastructure.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2123	Codey Sharp	0818	SP8	Objects to SP8. Objects to Green Belt development, brownfield should be prioritised.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2124	Christine Hortom	0819	SP8	Objects to SP8. Concerns include loss of Green Belt, existing traffic, impact on the environment, loss of arable land, increased flood risk and impact on existing residents. Suggests looking at industrial land that is no longer used.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development. We have undertaken an exhaustive search for brownfield sites, including industrial and economic land, through the Strategic Housing Land Availability Assessment (SHLAA)

Appendix J – Chapter 5 – Strategic Allocations

					(HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2125	Bryan Tyerman	0820	SP8	Objects to SP8. Concerns include road infrastructure, loss of Green Belt, impact on local wildlife and increase flood risk. Brownfield sites should be considered first.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2126	Kevin Lamb	0821	SP8	Objects to SP8. Concerns include impact on road network and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2127	John Hackett	0822	SP8	Object to SP8. Concerns include impact on road network and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2128	Heather Cook	0823	SP8	Objects to SP8. Concerns include impact on road network and flood risk, environmental impact and healthcare provision is already inadequate.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP2129	Elizabeth Kinrade	0824	SP8	Objects to SP8. Concerns include. negative impacts on existing residents in terms of traffic congestion, loss of views and impact on wildlife. Build on brownfield rather than Green Belt.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2130	David Worsley	0825	SP8	Area around the ponds should be made open to the public.	We believe the policy to be sound and no change is required.
LP2131	Elaine Davison	0826	SP8	Objects to SP8. Concerns include loss of Green Belt, reduction in value of properties, increased risk of flooding, significant increase in traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2132	Michelle Blythe	0827	SP8	Objects to SP8. Development will have a negative impact on existing residents.	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2133	Emma Saxton	0828	SP8	Objects to SP8. Development will add to existing traffic congestion. The allocation does not sufficiently take into account the economic and community value of the farm.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The future of existing business and land use within the allocation is a matter for the landowner.

Appendix J – Chapter 5 – Strategic Allocations

LP2134	India Ridley	0829	SP8	Objects to SP8. Concerns include development of greenfield site is not sustainable and more suitable brownfield sites exist. Development will increase flood risk, destroy wildlife habitat and put pressure on existing local services such as healthcare provision. Objects to loss of equestrian facilities. The current highway does not have the capacity for additional traffic, and this will lead to more emissions.	We believe the policy to be sound and no change is required. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2135	Christine Mottershead	0830	SP8	Objects to SP8. Concerns include the loss of Green Belt, negative impact on biodiversity, lead to increased risk of flooding, loss of an equestrian facility and loss of farmland. Brownfield should be built on first.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2136	Joanne Fulcher	0831	SP8	Objects to loss of trees and wildlife.	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2137	Andrew Wright	0832	SP8	Objects to SP8 when many brownfield sites are available.	We believe the policy to be sound and no change is required. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.

Appendix J – Chapter 5 – Strategic Allocations

LP2138	Kerry Davison	0833	SP8	Objects to SP8. Development will cause more pollution and congestion in the area.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2139	Stephen Browne	0834	SP8	Green Belt land should not be built on. Road infrastructure is already a problem.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2140	Sheila Rea	0835	SP8	Sites in the Green Belt should not be built on. Development will introduce more vehicles and will lead to a loss of farmland and equestrian facilities.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2141	Lisa Leoci	0836	SP8	Strongly opposed to SP8.	We believe the policy to be sound and no change is required.
LP2142	Angela Crane	0837	SP8	Objects to f Green Belt development which will make traffic congestion worse and increase flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 5 – Strategic Allocations

LP2143	Russell Scott	0838	SP8	Concerns include flood risk, traffic congestion, loss of Green Belt land and impact on environment.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2144	Sylvia Daŕd	0839	SP8	Objects to SP8. Schools and healthcare provision are a concern.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2145	Elsie Hardue	0840	SP8	Objects to Green Belt development. There are not enough school places, doctors or dentists. Traffic congestion will increase. Development will impact wildlife and green spaces.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2146	Matthew Fulcher	0841	SP8	Objects to SP8. The roads and infrastructure are not suitable for more traffic.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2147	Linda Mogie	0842	SP8	SP8 would have a detrimental impact on the infrastructure and facilities in South Tyneside. Existing schools,	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting

Appendix J – Chapter 5 – Strategic Allocations

				healthcare provision, public transport and road networks are inadequate. Development will destroy habitats and lead to increased flood risk.	evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2148	Dianne Hunter	0843	SP8	Objects to building on Green Belt. Additional strain on resources and increased traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2149	Kenneth Wood	0844	SP8	Objects to SP8. Objects to destruction of Green Belt and wildlife habitat.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP0726	Brian Goodman	0845	SP8	Objects to SP8. Development will not lead to an improvement in infrastructure and desperately needed social or affordable housing will not be delivered.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). Policy SP8 also sets out clear criteria to address and mitigate impacts of development and clear criteria for the delivery of affordable housing.
LP2150	Nicola Robinson	0846	SP8	Objects to SP8. Development will increase traffic congestion and pollution, result in loss of Green Belt, wildlife habitats destroyed, and flood risk increased.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other

Appendix J – Chapter 5 – Strategic Allocations

					Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0272	Martin Brown	0847	SP8	Objects to SP8. Development will have a detrimental impact on wildlife.	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2151	Lisa McGovan	0848	SP8	Objects to SP8. Green Belt should not be built on. Development will increase traffic congestion and pollution. Built on brownfield.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2152	Potter Michelle	0849	SP8	Concerned that planning approval may already have been granted.	We believe the policy to be sound and no change is required. Planning permission has not been granted on the site. Any planning application on the site would be subject to consultation prior to a decision being made.
LP2153	Gemma Carver	0850	SP8	Object to SP8 due to impact on the climate, increase flood risk and traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0066	Margaret Fletcher	0851	SP8	Objects to building on Green Belt at Fellgate.	Objection to the allocation noted. We believe the policy to be sound and no change is required.
LP0738	Audrey Lumley	0852	SP8	Objects to SP8 due to flood risk concerns. SP8 is unsustainable in	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting

Appendix J – Chapter 5 – Strategic Allocations

				terms of traffic, air pollution and loss of agricultural land.	evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0024	Rose Garvin	0853	SP8	Objects to loss of Green Belt, agricultural land, and wildlife habitat. Development will increase traffic congestion and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1254	Chris Mills	0854	SP8	Objects to SP8. Destruction of green spaces and loss of farmland is not necessary. Pollution will increase and affect wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0025	Mark Newsome	0855	SP8	Opposed to SP8. It is important to maintain Green Belt corridors. Development will have a negative impact on bird species and wildlife corridors.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2155	Newsome Victoria	0856	SP8	SP8 is contrary to point 3 of the spatial strategy which states that brownfield sites will be built on first. Proposed facilities are inadequate for new housing, which will cause traffic congestion and pollution. Development will put pressure on public transport and healthcare	We believe the policy to be sound and no change is required. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development

Appendix J – Chapter 5 – Strategic Allocations

				provision and will cause irreparable damage to wildlife corridors.	alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2156	Louise Capstick	0857	SP8	Objects to SP8. Development of so many houses will cause problems in the future.	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2157	Valerie Attewell	0858	SP8	Disagrees with building on Green Belt. Development will increase traffic congestion.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2158	N Davison	0859	SP8	Objects to SP8. Concerned about lack of protection for wildlife, increased flood risk, more traffic congestion and lack of capacity on public transport.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2160	Kay Smith	0861	SP8	Objects to Green Belt development.	We believe the policy to be sound and no change is required.
LP1153	Alex Woodcock	0862	SP8	Objects to SP8. The Plan will have a negative impact on wildlife and existing residents. Traffic congestion and pollution will increase. There are plenty of brownfield sites that could be developed instead. Green spaces should be protected.	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and mitigate impacts of development. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of

Appendix J – Chapter 5 – Strategic Allocations

					the proper long-term sustainable planning of the borough in accordance with the NPPF. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2161	Robert Colman	0863	SP8	Objects to SP8. Development will lead to increased congestion, loss of habitat for local wildlife, loss of green spaces, loss of arable farming land and potentially increasing flooding.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2162	Kathleen Watson	0864	SP8	Objects to SP8. Development will increase flood risk and traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2163	J W Turnbull	0865	SP8	The Consultation Strategy was flawed, and timescales allowed for objections were unreasonable.	The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.
LP2164	Robert Daniel Gray	0866	SP8	Objects to SP8 due to traffic concerns.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other

Appendix J – Chapter 5 – Strategic Allocations

					Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2165	Gail Gray	0867	SP8	Objects to SP8 due to impact on wildlife habitat.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2166	Robert Gray	0868	SP8	Objects to SP8.	We believe the policy to be sound and no change is required.
LP0776	Craig Stephenson	0869	SP8	Objects to the Plan and SP8. Concerns include impact on wildlife, increased flood risk and congestion. Development should take place on brownfield instead.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP2167	P and E McCaffery	0870	SP8	Objects to SP8. Concerns include density of development, increased traffic congestion, car parking issues at Fellgate Metro, loss of habitat and loss of farmland.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2168	Steven Tribe	0871	SP8	Objects to SP8. Traffic congestion is already severe, and development will only make it worse.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address

Appendix J – Chapter 5 – Strategic Allocations

					and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP0779	Adela Winton	0872	SP8	The Plan is not sound. Objects to SP8, concerns include increase traffic congestion, see the loss of farmland and habitat for wildlife, and increase the risk of flooding.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2169	Stephen Smith	0873	SP8	Objects to SP8. Development will increase flooding.	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2170	Peter Wilson	0874	SP8	No requirement for development as the population is in decline. Existing properties should be renovated before Green Belt development.	We believe the policy to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP2171	Raymond Beck	0875	SP8	Objects to SP8. Concerns include traffic problems increase in flood risk. Objects to development on Green Belt and loss of farmland.	We believe the policy to be sound and no change is required. We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development

Appendix J – Chapter 5 – Strategic Allocations

					alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2172	Scott Dotchin	0876	SP8	Objects to SP8. Concerns include impact on traffic and the environment.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP1697	Raymond Cook	0877	SP8	Objects to SP8 as it is not sound. Concerns include the loss of Green Belt land, impact on existing community facilities and transport system, delivery of affordable housing, impact of extra traffic, impact on wildlife habitats and corridors and increased flood risk. Concerns raised regarding traffic modelling. The Reg 19 consultation is confusing and not user friendly. Requests for an extension were ignored. Object to SP8 Green Belt development which would have a high impact on the landscape and wildlife corridor. Previous evidence has not considered the site suitable for development.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Local Road Network - Traffic Capacity Assessment (2023) (INV5), assessed how the growth planned as part of the Council's Regulation 19 Publication Draft Local Plan (2024) (SUB1) will impact on the local road network across the borough. The study identified that the impact of the Local Plan on the highway network can be satisfactorily mitigated. We consider this evidence to be robust. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) and is therefore legally compliant.
LP2173	Keith How	0878	SP8	Objects to SP8.	We believe the policy to be sound and no change is required.
LP2174	Andrew Gilbert	0879	SP8	Objects to SP8. The existing road infrastructure will be unable to cope.	We believe the policy to be sound and no change is required. The allocation has been robustly considered

Appendix J – Chapter 5 – Strategic Allocations

					through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2175	Kerry Godridge	0880	SP8	Objects to SP8 due to increase in traffic, impact on the environment and flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2176	Joyce Lynch	0881	SP8	Objects to SP8. Concerns include disruption to wildlife, increase in traffic and pollution, flood risk.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2177	Lee Robertson	0883	SP8	Objects to SP8. Loss of Green Belt will have a detrimental impact. Build on brownfield instead.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as

Appendix J – Chapter 5 – Strategic Allocations

					suitable, available, and achievable in the SHLAA have been allocated.
LP2178	Callam Walsh	0884	SP8	Objects to SP8. Green Belt should be retained to protect wildlife and at as a soak away. Roads are already congested, and our children enjoy open green spaces and fresh air.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2179	Louisa Rickman	0885	SP8	Objects to SP8. Strongly opposed to the plan due to the adverse local impact, including loss of green space, wildlife habitat and farming land and potential increased flooding and traffic congestion.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).
LP2180	Jane Rickman	0886	SP8	Objects to SP8. Concerns include loss of and impact on the Green Belt, lack of capacity in existing infrastructure, impact on health and wellbeing on existing residents, loss of farmland, impact on wildlife habitats. Exceptional Circumstances for Green Belt release have not been demonstrated and questions the methodology of the Green Belt Assessment.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP2181	Anna Kenolty	0887	SP8	The policy does not reflect the evidence set out in the Strategic	We believe the policy to be sound and no change is required. Policy SP8 sets out clear criteria to address and

Appendix J – Chapter 5 – Strategic Allocations

				Housing Marketing Assessment 2023) which says there is a significant need for 1-bed properties. Questions what is meant by 'opportunities for healthcare provision'.	mitigate impacts of development. Policy 19 requires development to deliver an appropriate mix of housing as identified in the Strategic Housing Market Assessment (2023) (HOU4). The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP2182	Barry Davison	0888	SP8	Objects to SP8. Opposed to Green Belt development. Brownfield should be built on instead. Development will increase congestion and pollution, and the existing public transport network will struggle to cope. Flooding is an existing risk. Housing numbers have been calculated using out of date figures.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (HOU5). Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP2183	Lucina Wareham	0889	SP8	Objects to SP8. Development on Green Belt will affect the mental health of residents and harm local wildlife.	We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.

Appendix J – Chapter 5 – Strategic Allocations

LP2184	Simon Dusher	0890	SP8	Considers SP8 not to be sound or legally compliant. Exceptional circumstances for Green Belt release have not been demonstrated. Fellgate suffers from existing flooding problems. Development will make existing traffic congestion worse and therefore SP8 does not comply with Policy 51. The traffic modelling data was out of date.	<p>We believe the policy to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.</p> <p>The council considers that the Traffic Assessment (2023) (INV5) and the Strategic Road Network Forecast Report (2024) (INV2) has been conducted using a robust methodology to support the South Tyneside Local Plan.</p>
LP2187	Gillian Johnston	0891	SP8	<p>Objects to SP8 as it is not sustainable or positively prepared. Contends that a shortfall in land supply does not of itself amount to Exceptional Circumstances and objects to the loss of farmland in South Tyneside.</p> <p>Proposal is not positively prepared in proposing the loss of more Green Belt land particularly when this area is prone to flooding.</p> <p>The policy is in conflict with the following Policies: Policy SP21 Natural Environment; Policy 2 Air Quality and SP25 Infrastructure; Policy 40: Agricultural Land.</p>	<p>We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The Council does not consider SP8 to be in conflict with policies 40, 2, SP21 and SP25.</p>

Appendix J – Chapter 5 – Strategic Allocations

LP1867	Church Commissioners for England	0892	SP8	Strongly supports the inclusion of this land for a residential-led development in the draft Plan but have lodged an objection on detailed policy requirements and the proposed site capacity and lack of safeguarded land.	Support for the inclusion of the allocation welcomed.
LP1867	Church Commissioners for England	0893	SP8	Strongly support the allocation of the Fellgate Sustainable Growth Area but has concerns regarding the proposed capacity and allocation area. Amendments to the criteria of Policy SP8 are required to make the policy effective and thereby sound. Strongly advocates an approach where the boundary for Policy SP8 is extended to include additional land and ensure the policy requirements are delivered.	We believe the policy to be sound but would be willing to consider some minor modifications to parts of the policy. The boundary of the Fellgate Sustainable Growth Area reflects the findings of the South Tyneside Green Belt Study (2023) (GRB1) which was undertaken by independent consultants. The council does not consider it necessary to extend the boundary.
LP1867	Church Commissioners for England	0894	SP8	Generally supportive of the Policy but consider amendments should be made to make the policy approach more effective.	We believe the policy to be sound but would be willing to consider some modifications to parts of the policy.
Policy SP9					
LP1890	Geoffrey Careless	0895	SP9	Supports SP9.	Support for SP9 noted.
LP1896	Christopher Horne	0896	SP9	SP9 is not considered to be sound, legally compliant and to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
LP1931	Historic England	0898	SP9	Suggest an additional point of criteria that opportunities will be sought to support the vitality of the historic	We believe the policy to be sound and no change is required. The matter is addressed through other specific policies in the Plan and the NPPF.

Appendix J – Chapter 5 – Strategic Allocations

				environment within the town centre including the continued use and reuse of heritage assets where appropriate.	
LP0645	Delia McNally	0899	SP9	SP9 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
LP1944	Avant Homes North East	0900	SP9 Paragraph 5.41	Considers that Policy SP9 is not sound, not positively prepared, not justified, not effective, and is not consistent with national policy. The redevelopment of the existing campus at St George's Avenue should be referenced.	We believe the policy to be sound and no change is required. The Plan supports the redevelopment of the existing campus by allocating it for residential use under policy SP4.
LP1946	Barratt Homes	0901	SP9	No comment to make.	Noted.
LP1997	T P Duffy	0902	SP9	SP9 is not considered to be sound, legally compliant and to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
SP10					
LP1890	Geoffrey Careless	0905	SP10	Supports SP10.	Support for SP10 noted.
LP1896	Christopher Horne	0918	SP10	SP10 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
LP1931	Historic England	0907	SP10	Suggest changes to align better with legislation on conservation areas within the Town & Country (Listed Buildings and Conservation Areas) Act 1990 s.72 and to make clear that the Customs House comprises two designated heritage assets of which it will be important to protect the setting	We believe the policy to be sound but are willing to consider some minor modifications in relation to the suggested amendments.

Appendix J – Chapter 5 – Strategic Allocations

LP0645	Delia McNally	0908	SP10	Supports SP10	Support for SP10 noted.
LP1946	Barratt Homes	0909	SP10	No comment to make.	Noted.
LP1967	Port of Tyne	0910	SP10	Concern raised in regard to impact residential development will have on operations at Tyne Dock Enterprise Park. The Port requests that due consideration to the interrelationship between the two land uses and that this is acknowledged within the supporting text to Policy SP10.	We believe the policy to be sound and no change is required. This matter is being dealt with through the planning application process.
LP1997	T P Duffy	0911	SP10	SP10 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
Policy SP11					
LP1890	Geoffrey Careless	0917	SP11	Supports SP11.	Support for SP11 noted.
LP0078	Peter Oneil	0919	SP11	Supports SP11.	Support for SP11 noted.
LP1896	Christopher Horne	0920	SP11	SP11 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and change is required.
LP1931	Historic England	0399	SP11	Considers the policy is not sound. Modifications suggested to strengthen the policy in terms of impact on designated heritage assets.	We believe the policy to be sound but are willing to consider some minor modifications in relation to the suggested amendments.
LP1944	Avant Homes North East	0400	SP11	Policy SP11 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Modifications to supporting text are recommended in relation to the redevelopment of existing college site at Westoe.	We believe the policy to be sound but are willing to consider some minor modifications in relation to the suggested amendments.
LP1946	Barratt Homes	0433	SP11	No comment to make.	Noted.

Appendix J – Chapter 5 – Strategic Allocations

LP1997	T P Duffy	0446	SP11	SP11 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
Policy SP12					
LP1890	Geoffrey Careless	0582	SP12	Supports SP12.	Support for SP12 noted.
LP1896	Christopher Horne	0674	SP12	SP12 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
LP1914	Thomas and Lynn Elves	0726	SP12	Considers the plan must be revised because it is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA). There are no sites allocated to meet the type of need identified in paragraph 62 of the NPPF. in the SHMAA.	We believe the policy is consistent with the NPPF and contributes to meeting the needs set out in Strategic Housing Market Assessment (2023) (HOU4) . Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. We believe the Plan to be sound and no change is required.
LP1847	Andrea George	0904	SP12		
LP2025	Anthony Pollock	0906	SP12		
LP0645	Delia McNally	0732	SP12	Supports SP12	Support for SP12 noted.
LP1946	Barratt homes	0897	SP12	No comment to make.	Noted.
LP1997	T P Duffy	0903	SP12	SP12 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
Policy SP13					
LP1890	Geoffrey Careless	0912	SP13	Supports SP13.	Support for SP13 noted.

Appendix J – Chapter 5 – Strategic Allocations

LP1896	Christopher Horne	0913	SP13	SP13 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
LP1914	Thomas and Lynn Elves	0921	SP13	Considers the plan must be revised because it is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA). There are no sites allocated to meet the type of need identified in paragraph 62 of the NPPF.	We believe the policy is consistent with the NPPF and contributes to meeting the needs set out in Strategic Housing Market Assessment (2023) (HOU4) . Whilst the Plan considers evidence from the Strategic Housing Market Assessment (SHMA) (2023) (HOU4), policies in the Plan also consider viability evidence. Policy 18: Affordable Housing seeks to deliver affordable housing levels informed by the SHMA and the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. We believe the Plan to be sound and no change is required.
LP1847	Andrea George	0925	SP13		
LP2025	Anthony Pollock	0926	SP13		
LP1915	Sport England	0922	SP13	Considers SP13 is not legally compliant or sound as the allocation washes over playing field and major sports facilities at Bents Recreation Ground and Gypsies Green Stadium. Sport England requires recognition within the designation that improvements will be cognisant of playing field policy.	We believe the policy to be legally compliant and sound but are willing to consider a minor modification including additional clarification in the supporting text regarding the sports facilities.
LP1946	Barratt homes	0923	SP13	No comment to make.	Noted.
LP1997	T P Duffy	0924	SP13	SP13 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate and no change is required.
Policy SP14					
LP1890	Geoffrey Careless	0927	SP14	Supports SP14.	Support for SP14 noted.

Appendix J – Chapter 5 – Strategic Allocations

LP1896	Christopher Horne	0928	SP14	SP14 is not considered to be sound, legally compliant and compliant with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP1914	Thomas and Lynn Elves	0929	SP14	Considers the plan must be revised because it is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA). There are no sites allocated to meet the type of need identified in paragraph 62 of the NPPF.	We believe the Plan to be sound and that no change is needed. The comments by the respondents are not relevant to Policy SP14.
LP1847	Andrea George	0941	SP14		
LP1916	Dennis Grieves	0930	SP14	Considers the Plan is not justified by the evidence base. The amount of land allocated for employment is too high and more of this land needs to be utilised for housing development in existing urban areas.	We believe the Plan to be sound and that no change is needed. The Local Plan is required to plan for the economic needs for the borough alongside its housing requirements. The employment need for South Tyneside is set out in the Employment Land Review (2023) (EMP1) and the Employment Land Technical Paper (2024) (EMP2). We consider that both documents are robust.
LP0520	Alex Air	0931	SP14		
LP1917	Angela Beattie	0932	SP14		
LP0609	Ian Beattie	0933	SP14		
LP1943	Paul Crompton	0936	SP14		
LP2022	Matthew Johnson	0942	SP14		
LP2023	Jacqueline Johnson	0943	SP14		
LP2024	Christopher Johnson	0944	SP14		
LP0636	Kevin Tindle	0945	SP14		
LP2025	Anthony Pollock	0946	SP14		
LP1756	Ian Hudson	0947	SP14		
LP2048	Jennie and Ann West	0948	SP14		
LP2049	Nicola, David and Megan West	0949	SP14		

Appendix J – Chapter 5 – Strategic Allocations

LP2050	Bev, Jon and Robyn Olds	0950	SP14		
LP2051	Joyce and Bill Hills	0951	SP14		
LP2052	Hilary, Mammed and Alex Bagher	0952	SP14		
LP2053	Joanne, Christopher, Jack and Harry West	0953	SP14		
LP0088	Andrew Davison	0954	SP14		
LP2054	Lauren and Nicholas Bagher	0955	SP14		
LP1771	Russell Hewitson	0956	SP14		
LP1767	Andrea Hewitson	0957	SP14		
LP2061	STEP	0958	SP14		
LP1769	Moyra Fairweather	0959	SP14		
LP2064	South Tyneside Green Party	0960	SP14		
LP2065	Chris Davies	0961	SP14		
LP2185	G and J Shepherd	0962	SP14		
LP2187	Gillian Johnston	0963	SP14	We would wish to see the outputs of any assessments of the potential impact of development proposals on	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Gateshead Council.
LP1164	Gateshead Council	0934	SP14		

Appendix J – Chapter 5 – Strategic Allocations

				<p>the local highway network has been undertaken – particularly on junctions at Heworth and Whitemare Pool and on routes into Gateshead.</p> <p>We would also wish to see the outputs of assessment of the impacts of any proposed improvements at Whitemare Pool, which will undoubtedly result in increased traffic flows through the junction, with those flows arriving at the next downstream junction(s) (Leam Lane and Heworth), more quickly.</p> <p>In addition, we would like to discuss what efforts are being made to encourage active and public transport to/from these locations.</p>	
LP0645	Delia McNally	0935	SP14	Supports SP14.	Support for SP14 noted.
LP1946	Barratt homes	0937	SP14	Supports SP14.	Support for SP14 noted.
LP1971	Thomas Armstrong	0938	SP14	Considers that the current allocation under Policy SP14 should be increased in order to deliver 16.4 hectares of land with associated release from the Green Belt. It is not considered that the current omission of 3.7ha from the proposed allocation is evidentially supported by the Green Belt Study.	We believe the plan to be sound and no change is needed.
LP1997	T P Duffy	0939	SP14	SP14 is not considered to be sound.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0585	David Milne	0940	SP14	SP14 is not considered to be sound or to comply with the Duty to Cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate. The council considers that a sound approach has been undertaken in

Appendix J – Chapter 5 – Strategic Allocations

				Green Belt development should not be allocated.	considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
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Appendix J – Chapter 6 – Promoting healthy communities

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy 1					
LP1896	Christopher Horne	0964	Policy 1	Considers Policy 1 not to be legally compliant, not sound and does not comply with the Duty to Cooperate.	We believe the policy to be legally compliant, sound and compliant with the Duty to Cooperate.
LP1914	Thomas and Lynn Elves	0965	Policy 1	<p>The Local Plan is not justified because these policies will not ensure the Strategic Objectives for Promoting Healthy Communities will be achieved; and these policies are not consistent with national policy. Key points include:</p> <ul style="list-style-type: none"> • Negative health impacts associated with development of open spaces. • Negative impacts on air pollution due to increased traffic from new developments. 	<p>The council considers the policy to be sound and no amendments required. Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. Site allocations, development proposals will be required to comply with the policies in the Local Plan and ensure mitigation is provided where necessary including Policy 2: Air Quality requires that development would result in exposure to air pollution that exceeds national air quality.</p>
LP1916	Dennis Grieves	0967	Policy 1		
LP1688	Susan Ridge	0968	Policy 1		
LP1680 / LP1689	Keith Ward	0969	Policy 1		
LP0520	Alex Air	0970	Policy 1		
LP1917	Angela Beattie	0971	Policy 1		
LP1679	David Todd	0972	Policy 1		
LP1678	Joyce Todd	0973	Policy 1		
LP0609	Ian Beattie	0974	Policy 1		
LP2022	Matthew Johnson	0992	Policy 1		
LP2023	Jacqueline Johnson	0993	Policy 1		
LP2024	Christopher Johnson	0994	Policy 1		
LP0636	Kevin Tindle	0995	Policy 1		
LP2025	Anthony Pollock	0996	Policy 1		
LP1756	Ian Hudson	0997	Policy 1		
LP2048	Jennie and Ann West	0998	Policy 1		
LP2049	Nicola, David and Megan West	0999	Policy 1		

Appendix J – Chapter 6 – Promoting healthy communities

LP2050	Bev, Jon and Robyn Olds	1000	Policy 1		
LP2051	Joyce and Bill Hills	1001	Policy 1		
LP2052	Hilary, Mammed and Alex Bagher	1002	Policy 1		
LP2053	Joanne, Christopher, Jack and Harry West	1003	Policy 1		
LP0088	Andrew Davison	1004	Policy 1		
LP2054	Lauren and Nicholas Bagher	1005	Policy 1		
LP1771	Russell Hewitson	1006	Policy 1		
LP1767	Andrea Hewitson	1007	Policy 1		
LP1769	Moyra Fairweather	1008	Policy 1		
LP2064	South Tyneside Green Party	1009	Policy 1		
LP2065	Chris Davies	1010	Policy 1		
LP2185	G and J Shepherd	1011	Policy 1		
LP1915	Sport England	0966	Policy 1	Supportive of Policy 1. More detailed guidance should be produced explaining how the policy's requirements are to be embedded into development proposals.	The council considers the policy to be sound and no amendments required. It is not considered necessary to produce an SPD or Design Code in relation to Policy 1.
LP0645	Delia McNally	0975	Policy 1	The policy is not considered to be sound. The Plan does not set out how additional infrastructure needs in the East Boldon area will be met, including school places, healthcare provision and traffic congestion.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this

Appendix J – Chapter 6 – Promoting healthy communities

					is set out in the Infrastructure Delivery Plan (2024) which accompanies this local plan.
LP1938	Alan Howard Becke and Susan Shilling	0976	Policy 1	The policy is not considered to be sound. The Plan does not set out how additional infrastructure needs in the East Boldon area will be met, including school places, healthcare provision and traffic congestion.	We believe the policy to be sound. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) which accompanies this local plan.
LP1944	Avant Homes North East	0977	Policy 1	Policy 1 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. The Council revises its requirements for HIAs and caution it from mandating the requirement for HIAs for applications, at least until it has clarified and justified where these would be needed, and until it has published further guidance on the requirements for HIAs.	We believe the policy to be sound and no change is needed. The council considers that the health inequalities evidenced in the council's Health and Wellbeing strategy (SPV8) and JSNAA (SPV5) demonstrate the need for Local Plan developments to positively contribute to the health and wellbeing of communities in South Tyneside. It is considered that the HIA policy requirement is intended to assess the localised health impacts associated with development and should be considered on a site-by-site basis at planning application stage. Further HIA guidance will be produced following adoption of the Local Plan.
LP1946	Barratt homes	0978	Policy 1	Supports Policy 1.	Support for Policy 1 noted.
LP1952	Taylor Wimpey	0979	Policy 1	Policy 1 is not justified, as defined in the NPPF, and should be supported by the appropriate evidence before being considered for adoption. HIA requirements are excessive.	We believe the policy to be sound and no change is needed. The council considers that the health inequalities evidenced in the council's Health and Wellbeing strategy (SPV8) and JSNAA (SPV5) demonstrate the need for Local Plan developments to positively contribute to the health and wellbeing of communities in South Tyneside. Further HIA guidance will be produced following adoption of the Local Plan.
LP1953	Bellway Homes	0980	Policy 1	The policy is unsound for being unjustified and inconsistent with national policy. We consider there is a lack of evidence in setting a general HIA threshold of 100 dwellings or more, rather	We believe the policy to be sound and no change is needed. The council considers that the health inequalities evidenced in the council's Health and Wellbeing strategy (SPV8) and JSNAA (SPV5) demonstrate the need for Local Plan developments to positively contribute to the health and wellbeing of
LP1417	Bellway Homes	0982			

Appendix J – Chapter 6 – Promoting healthy communities

				each site should be assessed on its own merits at the planning application stage.	communities in South Tyneside. It is considered that the HIA policy thresholds represent a pragmatic approach to HIA and will assess the localised health impacts associated with development. Further HIA guidance will be produced following adoption of the Local Plan.
LP1138	Home Builders Federation	0981	Policy 1	Policy 1 is not considered to be sound as it is not justified and not consistent with national policy. Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The Viability Assessment does not appear to have included any assessment of costs associated with this policy.	We believe the policy to be sound and no change is needed. The council considers that the health inequalities evidenced in the council's Health and Wellbeing strategy (SPV8) and JSNAA (SPV5) demonstrate the need for Local Plan developments to positively contribute to the health and wellbeing of communities in South Tyneside. The viability implications of undertaking a HIA are not considered to be a significant cost burden and unlikely to be the difference between a scheme returning a viable outcome and one that is shown to be unviable.
LP0949	Lesley Younger	0983	Policy 1	Housing allocations in the East Boldon Forum area will result in increased traffic, congestion and pollution. This is contrary to the Plan's ambition to move towards being green, healthy and carbon neutral.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) which accompanies this local plan.
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	0984	Policy 1	The requirement for HIA for development proposals of 100 dwellings or more without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG.	We believe the policy to be sound and no change is needed. The council considers that the health inequalities evidenced in the council's Health and Wellbeing strategy (SPV8) and JSNAA (SPV5) demonstrate the need for Local Plan developments to positively contribute to the health and wellbeing of communities in South Tyneside. It is considered that the HIA policy thresholds represent a pragmatic approach to HIA and will assess the localised health impacts associated with development. Further HIA guidance will be produced following adoption of the Local Plan. .

Appendix J – Chapter 6 – Promoting healthy communities

LP1963	Stonebridge Homes	0985	Policy 1	Supports Policy 1.	Support for Policy 1 noted.
LP1964	Persimmon Homes	0986	Policy 1	Policy 1 is not considered to be sound as it is not consistent with national policy. The intention to use an HIA should be determined early in the planning process.	We believe the policy to be sound and no change is needed. The council considers that the health inequalities evidenced in the council's Health and Wellbeing strategy (SPV8) and JSNAA (SPV5) demonstrate the need for Local Plan developments to positively contribute to the health and wellbeing of communities in South Tyneside.
LP1966	NHS Property Services Ltd	0987	Policy 1	Welcomes and supports the requirements for a Health Impact Assessment (HIA) on significant residential developments of 100 dwellings or more.	Support noted.
LP1988	Doreen Green	0988	Policy 1	Development at Fellgate will have a negative impact on residents in terms of air, light and noise pollution.	The council considers the policy to be sound and no amendments required. Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. Site allocations, development proposals will be required to comply with the policies in the Local Plan and ensure mitigation is provided where necessary.
LP1993	Georgina Scott	0989	Policy 1	Development at SP8 will not promote healthy communities but will have a negative impact on residents in terms of air pollution.	The council considers the policy to be sound and no amendments required. Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. Site allocations, development proposals will be required to comply with the policies in the Local Plan and ensure mitigation is provided where necessary.
LP0585	David Milne	0990	Policy 1	Development will have a negative impact on residents in terms of air, light and noise pollution. Loss of Green Belt will damage wildlife.	The council considers the policy to be sound and no amendments required. Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. Site allocations, development proposals will be required to comply

Appendix J – Chapter 6 – Promoting healthy communities

					with the policies in the Local Plan and ensure mitigation is provided where necessary.
LP1847	Andrea George	0991	Policy 1	The Local Plan is not justified because these policies will not ensure the Strategic Objectives for Promoting Healthy Communities will be achieved; and these policies are not consistent with national policy and will result in negative health impacts associated with development of open spaces.	The council considers the policy to be sound and no amendments required. Improving the health and wellbeing is a central aim of the South Tyneside Local Plan as set out in Strategic Objective 2: Promoting Healthy Communities'. Site allocations, development proposals will be required to comply with the policies in the Local Plan and ensure mitigation is provided where necessary.
Policy 2					
LP1896	Christopher Horne	1012	Policy 2	Does not consider Policy 2 is legally compliant, sound or complaint with Duty to Cooperate.	We believe the policy to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1914	Thomas and Lynn Elves	1013	Policy 2	Does not consider Policy 2 to be sound. The Local Plan will worsen air quality in South Tyneside and is not compliant with the NPPF. Measures should be introduced to mitigate increased traffic congestion and air pollution.	We consider the policy to be sound and no amendments required. There are a range of policies within the Local Plan in relation to air quality, transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1916	Dennis Grieves	1014	Policy 2		
LP1688	Susan Ridge	1015	Policy 2		
LP1680 / LP1689	Keith Ward	1016	Policy 2		
LP0520	Alex Air	1017	Policy 2		
LP1917	Angela Beattie	1018	Policy 2		
LP1679	David Todd	1019	Policy 2		
LP1678	Joyce Todd	1020	Policy 2		
LP0609	Ian Beattie	1021	Policy 2		
LP2022	Matthew Johnson	1033	Policy 2		
LP2023	Jacqueline Johnson	1034	Policy 2		
LP2024	Christopher Johnson	1035	Policy 2		
LP0636	Kevin Tindle	1036	Policy 2		
LP2025	Anthony Pollock	1037	Policy 2		

Appendix J – Chapter 6 – Promoting healthy communities

LP1756	Ian Hudson	1039	Policy 2		
LP2048	Jennie and Ann West	1040	Policy 2		
LP2049	Nicola, David and Megan West	1041	Policy 2		
LP2050	Bev, Jon and Robyn Olds	1042	Policy 2		
LP2051	Joyce and Bill Hills	1043	Policy 2		
LP2052	Hilary, Mammed and Alex Bagher	1044	Policy 2		
LP2053	Joanne, Christopher, Jack and Harry West	1045	Policy 2		
LP0088	Andrew Davison	1046	Policy 2		
LP2054	Lauren and Nicholas Bagher	1047	Policy 2		
LP1771	Russell Hewitson	1048	Policy 2		
LP1767	Andrea Hewitson	1049	Policy 2		
LP1769	Moyra Fairweather	1050	Policy 2		
LP2064	South Tyneside Green Party	1051	Policy 2		
LP2065	Chris Davies	1052	Policy 2		
LP2185	G and J Shepherd	1053	Policy 2		
LP0744	Eric Mason	1022	Policy 2	SP8 does not take into account the impact more cars will have on air quality for local residents.	We consider the policy to be sound and no amendments required. Development proposals would have to adhere to Policy 2 which requires mitigation measures where

Appendix J – Chapter 6 – Promoting healthy communities

					development would result in exposure to air pollution which exceeds national air quality objectives.
LP0645	Delia McNally	1023	Policy 2	The policy is not sound and does not comply with the NPPF. The road infrastructure in the East Boldon Forum area cannot cope with more housing. More cars will reduce air quality.	We believe the policy is sound and complies with the NPPF. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed.
LP1938	Alan Howard Becke and Susan Shilling	1024	Policy 2	Considers Policy 2 to be legally compliant but not sound.	We believe the policy is sound and no amendments required.
LP1943	Paul Crompton	1025	Policy 2	Supports Policy 2.	Support for the policy is noted.
LP1944	Avant Homes North East	1026	Policy 2, Criterion 1	Policy 2 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Recommends criterion 1 is deleted from the Policy as criterion 2 captures necessary requirements that need to be considered.	We believe the policy is sound and no change is needed.
LP1946	Barratt homes	1027	Policy 2	Supports Policy 2.	Support for the policy is noted
LP0949	Lesley Younger	1028	Policy 2	Considers housing allocations in the East Boldon Forum area will result in increased traffic, congestion and pollution. This is contrary to the Plan's ambition to move towards being green, healthy and carbon neutral.	We believe the policy is sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed.
LP1409	Jean Eckert	1029	Policy 2	The Air Quality Strategy is not an effective strategy which will prevent an increase of air pollution from development and does not support healthy communities.	We believe the policy is sound and no change is needed. The Air Quality Strategy and Action Plan (CLM10) forms part of the evidence base which informs Policy 2. The policy requires mitigation measures where development would result in exposure to air pollution which exceeds national air quality objectives.
LP2007	Dan Parr	1030	Policy 2	Development will lead to an increase in cars which will lead to an increase in hospital admissions and death.	We believe the policy is sound and no change is needed. Any proposal would have to adhere to policy 2 which requires mitigation measures where development would result in

Appendix J – Chapter 6 – Promoting healthy communities

					exposure to air pollution which exceeds national air quality objectives.
LP0585	David Milne	1031	Policy 2	Proposed development will lead to additional pollution and traffic which will have a negative impact on the residents.	We believe the policy is sound and no change is needed. Any proposal would have to adhere to policy 2 which requires mitigation measures where development would result in exposure to air pollution which exceeds national air quality objectives.
LP1847	Andrea George	1032	Policy 2	The Plan has failed to identify opportunities to improve air quality adequately and this demonstrates that the Plan is not sound. Development will increase car usage, congestion and pollution.	We believe the policy is sound and no change is needed. Any proposal would have to adhere to policy 2 which requires mitigation measures where development would result in exposure to air pollution which exceeds national air quality objectives. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP2027	Karen King	1038	Policy 2	Does not consider Policy 2 to be legally compliant or sound. Increase in cars results in increase in hospital admissions and death.	We believe the policy is legally compliant and sound. Any proposal would have to adhere to policy 2 which requires mitigation measures where development would result in exposure to air pollution.
Policy 3					
LP1904	A. Ball	1054	Policy 3	Objects to Policy 3 as proposed development in the East Boldon Neighbourhood Plan area is not sustainable and will put a strain on local infrastructure and threatening the unique character of East Boldon.	We consider the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained/ provided at the appropriate level for the distribution of housing growth proposed.
LP0744	Eric Mason	1055	Policy 3	Developing SP8 will lead to an increase in cars that will significantly impact pollution.	We consider the policy to be sound and no change is needed. Policy 3 ensures development will only be permitted where mitigation measures can be introduced to provide and acceptable living or working environment.
LP0645	Delia McNally	1056	Policy 3	Policy 50 does not contain sufficient detail about how appropriate social, environmental, and physical infrastructure will be provided to cater for the impact of new development on local	We consider the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services

Appendix J – Chapter 6 – Promoting healthy communities

				communities. Housing allocations in the EBNF area should be reduced.	can be maintained/ provided at the appropriate level for the distribution of housing growth proposed.
LP1938	Alan Howard Becke and Susan Shilling	1057	Policy 3	Policy 3 does not fit with the council's stated objectives and current climate emergency status	We consider the policy to be sound and no change is needed. We believe the policy is consistent with the Council's objectives.
LP1943	Paul Crompton	1058	Policy 3	Considers Policy 3 is legally compliant, sound and in compliance with the Duty to Cooperate.	Support for the soundness of the policy and compliance with the Duty to Cooperate is noted.
LP1944	Avant Homes North East	1059	Policy 3, Criterion 1 and 2	Policy 3 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Criterion 1 and 2 could be consolidated.	We believe the policy is sound and no change is needed.
LP1946	Barratt homes	1060	Policy 3	Supports Policy 3	Support for the policy is noted
LP0949	Lesley Younger	1070	Policy 3	Considers housing allocations in the East Boldon Forum area will result in increased traffic, congestion and pollution. This is contrary to the Plan's ambition to move towards being green, healthy and carbon neutral.	We believe the policy is sound and no change is needed. There are a range of policies within the Local Plan in relation to pollution, transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP0585	David Milne	1071	Policy 3	Policy 3 is not considered to be sound as 1200 new homes will create additional pollution and traffic congestion and will have a negative impact on the environment.	We believe the policy is sound and no change is needed. There are a range of policies within the Local Plan in relation to pollution, transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
Policy 4					
LP1921	Lynn Mills	1072	Policy 4	Does not consider Policy 4 to be legally compliant, sound or comply with the Duty to Cooperate. Objects to planning application no. ST/0676/23/FUL at South Tyneside College including the felling and destruction of mature healthy trees.	We believe the policy is legally compliant, sound and compliant with the Duty to Cooperate. Objection to the planning application noted.
LP0594	The Coal Authority	1073	Policy 4	Supports Policy 4 which requires land stability issues to be addressed as part of development proposals.	Support for the policy is noted.

Appendix J – Chapter 6 – Promoting healthy communities

LP1944	Avant Homes North East	1074	Policy 4, Criterion 1 and para 6.27	Does not consider Policy 4 to be sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Criterion 1 should make clear that investigations are appropriate and proportionate. Paragraph 6.27 should be also amended.	We believe the policy is sound. No change needed.
LP1946	Barratt homes	1075	Policy 4	Supports Policy 4.	Support for the policy is noted.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP15					
LP0303	National Highways	1076	SP15	Supports SP15.	Support for the policy noted.
LP1914	Thomas and Lynn Elves	1077	SP15	<p>Does not consider Policy SP15 is sound. The Local Plan is not sound because it is not compliant with the Climate Change Act 2008 and Planning and Compulsory Purchase Act 2004 (as amended) duties or consistent with NPPF guidance – carbon accounting and climate mitigation. The Local Plan must be revised to bring it into compliance with legislative and policy requirements around climate change and the councils stated ambitions. Key issues include:</p> <ul style="list-style-type: none"> Increased carbon emissions from the development proposed in the Local Plan will add to South Tyneside's carbon footprint and add to the climate change emergency. Policies do not aim to secure a reduction in carbon emissions. As far as possible, all new development should be zero carbon given that the country's net zero target must be met in the next 30 years. Zero carbon is an achievable standard. 	<p>The council considers the Policy SP15 and the plan to be sound and is consistent with national policy and guidance. The Local Plan sets out a positive approach to securing radical reductions in greenhouse gas emissions. The Plan acknowledges that decisions should be taken in line with the 2008 Climate Change Act, which has the provision to reduce carbon dioxide emissions by 80% by 2050, albeit there is no quota which the Local Plan must deliver. Policy SP15 is supported by a Climate Change Topic Paper (2024) (CLM1) and South Tyneside Carbon Audit (2021) (CLM2).</p>
LP1916	Dennis Grieves	1078	SP15		
LP1688	Susan Ridge	1079	SP15		
LP1680 / LP1689	Keith Ward	1080	SP15		
LP0520	Alex Air	1081	SP15		
LP1917	Angela Beattie	1082	SP15		
LP1679	David Todd	1083	SP15		
LP1678	Joyce Todd	1084	SP15		
LP0609	Ian Beattie	1085	SP15		
LP1847	Andrea George	1100	SP15		
LP2022	Matthew Johnson	1101	SP15		
LP2023	Jacqueline Johnson	1102	SP15		
LP2024	Christopher Johnson	1103	SP15		
LP0636	Kevin Tindle	1104	SP15		
LP2025	Anthony Pollock	1105	SP15		
LP1756	Ian Hudson	1106	SP15		
LP2037	Brenda Forrest	1107	SP15		
LP2048	Jennie and Ann West	1108	SP15		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP2049	Nicola, David and Megan West	1109	SP15		
LP2050	Bev, Jon and Robyn Olds	1110	SP15		
LP2051	Joyce and Bill Hills	1111	SP15		
LP2052	Hilary, Mammed and Alex Bagher	1112	SP15		
LP2053	Joanne, Christopher, Jack and Harry West	1113	SP15		
LP0088	Andrew Davison	1114	SP15		
LP2054	Lauren and Nicholas Bagher	1115	SP15		
LP1771	Russell Hewitson	1116	SP15		
LP1767	Andrea Hewitson	1117	SP15		
LP1769	Moyra Fairweather	1119	SP15		
LP2064	South Tyneside Green Party	1120	SP15		
LP2065	Chris Davies	1121	SP15		
LP2185	G and J Shepherd	1122	SP15		
LP0645	Delia McNally	1086	SP15	The Plan is not in compliance with the environmental objectives of the NPPF. Development at GA2 will compromise the character and distinctiveness of East Boldon. Increased car ownership will lead to more congestion and pollution.	<p>We believe the Plan to be sound and no change is required. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2)</p>

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

					concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP1944	Avant Homes North East	1087	Criterion 4	Policy SP15 is not considered sound As it should be reflective of appropriate targets. Criterion 4 - recommend that the word 'maximising' is replaced by 'Strengthening' which is a more appropriate word. Concern that the Future Homes Standard will introduce requirements that have not been accounted for in the Local Plan Viability Testing – Update (2023) and that this could impact the potential deliverability of the Plan.	The council considers the policy sound, and no change is needed. to be sound and is consistent with national policy and emerging national standards and are viable and deliverable as demonstrated in the viability assessment (2023). Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations. The approach to Future Homes is set out in paragraph 2.8.11 of the Local Plan Viability Update (2023) (INV4). It does not consider it appropriate to include the Future Homes standard at this current stage of the viability testing.
LP1946	Barratt homes	1088	SP15	Does not consider Policy SP15 is legally compliant or sound. Council should not be seeking to introduce new standards through planning and should adhere to Government stipulated Building Regulations.	The council considers the policy to be sound and no change is needed. Development proposals are required to comply with current Building Regulations.
LP1947	Story Homes	1089	SP15	It is considered that Policy SP15 is not sound. The policy should be consistent with national policy and guidance unless clear and up to date evidence justifies otherwise.	The council considers the plan to be sound and is consistent with national policy and emerging national standards. No change is needed.
LP1952	Taylor Wimpey	1090	SP15	Policy SP15 goes beyond nationally prescribed standards. Local policy approach must reflect the national planning policy context as well as the direction provided by Government on draft such policies.	The council considers the plan to be sound and is consistent with national policy and emerging national standards. No change is needed.
LP1953	Bellway Homes	1091	SP15	SP15 is unsound for being ineffective and inconsistent with national policy. The policy (or its supporting text) should reflect the Future Homes Standard and considered in the	The council considers the policy sound, and no change is needed. to be sound and is consistent with national policy and emerging national standards and are viable and deliverable as demonstrated in the viability assessment (2023). Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become
LP1417	Bellway Homes	1093	SP15		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				Local Plan Viability Update document (see our comments in relation to Policy SP3).	mandatory. Development proposals are required to comply with current Building Regulations. The approach to Future Homes is set out in paragraph 2.8.11 of the Local Plan Viability Update (2023) (INV4). It does not consider it appropriate to include the Future Homes standard at this current stage of the viability testing.
LP1138	Home Builders Federation	1092	SP15	Policy SP15 is not considered to be sound as it is not justified and not consistent with national policy. Concern that the Future Homes Standard will introduce requirements that have not been accounted for in the Local Plan Viability Testing – Update (2023) and that this could impact the potential deliverability of the Plan.	The council considers the policy sound, and no change is needed. to be sound and is consistent with national policy and emerging national standards and are viable and deliverable as demonstrated in the viability assessment (2023). Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations. The approach to Future Homes is set out in paragraph 2.8.11 of the Local Plan Viability Update (2023) (INV4). It does not consider it appropriate to include the Future Homes standard at this current stage of the viability testing.
LP0949	Lesley Younger	1094	SP15	Does not consider Policy SP15 is legally compliant, sound or in accordance with the duty to cooperate. Development of GA2 will increase flood risk and have a negative impact on climate change and the natural environment.	We believe the Plan to be sound and no change is required. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1095		Policy SP15 could be amended as follows: “To meet the challenge of mitigating and adapting to the effects of climate change, a comprehensive approach to delivering sustainable development and reducing carbon emissions is required. This will be achieved through compliance with the Future Homes Standard and the Building Regulations as the appropriate standards for development.”	We believe the policy to be sound, no change needed. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP1964	Persimmon Homes	1096	SP15	SP15 is not considered to be sound as it is not consistent with national policy. It is important to refer to the Future Homes Standard and the Building Regulations as the appropriate standards for development.	We believe the policy to be sound. The Plan does not set local energy efficiency standards. Policy 5 sets out ways in which development can reduce energy consumption and support sustainable design. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.
LP1969	Sunderland AFC	1097	SP15	Supportive of SP15. However, it is considered that the failure to mention the importance of utilising Green Belt land to meet this significant rise in electricity demand within the Policy requires addressing.	Support for the policy noted. We consider the policy to be sound and no change needed. The matter is addressed through other specific policies across this Plan and the NPPF which are taken as a whole.
LP0945	Grahame Tobin	1098	SP15	Does not consider SP15 to be sound. Para 2 needs to explicitly mandate the use of available technologies to reduce carbon emissions in all new developments.	We believe the policy to be sound and no change is needed. The matter is addressed through other specific policies across this Plan and the NPPF which are taken as a whole.
LP0585	David Milne	1099	SP15	Objects to Green Belt deletion which will contribute to climate change. Additional homes will lead to negative impacts from additional traffic.	We believe the policy to be sound and no change is needed. The Local Plan includes a suite of policy which seek to address the impacts of development including climate change.
LP2061	STEP	1118	SP15	The Plan is not considered to be positively prepared or sound. A major review of the Plan is required to bring it into compliance with legislative and policy requirements around climate change. SP15 is a disappointment and does nothing to meet the Plans Strategic Objectives.	The council considers the policy to be sound and is consistent with national policy and guidance. The council considers the Policy SP15 and the plan to be sound and is consistent with national policy and guidance. The Local Plan sets out a positive approach to securing radical reductions in greenhouse gas emissions. The Plan acknowledges that decisions should be taken in line with the 2008 Climate Change Act, which has the provision to reduce carbon dioxide emissions by 80% by 2050, albeit there is no quota which the Local Plan must deliver. Policy SP15 is supported by a Climate Change Topic Paper (2024) (CLM1) and South Tyneside Carbon Audit (2021) (CLM2).
LP2187	Gillian Johnston	1123	SP15		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

Policy 5					
LP0303	National Highways	1124	Policy 5	Supports Policy 5.	Support noted.
LP1234	Mineral Products Association	1125	Policy 5	The plan should have greater focus on the needs for mineral products to deliver the plan's aspiration. Major developments should include a resource assessment and supply chain considerations. The wider need for raw materials to deliver on the plan's infrastructure should include a raw material resource assessment and supply chain audit in the plan's evidence base.	We believe the policy to be sound and no change is required. Policy 57 supports mineral extraction; however, the council do not consider it to be the role of the Plan to identify material sources or supply chains for specific developments. The council considers the methodology used in the Local Aggregates Assessment (2021) (INV11) to be proportionate and robust.
LP0645	Delia McNally	1126	Policy 5	The Plan is not in compliance with the environmental objectives of the NPPF. Development at GA2 will compromise the character and distinctiveness of East Boldon. Increased car ownership will lead to more congestion and pollution.	We believe the Plan to be sound and no change is required. The allocation at GA2 has been robustly considered through the plan preparation process and supporting evidence base. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP1944	Avant Homes North East	1127	Policy 5	Considers that Policy 5 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Policy 5 is currently onerous. Proposals for local energy efficiency standards that go beyond current, or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale.	The council considers the policy to be sound and is consistent with national policy and emerging national standards and is viable and deliverable as demonstrated in the viability assessment (2023). Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations. Para. 7.22 sets out what is expected to be included in a Sustainability Statement and that it should be proportionate to the scale of development. The council would be willing to consider a modification in relation to the suggestion that Policy 5.1v may not be necessary.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				Greater flexibility should be added to Criterion 1. It is not considered that an optional water efficiency standard is justified. The requirement for all major applications to be accompanied by a Sustainability Statement is unnecessary. With regards to criterion 4 of Policy 5 there is a high subjective bar set as to what are 'compelling reasons' for why achieving the sustainability standards would not be technically feasible or economically viable. Suggest amendments to text to provide greater clarity.	
LP1946	Barratt homes	1128	Policy 5	Considers Policy 5 is not sound as the Council should not be seeking to introduce new standard through planning and should adhere to Government stipulated Building Regulations.	We believe the policy to be sound and consistent with national policy and guidance. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.
LP1947	Story Homes	1129	Policy 5	Does not consider Policy 5 to be sound. Ensure that the policy is consistent with national policy and guidance unless clear and up to date evidence justifies otherwise.	We believe the policy to be sound and consistent with national policy and guidance. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.
LP1952	Taylor Wimpey	1131	Policy 5	It is strongly advocated that the need for Policy 5 is reconsidered but at the very least is reworded to align with national requirements and avoid confusion with Building Regulations.	We believe the policy to be sound and consistent with national policy and guidance. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.
LP1953	Bellway Homes	1132	Policy 5	The policy is unsound as it is unjustified and inconsistent with national policy. In terms of water usage, the PPG is clear that where optional standards are pursued, that this needs to be evidenced and reflected in	The council considers the policy to be sound and is consistent with national policy and emerging national standards and is viable and deliverable as demonstrated in the viability assessment (2023). Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals
LP1417	Bellway Homes	1134	Policy 5		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				viability considerations. Part 3 of the policy requires all major development to be accompanied by a Sustainability Statement. This needs to be proportionate to the scale of the development and not unnecessarily duplicate details which are already included within the planning application.	are required to comply with current Building Regulations. The viability model includes allowances for changes to building regulations which were mandatory from June 2023. At this stage the viability testing does not reflect the Future Homes Standard (FHS) which will come into effect after June 2025. The FHS has yet to be clarified and confirmed. It is also unclear what impact it will have on the end value of dwellings. Para. 7.22 sets out what is expected to be included in a Sustainability Statement and that it should be proportionate to the scale of development.
LP1138	Home Builders Federation	1133	Policy 5	<p>Policy 5 is not considered to be sound as it is not justified and not consistent with national policy. It is not considered that requirement for optional water efficiency standard is justified or consistent with national policy in relation to need or viability and should be deleted as South Tyneside is not considered to be an area of Water Stress as identified by the EA.</p> <p>The requirement for all major applications to be accompanied by a Sustainability Statement under sub-section 3 of Policy 5 is unnecessary.</p> <p>The Viability Assessment does not appear to have included any assessment of costs associated with this policy.</p>	<p>The council considers the policy to be sound and is consistent with national policy and emerging national standards and is viable and deliverable as demonstrated in the viability assessment (2023). Policy 60: Developer Contributions, Infrastructure Funding and Viability sets out that, subject to robust evidence, an applicant may contend that the economic viability of a new development is such that it is not reasonably possible to make payments to fund all or part of the infrastructure required to support it.</p> <p>Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations.</p> <p>Para. 7.22 sets out what is expected to be included in a Sustainability Statement and that it should be proportionate to the scale of development. No specific allowance has been made for undertaking a Sustainability Statement. This is a minor cost that will not impact on viability. The council would be willing to consider a modification in relation to Policy 5.1v.</p>
LP1960	Hellens Land Ltd and the Trustees of the	1135	Policy 5	Our client is generally supportive of Policy 5, with the caveat that it must remain sufficiently flexible to follow standards set out within the Building Regulations.	We believe the policy to be sound and no change is needed. Support noted. Development proposals are required to comply with current Building Regulations.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

	T.J.Jacobson Will Trust				
LP1964	Persimmon Homes	1136	Policy 5	Does not consider Policy 5 is sound as it is not consistent with national policy as it is considered that there needs to be justifiable evidence to request new development meets the highest national standard, it should also be reflected in the viability assessment work produced by the LPA.	We believe the policy to be sound and consistent with national policy and guidance. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations. The viability model includes allowances for changes to building regulations which were mandatory from June 2023. At this stage the viability testing does not reflect the Future Homes Standard (FHS) which will come into effect after June 2025. The FHS has yet to be clarified and confirmed. It is also unclear what impact it will have on the end value of dwellings.
LP1966	NHS Property Services Ltd	1137	Policy 5	Support for the policy.	Support for policy 5 welcomed.
LP1867	Church Commissioners of England	1138	Policy 5	Generally, supportive of Policy 5 but the policy should be revised to make it clear that new developments compliant with the Future Homes Standard will be supported.	We believe the Plan to be sound and consistent with national policy and guidance. Para 7.12 acknowledges that in 2025, compliance with the Future Homes Standard will become mandatory. Development proposals are required to comply with current Building Regulations. The viability model includes allowances for changes to building regulations which were mandatory from June 2023. At this stage the viability testing does not reflect the Future Homes Standard (FHS) which will come into effect after June 2025. The FHS has yet to be clarified and confirmed. It is also unclear what impact it will have on the end value of dwellings.
Policy 6					
LP1916	Dennis Grieves	1139	Policy 6	The Local Plan is not sound because this policy is not consistent with national policy., NPPF Para 156. Policy 6 para 2 and para 4 are not strong enough.	The council considers the policy 6 to be sound and is consistent with national policy and guidance. No change is needed. The Plan aims to balance the often competing and conflicting issue of protecting the environment and address the challenges of climate change, and growth to meet economic, housing and infrastructure needs. Policy
LP0520	Alex Air	1140	Policy 6		
LP1917	Angela Beattie	1141	Policy 6		
LP0609	Ian Beattie	1142	Policy 6		
LP1847	Andrea George	1156	Policy 6		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP2022	Matthew Johnson	1157	Policy 6	A requirement to include and maximise on-site renewable energy generation needs to be folded into an overall greenhouse gas emissions policy.	6 sets out a positive strategy and guidance for delivering energy from renewable and low carbon sources across the borough, whilst ensuring that development does not have a harmful impact on the character of the surrounding area.
LP2023	Jacqueline Johnson	1158	Policy 6		
LP2024	Christopher Johnson	1159	Policy 6		
LP0636	Kevin Tindle	1160	Policy 6		
LP2025	Anthony Pollock	1161	Policy 6		
LP1756	Ian Hudson	1162	Policy 6		
LP2048	Jennie and Ann West	1163	Policy 6		
LP2049	Nicola, David and Megan West	1164	Policy 6		
LP2050	Bev, Jon and Robyn Olds	1165	Policy 6		
LP2051	Joyce and Bill Hills	1166	Policy 6		
LP2052	Hilary, Mammed and Alex Bagher	1167	Policy 6		
LP2053	Joanne, Christopher, Jack and Harry West	1168	Policy 6		
LP0088	Andrew Davison	1169	Policy 6		
LP2054	Lauren and Nicholas Bagher	1170	Policy 6		
LP1771	Russell Hewitson	1171	Policy 6		
LP1767	Andrea Hewitson	1172	Policy 6		
LP1769	Moyra Fairweather	1173	Policy 6		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP2064	South Tyneside Green Party	1174	Policy 6		
LP2065	Chris Davies	1175	Policy 6		
LP2185	G and J Shepherd	1176	Policy 6		
LP1931	Historic England	1143	Policy 6	Concerned that current wording does not align with national policy and legislation which sets out that harm to heritage assets should be avoided before mitigation is considered. Suggested modifications proposed to strengthen the protection of heritage assets and make the policy sound.	The council considers the Policy 6 and the plan to be sound and is consistent with national policy and guidance. No change is needed. Planning applications will be assessed against the policies contained within the Conserving and Enhancing the Historic Environment chapter of the Local Plan, which are in accordance with the NPPF.
LP0645	Delia McNally	1144	Policy 6	Supports Policy 6.	Support for Policy 6 welcomed.
LP1943	Paul Crompton	1145	Policy 6	Considers Policy 6 is legally compliant, sound and in accordance with the duty to cooperate.	Support for Policy 6 welcomed.
LP1944	Avant Homes North East	1146	Policy 6	Considers that Policy 6 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Heat networks will remain unviable in most circumstances it will be more sustainable, as well as viable for developments to incorporate alternative forms of energy provision. Criterion 6 of Policy 6 should include criteria relating to viability.	The council considers the policy to be sound and no change is needed. It is considered that policy 6 offers sufficient flexibility with regard to District Heating connections Policy 60: Developer Contributions, Infrastructure Funding and Viability sets out that, subject to robust evidence, an applicant may contend that the economic viability of a new development is such that it is not reasonably possible to make payments to fund all or part of the infrastructure required to support it.
LP1946	Barratt homes	1147	Policy 6	Does not consider Policy 6 is legally compliant or sound. The Council should not be seeking to introduce new standard through planning and should adhere to Government stipulated Building Regulations.	The council considers the policy to be sound and consistent with national policy and guidance. Development proposals are required to comply with current Building Regulations.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP1947	Story Homes	1148	Policy 6	Considers Policy 6 is not sound. There is a need for clear and up to date evidence to justify moving away from national standards, along with factoring them into the Local Plan's Viability Assessment.	The council considers the policy to be sound and is consistent with national policy and emerging national standards and is viable and deliverable as demonstrated in the viability assessment (2023).
LP1952	Taylor Wimpey	1149	Policy 6	No evidence has been provided to justify the policy requirement. Policy 6 should be amended to remove the requirement for developments within 400m of an existing district heat network or an emerging identified heat network to be designed ready to connect to the district network.	The council considers the policy to be sound and is consistent with national policy and emerging national standards and is viable and deliverable as demonstrated in the viability assessment (2023). No change is needed. It is considered that policy 6 provides sufficient flexibility regarding connecting to district heat networks and also supports alternative options for renewable energy.
LP1953	Bellway Homes	1150	Policy 6	Considers Policy 6 is not sound as it unduly places an emphasis on connecting to heating networks when this may not always be the most appropriate way in which to sustainably heat a development; Putting such a strong emphasis on having to explore connecting to a heating network is not appropriate. The Council should seek that developments explore multiple methods to seek to reduce their carbon emissions rather than favouring one method over others.	The council considers the Policy 6 to be sound and is consistent with national policy and guidance. No change is needed. It is considered that policy 6 provides sufficient flexibility regarding connecting to district heat networks and supports alternative options for renewable energy.
LP1417	Bellway Homes	1152	Policy 6		
LP1138	Home Builders Federation	1151	Policy 6	Policy 6 is not considered to be sound as it is not justified and not consistent with national policy. Important that Parts 4 and 6 are not seen as requirement to connect to a heat network and is instead implemented in relation to the assessment of feasibility, with the use of heat networks determined by the developer. This may mean that it is more sustainable and more appropriate for	The council considers the Policy 6 and the plan to be sound and no change is needed. No change is needed. It is considered that policy 6 provides sufficient flexibility regarding connecting to district heat networks and also supports alternative options for renewable energy.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				developments to utilise other forms of energy provision, and this may need to be considered.	
LP1964	Persimmon Homes	1153	Policy 6	Does not consider Policy 6 to be sound. District Heating Systems are often not viable for residential development schemes. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered. The policy requirements need to be reflected in the Viability Assessment.	We consider the policy to be sound and no change is needed. The council considers the Policy 6 to be sound and is consistent with national policy and guidance. No change is needed. It is considered that policy 6 provides sufficient flexibility regarding connecting to district heat networks and also supports alternative options for renewable energy.
LP1969	Sunderland AFC	1154	Policy 6	Strongly support Policy 6. However, in accordance with para 164 of the NPPF, greater emphasis and clarity should be placed upon measures of appropriateness for the development of renewable solar energy schemes.	The council considers the Policy 6 and the plan to be sound and is consistent with national policy and emerging national standards but would be willing to consider a modification in relation to the inclusion of solar energy development.
LP2006	CPRE Durham Branch	1155	Policy 6	Considered Policy 6 is not sound. Policy 6 should give guidance on what may, or may not, be acceptable for solar array applications. It should encourage roof top solar as opposed to solar on green fields. The Policy should make it clear that only turbines identified in the 2022 Wind Development Study are appropriate in South Tyneside. No large turbines are appropriate anywhere in the borough.	The council considers the Policy 6 and the plan to be sound and is consistent with national policy and emerging national standards but would be willing to consider a modification in relation to the inclusion of solar energy development. Proposals will be assessed in accordance with the Policy Statement on Onshore Wind, published 8 July 2024. This policy statement revises planning policy that place onshore wind on the same footing as other energy development in the National Planning Policy Framework.
LP1867	Church Commissioners of England	1177	Policy 6	Policy 6 is generally supported but we are of the view that amendments are necessary to make the policy approach more effective. Part 6 suggests that district heat networks are the	We consider the policy to be sound and no change is needed. The council considers the Policy 6 to be sound and is consistent with national policy and guidance. No change is needed. It is considered that policy 6 provides sufficient flexibility with regard to connecting

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				most sustainable way to heat and / or power homes which is not the case, and the exemption is a high bar. Policy 6 also fails to take account of emerging technologies and the potential for a step change in sustainable heat and power generation and a more flexible policy approach which takes account of all possible methods to achieve the overarching aim of sustainable net zero development is advocated.	to district heat networks and also supports alternative options for renewable energy.
Policy 7					
LP0744	Eric Mason	1178	Policy 7	Does not consider Policy 7 is sound as Fellgate Sustainable Growth Area will worsen flooding.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
LP0645	Delia McNally	1179	Policy 7	There is a risk of surface water flooding for GA2, which is located within Flood Zones 2 and 3. The allocation is contrary to EBNF and should be removed, or housing numbers reduced.	We believe the policy to be sound and no change is needed. Local Plan allocations have been robustly considered through the plan preparation process and where appropriate policies clear criteria to address and mitigate impacts of development alongside other Local Plan policies. The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
LP1944	Avant Homes North East	1180	Policy 7 Section 9	Considers that Policy 7 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national	The council considers the policy to be sound but would be willing to consider a minor modification in relation to the suggestion made regarding criterion 9.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				policy. Sub-section 9 requires the introduction of greater flexibility.	
LP1946	Barratt homes	1181	Policy 7	Supports Policy 7.	Support noted and welcomed.
LP1953	Bellway Homes	1182	Policy 7 Section 6	Considers part 6 of Policy 7 is unsound for being unjustified, not positively prepared and inconsistent with national policy as it does not allow any culverting or building over watercourses which is an inflexible and rigid approach and does not appear to have any justification.	We believe the policy to be sound and no change is needed. The PPG states 'Proposals to introduce new culverting or to build on top of existing culverting are likely to have adverse impacts on flood risk, ecology, human health and safety and amenity whilst increasing maintenance costs and hindering future options to restore the watercourse. Such proposals are likely to run contrary to natural flood management objectives and the objectives of River Basin Management Plans' (Paragraph: 067 Reference ID: 7-067-20220825)
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1183	Policy 7 Section 5	Concerned with Policy 7 criterion 5. Considers permeable surfaces to be of questionable effectiveness within new developments. Providing SuDS features in areas of private ownership would not comply entirely with the requirements of the policy as written.	We believe the policy to be sound and no change is needed. Mechanisms regarding the determination of planning applications, such as planning obligations or conditions, could address the point raised. Also, the wording of part 5 includes 'where practicable'. The policy therefore incorporates flexibility.
LP1989	Julie Price	1184	Policy 7	Considers that the Plan is not legally compliant or sound. SP8 should be removed from the Plan as development will lead to flooding.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
LP0585	David Milne	1185	Policy 7	Does not consider Policy 7 to be sound or to comply with the Duty to Cooperate as destroying natural soak away land and putting roads and houses in the place of farm land at SP8 will worsen flood risk.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

					Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
Policy 8					
LP0744	Eric Mason	1186	Policy 8	Does not consider Policy 8 is sound as building on SP8 will worsen flooding.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
LP0645	Delia McNally	1187	Policy 8	Considers Policy 8 is not sound as there is a risk of surface water flooding at GA2.	We believe the policy to be sound and no change is needed. Local Plan allocations have been robustly considered through the plan preparation process and where appropriate policies clear criteria to address and mitigate impacts of development alongside other Local Plan policies. The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
LP0984	Jill Doran	1188	Policy 8	Objects on the grounds that the council have not been able to give Fellgate residents any guarantees that homes would not be at any further risk from the development of SP8.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP1946	Barratt homes	1189	Policy 8	Supports Policy 8.	Support noted and welcomed.
LP1964	Persimmon Homes	1190	Policy 8 Section 2	Does not consider Policy 8 is not considered to be sound as it is not consistent with national policy. Part 2 of the policy wording needs to make it clear where a sequential test is necessary.	We believe the policy to be sound and no change is needed. The current wording regarding the sequential test is clear.
LP0585	David Milne	1191	Policy 8	Does not consider Policy 8 to be sound or to comply with the Duty to Cooperate as destroying natural soak away land and putting roads and houses in the place of farm land at SP8 will worsen flood risk.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
Policy 9					
LP0645	Delia McNally	1192	Policy 9	Considers Policy 9 is legally compliant.	Support for the legal compliance of the policy noted.
LP1944	Avant Homes North East	1193	Policy 9 Section 4	Considers that Policy 9 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. BNG and ecological enhancements could still conflict with other material planning requirements on a site and it is recommended that sub-section 4 of Policy 9 is clarified for the avoidance of doubt.	We believe the policy to be sound but are willing to consider modifications regarding the clarification of section 4.
LP1946	Barratt Homes	1194	Policy 9	Supports Policy 9.	Support for the policy noted.
LP0585	David Milne	1195	Policy 9	Does not consider Policy 9 to be sound or to comply with the Duty to Cooperate as destroying natural soak away land and putting roads and houses in the place of farm land at SP8 will worsen flood risk.	We believe the policy to be sound and no change is needed. SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development alongside other Local Plan policies and the Infrastructure Delivery Plan (2024) (INV1). The

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

					Local Plan is supported by evidence base documents including a Strategic Flood Risk Assessment (NAT4 -9) and Sequential Flood Test Report (NAT11), these documents do not identify and increase in flood risk from the Local Plan.
Policy 10					
LP1914	Thomas and Lynn Elves	1196	Policy 10	<p>Considers Policy 10 is not sound. The Local Plan is not justified because this policy is not able to ensure the Objectives for Protecting Water Quality will be achieved; and is not consistent with national policy. Key issues include:</p> <ul style="list-style-type: none"> • Increase in housing development on green spaces, will result in more pressure on the sewage system. Refer to NPPF paras 20 and 185. • Sewage is regularly discharged into South Tyneside watercourses in moderate rainfall. This is due to a lack of capacity at the sewage treatment works caused by a lack of investment and contravenes environmental law. • Sewage pollution is a contributor to climate change and impacts on public health 	<p>We believe the policy is sound and no change is needed. Policy 10 and Policy 11 provide clear guidance for the disposal of foul water and protection of water quality for future development proposals. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).</p>
LP1916	Dennis Grieves	1197	Policy 10		
LP1688	Susan Ridge	1198	Policy 10		
LP1680 / LP1689	Keith Ward	1199	Policy 10		
LP0520	Alex Air	1200	Policy 10		
LP1917	Angela Beattie	1201	Policy 10		
LP1679	David Todd	1202	Policy 10		
LP1678	Joyce Todd	1203	Policy 10		
LP0609	Ian Beattie	1204	Policy 10		
LP1847	Andrea George	1211	Policy 10		
LP2022	Matthew Johnson	1212	Policy 10		
LP2023	Jacqueline Johnson	1213	Policy 10		
LP2024	Christopher Johnson	1214	Policy 10		
LP0636	Kevin Tindle	1215	Policy 10		
LP2025	Anthony Pollock	1216	Policy 10		
LP1756	Ian Hudson	1217	Policy 10		
LP2048	Jennie and Ann West	1218	Policy 10		
LP2049	Nicola, David and Megan West	1219	Policy 10		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP2050	Bev, Jon and Robyn Olds	1220	Policy 10		
LP2051	Joyce and Bill Hills	1221	Policy 10		
LP2052	Hilary, Mammed and Alex Bagher	1222	Policy 10		
LP2053	Joanne, Christopher, Jack and Harry West	1223	Policy 10		
LP0088	Andrew Davison	1224	Policy 10		
LP2054	Lauren and Nicholas Bagher	1225	Policy 10		
LP1771	Russell Hewitson	1226	Policy 10		
LP1767	Andrea Hewitson	1227	Policy 10		
LP1769	Moyra Fairweather	1229	Policy 10		
LP2064	South Tyneside Green Party	1230	Policy 10		
LP2065	Chris Davies	1231	Policy 10		
LP2185	G and J Shepherd	1232	Policy 10		
LP0645	Delia McNally	1205	Policy 10	Considers Policy 10 is not sound.	We believe the policy to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1943	Paul Crompton	1206	Policy 10	Considers Policy 10 is legally compliant, sound and in accordance with the duty to cooperate. Development should be scaled back if water and sewerage infrastructure cannot cope.	We believe the policy is sound and no change is needed.
LP1946	Barratt Homes	1207	Policy 10	Supports Policy 10.	Support noted and welcomed.
LP1975	Sonia Ali	1208	Policy 10	Does not consider Policy 10 is sound as it fails to address the fact that Northumbrian Water	We believe the policy is sound and no change is needed. Northumbrian Water has advised that it has sufficient network and
LP2187	Gillian Johnston	1233	Policy 10		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				Limited (NWL) remains subject to a Compliance Assessment Report (CAR) with respect to the Whitburn sewage system which demonstrates a lack of capacity in the system. Policy 10 is not positively prepared as data provided to the LPA demonstrates the lack of capacity of sewage treatment and presents a robust and credible evidence base which requires further research/act finding by the LPA.	treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).
LP1977	Robert Latimer	1209	Policy 10	Sewage policy contained in the Local Plan is not fit for purpose. Sewerage capacity at Whitburn pumping station is undercapacity and additional housing will exacerbate the issue. Questions assurances from the EA and NWL. Provides specific examples of spills and lack of capacity. Reference to close working with EA and NWL should be removed from Policy 10. The Local Plan must contain a policy on disposal of foul water that protects the public and undertake their own assessment of the sewerage network.	We believe the policy is sound, and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).
LP1982	Whitburn Neighbourhood Forum	1210	Policy 10	Does not consider Policy 10 is legally compliant, sound or in accordance with the duty to cooperate. The local plan is not in compliance with the Urban Waste Water Treatment Regulations 1994. Hendon sewage works discharges illegally regularly in dry weather. Data provided to the LPA demonstrates the lack of capacity of sewage	We believe the policy is sound and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

				<p>treatment and presents a robust and credible evidence base which requires further research/ fact finding by the LPA.</p> <p>Therefore, the plan is not positively prepared. Representations made by the WNF at Reg 18 stage were largely ignored which demonstrates undue bias.</p>	<p>response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).</p>
LP2061	STEP	1228		<p>Policy 10 Disposal of Foul Water and Policy 11 Protecting Water Quality are not positively prepared as both fail to address the fact that Northumbrian Water Limited (NWL) remains subject to a Compliance Assessment Report which demonstrates a lack of capacity in the system. Proposed development in East Boldon, Cleadon and Whitburn will exacerbate sewage pollution currently experienced due to lack of sewage capacity. Data provided to the LPA demonstrates the lack of capacity of sewage treatment. Contradicts Strategic Objective 3 and 5, policies SP1, SP22 and SP25. Sewerage pollution effects climate change, natural environment and public health. The Local Plan should include that proposals will not be supported unless it can be shown by rigorous analysis that there is sufficient capacity in the local sewerage system.</p>	<p>We believe the policy is sound and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).</p>
Policy 11					
LP1914	Thomas and Lynn Elves	1234	Policy 11	<p>Considers Policy 11 is not sound. The Local Plan is not justified because this policy is not able to ensure the Objectives for Protecting Water Quality will be achieved; and is not</p>	<p>We believe the policy is sound and no change is needed. Policy 10 and Policy 11 provide clear guidance for the disposal of foul water and protection of water quality for future development proposals. Northumbrian Water has advised that it has sufficient network and</p>
LP1916	Dennis Grieves	1235	Policy 11		
LP1688	Susan Ridge	1236	Policy 11		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP1680 / LP1689	Keith Ward	1237	Policy 11	<p>consistent with national policy. Key issues include:</p> <ul style="list-style-type: none"> • Increase in housing development on green spaces, will result in more pressure on the sewage system. Refer to NPPF paras 20 and 185. • Sewage is regularly discharged into South Tyneside watercourses in moderate rainfall. This is due to a lack of capacity at the sewage treatment works caused by a lack of investment and contravenes environmental law. • Sewage pollution is a contributor to climate change and impacts on public health 	<p>treatment capacity to support the proposed development allocations. The Environment Agency has not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).</p>
LP0520	Alex Air	1238	Policy 11		
LP1917	Angela Beattie	1239	Policy 11		
LP1679	David Todd	1240	Policy 11		
LP1678	Joyce Todd	1241	Policy 11		
LP0609	Ian Beattie	1242	Policy 11		
LP1847	Andrea George	1248	Policy 11		
LP2022	Matthew Johnson	1249	Policy 11		
LP2023	Jacqueline Johnson	1250	Policy 11		
LP2024	Christopher Johnson	1251	Policy 11		
LP0636	Kevin Tindle	1252	Policy 11		
LP2025	Anthony Pollock	1253	Policy 11		
LP1756	Ian Hudson	1254	Policy 11		
LP2048	Jennie and Ann West	1255	Policy 11		
LP2049	Nicola, David and Megan West	1256	Policy 11		
LP2050	Bev, Jon and Robyn Olds	1257	Policy 11		
LP2051	Joyce and Bill Hills	1258	Policy 11		
LP2052	Hilary, Mammed and Alex Bagher	1259	Policy 11		
LP2053	Joanne, Christopher, Jack and Harry West	1260	Policy 11		
LP0088	Andrew Davison	1261	Policy 11		

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

LP2054	Lauren and Nicholas Bagher	1262	Policy 11		
LP1771	Russell Hewitson	1263	Policy 11		
LP1767	Andrea Hewitson	1264	Policy 11		
LP1769	Moyra Fairweather	1266	Policy 11		
LP2064	South Tyneside Green Party	1267	Policy 11		
LP2065	Christopher Davies	1268	Policy 11		
LP2185	G and J Shepherd	1269	Policy 11		
LP0645	Delia McNally	1243	Policy 11	Supports Policy 11.	Support for the policy noted.
LP1943	Paul Crompton	1244	Policy 11	Supports Policy 11.	Support for the policy noted.
LP1944	Avant Homes North East	1245	Policy 11 Section 2	Considers that Policy 11 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Policy 11 sub-section 2 should be re-worded for continuity and consistency.	We believe the policy to be sound but are willing to consider modifications to Policy 11 to increase the flexibility of the policy.
LP1946	Barratt Homes	1246	Policy 11	Supports Policy 11.	Support for the policy noted.
LP2006	CPRE Durham Branch	1247	Policy 11	Considers Policy 11 is not sound as it does not refer to overloading existing sewerage systems.	We believe the policy to be sound and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. Additionally, they have a legal duty under Section 94 of the Water Industry Act to ensure that their network is maintained, improved and extended to meet growth demands. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council's response to issues raised are set out in

Appendix J – Chapter 7 – Meeting the challenge of Climate Change, Flooding and Coastal Change

					the Sewage Management – Local Plan Position Statement (2024) (INV13).
LP2061	STEP	1265	Policy 11	Policy 10 Disposal of Foul Water and Policy 11 Protecting Water Quality are not positively prepared as both fail to address the fact that Northumbrian Water Limited (NWL) remains subject to a Compliance Assessment Report which demonstrates a lack of capacity in the system. Proposed development in East Boldon, Cleadon and Whitburn will exacerbate sewage pollution currently experienced due to lack of sewage capacity. Data provided to the LPA demonstrates the lack of capacity of sewage treatment. Contradicts Strategic Objective 3 and 5, policies SP1, SP22 and SP25. Sewerage pollution effects climate change, natural environment and public health. The Local Plan should include that proposals will not be supported unless it can be shown by rigorous analysis that there is sufficient capacity in the local sewerage system.	We believe the policy is sound and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. The Council considers that it is legitimate to place considerable weight on the professional advice of both organisations. The council’s response to issues raised are set out in the Sewage Management – Local Plan Position Statement (2024) (INV13).
LP2187	Gillian Johnston	1270	Policy 11		
Policy 12					
LP0645	Delia McNally	1271	Policy 12	Considers Policy 12 to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt homes	1273	Policy 12	Considers Policy 12 to be legally compliant, sound and in compliance with the Duty to Cooperate.	Support for the legal compliance, soundness and compliance with the Duty to Cooperate.

Appendix J – Chapter 8 – Delivering a mix of homes

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP16					
LP0078	Peter Oneil	1274	SP16 GA5 and GA6	Green Belt should be safeguarded. Development in Whitburn (GA5 and GA6) will harm the Green Infrastructure and associated wildlife. Sewerage infrastructure needs investment.	<p>We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.</p> <p>The Council has published a Green and Blue Infrastructure (GBI) Strategy (2023) (NAT1) which provides an overarching framework for the delivery of an integrated approach to GI across the borough and</p>

Appendix J – Chapter 8 – Delivering a mix of homes

					catalogues GI projects. Policy SP22 sets out the requirements for the enhancement and incorporation of new and/or existing GBI within new proposals.
LP1893	Paul Andrew	1275	SP16	The borough is poorly served in terms of homes in the higher council tax brackets, which means professionals are moving out of the area.	Noted. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing across the borough, taking into account site specific circumstances and the SHMA. We believe the Plan to be sound and no change is required.
LP1902	Alison Donnison	1276	SP16	Proposed housing numbers are inaccurate, misleading and unsustainable.	The Council is confident that the housing requirement is in accordance with national planning policy and guidance. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. We believe the Plan is sound and no change is required.
LP1812	Rachel Adamson-Brown	1277	SP16 GA2	Objection to GA2. Development would result in loss of distinctiveness of East Boldon and the existing infrastructure will not be able to cope.	We believe the Plan is sound and no change is required. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1904	A. Ball	1278			
LP1910	Lisa Johnson	1279			
LP0692	Paul Bradbury	1281			
LP0155	Zilla Rees	1282			
LP1922	Peter Rooney	1284			
LP1928	Garry McCauley	1286			
LP2188	Mervyn Butler	1287			

Appendix J – Chapter 8 – Delivering a mix of homes

LP0303	National Highways	1280	SP16	Policy is not reflective of the Strategic Road Network. The variance between the 5,253 dwellings being planned for, and the 4,927 being forecast needs to be explained.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP0744	Eric Mason	1285	SP16	The Plan is not sound as brownfield sites should be considered before Green Belt. The consultation did not follow government guidance.	We believe the Plan is sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The council considers that the Regulation 19 Publication draft consultation was undertaken in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community involvement (SCI) (SUB7) and is therefore legally compliant.
LP1933	Howard Lawrence	1288	SP16 GA2	The policy is not sound or justified. Development would result in loss of distinctiveness of East Boldon. The infrastructure of the village is inappropriate for this increase in size.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0703	Cleadon and East Boldon Branch Labour Party	1292			
LP0628	Keith Humphreys	1294			
LP0749	Peter Youll	1295			

Appendix J – Chapter 8 – Delivering a mix of homes

LP0147	Stewart Miller	1299			
LP1948	Philip Payne	1300			
LP1185	Miriam Hardie	1302			
LP1950	George Tisseman	1303			
LP0945	Grahame Tobin	1318			
LP1983	Dave Hutchinson	1319			
LP1996	Kirstin Richardson	1321			
LP1935	David Dick	1289	SP16	There is insufficient infrastructure available in schools, medical facilities and roads amongst other elements to accommodate such a major increase in housing in East Boldon.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0645	Delia McNally	1290	SP16 GA2	There is insufficient infrastructure available to accommodate such a major increase in housing in East Boldon.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1049 / LP1663	Laverick Hall Farm Ltd and	1291	SP16 Table 2	SP16 is not considered to be sound. Given the limited lack of flexibility in the Plan,	We believe the policy to be sound and no change is needed. We believe the Plan makes adequate

Appendix J – Chapter 8 – Delivering a mix of homes

	the Dean & Chapter of Durham Cathedral (jointly)			the council must maintain a sufficient supply of housing land over the plan period in accordance with Policy SP16 and maintain a rolling five-year supply of deliverable housing sites, including appropriate buffers. Please refer to comments made against SP2 and SP3.	provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.
LP1938	Alan Howard Becke and Susan Shilling	1293	SP16 GA2	The additional 263 proposed new buildings will increase the size of East Boldon by 26% altering the Character and nature of the Village. This level of growth is unsustainable.	We believe the Plan to be sound and no change is required. The council has robustly considered the sustainability of the allocations and policies in the Plan.
LP1944	Avant Homes North East	1296	SP16	SP16 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Plan does not meet the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023. The evidence would support the need to increase the buffer to 20%, given the chronic historic under-delivery and reliance on a large strategic allocation to deliver a significant part of the planned housing supply over the plan period. More information is required to support the inclusion of windfalls. The housing figure should also be increased to reflect the economic development the Plan aspires to deliver.	<p>We believe the policy to be sound and no change is needed.</p> <p>It is acknowledged that the affordable housing need identified in the Strategic Housing Market Assessment (2023)(HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local</p>

Appendix J – Chapter 8 – Delivering a mix of homes

					Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. We acknowledge that the International Advanced Manufacturing Park (IAMP) is a strategic scale allocation and there will be some interaction with the housing market as a result. However, the evidence suggests that this will be relatively modest. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.
LP1946	Barratt Homes	1297	SP16	<p>SP16 is not considered to be sound. To ensure the council meet their housing requirement they should:</p> <ul style="list-style-type: none"> • Identify a short and long-term supply of sites, with both strategic and non-strategic allocations for residential development; • Identify at least 10% of its housing requirement on sites no larger than one hectare; • Provide some headroom between its minimum housing requirement and overall housing land supply by allocating more sites to give some flexibility; and • Consider Safeguarding land, to ensure that further amendments to the Green 	<p>We believe the policy to be sound and no change is needed. The policy makes provision for a sufficient supply of housing land over the Plan period. The council has demonstrated in the Local Plan through a mix of allocations and windfall sites how it has planned to meet the requirement to identify at least 10 per cent of the housing requirement on sites less than one hectare, through the development plan and brownfield register.</p> <p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the Green Belt.</p>

Appendix J – Chapter 8 – Delivering a mix of homes

				Belt boundary are not required following this Plan period.	
LP1947	Story Homes	1298	SP16 Criterion 9 and para 8.16.	SP9 is not considered to be sound because it has not been positively prepared, is not justified, and is not consistent with the requirements of national policy. Significant concern that the council is not doing enough to identify and allocate housing sites to meet the minimum housing needs over the plan period.	We believe the policy to be sound and no change is needed. The policy makes provision for a sufficient supply of housing land over the Plan period. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0905	Joe Thompson	1301	SP4, GA2, SP14	There is insufficient infrastructure available in schools, medical facilities and roads amongst other elements to accommodate such a major increase in housing in East Boldon. Developing GA2 will fail to protect and enhance the natural environment and does sufficiently mitigating the loss of green belt and the habitat and open space it provides.	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. The Local Plan includes policies which seek to protect the natural environment which any proposals would have to adhere to.
LP1952	Taylor Wimpey	1304	SP16	The policy does not provide sufficient detail of contingency measures for ensuring housing delivery, including a housing buffer. This is a particular concern given the council's record of under delivery.	The Council are confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Although the Council has failed the Housing Delivery Test, we believe that policies and allocations in the Plan will significantly increase delivery once the Plan is adopted.

Appendix J – Chapter 8 – Delivering a mix of homes

LP1953	Bellway Homes	1305	Table 2, Policy 13, Criterion 9, Paragraph 8.16	Objects to the policy and consider it unsound for being not positively prepared, unjustified and inconsistent with national policy. If there is going to be such a reliance on windfalls, it is important that the Council does not have overly restrictive policies when it comes to windfall sites. Additional Green Belt release and the allocation of Safeguarded land would be more conducive to long term planning.	We believe the policy to be sound and no change is required. See Policy 13 regarding the restrictiveness of the windfall policy. Details of the windfall supply is outlined in the Efficient Use of Land paper (2024) (HOU7). Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt.
LP1417		1308			
LP1954	East Boldon Neighbourhood Forum	1306	GA2	EBNF believe the Plan has not been positively prepared to meet the objectively assessed need for homes, services and infrastructure in East Boldon and is not effective in delivering sustainable development in the Forum Area. The allocation at GA2 should be removed from the Plan or significantly reduced.	Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). We believe the Plan is sound and no change is required.
LP1138	Home Builders Federation	1307	Table 2	SP16 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. To ensure the council meet their housing requirement they should: <ul style="list-style-type: none"> • Identify a short and long-term supply of sites, with both strategic and non-strategic allocations for residential development; • Identify at least 10% of its housing 	We believe the policy to be sound and no change is needed. The policy makes provision for a sufficient supply of housing land over the Plan period. The council has demonstrated in the local plan through a mix of allocations and windfall sites how it has planned to meet the requirement to identify at least 10 per cent of the housing requirement on sites less than one hectare, through the development plan and brownfield register.

Appendix J – Chapter 8 – Delivering a mix of homes

				<p>requirement on sites no larger than one hectare;</p> <ul style="list-style-type: none"> • Provide some headroom between its minimum housing requirement and overall housing land supply by allocating more sites to give some flexibility; and • Consider Safeguarding land, to ensure that further amendments to the Green Belt boundary are not required following this Plan period. 	<p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt. Moreover, there would be little practical benefit in this approach given that a new/reviewed plan would subsequently be required to allocate the safeguarded land for development.</p>
LP0949	Lesley Younger	1309	SP16	<p>The policy is not sound or justified. Development would result in loss of distinctiveness of East Boldon. The infrastructure of the village is inappropriate for this increase in size.</p>	<p>We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p>
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	1310	SP16	<p>If the council wishes to include windfalls within their supply, then our client suggests that this needs to be supported by compelling evidence justifying them as a reliable source of supply. Given the council's record of under delivery, it is suggested that additional land is allocated in the Plan and that consideration is given to Safeguarding land.</p>	<p>We believe the policy to be sound and no change is needed. Details of the windfall supply is outlined in the Efficient Use of Land paper (2024) (HOU7). Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt. Moreover, there would be little practical benefit in this approach given that a new/reviewed plan would subsequently be required to allocate the safeguarded land for development.</p>

Appendix J – Chapter 8 – Delivering a mix of homes

LP1961	Cleadon Property Investments	1311	SP16	If the Council wishes to include windfalls within their supply, then our client suggests that this needs to be supported by compelling evidence justifying them as a reliable source of supply. The council should seek to provide a degree of headroom between its minimum housing requirement and overall housing land supply. This will serve to provide a degree of protection should housing delivery slow.	We believe the policy to be sound and no change is needed. Details of the windfall supply is outlined in the Efficient Use of Land paper (2024) (HOU7). The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.
LP1962	Adderstone Living Ltd	1312	Table 2	Windfalls should not be included in the supply and instead should form part of the flexibility in supply. Should allocations be delayed or fail to come forward, this will lead to issues relating to housing land supply and housing delivery.	We believe the policy to be sound. The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5).
LP1963	Stonebridge Homes	1313	SP16	Suggest that there are exceptional circumstances for a departure from the standard method of calculation and a compelling need to increase the housing need figure. Further, Council is not able to demonstrate a 4-year supply of deliverable housing sites against the ONA.	We believe the policy to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The standard method provides a minimum number of homes that should be planned for and should be used as a starting point when preparing the housing requirement unless exceptional circumstances exist to justify an alternative approach. The Strategic Housing Market Assessment (2023) (HOU4) recognises

Appendix J – Chapter 8 – Delivering a mix of homes

					that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.
LP1964	Persimmon Homes	1314	Table 2, Para 8.16	<p>Concern regarding level of windfalls accounting towards the housing requirement.</p> <p>Do not consider the proposed housing trajectory to be achievable.</p> <p>The Plan is contrary to the NPPF as it does not consider Safeguarding land.</p>	<p>The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.</p> <p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt. Moreover, there would be little practical benefit in this approach given that a new/reviewed plan would subsequently be required to allocate the safeguarded land for development.</p>
LP1149	Banks Group	1315	Section D of SP16	<p>Policy SP16 is not positively prepared, justified or consistent with national planning policy.</p> <p>An economic uplift should be applied to the standard method figure to satisfy the economic growth aspirations.</p> <p>Increasing the housing requirement will alleviate the issue surrounding affordable housing.</p> <p>A 10% buffer should be added to the residual housing requirement.</p> <p>Land at Wellands Farm should be allocated for residential development.</p>	<p>We believe the Plan to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.</p> <p>The North East Local Enterprise Partnership Strategic Economic Plan (2017) (EMP6) and the South Tyneside Vision and Council Strategy (SPV1) demonstrates the council's commitment to economic growth. The Local Plan is supportive of this in ensuring that an adequate supply of employment land is allocated to meet the identified need. Except for Wardley Colliery, all the allocated employment land is on already established</p>

Appendix J – Chapter 8 – Delivering a mix of homes

					<p>employment areas. The modest scale of additional land being proposed for release at Wardley Colliery means that it is unlikely to have a discernible impact on housing need. We acknowledge that the International Advanced Manufacturing Park (IAMP) is a strategic scale allocation and there will be some interaction with the housing market as a result. However, the evidence suggests that this will be relatively modest. The Strategic Housing Market Assessment (2023) (HOU4) did not recommend an uplift to the housing requirement.</p> <p>Sites that are assessed as suitable, available, and achievable in the Strategic Housing Land Availability Assessment (SHLAA) (HOU5) have been allocated.</p>
LP1978	Ruth Rees	1316	GA2, GA4	<p>The policy is not sound or justified. Development on GA2 would result in loss of distinctiveness of East Boldon. The infrastructure of the village is inappropriate for this increase in size.</p>	<p>Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). We believe the Plan is sound and no change is required.</p>
LP1979	Emma Johnston	1317	GA2, GA3, GA4	<p>The Plan has not been positively prepared to meet the objectively assessed need for homes, services and infrastructure in East Boldon and is not effective in delivering sustainable development in the Forum Area. The</p>	<p>We believe the Plan is sound and no change is required. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base.</p> <p>The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the</p>

Appendix J – Chapter 8 – Delivering a mix of homes

				allocation at GA2 should be removed from the Plan or significantly reduced.	appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1986	Andrew Burnett (Buckley Burnett)	1320	Table 2	Policy is not positively prepared and is therefore unsound. It is not clear how the windfall allowance has been calculated . There is no meaningful flexibility in housing supply. The only way to make the Plan sound is to increase the amount of site allocations.	We believe the policy to be sound and no change is required. Details of the windfall supply is outlined in the Efficient Use of Land paper (2024) (HOU7). The Council is confident that the policy makes provision for a sufficient supply of housing land over the Plan period. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.
LP0585	David Milne	1322	SP16	Considers SP16 to be unsound. The housing requirement is too high as a result of poor use of population expansion models.	We believe the Plan is sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance.
LP0668 / LP1738	Beryl Massam	1324	GA2	Questions the use of 2014 housing projections. Objects to the amount and types of housing, with lack of additional services and infrastructure,	The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. We believe the policy to be sound and no change is required. It is acknowledged that the affordable housing need identified in the Strategic Housing Market Assessment (2023)(HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is

Appendix J – Chapter 8 – Delivering a mix of homes

					assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing. We believe the Plan is sound and no change is required.
LP2062	Avant Homes North East	1325	SP16	SP16 is not considered to be sound, is not positively prepared and is not consistent with national policy. The council will struggle to meet the delivery of the required new homes should anything go wrong with any of the allocated or committed sites. The council should consider Safeguarded land to ensure it can meet the long-term development needs and maintain an appropriate spatial strategy.	The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13. Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt. Moreover, there would be little practical benefit in this approach given that a new/reviewed plan would subsequently be required to allocate the safeguarded land for development. We believe the Plan is sound and no change is required.
LP1334	Keep Boldon Green	1326	GA2, GA4, Appendix 1	We believe the Plan has not been positively prepared to meet the objectively assessed need for homes, services and infrastructure in East Boldon and is not effective in delivering sustainable development in the Forum Area. The effect on the village of East	We believe the Plan to be sound and no change is required. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is

Appendix J – Chapter 8 – Delivering a mix of homes

				<p>Boldon will be exacerbated by other sites included in the plan that are close to the EBNF area (GA4).</p> <p>GA2 is contrary to SP3.2 and does not comply with the NPPF paras 8 and 9.</p>	<p>set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>Site allocations GA2 and GA4 have been robustly considered through the plan preparation process and supporting Evidence base.</p>
LP2185	G and J Shepherd	1327	GA2	<p>The Local Plan is not justified by the evidence as set out in the Density Report 2024 of housing density achieved since the last housing density report in 2018. The Local Plan in paragraph 8.24 sets a lower average housing density than has been achieved which means it is not consistent with the NPPF.</p>	<p>We believe the evidence set out in the Density Report (2024) (HOU6) is appropriate and proportionate and this is reflected in paragraph 8.24.</p>
LP1867	Church Commissioners of England	1328	SP2	<p>Strongly object to SP16 as a framework for delivering SP2.</p>	<p>Objection to SP16 noted. We believe the policy to be sound and no change is required.</p>
LP1867	Church Commissioners of England	1329	SP16	<p>SP16 should be amended to include previously proposed buffer and contingency measures in the event of undersupply or delivery.</p> <p>The council should consider the inclusion of Safeguarded land.</p>	<p>We believe the policy to be sound and no change is needed. We believe the Plan makes adequate provision of sites to ensure delivery is maintained throughout the Plan period. The Council has carefully considered anticipated delivery rates for sites identified for allocation; this approach is explained through the Strategic Housing Land Availability Assessment (2023) (HOU5). The Plan also ensures that windfall sites can come forward throughout the plan period through Policy 13.</p> <p>Given the inherent uncertainty in determining housing needs such a long way into the future, it would be difficult to demonstrate the exceptional circumstances necessary to remove safeguarded land from the green belt. Moreover, there would be little practical benefit in this approach given that a new/reviewed plan</p>

Appendix J – Chapter 8 – Delivering a mix of homes

					would subsequently be required to allocate the safeguarded land for development.
Policy 13					
LP0645	Delia McNally	1330	Policy 13	Support for policy.	Support for the policy noted.
LP1944	Avant Homes North East	1331	Policy 13	Policy 13 is not sound, not positively prepared and unjustified. Consideration of windfall requires revision. Wording of provisions in sub-section 1 are ambiguous and amendments are required.	We believe the policy to be sound. Details of the windfall supply is outlined in the Efficient Use of Land paper (2024) (HOU7). We would be willing to consider a minor modification to clarify the intended requirements of the policy.
LP1946	Barratt Homes	1332	Policy 13	Support for policy but text requires amendments to allow for flexibility and pragmatic approaches to ensure housing need is met.	We believe the policy to be sound however we would be willing to consider a minor modification to clarify the intended requirements of the policy.
LP1947	Story Homes	1333	Paragraph 2.5, Map 3	Policy 13 is not considered to be sound and further clarity is needed in relation to the approach to windfall housing in the main urban area. There is concern that the Council is placing too much reliance on the delivery of very high densities in the majority of the proposed allocations. The Council should ensure that the Plan incorporates realistic development densities.	We believe the policy to be sound however we would be willing to consider a minor modification to clarify the intended requirements of the policy. We believe the evidence set out in the Density Report (2024) (HOU6) is robust and proportionate and is reflected in Policy 14. It is considered that the density assumptions for the proposed allocations reflect the evidence set out in the Density Report as well as site specific evidence.
LP1953	Bellway Homes	1334	Policy 13	Policy is not considered to be sound. The inclusion of windfalls within the supply needs to be properly evidenced. Policy approach for brownfield first may contradict the NPPF, therefore the policy will not allow for positive growth of settlements.	Details of the windfall supply is outlined in the Efficient Use of Land paper (2024) (HOU7).
LP1417	Bellway Homes	1335	Policy 13		We believe the policy to be sound however we would be willing to consider a modification to clarify the intended requirements of the policy. The Council do not consider that the policy promotes a brownfield first approach.

Appendix J – Chapter 8 – Delivering a mix of homes

LP1962	Adderstone Living Ltd	1336	Policy 13	Object to policy as it is unsound on the basis that it is not positively prepared and inconsistent with national policy. Assumptions for windfall development need to be firmly evidenced and supported by a flexible policy which allows windfall sites to readily come forward.	We believe the policy to be sound however we would be willing to consider a minor modification to clarify the intended requirements of the policy.
LP1963	Stonebridge Homes	1337	Policy 13	Policy 13 should refer to medium-sized sites in line with NPPF paragraph 70..	We believe the policy to be sound however we would be willing to consider a minor modification to clarify the intended requirements of the policy.
Policy 14					
LP0078	Peter Oneil	1338	Policy 14	The policy is not legally compliant, sound and does not comply with the Duty to Cooperate. Green Belt should be safeguarded (GA6). Sewerage systems need improvement before new housing developments are allowed. Whitburn is within a GI corridor and development will cause harm.	We believe the policy is sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment

Appendix J – Chapter 8 – Delivering a mix of homes

					Agency has also not raised any concerns regarding the proposed development allocations The Council has published a Green and Blue Infrastructure (GBI) Strategy (2023) (NAT1) which provides an overarching framework for the delivery of an integrated approach to GI across the borough and catalogues GI projects. Policy SP22 sets out the requirements for the enhancement and incorporation of new and/or existing GBI within new proposals.
LP1916	Dennis Grieves	1339	Density Report 2024 and para 8.24 in LP.	Considers the Plan is not sound. The Local Plan is not justified by the evidence as set out in the Density Report (2024) of housing density achieved since the last housing density report in 2018. The Plan should be revised to increase the housing density standards.	We believe the evidence set out in the Density Report (2024) (HOU6) is robust and proportionate. Policy 14 requires development to achieve optimal densities however, there must also be a balance against a range of competing concerns and other policy requirements. We believe the policy to be sound and no change is required.
LP0520	Alex Air	1340			
LP1917	Angela Beattie	1341			
LP0609	Ian Beattie	1342			
LP2022	Matthew Johnson	1356			
LP2023	Jacqueline Johnson	1357			
LP2024	Christopher Johnson	1358			
LP0636	Kevin Tindle	1359			
LP2025	Anthony Pollock	1360			
LP1756	Ian Hudson	1361			
LP2048	Jennie and Ann West	1362			
LP2049	Nicola, David and Megan West	1363			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2050	Bev, Jon and Robyn Olds	1364			
LP2051	Joyce and Bill Hills	1365			
LP2052	Hilary, Mammed and Alex Bagher	1366			
LP2053	Joanne, Christopher, Jack and Harry West	1367			
LP0088	Andrew Davison	1368			
LP2054	Lauren and Nicholas Bagher	1369			
LP1771	Russell Hewitson	1370			
LP1767	Andrea Hewitson	1371			
LP2061	STEP	1372			
LP1769	Moyra Fairweather	1373			
LP2064	South Tyneside Green Party	1374			
LP2065	Christopher Davies	1375			
LP2185	G and J Shepherd	1376			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2187	Gillian Johnston	1377			
LP1929	Robert and Ellen Smith	1343	Policy 14	Considers Policy 14 unsound as it does not comply with the NPPF. Applications which fail to meet minimum density usage should be refused.	We believe the policy to be sound and no change is required. In line with the NPPF, Policy 14 requires development to achieve optimal densities however, there must also be a balance against a range of competing concerns and other policy requirements which impact the densities that can be achieved on site.
LP1931	Historic England	1344	P 8.23 bullet 2	Considers para 8.23 partially unsound. Modification to wording proposed to include 'and identity'.	We believe the policy to be sound however, we would be willing to consider a minor modification based on the proposed amendment.
LP0645	Delia McNally	1345	SP2 pg 31	Policy is unsound and there remains a case for a much lower housing requirement figure based on local circumstances and Green Belt constraint. Out of date census figures have been used and exceptional circumstances for Green Belt release have not been demonstrated.	We believe the policy is sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The standard method for calculating housing requirement was used to determine the housing requirement for the Plan in line with Planning Practice Guidance. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP1943	Paul Crompton	1346	Para 8.24.	Considers the Plan is not sound. The Local Plan is not justified by the evidence as set	We believe the evidence set out in the Density Report (2024) (HOU6) is robust and proportionate. Policy 14

Appendix J – Chapter 8 – Delivering a mix of homes

				out in the Density Report (2024) of housing density achieved since the last housing density report in 2018. The Plan should be revised to increase the housing density standards.	requires development to achieve optimal densities however, there must also be a balance against a range of competing concerns and other policy requirements. We believe the policy to be sound and no change is required.
LP1944	Avant Homes North East	1347	Para 8.24.	Considers Policy 14 is unsound as it is not positively prepared, not justified, not effective, and not consistent with national policy. Request that the Council demonstrates that its density and viability assumptions in the draft Local Plan have allowed for the application of such other design and technical policy requirements. Flexibility should be built into the policy to enable developers to account for local character and site context. Questions the achievability of housing densities including M4(3) and M4(2). Para 8.24 refers to 2023 Density Report which is not the most up to date version.	We believe the policy to be sound and no change is required. We consider the viability evidence to be robust and no change is needed. The viability modelling is evidence led and robust, as per the requirements of the Planning Practice Guidance: Viability. We believe the policy is sufficiently flexible, allowing for site specific considerations.
LP1946	Barratt Homes	1348	Policy 14	Considers Policy 14 to be unsound. Agrees with the principle of the policy but it requires flexibility to allow deviations from the policy on viability grounds.	We believe the policy to be sound and no change is required. We believe the policy is sufficiently flexible, allowing for site specific considerations.
LP1947	Story Homes	1349	Para 2.5, Map 3, Policy 13 and 14	Considers Policy 13 and 14 to be unsound as they are not justified or consistent with National Policy. The Council is placing too much reliance on the delivery of very high densities on proposed allocations. The Plan should incorporate realistic development densities.	We believe the evidence set out in the Density Report (2024) (HOU6) is robust and proportionate and is reflected in Policy 14. It is considered that the density assumptions for the proposed allocations reflect the evidence set out in the Density Report as well as site specific evidence. We believe the policy to be sound and no change is required.

Appendix J – Chapter 8 – Delivering a mix of homes

				The Plan does not consider benefits of windfall development, and there is no justification to simply discount the average density of development achieved up to 2018.	
LP1953	Bellway Homes	1350	Paragraph 8.24.	Considers Policy 14 unsound as it is not consistent with national policy. The policy cannot be applied in a rigid way as set out in the plan. The Density Study does not account for net to gross ratios of development sites being consistently squeezed. Reference to specific densities should be removed.	We believe the policy is sound and no change is required. We believe the policy is sufficiently flexible, allowing for site specific considerations. Although reference to specific densities are set out in the supporting text, the supporting text also recognises that lower densities may be appropriate in response to the existing character of a site or to provide a range and choice of housing.
LP1138	Home Builders Federation	1351		Policy 14 is not considered to be sound as it is not justified and not consistent with national policy. The Council should ensure that the policy is in line with the NPPF, but also ensure that it includes a level of flexibility to allow developers to take account of to individual site characteristics and evidence in relation to demand, market aspirations and viability, particularly in regard to other policy requirements.	We believe the policy is sufficiently flexible, allowing for site specific considerations. Although reference to specific densities are set out in the supporting text, the supporting text also recognises that lower densities may be appropriate in response to the existing character of a site or to provide a range and choice of housing. We believe the policy is sound and no change is required.
LP1417	Bellway Homes	1352	8.24.	Considers Policy 14 unsound as it is not consistent with national policy. The policy cannot be applied in a rigid way as set out in the plan. The Density Study does not account for net to gross ratios of development sites being consistently squeezed to	We believe the policy is sound and no change is required. We believe the policy is sufficiently flexible, allowing for site specific considerations. Although reference to specific densities are set out in the supporting text, the supporting text also recognises that lower densities may be appropriate in response to

Appendix J – Chapter 8 – Delivering a mix of homes

				accommodate planning requirements. Reference to specific densities should be removed.	the existing character of a site or to provide a range and choice of housing.
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	1353	Policy 14	Raises the importance of providing an appropriate mix of house types and sizes. Housing developments furthest from the urban core may result in lower density developments being brought forward contrary to the density standards referenced in the supporting text to the policy.	We believe the policy is sound and no change is required We believe the policy is sufficiently flexible, allowing for site specific considerations. Although reference to specific densities are set out in the supporting text, the supporting text also recognises that lower densities may be appropriate in response to the existing character of a site or to provide a range and choice of housing.
LP1962	Adderstone Living Ltd	1354	Policy 14	Policy 14 is unsound for being unjustified, not positively prepared and inconsistent with national policy. The Density Study (2024) is overly optimistic in its conclusions on achievable density. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver and considers that additional site allocations should be included.	We believe the policy is sound and no change is required. We believe the policy is sufficiently flexible, allowing for site specific considerations. Although reference to specific densities are set out in the supporting text, the supporting text also recognises that lower densities may be appropriate in response to the existing character of a site or to provide a range and choice of housing. We believe the Plan ensures a sufficient supply of sites to meet the borough's housing requirement. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.
LP1964	Persimmon Homes	1355	Policy 14	Policy 14 is unsound for being unjustified, not positively prepared and inconsistent with national policy. The Density Study (2024) is overly optimistic in its conclusions on achievable density. The Plan's policies should ensure the	We believe the policy is sound and no change is required. We believe the policy is sufficiently flexible, allowing for site specific considerations. Although reference to specific densities are set out in the supporting text, the supporting text also recognises that lower densities may be appropriate in response to

Appendix J – Chapter 8 – Delivering a mix of homes

				availability of a sufficient supply of deliverable and developable land to deliver and considers that additional site allocations should be included.	the existing character of a site or to provide a range and choice of housing. We believe the Plan ensures a sufficient supply of sites to meet the borough's housing requirement. Additionally, Policy 13: Windfall Sites ensures that sites in suitable and sustainable locations not allocated through the Plan can still come forward for development.
Policy 15					
LP1916	Dennis Grieves	1378	Paragraph 15.1 and 15.4	The Local Plan must be revised to ensure compliance with legislative and policy requirements around climate change and the councils stated ambitions. Existing homes should be retrofitted instead of prioritising demolition.	We believe the policy to be sound and no change is required. Proposal to retrofit existing housing will be considered in accordance with Policy 5 and Policy 6.
LP0520	Alex Air	1379			
LP1917	Angela Beattie	1380			
LP0609	Ian Beattie	1381			
LP1847	Andrea George	1384			
LP2022	Matthew Johnson	1385			
LP2023	Jacqueline Johnson	1386			
LP2024	Christopher Johnson	1387			
LP0636	Kevin Tindle	1388			
LP2025	Anthony Pollock	1389			
LP1756	Ian Hudson	1390			
LP2048	Jennie and Ann West	1391			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2049	Nicola, David and Megan West	1392			
LP2050	Bev, Jon and Robyn Olds	1393			
LP2051	Joyce and Bill Hills	1394			
LP2052	Hilary, Mammed and Alex Bagher	1395			
LP2053	Joanne, Christopher, Jack and Harry West	1396			
LP0088	Andrew Davison	1397			
LP2054	Lauren and Nicholas Bagher	1398			
LP1771	Russell Hewitson	1399			
LP1767	Andrea Hewitson	1400			
LP1769	Moyra Fairweather	1401			
LP2064	South Tyneside Green Party	1402			
LP2065	Christopher Davies	1403			

Appendix J – Chapter 8 – Delivering a mix of homes

LP0645	Delia McNally	1382	Policy 15	Support for policy.	Support for the policy noted.
LP1946	Barratt Homes	1383	Policy 15	Considers the policy to be legally compliant.	Support for the legal compliance of the policy noted.
Policy 16					
LP0078	Peter Oneil	1404	Policy 16	The policy is not legally compliant, sound or to meet the Duty to Cooperate.	We believe the policy to be legally complaint, sound and compliant with the Duty to Cooperate. No change is required.
LP1916	Dennis Grieves	1405	Policy 16 paragraph (ii)	Support for the policy but suggest amending Policy 16.2 to state that the number of HMO dwellings does not exceed 5% of the total number of properties, within 100m of the application site due to cumulative impact in the area.	Policy 16 is supported by the Houses in Multiple Occupation Topic Paper (2024) (HOU9). The paper justifies the application of a 10% threshold of HMO is the Lawe Top Article 4 Area. The council considers that when 10% or more of housing types are HMOs, a community becomes unsustainably imbalanced, and the risk of associated effects catalysed by HMO over-concentrations become possible. Therefore, we believe the policy to be sound and no change is required.
LP0520	Alex Air	1406			
LP1917	Angela Beattie	1407			
LP0609	Ian Beattie	1408			
LP1943	Paul Crompton	1410			
LP2022	Matthew Johnson	1413			
LP2023	Jacqueline Johnson	1414			
LP2024	Christopher Johnson	1415			
LP0636	Kevin Tindle	1416			
LP2025	Anthony Pollock	1417			
LP1756	Ian Hudson	1418			
LP2048	Jennie and Ann West	1419			
LP2049	Nicola, David and Megan West	1420			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2050	Bev, Jon and Robyn Olds	1421			
LP2051	Joyce and Bill Hills	1422			
LP2052	Hilary, Mammed and Alex Bagher	1423			
LP2053	Joanne, Christopher, Jack and Harry West	14234			
LP0088	Andrew Davison	1425			
LP2054	Lauren and Nicholas Bagher	1426			
LP1771	Russell Hewitson	1427			
LP1767	Andrea Hewitson	1428			
LP1769	Moyra Fairweather	1429			
LP2064	South Tyneside Green Party	1430			
LP2065	Christopher Davies	1431			
LP2185	G and J Shepherd	1432			
LP0645	Delia McNally	1409	Policy 16	Considers the policy to be legally compliant.	Support for the legal compliance of the policy noted.

Appendix J – Chapter 8 – Delivering a mix of homes

LP1946	Barratt Homes	1411	Policy 16	Considers the policy to be legally compliant, sound and to meet the Duty to Cooperate.	Support for the legal compliance, soundness and compliance with the Duty to Cooperate noted.
LP0945	Grahame Tobin	1412	GA2	Objects to the allocation of GA2 due to impact on infrastructure in the EBNF area.	Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. We believe the Plan is sound and no change is required.
Policy 17					
LP0078	Peter Oneil	1433	Policy 17	The policy is not considered to be sound, legally compliant or meet with the duty to cooperate.	We believe the policy to be legally complaint, sound and compliant with the Duty to Cooperate. No change is required.
LP0645	Delia McNally	1434	Policy 17	The policy is not considered sound having regard to GA2. This allocation does not meet the housing needs identified in the Strategic Housing Market Assessment in terms of accommodation for older persons.	We believe the Plan to be sound and no change is required. Site allocation GA2 North Farm has been robustly considered through the plan preparation process and supporting Evidence base. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. This includes accommodation for older persons.
LP1946	Barratt homes	1435	Policy 17	The policy is considered to be sound, legally compliant and to meet the duty to cooperate. Would welcome amendments to allow flexibility to ensure housing need is met in the borough.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted. We consider the policy to be sufficiently flexible and sound, no change is required.
Policy 18					
LP0078	Peter Oneil	1436	Policy 18	Policy 18 is not considered to be sound, legally compliant or to meet with the duty to cooperate.	We believe the policy to be legally complaint, sound and compliant with the Duty to Cooperate. No change is required.
LP1916	Dennis Grieves	1437	Policy 18	The Plan is not justified and is not consistent with the NPPF in terms of meeting the housing needs identified in	We believe the policy to be sound and no change is required. It is acknowledged that the affordable housing need identified in the Strategic Housing
LP0520	Alex Air	1438			

Appendix J – Chapter 8 – Delivering a mix of homes

LP1917	Angela Beattie	1439		the Strategic Housing Market Assessment (SHMA) 2023 having particular regard to affordable housing, specialist housing and housing for older people.	Market Assessment (2023) (HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. This includes accommodation for older people.
LP0609	Ian Beattie	1440			
LP2022	Matthew Johnson	1461			
LP2023	Jacqueline Johnson	1462			
LP2024	Christopher Johnson	1463			
LP0636	Kevin Tindle	1464			
LP2025	Anthony Pollock	1465			
LP1756	Ian Hudson	1466			
LP2048	Jennie and Ann West	1468			
LP2049	Nicola, David and Megan West	1469			
LP2050	Bev, Jon and Robyn Olds	1470			
LP2051	Joyce and Bill Hills	1471			
LP2052	Hilary, Mammed and Alex Bagher	1472			
LP2053	Joanne, Christopher, Jack and Harry West	1473			

Appendix J – Chapter 8 – Delivering a mix of homes

LP0088	Andrew Davison	1474			
LP2054	Lauren and Nicholas Bagher	1475			
LP1771	Russell Hewitson	1476			
LP1767	Andrea Hewitson	1477			
LP1769	Moyra Fairweather	1479			
LP2064	South Tyneside Green Party	1480			
LP2065	Chris Davies	1481			
LP2185	G and J Shepherd	1482			
LP1929	Robert and Ellen Smith	1441	Policy 18	Concerned that affordable housing will still be too expensive.	We believe the policy to be sound and no change is required.
LP2188	Mervyn Butler	1442	Policy 18	Policy 18 is not sound in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023, having particular regard to the provision of affordable housing.	We believe the policy to be sound and no change is required. It is acknowledged that the affordable housing need identified in the Strategic Housing Market Assessment (2023)(HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing.
LP0703	Cleadon and East Boldon Branch Labour Party	1444	Policy 18		

Appendix J – Chapter 8 – Delivering a mix of homes

					We believe the plan to be sound and no change is required.
LP0645	Delia McNally	1443	Policy 18	Policy 18 is not considered to be sound as the percentage of affordable homes required is too low. No justification is given for the reduction in percentage since the previous version of the plan.	We believe the policy to be sound and no change is required. It is acknowledged that the affordable housing need identified in the Strategic Housing Market Assessment (2023)(HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing.
LP1938	Alan Howard Becke and Susan Shilling	1445	Policy 18	Would like to know what is considered to be an affordable home.	We believe the policy to be sound and no change is required. The definition of affordable housing is set out in the National Planning Policy Framework Glossary.
LP1943	Paul Crompton	1446	Policy 18	Affordable housing should be realistically priced. Green Belt must only be used after all brownfield options have been exhausted.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. We have undertaken an exhaustive search for brownfield sites through the Strategic Housing Land Availability Assessment (SHLAA) (2023) (HOU5). Sites

Appendix J – Chapter 8 – Delivering a mix of homes

					that are assessed as suitable, available, and achievable in the SHLAA have been allocated.
LP1944	Avant Homes North East	1447	Policy 18	Considers that the policy is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. The policy should be more explicit about what type of affordable housing is expected on each site. Insufficient evidence that the Council's policies will address the full extent of affordable housing need identified through the SHMA (2023). An uplift in the overall housing figure would assist in delivering this. Advice on the level of discount in respect of Discounted Market Value affordable dwellings is not set out in the draft Local Plan like it is for First Homes. The Viability Assessment update continues to demonstrate that there are major viability challenges in the Borough.	<p>We believe the policy to be sound and no change is required however we would be willing to consider minor modification to the supporting text provide advice on the level of discount in respect of Discount Market Value homes.</p> <p>The council does not consider it appropriate to specify the type of affordable housing that should be delivered on each site. This would be addressed through the planning application process. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need. We consider the policy to be in line with the Local Plan Viability Testing Report (2023) (INV4).</p>
LP1946	Barratt Homes	1448	Policy 18	The affordable housing need exceeds the stated housing requirement is clear evidence that the housing target for the LPA is too low. Therefore policy 18 is not considered to be sound.	We believe the policy to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.

Appendix J – Chapter 8 – Delivering a mix of homes

LP1947	Story Homes	1449	Policy 18	Policy 18 is not considered to be sound because it has not been positively prepared, is not justified, and is not consistent with the requirements of national policy. The Plan does not meet the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023, having particular regard to the provision of affordable housing. Additional sites should be allocated in the Urban and Village Sustainable Growth Area.	<p>We believe the policy to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.</p> <p>The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.</p>
LP0905	Joe Thompson	1450	Policy 18	Considers that the affordable housing requirement for East Boldon should be increased to 30%.	<p>We believe the policy to be sound and no change is required. It is acknowledged that the affordable housing need identified in the Strategic Housing Market Assessment (2023) (HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing.</p>
LP0916	Eileen Thompson	1451			
LP1954	East Boldon Neighbourhood Forum	1454	Policy 18		
LP1952	Taylor Wimpey	1452	Policy 18	The policy requirement for affordable housing should be considered in the context of the comments made on this representation on the local housing requirements set by Policy SP2 which are	<p>We believe the policy to be sound and no change is required. The Council is confident that the housing requirement is in accordance with national planning policy and guidance and will meet the housing need for the borough.</p>

Appendix J – Chapter 8 – Delivering a mix of homes

				below the identified need to deliver sufficient affordable housing.	The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.
LP1953	Bellway Homes	1453	Policy 18	Objects to this policy and considers it unsound on the basis of being unjustified and inconsistent with national policy. Considers there are a number of issues with how viability has been calculated. The SHMA identifies an affordable housing need of 361 dwellings per annum which is not addressed by the Local Plan.	We believe the policy is sound and no change is required. We believe the policy to be sound and no change is required. It is acknowledged that the affordable housing need identified in the Strategic Housing Market Assessment (2023) (HOU4) is greater than the housing requirements identified by the Standard Method. The need for affordable homes is assessed using Planning Practice Guidance (PPG). Where this number is higher than the overall housing need it is reflective of a considerable need for affordable housing in the area. Policy 18 is informed by the Viability Report and Appendices (2023) (INV4) which identified realistic targets for the delivery of affordable housing.
LP1417	Bellway Homes	1455			
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	1456	Policy 18	Concern regarding the proposed affordable housing requirement for Town End Farm (GA3). 20% housing requirement does not reflect average house prices in Town End Farm, which is the settlement which this site adjoins. Viability could threaten delivery. The Council should give serious consideration to taking this affordable housing requirement into consideration as part of their housing requirement to	We believe the policy is sound and no change is required. The council is confident that the evidence set out in the Local Plan Viability Testing Report (2023) (INV4) is robust. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.

Appendix J – Chapter 8 – Delivering a mix of homes

				meet the affordable needs identified in the SHMA.	
LP1964	Persimmon Homes	1457	Policy 18	Policy 18 is not considered to be sound as it is not consistent with national policy. The Plan fails to meet the affordable housing needs identified in the SHMA. Instead, artificially increasing the percentage of affordable housing on a limited number of allocations, the more positive approach is to have more housing allocations.	We believe the policy is sound and no change is required. The council is confident that the evidence set out in the Local Plan Viability Testing Report (2023) (INV4) is robust. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.
LP1966	NHS Property Services Ltd	1458	Policy 18	The Council should consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area.	We believe the policy to be sound and no change is required. The council do not consider there to be appropriate evidence to include policy requirements for affordable housing for specific groups.
LP1149	Banks Group	1459	Policy 18	Support for the policy and the level and distribution of affordable housing allocated.	Support for the policy is noted.
LP1986	Andrew Burnett (Buckley Burnett)	1460	Policy 18	The plan does not provide sufficient levels of affordable housing. Allocating a greater number of sites in the first place will deliver more affordable housing as a proportion of those developments.	We believe the policy is sound and no change is required. The council is confident that a sound approach has been taken to delivering affordable housing. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the housing number to help meet affordable housing need.
LP2061	STEP	1478	Policy 18	Most of the houses proposed in this plan will not be affordable. This is not justified as it is not an appropriate strategy to place most of the affordable housing on	We believe the policy to be sound and no change is required. We consider the policy to balance the affordable housing needs identified in the Strategic Housing Market Assessment (2023) (HOU4) with the

Appendix J – Chapter 8 – Delivering a mix of homes

				sites where house prices are well above average.	evidence set out in the Local Plan Viability Testing Report (2023) (INV4).
LP2187	Gillian Johnston	1483	Policy 18	Most of the houses proposed in this plan will not be affordable. This is not justified as it is not an appropriate strategy to place most of the affordable housing on sites where house prices are well above average.	We believe the policy to be sound and no change is required. We consider the policy to balance the affordable housing needs identified in the Strategic Housing Market Assessment (2023) (HOU4) with the evidence set out in the Local Plan Viability Testing Report (2023) (INV4).
Policy 19					
LP0078	Peter Oneil	1484	Policy 19	Policy 19 is not considered to be sound, legally compliant or to meet the duty to cooperate.	We believe the policy to be legally complaint, sound and compliant with the Duty to Cooperate. No change is required.
LP1902	Alison Donnison	1485	Policy 19	Considers there are no guarantees that housing will be mixed accommodation consisting of single-story dwellings and affordable housing.	We believe the policy to be sound and no change is required. Policy 19 and Policy 20 provide clear guidance for the delivery of a range of house types on future development proposals. The policy is supported by the Strategic Housing Market Assessment (2023) (HOU4).
LP1916	Dennis Grieves	1486	Policy 19	The Local Plan is not justified and is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023.	We believe the policy to be sound and no change is required. Policy 19 and Policy 20 provide clear guidance for the delivery of a range of house types on future development proposals. The policy is supported by the Strategic Housing Market Assessment (2023) (HOU4).
LP0520	Alex Air	1487			
LP1917	Angela Beattie	1488			
LP0609	Ian Beattie	1489			
LP2022	Matthew Johnson	1504			
LP2023	Jacqueline Johnson	1505			
LP2024	Christopher Johnson	1506			
LP0636	Kevin Tindle	1507			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2025	Anthony Pollock	1508			
LP1756	Ian Hudson	1509			
LP2048	Jennie and Ann West	1510			
LP2049	Nicola, David and Megan West	1511			
LP2050	Bev, Jon and Robyn Olds	1512			
LP2051	Joyce and Bill Hills	1513			
LP2052	Hilary, Mammed and Alex Bagher	1514			
LP2053	Joanne, Christopher, Jack and Harry West	1515			
LP0088	Andrew Davison	1516			
LP2054	Lauren and Nicholas Bagher	1517			
LP1771	Russell Hewitson	1518			
LP1767	Andrea Hewitson	1519			
LP1769	Moyra Fairweather	1520			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2064	South Tyneside Green Party	1522			
LP2065	Christopher Davies	1523			
LP2185	G and J Shepherd	1524			
LP0645	Delia McNally	1490	Policy 19	Policy 19 is not considered to be sound. The type of housing developers inevitably wants to build in East Boldon tends to be more expensive properties.	We believe the policy to be sound and no change is required. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA.
LP0703	Cleadon and East Boldon Branch Labour Party	1491	Policy 19	Policy 19 is not considered to be sound as it does not meet the identified needs for older people as set out in the Strategic Market Housing Assessment.	We believe the policy to be sound and no change is required. Policy 19 and Policy 20 provide clear guidance for the delivery of a range of house types on future development proposals. The policy is supported by the Strategic Housing Market Assessment (2023) (HOU4).
LP1944	Avant Homes North East	1492	Policy 19	Policy 19 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy. It is critical that the policy framework in the Local Plan does not stall the delivery of housing as a result of overly prescriptive requirements. Neither Policy 19 or the supporting text are clear as to whether this is seeking the M4(2) standard for all homes or some other standard.	We believe the policy to be sound but would be willing to consider a minor modification to change 'aging population' to 'older people' to bring the policy in line with NPPF. We do not consider the policy to be overly prescriptive. Policy 20 addresses the requirement for M4(2) standard homes. It is not considered necessary to address this in Policy 19.
LP1946	Barratt Homes	1493	Policy 19	Policy 19 is not considered to be sound as the introduction of self-build elements to new schemes will add complexity and delay to the delivery of new homes and	We believe the policy to be sound and no change is required. We do not consider the policy to be overly prescriptive regarding self-build homes. The policy

Appendix J – Chapter 8 – Delivering a mix of homes

				will add uncertainty to the deliverability of schemes. Self-build homes by their very nature also have a negative implication on the number of deliverable homes on site.	recognises that these should only be delivered where it is viable.
LP0916	Eileen Thompson	1494	Policy 19	Considers that the plan will be ineffective in delivering a housing mix that is needed to meet the needs of local residents. Policy 19 will allow developers to deliver homes that provide maximum profit rather than the houses needed. Accommodation for the elderly should be identified for each major site to reflect the need as identified in the supporting evidence.	We believe the policy to be sound and no change is required. We consider the policy to balance the housing needs identified in the Strategic Housing Market Assessment (2023) (HOU4) with the evidence set out in the Local Plan Viability Testing Report (2023) (INV4). Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. This includes accommodation for older people.
LP1952	Taylor Wimpey	1495	Policy 19 2 (iv)	Seeks greater clarity on requirement 2(iv) which specifies new homes should meet the needs of our aging population and are accessible to all. It is not clear how this policy interacts with Policy 20 or nationally prescribed Building Regulations.	We believe the policy to be sound but would be willing to consider a wording change from 'aging population' to 'older people' to bring the policy in line with NPPF. The council considers it clear the Policy 19 2(iv) related to requirement 2 of Policy 20 which requires all new dwellings to be M4(2) compliant.
LP1953	Bellway Homes	1496	Policy 19	The policy is not positively prepared and is unjustified. The policy needs to be reworded so as to build in flexibility and take into account other factors.	We believe the policy to be sound and no change is required. We consider the policy to be sufficiently flexible, the policy recognises that regard should be had to the SHMA or its successor document.
LP1417	Bellway Homes	1499	Policy 19		
LP1954	East Boldon Neighbourhood Forum	1497	Policy 19	The policy is not considered to be sound and does not comply with national policy. Without a policy that will actively require developers to consider the provision of accommodation for the elderly from the	We believe the policy to be sound and no change is required. We consider the policy to balance the housing needs identified in the Strategic Housing Market Assessment (2023) (HOU4) with the evidence

Appendix J – Chapter 8 – Delivering a mix of homes

				<p>outset, it is unlikely that the local plan will deliver the housing mix that is required and is identified in its evidence base.</p> <p>The inclusion on site allocation GA2 of a 3-storey retirement building would have the additional benefit of maintaining the housing density at the same time as creating the opportunity for greater greening and reducing the car numbers generated.</p>	<p>set out in the Local Plan Viability Testing Report (2023) (INV4).</p> <p>Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. This includes accommodation for older people.</p> <p>The council considers it would be overly prescriptive to require specific building types on allocated sites, this is something that would be addressed through the planning application process.</p>
LP1138	Home Builders Federation	1498	Policy 19	<p>The policy is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. It is important the policy is workable and ensures that housing delivery will not be compromised. Clarity is required around the wording that development should also seek to ensure new homes are accessible to all. It is not clear if this seeking the M4(2) standard for all homes or some other standard. If this is in relation to Policy 20 technical design standards for new homes, it would be useful to refer to the policy.</p>	<p>We believe the policy to be sound and no change is required. We do not consider the policy to be overly prescriptive. Policy 20 addresses the requirement for M4(2) standard homes. It is not considered necessary to address this in Policy 19.</p>
LP1963	Stonebridge Homes	1500	Policy 19	<p>Support for policy 19 however more explanation is required in terms of how the necessary levels of affordable housing are going to be delivered against the backdrop of restricting general open market housing supply across the</p>	<p>Support for the policy is noted. The council is confident that a sound approach has been taken to delivering affordable housing. The Strategic Housing Market Assessment (2023) (HOU4) recognises that the Council is making positive steps to help address the affordable housing shortfalls across the borough and therefore does not recommend any uplift to the</p>

Appendix J – Chapter 8 – Delivering a mix of homes

				borough. Suggestions provision for Custom or Self Build plots.	housing number to help meet affordable housing need. Part 2iii of the policy encourages the inclusion of self-build and custom housebuilding plots where viable. We believe the policy to be sound and no change is required.
LP1964	Persimmon Homes	1501	Policy 19 2iv	Policy 19 is not considered to be sound as it is not consistent with national policy. Further clarity required in policy wording regarding 'accessible to all' in part 2iv. This could be interpreted as M4(3) dwelling, when it is assumed not due to the policy wording in Policy 20.	We believe the policy to be sound but would be willing to consider a wording change from 'aging population' to 'older people' to bring the policy in line with NPPF. The council considers it clear the Policy 19 2(iv) related to requirement 2 of Policy 20 which requires all new dwellings to be M4(2) compliant.
LP1149	Banks Group	1502	Policy 19	Supports the policy.	Support noted.
LP0945	Grahame Tobin	1503	Policy 19	There is nowhere for elderly residents to downsize. The policy should require this type of accommodation to be provided within the areas they already live, allowing existing residents to downsize and potentially releasing high quality larger properties to the market.	We believe the policy to be sound and no change is required. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing including accommodation for older people.
LP1334	Keep Boldon Green	1521	Policy 19	Policy 19 is not considered to be sound and does not comply with national policy. Suggest including the requirement: Accommodation for the elderly is to be provided as identified in policies listed under Strategic Allocations. The provision on site GA2 of adequate affordable housing & accommodation for older people, would also achieve conformity with the East Boldon	We believe the policy to be sound and no change is required. Policy 19: Housing Mix seeks to secure the most appropriate mix of housing, considering site specific circumstances and the SHMA. This includes accommodation for older people. The council considers it would be overly prescriptive to require specific building types on allocated sites, this is something that would be addressed through the planning application process.

Appendix J – Chapter 8 – Delivering a mix of homes

				Neighbourhood Plan, in particular Policies EB12, EB13 & EB14.	
Policy 20					
LP0078	Peter Oneil	1525	Policy 20	Policy 20 is not considered to be sound, legally compliant or to meet the duty to cooperate.	We believe the policy to be legally complaint, sound and compliant with the Duty to Cooperate. No change is required.
LP1916	Dennis Grieves	1526	Policy 20	The Local Plan is not justified and is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA) 2023.	We believe the policy to be sound and no change is required. Policy 19 and Policy 20 provide clear guidance for the delivery of a range of house types on future development proposals. The policy is supported by the Strategic Housing Market Assessment (2023) (HOU4).
LP0520	Alex Air	1527			
LP1917	Angela Beattie	1528			
LP0609	Ian Beattie	1529			
LP2022	Matthew Johnson	1541			
LP2023	Jacqueline Johnson	1542			
LP2024	Christopher Johnson	1543			
LP0636	Kevin Tindle	1544			
LP2025	Anthony Pollock	1545			
LP1756	Ian Hudson	1546			
LP2048	Jennie and Ann West	1547			
LP2049	Nicola, David and Megan West	1548			
LP2050	Bev, Jon and Robyn Olds	1549			
LP2051	Joyce and Bill Hills	1550			

Appendix J – Chapter 8 – Delivering a mix of homes

LP2052	Hilary, Mammed and Alex Bagher	1551			
LP2053	Joanne, Christopher, Jack and Harry West	1552			
LP0088	Andrew Davison	1553			
LP2054	Lauren and Nicholas Bagher	1554			
LP1771	Russell Hewitson	1555			
LP1767	Andrea Hewitson	1556			
LP1769	Moyra Fairweather	1557			
LP2064	South Tyneside Green Party	1558			
LP2065	Christopher Davies	1559			
LP2185	G and J Shepherd	1560			
LP1929	Robert and Ellen Smith	1530	Policy 20	The local plan fails to meet M4(3) and M4(2) accessible standards.	We believe the policy to be sound and no change is required. Policy 20 addresses the need for accessible homes identified in the SHMA.
LP0645	Delia McNally	1531	Policy 47	Policy 47 should reflect para 136 of the NPPF in terms of ensuring streets are tree-lined.	We believe the policy to be sound and no change is required. Comments are not considered relevant to Policy 20.

Appendix J – Chapter 8 – Delivering a mix of homes

LP1944	Avant Homes North East	1532	Policy 20	Policy 20 is not considered to be sound as it has not been positively prepared, is not justified, effective or consistent with national policy. The number of dwellings required to be Part M4(3) compliant and M4(2) compliant is unjustified and until appropriate evidence has been presented in further detail justifying the onerous proposed requirements, we will maintain our objection to Policy 20 as currently drafted. In addition, a transition period would enable businesses to plan for new requirements being introduced.	We believe the policy to be sound and no change is required but would be willing to consider minor modification to the supporting text regarding the Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). Paragraph 8.68 in the supporting text of the policy allows for a 6-month transition period from the date of adoption.
LP1946	Barratt Homes	1533	Policy 20	The 100% compliance requirement is unjustified. The Council have not provided evidence that the anticipated yields from the site allocations have been calculated with the increased footprint caused by the 100% M4(2) requirement, this should be confirmed as incorporated, or the yields reduced if not. The PPG also sets out that site specific factors such as flooding, and topography should be considered. The requirements for compliance with M4(3) reduces the viability and deliverability of sites and further evidence should be provided. Policy 20 is not considered to be sound as a result.	We believe the policy to be sound and no change is required. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). The policy provides flexibility where it can be demonstrated that it is impractical or unviable to provide 100% M4(2) dwellings due to site specific constraints. The council considers that the policy balances the needs identified in the SHMA with the evidence in the Local Plan Viability Testing Report (2023) (INV4).
LP1947	Story Homes	1534	Policy 20	Supportive of providing homes that accord with the standards required by national policy and guidance. There is a	We believe the policy to be sound and no change is required but would be willing to consider a minor modification to the supporting text regarding the

Appendix J – Chapter 8 – Delivering a mix of homes

				need for clear and up to date evidence to justify moving away from national standards, along with factoring them into the Local Plan's Viability Assessment.	Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). The policy provides flexibility where it can be demonstrated that it is impractical or unviable to provide 100% M4(2) dwellings due to site specific constraints. The council considers that the policy balances the needs identified in the SHMA with the evidence in the Local Plan Viability Testing Report (2023) (INV4).
LP1952	Taylor Wimpey	1535	Policy 20	Considers the Council has not provided the necessary evidence to justify this requirement as specified in the national Planning Practice Guidance. It is incumbent on the Council to provide a local assessment evidencing the specific case for South Tyneside which justifies the inclusion of optional higher standards for accessible and adaptable homes. A transitional period would be suitable upon the introduction of these requirements.	We believe the policy to be sound and no change is required but would be willing to consider a minor modification to the supporting text regarding the Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). Paragraph 8.68 in the supporting text of the policy allows for a 6-month transition period from the date of adoption.
LP1953	Bellway Homes	1536	Policy 20	As the standards being introduced are optional it is the council's responsibility to ensure they are justified, and this evidence has not been provided. Currently considers that the evidence presented is not sufficient to justify the levels outlined in the policy.	We believe the policy to be sound and no change is required but would be willing to consider a minor modification to the supporting text regarding the Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA)
LP1417	Bellway Homes	1538	Policy 20		

Appendix J – Chapter 8 – Delivering a mix of homes

				Consequently, we object to the policy and consider is unsound for being unjustified and inconsistent with national policy. Even if it were the case that this policy was justified, an appropriate transition period needs to be provided.	(2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). Paragraph 8.68 in the supporting text of the policy allows for a 6-month transition period from the date of adoption.
LP1138	Home Builders Federation	1537	Policy 20	Policy 20 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. If the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. A local assessment evidencing the specific case for South Tyneside which justifies the inclusion of optional higher standards for accessible and adaptable homes should be undertaken by the council. Site specific factors such as flooding and topography should be considered. A transitional period would be suitable upon the introduction of these requirements.	We believe the policy to be sound and no change is required but would be willing to consider a minor modification to the supporting text regarding the Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). The policy provides flexibility where it can be demonstrated that it is impractical or unviable to provide 100% M4(2) dwellings due to site specific constraints. Paragraph 8.68 in the supporting text of the policy allows for a 6-month transition period from the date of adoption.
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	1539	Policy 20	It is vital that, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes, then they should only do so by applying the criteria set out in the PPG. If the Council can provide the appropriate evidence and this policy is to be included, then our client considers that it would be	We believe the policy to be sound and no change is required but would be willing to consider a minor modification to the supporting text regarding the Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings

Appendix J – Chapter 8 – Delivering a mix of homes

				sensible to incorporate an appropriate transition period within the policy.	to be built to M4(2). Paragraph 8.68 in the supporting text of the policy allows for a 6-month transition period from the date of adoption.
LP1964	Persimmon Homes	1540	Policy 20	Policy is not considered to be sound as it is not consistent with national policy. Flexibility should be added into Part 1 of the policy to allow for site specific factors such as vulnerability to flooding, site topography, and other circumstances. Further evidence required for the M4(3) compliance requirement.	We believe the policy to be sound and no change is required but would be willing to consider a minor modification to the supporting text regarding the Planning Practice Guidance requirements. Based on the ageing population in the Borough and the identified levels of disability amongst the population, the Strategic Housing Market Assessment (SHMA) (2023) (HOU4) recommends a minimum of 5% of new homes should be built to M4(3) and all new dwellings to be built to M4(2). The policy provides flexibility where it can be demonstrated that it is impractical or unviable to provide 100% M4(2) dwellings due to site specific constraints.
Policy 21					
LP0078	Peter Oneil	1561	Policy 21	Policy 21 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy is sound, legally complaint and compliant with the Duty to Cooperate and no change is required.
LP0645	Delia McNally	1562	Policy 21	Policy 21 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1563	Policy 21	Policy 21 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.

Appendix J – Chapter 9 – Building a Strong and Competitive Economy

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP17					
LP0078	Peter Oneil	1564	SP17	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0744	Eric Mason	1565	SP17	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Brownfield sites should be used over greenbelt for housing.	We believe the plan to be sound and no change is needed. The Strategic Housing Land Availability Assessment (SHLAA) (HOU5) includes an exhaustive search for brownfield sites to meet our housing need. Sites that are assessed as suitable, available, and achievable in the SHLAA have been allocated. However, the SHLAA demonstrates that there are insufficient non-Green Belt sites to meet our need.
LP1234	Mineral Products Association	1566	SP17	Reassurance is sought that the “Agent of Change” principle will apply to the existing minerals infrastructure facilities in the Port of Tyne.	We believe the plan to be sound and no change is needed. The proposed modification has not been requested by the Port of Tyne and is considered to be an operational matter for the Port of Tyne.
LP0645	Delia McNally	1567	SP17	The policy is not considered to be sound. It conflicts with NPPF Paras 7 and 8. How school places will be delivered for families living in the EBNF area has not been set out. EBNF needs to know how schools, health and transport will accommodate the increase.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal

Appendix J – Chapter 9 – Building a Strong and Competitive Economy

					coming forward for a development would need to adhere to.
LP1946	Barratt Homes	1568	SP17	Supportive of the policy.	Support noted and welcomed.
LP1967	Port of Tyne	1569	SP17	The support for the Port of Tyne is welcomed. Within the supporting text to Policy SP17, acknowledge the relationship between Holborn Middle Docks and Windmill Hill and the Port of Tyne's existing operations.	We believe the plan to be sound and no change is needed. It is not considered necessary to refer to specific sites within the supporting text.
LP2061	STEP	1570	SP17	The policy has not been positively prepared. The Plan does not sufficiently address climate change mitigation and adaptation.	We believe the plan to be sound and no change is needed. The Local Plan includes policies which seek to mitigate and adapt to climate change.
Policy SP18					
LP0078	Peter Oneil	1571	SP18	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0645	Delia McNally	1572	SP18	The policy is considered to be legally compliant.	Support for the policy noted and welcomed.
LP1946	Barratt Homes	1573	SP18	Supportive of the policy.	Support for the policy noted and welcomed.
LP1970	Nelson Petcare Ltd (trading as 'mypetstop')	1574	SP18	The policy is not considered to be sound. The approach to allocating new employment sites is flawed because it misinterprets the Employment Land Review recommendations. The land at 'mypetstop', Follingsby Lane should be allocated for employment use to ensure the Council has a robust supply of employment land.	We believe the plan to be sound and no change is needed. The Employment Land Review (2023) (EMP1) and Employment Land Technical Paper (2024) (EMP2) sets out scenarios for forecasting need for employment land and the justification for the council's approach to allocating land for employment within the Local Plan.
LP1971	Thomas Armstrong	1575	SP18	The policy is not considered to be sound. We support the allocation of employment land at Wardley Colliery. However, the current allocation under Policy SP18 should be increased in order to deliver 16.4 hectares of land with an available net area 10.41 ha.	Support for Wardley Colliery allocation in noted. We believe the plan to be sound and no change is needed. It is considered that allocation of a larger site for development would conflict with natural environment and biodiversity constraints.

Appendix J – Chapter 9 – Building a Strong and Competitive Economy

LP0585	David Milne	1576	SP18	The policy is not considered to be legally compliant or sound. Proposed employment sites should be allocated for housing.	We believe the Plan to be sound and that no change is needed. The Local Plan is required to plan for the economic needs for the borough alongside its housing requirements. The employment need for South Tyneside is set out in the Employment Land Review (2023) (EMP1) and the Employment Land Technical Paper (2024) (EMP2).
Policy SP19					
LP0078	Peter Oneil	1577	SP19	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0303	National Highways	1578	SP19	The council needs to explain variances between the policy and the SRN Forecast Report.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP1931	Historic England	1579	SP19	Principles need to be added to criteria regarding the allocation of the E35 part of the Port of Tyne allocation.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Historic England.
LP1234	Mineral Products Association	1580	SP19	Reassurance is sought that the "Agent of Change" principle will apply to the existing facilities and any development proposed will be compatible with existing land-uses, including the function and operation of the marine wharves.	We believe the plan to be sound and no change is needed. The proposed modification has not been requested by the Port of Tyne and is considered to be an operational matter for the Port of Tyne.
LP0645	Delia McNally	1581	SP19	The policy is considered to be legally compliant.	Support for the policy noted and welcomed.
LP1946	Barratt Homes	1582	SP19	Supportive of the policy.	Support for the policy noted and welcomed.
LP1958	Sunderland City Council	1583	SP19	Support and welcome the Plan's commitment to the delivery of the International Advanced Manufacturing Park.	Support for the policy noted and welcomed.
LP1967	Port of Tyne	1584	SP19	The Port's current position is slightly revised with 24.2 hectares currently considered to be available.	Comment noted. We will consider the updated employment land position through the examination process.

Appendix J – Chapter 9 – Building a Strong and Competitive Economy

Policy 22					
LP0078	Peter Oneil	1585	Policy 22	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0645	Delia McNally	1586	Policy 22	The policy is considered to be legally compliant	Support for the policy noted and welcomed.
LP1944	Avant Homes North East	1587	Policy 22 Criterion 1	The policy is not considered to be sound. Supports the principle of the policy. It provides a degree of flexibility for the release of employment land. However, the flexibility should be revised through amending criterion 1 to make it more flexible.	We believe the Plan to be sound, but the council would be willing to consider a minor modification to Policy 22 (criterion 1).
LP1946	Barratt Homes	1588	Policy 22	Supportive of the policy.	Support for the policy noted and welcomed.
LP1964	Persimmon Homes	1589	Policy 22 Parts 2 and 4.	The policy is not considered to be sound. Part 2 does not accord with the NPPF as it suggests a betterment would be required. Part 4 requires re-wording to better reflect Para 139 of the NPPF.	We believe the plan to be sound and no change is needed to criterion 2 of Policy 22 as it is not considered that criterion 2 suggests a betterment would be required. However, the council would be willing to consider a minor modification to criterion 4 to better reflect Para 187 of the NPPF (September 2023).
LP1967	Port of Tyne	1590	Policy 22	The Port is supportive of the overall aim of the policy but would welcome specific reference of the Port of Tyne within the policy to protect its established uses.	We believe the plan to be sound and no change is needed. There is no reason to specifically reference the Port of Tyne in the policy. The Port of Tyne is referenced in other policies where appropriate.
LP0585	David Milne	1591	Policy 22	The policy is not considered to be sound or to meet the Duty to Cooperate. Jobs will be created but similar jobs would be created if brownfield sites were used.	We believe the plan to be sound and no change is needed.
Policy 23					
LP0078	Peter Oneil	1592	Policy 23	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0645	Delia McNally	1593	Policy 23	The policy is considered to be legally compliant.	Support for the policy noted and welcomed.

Appendix J – Chapter 9 – Building a Strong and Competitive Economy

LP1946	Barratt Homes	1594	Policy 23	Supportive of the policy.	Support for the policy noted and welcomed.
Policy 24					
LP0078	Peter Oneil	1595	Policy 24	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0303	National Highways	1596	Policy 24	Supportive of the policy.	Support for the policy noted and welcomed.
LP1164	Gateshead Council	1597	Policy 24	Supportive of the policy.	Support for the policy noted and welcomed.
LP1234	Mineral Products Association	1598	Policy 24	Supportive of the policy.	Support for the policy noted and welcomed.
LP0645	Delia McNally	1599	Policy 24	Supportive of the policy.	Support for the policy noted and welcomed.
LP1946	Barratt Homes	1600	Policy 24	Supportive of the policy.	Support for the policy noted and welcomed.
Policy 25					
LP0078	Peter Oneil	1601	Policy 25	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP1931	Historic England	1602	Policy 25	The policy is considered to be sound.	Support for the policy noted and welcomed.
LP1234	Mineral Products Association	1603	Policy 25	The policy should reference the “Agent of change” principle which would ensure neighbouring operational activities are not conflicted or constrained.	We believe the plan to be sound and no change is needed. It is not considered necessary to incorporate the ‘agent of change’ principle within Policy 25.
LP0645	Delia McNally	1604	Policy 25	Supportive of the policy.	Support for the policy noted and welcomed.
LP1946	Barratt Homes	1605	Policy 25	Supportive of the policy.	Support for the policy noted and welcomed.
LP2006	CPRE Durham Branch	1606	Policy 25 Point 3.	The policy is not considered to be sound. The policy should protect biodiversity and make this clear. The policy should also cross refer to Policy 34, especially in relation to priority species.	We believe the plan to be sound and no change is needed. Point 4 of the policies references a requirement for a Habitat Regulations Assessment. Policy 34 is referenced in the supporting text.

Appendix J – Chapter 10 – Ensuring the vitality of centres

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP20					
LP0078	Peter Oneil	1607	SP20	SP20 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1608	SP20	SP20 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1609	SP20	SP20 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
LP1956	Linda Gregg	1610	SP20	SP20 is not consistent with national policy and is not considered to be sound. Sea Winnings Way at Westoe Crown should be considered a local centre. The assessment appears to be inconsistent and is not justified. It is a good example of a modern new local centre which performs an important role in serving the local area. It is of a similar size to other local centres and attracts visitors from outside the area.	We believe the Plan to be sound and no change is needed. The Local Centres and Neighbourhood Centres Assessment (2023) (EMP5) concluded that the centre at Sea Winnings Way meets the definition of a local neighbourhood hub, being a small parade of local significance. Further detail is available at paragraphs 26 to 29 of the Assessment.
Policy 26					
LP0078	Peter Oneil	1611	Policy 26	Policy 26 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1612	Policy 26	Concerned that there will be unequal treatment of infrastructure provision between East Boldon Forum Area and the Fellgate Sustainable Growth Area. Fellgate Sustainable Growth Area includes policies to ensure it has infrastructure to support the development, there is insufficient infrastructure to support the developments in the East Boldon Neighbourhood Forum area. Questions whether the council relying on Section 106 Agreements to address this.	We believe the Plan to be sound and no change is needed. The Fellgate Sustainable Growth Area is a strategic-scale development proposal (1200 homes) This has enabled the council to require the provision of on-site infrastructure to meet identified social and community needs. Social and community needs arising from the development proposed will be required to contribute to their provision accordingly (subject to meeting the relevant tests).
LP1946	Barratt Homes	1613	Policy 26	Policy 26 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.

Appendix J – Chapter 10 – Ensuring the vitality of centres

Policy 27					
LP0078	Peter Oneil	1614	Policy 27	Policy 27 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1615	Policy 27	Policy 27 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1616	Policy 27	Policy 27 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
Policy 28					
LP0078	Peter Oneil	1617	Policy 28	Policy 28 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1618	Policy 28	Policy 28 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1619	Policy 28	Policy 28 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
Policy 29					
LP0078	Peter Oneil	1620	Policy 29	Policy 28 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1621	Policy 29	Policy 29 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1622	Policy 29	Policy 29 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
Policy 30					
LP0078	Peter Oneil	1623	Policy 30	Policy 30 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP1931	Historic England	1624	Policy 30	Largely supports Policy 30. However, the policy should refer to the requirement to conserve and enhance the Grade I Listed Old Town Hall as this is central to the Market Place and any proposals here may affect both the fabric and setting of this heritage asset.	The Council does not consider it necessary to amend the policy as requested. The matter is addressed through other specific policies across this Plan and the NPPF which are taken as a whole.
LP0645	Delia McNally	1625	Policy 30	Policy 30 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1626	Policy 30	Policy 30 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
Policy 31					

Appendix J – Chapter 10 – Ensuring the vitality of centres

LP0078	Peter Oneil	1627	Policy 31	Policy 31 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1628	Policy 31	Policy 31 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1629	Policy 31	Policy 31 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.
Policy 32					
LP0078	Peter Oneil	1630	Policy 32	Policy 32 is not considered to be sound, legally compliant or to comply with the duty to cooperate.	We believe the policy to be sound, legally compliant and compliant with the Duty to Cooperate.
LP0645	Delia McNally	1631	Policy 32	Policy 32 is considered to be legally compliant.	Support for the legal compliance of the policy noted.
LP1946	Barratt Homes	1632	Policy 32	Policy 32 is considered to be sound, legally compliant and to comply with the duty to cooperate.	Support for the soundness, legal compliance and compliance with the Duty to Cooperate noted.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP21					
LP0078	Peter Oneil	1633	SP21	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate.
LP0645	Delia McNally	1634	SP21	Supports SP21.	Support noted.
LP1944	Avant Homes North East	1635	SP21, Criterion 4	Considers SP21 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Suggests modifications Criterion 4 to allow development to be assessed against the planning balance.	We consider the policy to be sound and no change is needed. Policy SP21 is a strategic policy which seeks to protect loss of trees, hedgerows and irreplicable habitats. It is considered that Policy 36 provides clarity with regard the consideration of tree loss and mitigation.
LP1946	Barratt Homes	1636	SP21	No comments made.	Noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1637	SP21	Supports SP21.	Support noted.
LP1989	Julie Price	1638	SP21	The Local Plan is not considered to be legally compliant or sound or to meet the Duty to Cooperate. Remove the proposed development of the land to the south of Fellgate to protect the natural environment and not destroy the wildlife.	We believe the plan to be sound and no change is needed. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP1995	Swifts Local Network: Swifts & Planning Group	1639	SP21	The policy is not considered to be sound. It is not effective or compliant with national policy due to a lack of consideration of urban wildlife that falls	We believe the plan to be sound and no change is needed. The council considers that policies within the Local Plan adequately address wildlife considerations.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				outside the remit of Biodiversity Net Gain.	
LP0585	David Milne	1640	SP21	The policy is not considered to be sound or to meet the Duty to Cooperate. Objects to the harm green belt allocation will have on biodiversity and geodiversity.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. Site allocations set out clear criteria to address and mitigate impacts of development.
LP1867	Church Commissioners for England	1641	SP21	Supports SP21.	Support noted.
Policy 33					
LP0645	Delia McNally	1642	Policy 33	Supports Policy 33.	Support noted.
LP1946	Barratt Homes	1643	Policy 33	Supports Policy 33.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1644	Policy 33	Supports Policy 33.	Support noted.
LP2006	CPRE Durham Branch	1645	Point 2	The policy is not considered to be sound in relation to priority species. Point 2 should make it clear that such proposals will be refused permission unless exceptional circumstances indicate otherwise.	We believe the policy to be sound and no change is needed. Supporting text states: 'Where harm from a proposed development cannot be addressed through the mitigation hierarchy, permission will be refused'. The mitigation hierarchy reflects paragraph 180 (a) of the NPPF (2023).
LP0585	David Milne	1646	Policy 33	The policy is not considered to be sound or to meet the Duty to Cooperate. Building on greenbelt will not enhance the natural environment it will destroy it.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. Site allocations set out clear criteria to address and mitigate impacts of development.
LP1867	Church Commissioners for England	1647	Policy 33	Supports Policy 33.	Support noted.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

Policy 34					
LP0645	Delia McNally	1648	Policy 34	Supports Policy 34.	Support noted.
LP1944	Avant Homes North East	1649	Policy 34, Section 4	Policy 34 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Additional evidence is required that justifies current patterns of use still require a 20% increase in the extent of the previous 6km zone of influence to the Durham Coast Special Area of Conservation and Northumbria Coast Special Protection Area referred to in Policy 34 sub-section 4.	The council considers the plan to be sound but would be willing to consider modifications regarding Policy 34 as set out in the Natural England Statement of Common Ground.
LP1946	Barratt Homes	1650	Policy 34	Supports Policy 34.	Support noted.
LP1953	Bellway Homes	1651	Policy 34	GA2 is identified as falling within a wildlife corridor in its entirety. This expansion is unjustified and as such, we object to Part 8 of this policy and consider it to be unsound on the basis of being unjustified and not positively prepared.	We believe the policy to be sound and no change is needed. The wildlife corridor is determined by the Wildlife Corridor Review (2020) (NAT15).
LP1962	Adderstone Living Ltd	1652	Policy 34, Section 8	The policy is not considered to be sound. Given the under-delivery of affordable housing, criterion 8 should be modified to be more flexible, so that policy is positively prepared and consistent with national policy.	The council considers the policy to be sound but would be willing to consider minor modifications to the supporting text regarding Policy 34 and the points raised.
LP0585	David Milne	1653	Policy 34	The policy is not considered to be sound or to meet the Duty to Cooperate. Building houses on Green Belt will not promote Internationally, Nationally and Locally Important sites.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. Site allocations set out clear criteria to address and mitigate impacts of development.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

LP2186	Natural England	1654	Policy 34	Support for the HRA narrative.	Support noted.
Policy 35					
LP1164	Gateshead Council	1655	Policy 35	Supports the inclusion of a specific policy on BNG.	Support noted.
LP0645	Delia McNally	1656	Policy 35	The policy is not considered to be sound. Net Gain can be a tactic to allow the destruction of ecology. GA2 is very close to a SSSI, a wildlife site and an LNR. Either remove the site altogether from the Local Plan or significantly reduce the housing and carry out improvements at the Northern end of the site.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. Site allocations set out clear criteria to address and mitigate impacts of development.
LP1944	Avant Homes North East	1657	Policy 35	Policy 35 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. The gross to net ratios allowed for in the 'Local Plan Viability Testing – Update' (2023) do not adequately allow for the space needed for on-site BNG provision in certain typologies. In addition, the assumptions on the costs for BNG are generic. The significant additional costs associated with biodiversity gain should be fully accounted for in the Council's viability assessment work.	We consider the policy and viability evidence to be robust and no change is needed. The viability modelling is evidence led and robust, as per the requirements of the Planning Practice Guidance: Viability. The rationale for the adopted values is set out in detail in Section 2.7 of our Local Plan Viability Update (November 2023) (INV4). The approach to Biodiversity Net Gain ("BNG") is set out in paragraphs 2.19 and 2.20 (INV4). This notes that the potential impact of BNG can fluctuate significantly from site to site and therefore it is not possible to reflect individual site circumstances in the modelling. This is now a mandatory requirement and regarded as being equivalent to a site-specific infrastructure cost for the purposes of viability.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

LP1946	Barratt Homes	1658	Policy 35, Criteria 2, 3, 4	Policy 35 is not considered to be sound. Part 2, 3 and 4 of this policy sets a hierarchy for offsite BNG provision, this is a departure from the framework and should be removed. The proposed sections are too restrictive and will inhibit development, with a great burden of proof placed on developers to accord with the restrictive hierarchy.	We consider the policy to be sound and no change is needed. Parts 2, 4, 5 are consistent with the Framework and inline with Para 006 Ref ID: 74-006020240214 :‘Plan-makers can complement the statutory framework for biodiversity net gain by, for instance, including policies which support appropriate local offsite biodiversity sites, including whether specific allocated sites for development should include biodiversity enhancements to support other developments meet their net gain objectives in line with Local Nature Recovery Strategies.’
LP1947	Story Homes	1659	Policy 35	Policy 35 is not considered to be sound because it has not been positively prepared, is not justified, and is not consistent with the requirements of national policy. The plan needs a more realistic acknowledgment of the impact of biodiversity net gain on meeting the housing need, in terms of density of development, viability and deliverability. Allocate additional housing sites.	We consider the policy and viability evidence to be robust and no change is needed. The viability modelling is evidence led and robust, as per the requirements of the Planning Practice Guidance: Viability. The approach to Biodiversity Net Gain (“BNG”) is set out in paragraphs 2.19 and 2.20 (INV4). This is now a mandatory requirement and regarded as being equivalent to a site-specific infrastructure cost for the purposes of viability.
LP1952	Taylor Wimpey	1660	Policy 35	Policy 35 is not considered to be sound. Whilst a requirement set by national legislation it must still be fully accounted for in the Council’s viability evidence.	We consider the policy and viability evidence to be robust and no change is needed. The viability modelling is evidence led and robust, as per the requirements of the Planning Practice Guidance: Viability. The approach to Biodiversity Net Gain (“BNG”) is set out in paragraphs 2.19 and

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

					2.20 (INV4). This is now a mandatory requirement and regarded as being equivalent to a site-specific infrastructure cost for the purposes of viability.
LP1953	Bellway Homes	1896	Policy 35	Consider that this policy is unsound on the basis of being inconsistent with national policy. It repeats the NPPF and should be deleted.	We consider the policy to be sound and no change is needed. Parts 2, 4, 5 are consistent with the Framework and inline with Para 006 Ref ID: 74-006020240214 :‘Plan-makers can complement the statutory framework for biodiversity net gain by, for instance, including policies which support appropriate local offsite biodiversity sites, including whether specific allocated sites for development should include biodiversity enhancements to support other developments meet their net gain objectives in line with Local Nature Recovery Strategies.’
LP1417	Bellway Homes	1662	Policy 35		
LP1138	Home Builders Federation	1661	Policy 35	Policy 35 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. The policy is not necessary as it repeats national guidance. The Council should not deviate from the Government’s requirement for 10% biodiversity net gain as set out in the Environment Act. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council’s viability assessment.	We consider the policy to be sound and no change is needed. The policy is consistent with the Statutory Framework. The viability modelling is evidence led and robust, as per the requirements of the Planning Practice Guidance: Viability. The approach to Biodiversity Net Gain (“BNG”) is set out in paragraphs 2.19 and 2.20 (INV4). This is now a mandatory requirement and regarded as being equivalent to a site-specific infrastructure cost for the purposes of viability.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

LP1964	Persimmon Homes	1663	Policy 35	Policy 35 is not considered to be sound. Considers that in order to be positively planned the policy needs to state that Biodiversity Net Gain (BNG) shall be secured and delivered in accordance with the statutory framework.	We consider the policy to be sound and no change is needed. The policy is consistent with the Statutory Framework.
LP0585	David Milne	1664	Policy 35	The policy is not considered to be sound or to meet the Duty to Cooperate. Sites in the Green Belt should not be released.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
Policy 36					
LP0078	Peter Oneil	1665	Policy 36	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Objection to Green Belt development in Whitburn concerns include impact on sewerage infrastructure and wildlife corridor.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary. The council works closely with infrastructure providers to ensure that strategic and local level

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

					infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.
LP1914	Thomas and Lynn Elves	1666	Policy 36	Considers all three paragraphs of Policy 36 are weak and will allow the continued felling of healthy, mature trees and hedgerows for development. The policy needs to be strengthened.	The council considers the policy to be sound and no change is required.
LP1688	Susan Ridge	1667	Policy 36		
LP1680 / LP1689	Keith Ward	1668	Policy 36		
LP1679	David Todd	1669	Policy 36		
LP1678	Joyce Todd	1670	Policy 36		
LP1847	Andrea George	1677	Policy 36		
LP2025	Anthony Pollock	1678	Policy 36		
LP1931	Historic England	1671	Policy 36 4i	Suggests amendments to criterion 4i to strengthen the policy.	The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP0645	Delia McNally	1890	Policy 36	Supports Policy 36.	Support noted.
LP1944	Avant Homes North East	1672	Policy 36	Policy 36 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Recommends that sub-section 1 and sub-section 4 are modified to be more flexible.	The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

LP1946	Barratt Homes	1891	Policy 36	Supports Policy 36.	Support noted.
LP1953	Bellway Homes	1673	Policy 36	The policy needs to be sufficiently flexible and to acknowledge that there may be instances where tree loss is unavoidable. Without sufficient flexibility we object to this policy as being unsound in not being positively prepared.	The council considers the policy to be sound and sufficiently flexible. No change is required.
LP1417	Bellway Homes	1674	Policy 36		
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1675	Policy 36 Criterion 1	Policy 36, 1, is inconsistent with the NPPF paragraph 186. The policy affords blanket protection to all trees, woodlands and hedges irrespective of their value, age or condition.	The council considers the policy to be sound and no change is required. Criterion 1 reflects wording set out in British Standard 5837: Trees in Relation to Design, Demolition and Construction, Recommendations (2012).
LP2005	Rachael Milne	1676	Policy 36	The policy is not considered to be sound or to meet the Duty to Cooperate. The policy needs to be stronger. Policy 36 is inconsistent with Policy SP15 regarding Climate Change. To be found sound Local Plans will need to reflect the emphasis on climate change in PPG and the NPPF in line with the Climate Change Act 2008.	The council considers the policy to be sound and no change is required. The council does not consider the policy to be inconsistent with the aims of Policy SP15.
LP0585	David Milne	1892	Policy 36	The policy is not considered to be sound or to meet the Duty to Cooperate. Sites in the Green Belt should not be released.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

					Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
LP2061	South Tyneside Environmental Protection	1679	Policy 36	Considers all three paragraphs of Policy 36 are weak and will allow the continued felling of healthy, mature trees and hedgerows for development. The policy needs to be strengthened. Policy 36 is inconsistent with Policy SP15 regarding Climate Change. To be found sound Local Plans will need to reflect the emphasis on climate change in PPG and the NPPF in line with the Climate Change Act 2008. The Local Plan must be revised to ensure it is justified.	The council considers the policy to be sound and no change is required. The council does not consider the policy to be inconsistent with the aims of Policy SP15.
LP2187	Gillian Johnston	1680	Policy 36		
LP1867	Church Commissioners for England	1893	Policy 36	Supports Policy 36.	Support noted.
Policy SP22					
LP0645	Delia McNally	1681	SP22	Policy 37 is not considered to be sound. GA2 is part of a wildlife corridor and should be removed from the Plan or housing numbers reduced.	We believe the Plan to be sound and no change is required. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The “key considerations” for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP1944	Avant Homes North East	1682	SP22 Criterion 6	SP22 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national	We believe the policy to be sound but are willing to consider minor modifications regarding point 6.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				policy. The provisions in sub-section 6 have the potential to be an onerous requirement and should be re-worded to be more flexible.	
LP1946	Barratt Homes	1683	SP22	Supports SP22.	Support noted.
LP1982	Whitburn Neighbourhood Forum	1684	SP22	To make sure the plan is justified and based on evidence, the GBI corridor should be revised to align with the wildlife corridor in the north of Whitburn and the GBI strategy should be revised to ensure it follows its own methodology in a consistent manner to include the wildlife network within the GBI corridors. Objects to GA6.	We believe the policy to be sound and no change is required. The GBI corridor is informed by the Green and Blue Infrastructure Strategy (2023) (NAT1). The evidence in the GBI Strategy is considered to be robust. The allocation at GA6 has been robustly considered through the plan preparation process and supporting evidence base.
LP0585	David Milne	1685	SP22	The policy is not considered to be sound or to meet the Duty to Cooperate. Sites in the Green Belt should not be released. Development in Fellgate will worsen infrastructure capacity, pollution and flooding and have a negative impact on the community's quality of life.	We believe the policy to be sound and no change is required. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF. The allocation at SP8 has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

LP2187	Gillian Johnston	1686	SP22	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. The amount of sewage discharged into the North Sea at Whitburn was not considered and does not inform the decision to include sites which feed into the Whitburn sewage system. Therefore, this Plan cannot be positively prepared.	We believe the policy to be sound and no change is required. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.
Policy 37					
LP0078	Peter Oneil	1687	Policy 37	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Sites in the Green Belt should not be released, specifically GA5 and GA6. Development will worsen sewerage infrastructure capacity and harm Whitburn's wildlife corridor.	<p>We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate and no change is needed.</p> <p>The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.</p> <p>The allocations have been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA5 and GA6 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.</p>

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

					Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.
LP1915	Sport England	1688	Policy 37	Supports Policy 37.	Support noted.
LP1931	Historic England	1894	Policy 37, Criteria 2 i	Suggests amending Criteria 2.i to help integrate the historic environment as the value of heritage assets extends beyond character.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Historic England.
LP0645	Delia McNally	1689	Policy 37	Supports Policy 37.	Support noted.
LP1944	Avant Homes North East	1670	Policy 37	Policy 37 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. We request that the Council reviews the average household size set out in the Open Space Study and ensures that the correct figures are included as they have the potential to affect the amount and type of open space required in developments under Policy 37.	We believe the Plan to be sound and no change is needed. The average household size set out in the Open Space Study (2023) (NAT26) has been reviewed and amended.
LP1946	Barratt Homes	1671	Policy 37	Supports Policy 37.	Support noted.
LP1417	Bellway Homes	1672	Policy 37	Considers the wording of Part 2 is imprecise and therefore unsound for being ineffective and not positively prepared. The policy should clarify that open spaces proposed to be allocated for an alternative use in the Plan should then not need to justify the loss of the	We believe the Plan to be sound and no change is needed. Paragraph 11.50 of the supporting text in the Publication Draft Local Plan is clear that proposals which affect areas of open space or playing field land which are not considered to be surplus to

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				open space at the planning application stage. The policy does not identify how it would define open space that is undesignated. This needs further clarification.	requirements must contribute towards appropriate mitigation to offset the impacts of development. Para 11.52 refers to examples of undesignated open space.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1673	Policy 37	Considers it vital that the policy adopt a flexible approach towards provision that reflects local needs. This is to ensure that contributions are indeed necessary and also to ensure that the approach taken towards provision is appropriate.	We believe the Plan to be sound and no change is needed. The policy is considered to be flexible.
LP1962	Adderstone Living Ltd	1674	Policy 37	The policy is not considered to be sound on the basis that it is not positively prepared and inconsistent with national policy. Policy 37 needs to be strengthened by the addition of a new point that would provide more flexibility to address the under-provision of affordable housing. The policy needs to clarify that those open spaces which are proposed to be allocated for an alternative use in the Plan should then not need to justify the loss of the open space at the planning application stage. The policy does not identify how it would define open space that is undesignated. This needs further clarification.	We believe the Plan to be sound and no change is needed. The policy is sufficiently flexible to fulfil its purposes. Paragraph 11.50 of the supporting text in the Publication Draft Local Plan is clear that proposals which affect areas of open space or playing field land which are not considered to be surplus to requirements must contribute towards appropriate mitigation to offset the impacts of development. Para 11.52 refers to examples of undesignated open space.
LP0585	David Milne	1675	Policy 37	The policy is not considered to be sound or to meet the Duty to	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council considers that a

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				Cooperate. Destruction of the Green Belt will not enhance open spaces.	sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
Policy SP23					
LP0645	Delia McNally	1676	SP23	Supports SP23.	Support noted.
LP0685 / LP1616	Roy Wilburn	1677	SP23	The policy is not considered to be sound as the Plan has not addressed the EBNP 2021 and specifically sporting hubs.	The council considers the policy to be sound and no change is required.
LP1944	Avant Homes North East	1678	SP23, Criterion 5	Considers SP23 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Improvements proposed at the Harton and Westoe Collieries Welfare Ground (planning application ref: ST/0411/22/FUL) are not included in the list of facilities in criterion 5. These should be added to the list of proposed facilities for completeness.	The council considers the policy to be sound however the council is willing to consider minor modifications regarding point 5.
LP1946	Barratt Homes	1679	SP23	Supports SP23.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1680	SP23	There is a disconnect between Policy 37 and allocations SP5 and SP6, where development would result in the loss of playing pitches, with no apparent	The council considers the policy to be sound and no change is required. Policies SP5 and SP6 require development proposals to be

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				strategy in place to address this potential loss.	mitigated in accordance with an agreed mitigation strategy.
LP1409	Jean Eckert	1681	SP23	The policy is not considered to be sound. This policy requires a further consultation following the completion of the Playing Pitch Strategy and Playing Pitch Assessment Report being updated, before it can be included in the Regulation 19 Local Plan.	The council considers the policy to be sound and no change is required. The policy is supported by an up to date Playing Pitch Strategy (2024).
LP2061	South Tyneside Environmental Protection	1682	SP23	Considers SP23 is not positively prepared as it serves to detract from the natural environment. The policy does not protect outdoor sports pitches as stated re: allocations SP6, SP9 and SP11. SP23 fails to deliver Strategic Objectives 13 and 14.	The council considers the policy to be sound and no change is required. Policy 37 and SP23 seek to protect and enhance playing fields in South Tyneside. Strategic allocations resulting in the loss of playing field land are required to mitigate any impacts.
Policy 38					
LP1931	Historic England	1683	Policy 38	The policy is not considered to be sound as there is no reference to heritage assets within the policy.	We believe the policy to be sound and no amendment is needed. The matter is addressed through other policies in the Plan.
LP0645	Delia McNally	1684	Policy 38	Supports Policy 38.	Support noted.
LP1946	Barratt Homes	1685	Policy 38	Supports Policy 38.	Support noted.
Policy 39					
LP0645	Delia McNally	1686	Policy 39	Supportive of the policy.	Support noted.
LP1946	Barratt Homes	1687	Policy 39	Supportive of the policy.	Support noted.
LP1149	Banks Group	1688	Policy 39	There is no Policy Map for Areas of High Landscape Value, within the Conserving and Enhancing the Natural Environment subsection of the Policy Map. This needs to be reviewed.	We believe the policy to be sound and no amendment is needed. Areas of High Landscape Value are illustrated on the PDF policies map however we would be willing to consider an amendment to the interactive map.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

Policy 40					
LP0645	Delia McNally	1689	Policy 40	Supports Policy 40.	Support noted.
LP1938	Alan Howard Becke and Susan Shilling	1690	Policy 40	The policy Is not considered to be sound or to meet the Duty to Cooperate. Can we afford to build on needed productive quality faming land?	We believe the policy to be sound and no change is required. The council seeks to avoid, where possible, allocating sites comprising the best and most versatile agricultural lane (grades 1, 2 and 3a as classified through the Agricultural Land Classification (ALC) system) in line with the NPPF
LP1946	Barratt Homes	1691	Policy 40	Supports Policy 40.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1692	Policy 40	Supports Policy 40.	Support noted.
LP1993	Georgina Scott	1693	Policy 40	The policy is not considered to be legally complaint, sound or to meet the Duty to Cooperate. The proposal to build on Green Belt at SP8 does not comply with this policy. Preserve the land for food production.	We believe the plan to be sound and no change is needed. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP0585	David Milne	1694	Policy 40	The policy is not considered to be sound or to meet the Duty to Cooperate. The allocation of SP8 destroy the very little farm land we already have in the region.	We believe the plan to be sound and no change is needed. The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
Policy 41					
LP0078	Peter Oneil	1695	Policy 41	The policy is not considered to be legally compliant, sound or to meet the	We believe the plan to be sound and no change is needed. Policy 41 does not

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				Duty to Cooperate. Sites in the Green Belt should not be released, specifically GA5 and GA6. Development will worsen sewerage infrastructure capacity and harm Whitburn's wildlife corridor.	consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1891	Douglas Shearer	1696	Policy 41	The policy is not considered to be sound. Objection to SP8. It is not consistent with the NPPF.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP0645	Delia McNally	1697	Policy 41	The policy is not considered to be sound. This policy has not been positively prepared to deliver sustainable development in the EBNF area. The impact of GA2 on character and infrastructure is unsustainable. The exceptional circumstances case to amend the Green Belt boundary has not been made.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1938	Alan Howard Becke and Susan Shilling	1698	Policy 41	The policy is not considered to be sound or to meet the Duty to Cooperate. Objection to proposed development on Green Belt land at GA2.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1944	Avant Homes North East	1699	Policy 41	Considers that Policy 41 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. It is considered that the policy should be removed from the Plan as it is superfluous as it reiterates the	We believe the plan to be sound and no change is needed.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				requirements of national policy without adding any additional considerations.	
LP1946	Barratt Homes	1700	Policy 41	Supports Policy 41	Support noted.
LP1953	Bellway Homes	1701	Policy 41	The policy is superfluous and therefore unsound on the basis of being inconsistent with national policy given that the NPPF seeks to avoid duplication of policies. The policy should be deleted.	We believe the plan to be sound and no change is needed.
LP1417	Bellway Homes	1703	Policy 41		
LP1138	Home Builders Federation	1702	Policy 41	Policy 41 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy The policy is not necessary as it duplicates national policy.	We believe the plan to be sound and no change is needed.
LP0949	Lesley Younger	1704	Policy 41	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. GA2 is not justified and is not effective in delivering sustainable development. The allocation contradicts Neighbourhood Plan, the Green Belt Review undervalues the site, there is a risk of surface water flooding, loss of agricultural land.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1963	Stonebridge Homes	1705	Policy 41	References detailed comments under SP3 which put forward an omission site in the Green Belt around Cleadon.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1969	Sunderland AFC	1706	Policy 41	It is considered that Policy 41 could provide further clarity regarding	We believe the plan to be sound and no change is needed. Policy 41 does not

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				measures of what comprises ‘very special circumstances’, and further, how specific forms of development, such as renewable energy projects are assessed.	consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1980	David Green	1707	Policy 41	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Objection to proposed development on Green Belt land at Fellgate. Reasons include impact on wildlife and the loss of a working farm. Build on brownfield sites.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP1987	Brenda Horton	1708	Policy 41	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Objection to proposed development on Green Belt land at Boldon. When considering the benefits to the area of development, a wider approach needs to be adopted to consider the environment, benefits to our children's and our own wellbeing and mental health by having open space we can all appreciate.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP0270	Neil Johnson	1709	Policy 41	The SP8 allocation is not sound. The consultation process has not been legally compliant. The traffic harm survey appears to have been conducted during Covid Lockdown and therefore does not reflect a true result of the problems that may be caused. The increased traffic flow through the SP8 site is grossly	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				underestimated. The Plan needs to be modified.	
LP1993	Georgina Scott	1710	Policy 41	In 2016 the Green Belt at Fellgate was rejected due to high impact on the wildlife corridor. Build on brownfield, not Green Belt.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP0585	David Milne	1711	Policy 41	The policy is not considered to be sound or to meet the Duty to Cooperate. Removal of Green Belt will not enhance the natural environment.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP2020	Lawrence Taylor	1712	Policy 41	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Objects to proposed development on Green Belt land at SP8. Considers the housing estimates to be incorrect. Several brownfield sites have been excluded from the plan due to the perceived "difficulty in development," which often translates to higher costs and lower profits for developers. It is not clear how community facilities and infrastructure would be delivered. Negative impact on green infrastructure and wildlife corridor.	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.
LP2037	Brenda Forrest	1713	Policy 41	Objects to building on Green Belt. There are a number of industrial and commercial sites in the South Tyneside area which are no longer in use. A number of these sites are within the	We believe the plan to be sound and no change is needed. Policy 41 does not consider the proposed allocations. Rather, it seeks to protect the remaining Green Belt in accordance with the NPPF.

Appendix J – Chapter 11 – Conserving and enhancing the natural environment

				transport hub and would therefore be suitable for housing development. There is no evidence that the housing requirement for the Plan period is at a level requiring development on the Green Belt.	
LP1867	Church Commissioners for England	1714	Policy 41	Does not have any objections to the policy requirements of Policy 41 but rather the extent of the policy coverage, i.e., the land retained within the designated Green Belt.	We believe the plan to be sound and no change is needed.

Appendix J – Chapter 12 – Conserving and enhancing the historic environment

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP24					
LP1931	Historic England	1715	SP24	Considers the policy to be sound but suggest minor modifications to the wording.	South Tyneside are committed to continue to work with Historic England on heritage matters as set out in the Statement of Common Ground between the parties.
LP0645	Delia McNally	1716	SP24	Supports SP24.	Support noted.
LP1946	Barratt Homes	1717	SP24	Supports SP24.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1718	SP24	Supports SP24.	Support noted.
Policy 42					
LP1931	Historic England	1719	Policy 42, para 12.16, Map 31	The policy is not considered to be sound but could be made sound with some minor modifications to the policy title, policy wording, para 12.16 and the key on Map 31.	South Tyneside are committed to continue to work with Historic England on heritage matters as set out in the Statement of Common Ground between the parties.
LP0645	Delia McNally	1720	Policy 42	Supports Policy 42	Support noted.
LP1946	Barratt Homes	1721	Policy 42	Supports Policy 42	Support noted.
Policy 43					
LP1931	Historic England	1722	Policy 43	The policy is not considered to be sound but could be made sound with some minor modifications to the wording.	South Tyneside are committed to continue to work with Historic England on heritage matters as set out in the Statement of Common Ground between the parties.
LP0645	Delia McNally	1723	Policy 43	Supports Policy 43.	Support noted.
LP1946	Barratt Homes	1724	Policy 43	Supports Policy 43.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1725	Policy 43	Requests that the wording of point 3 be changed to make it 'should' instead of 'will only be permitted' as in reality there are circumstances where significance will be harmed but will be permitted because it is outweighed by	We believe the policy to be sound and no change is needed. The Council has worked closely with colleagues at Historic England to ensure

Appendix J – Chapter 12 – Conserving and enhancing the historic environment

				public benefits. Point 4 (ii) should be changed to make clear that development should protect those features of a designated heritage asset's immediate setting that contribute to its significance, including the space(s) around the building and the historically significant hard and soft landscaping, including trees, hedges, walls, fences, and surfacing.	the policy wording is robust and in accordance with the NPPF.
Policy 44					
LP1931	Historic England	1726	Policy 44	Supports Policy 44.	Support noted.
LP0645	Delia McNally	1727	Policy 44	Supports Policy 44.	Support noted.
LP1944	Avant Homes North East	1728	Policy 44	Policy 44 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with the provisions of paragraph 211 of the National Planning Policy Framework (NPPF) (2023) which states that 'Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.'	We believe the plan to be sound and no change is needed. The Council has worked closely with colleagues at Historic England to ensure the policy wording is robust and in accordance with the NPPF.
LP1946	Barratt Homes	1729	Policy 44	Supports Policy 44.	Support noted.
Policy 45					
LP1931	Historic England	1730	Policy 45	The policy is not considered to be sound. However, the wording of policy 45.3 does not accurately reflect the wording of the NPPF regarding a balanced judgement being taken.	South Tyneside are committed to continue to work with Historic England on heritage matters as set out in the Statement of Common Ground between the parties.
LP0645	Delia McNally	1731	Policy 45	Supports Policy 45.	Support noted.
LP1944	Avant Homes North East	1732	Policy 45	Policy 45 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Criterion 2 of Policy 45, along with paragraph 12.28 of the supporting text as written, would allow for unidentified non-designated heritage assets to be defined	We believe the plan to be sound and no change is needed. The Council has worked closely with colleagues at Historic England to ensure

Appendix J – Chapter 12 – Conserving and enhancing the historic environment

				through the development management process. Criterion 2 is not required in the Policy.	the policy wording is robust and in accordance with the NPPF.
LP1946	Barratt Homes	1733	Policy 45	Supports Policy 45.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1734	Policy 45	Supports Policy 45.	Support noted.
LP0585	David Milne	1735	Policy 45	The policy is not considered to be sound or to meet the Duty to Cooperate. Land in the Green Belt should not be released for development.	We believe the plan to be sound and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary to meet development needs in the interests of the proper long-term sustainable planning of the borough in accordance with the NPPF.
Policy 46					
LP1931	Historic England	1736	Policy 46	Supports Policy 46.	Support noted.
LP1234	Mineral Products Association	1737	Policy 46	Supports the principle of the policy but suggest the plan needs to clarify how it will meet the demand for the extraction of building stone needed for the repair of heritage assets.	We believe the policy is sound and no change is required. Policy 57 supports mineral extraction, however the council do not consider it to be the role of the Plan to identify material sources for specific developments.
LP0645	Delia McNally	1738	Policy 46	Supports Policy 46.	Support noted.
LP1946	Barratt Homes	1739	Policy 46	Supports Policy 46.	Support noted.

Appendix J – Chapter 13 – Well-designed Places

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy 47					
LP1912	National Gas Transmission	1740	Policy 47	Request the inclusion of a policy strand that respects existing site constraints including utilities situated within sites.	We believe the policy to be sound and no change is needed.
LP1912	National Grid	1741	Policy 47	Request the inclusion of a policy strand that respects existing site constraints including utilities situated within sites.	We believe the policy to be sound and no change is needed.
LP1931	Historic England	1742	Policy 47	Supports Policy 47.	Support noted.
LP0645	Delia McNally	1743	Policy 47	<p>The policy is not considered to be sound as it does not provide for does not provide for the use of Neighbourhood Plan Design guides and does not require the following:</p> <ul style="list-style-type: none"> • New development proposals to include a requirement for tree lined streets • The use of nationally Described Space Standards • The creation of places that are safe, inclusive and accessible and which promote health and well-being. 	We believe the plan to be sound and no change is needed. Policy 47 is consistent with the characteristics set out in the National Design Guide. Paragraph 13.5 makes specific reference to the National Design Guide. Planning applications are assessed against the NPPF, National Design Guidance, Local Plan policies and made Neighbourhood Plans.
LP1938	Alan Howard Becke and Susan Shilling	1745	Policy 47		
LP0905	Joe Thompson	1748	Policy 47		
LP1954	East Boldon Neighbourhood Forum	1750	Policy 47		
LP0945	Grahame Tobin	1755	Policy 47		
LP1996	Kirstin Richardson	1756	Policy 47		
LP1334	Keep Boldon Green	1759	Policy 47	The policy is not considered to be sound and does not comply with guidance, specifically the Nationally Described Space Standards.	We believe the plan to be legally compliant, sound and to meet the Duty to Cooperate. No change is needed. The Nationally Described Space Standard remains optional and Planning Practice Guidance states that Local Authorities should only introduce NDSS where there is clear evidence of need. There is no evidence to suggest that the Plan should implement NDSS across the borough. The introduction of such a policy would negatively impact the Council's aims to make the best and most
LP0703	Cleadon and East Boldon Branch Labour Party	1744	Policy 47		

Appendix J – Chapter 13 – Well-designed Places

					efficient use of land, therefore putting pressure on the Green Belt and greenfield sites. Policy 20 seeks to provide more accessible homes.
LP1944	Avant Homes North East	1746	Policy 47	<p>Policy 47 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Reasons are:</p> <ul style="list-style-type: none"> • Sub-section 7iii should not be seen preclude or discourage scheme amendments which can be appropriate and necessary. Rather they should focus on the design quality of those amendments. • With regards to the reference to the removal of permitted development rights to safeguard against inappropriate extensions and alterations by occupiers the Council should have regard to the Planning Practice Guidance - PPG ID: 21a-017-20190723. • The Council should set out a timetable for the preparation of the Design Code for the Borough. 	<p>We believe the plan to be sound and no change is needed.</p> <p>The Council is unable to set out a timetable for the preparation of a Design Code for South Tyneside at the moment, but it remains an aspiration.</p>
LP1946	Barratt Homes	1747	Policy 47	Supports Policy 47.	Support noted.
LP1952	Taylor Wimpey	1749	Policy 47	<p>The policy includes requirements which are not well defined and are likely to result in confusion for the decision-maker. For example, Part 1 (iii) of the policy requires development proposals to “Protect any important local views into, out of or through the site”. However, the important local views have not been identified or designated nor has any criteria been set for what defines a view as ‘important’. Any policy requirements need to be well defined and reflect a flexible approach which takes account of the broad range of possible designs for new development.</p>	<p>We believe the plan to be sound and no change is needed.</p> <p>Policy 47 is consistent with the characteristics set out in the National Design Guide.</p> <p>Paragraph 13.5 makes specific reference to the National Design Guide which makes more detailed guidance on context/views.</p>

Appendix J – Chapter 13 – Well-designed Places

LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1751	Policy 47	Requests that the numbering is amended for the purposes of accuracy and clarity.	Proposed modification noted. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with the suggestion made.
LP1964	Persimmon Homes	1752	Policy 47	The policy is not considered to be sound. In part 6 of the policy, it is not fully understood what is meant by good quality internal environments, and what this entails. Furthermore, there is no detail as to what would quantify as harm to amenity in terms of overlooking.	We believe the plan to be sound and no change is needed. Policy 47 is consistent with the characteristics set out in the National Design Guide. Paragraph 13.5 makes specific reference to the National Design Guide which makes more detailed guidance on context/views/overlooking.
LP1966	NHS Property Services Ltd	1753	Policy 47	Supports Policy 47.	Support noted.
LP1979	Emma Johnston	1754	Policy 47	Policy 47 as currently drafted does not specifically provide tree lined streets. Modification requested to address this.	We believe the plan to be sound and no change is needed. Policy 47 is consistent with the characteristics set out in the National Design Guide. Paragraph 13.5 makes specific reference to the National Design Guide. Planning applications are assessed against the NPPF, National Design Guidance, Local Plan policies and made Neighbourhood Plans.
LP1440	Emma Thompson	1757	Policy 47	Policy 47 as currently drafted does not specifically provide tree lined streets. Modification requested to address this.	We believe the plan to be sound and no change is needed. Policy 47 is consistent with the characteristics set out in the National Design Guide.

Appendix J – Chapter 13 – Well-designed Places

					Paragraph 13.5 makes specific reference to the National Design Guide. Planning applications are assessed against the NPPF, National Design Guidance, Local Plan policies and made Neighbourhood Plans.
LP1867	Church Commissioners for England	1760	Policy 47	Support the ambition of Policy 47 but do have concerns regarding the practical implementation of the policy without further guidance. For example, Important local views have not been identified or designated nor has any criteria been set for what defines a view as 'important'.	We believe the plan to be sound and no change is needed. Policy 47 is consistent with the characteristics set out in the National Design Guide. Paragraph 13.5 makes specific reference to the National Design Guide which makes more detailed guidance on context/views.
Policy 48					
LP0645	Delia McNally	1761	Policy 48	The policy is considered to be legally compliant and to meet the Duty to Cooperate. Agree with East Boldon Forum policy EB3 on Design Code.	Support noted.
LP1946	Barratt Homes	1762	Policy 48	Supports Policy 48.	Support noted.
Policy 49					
LP0645	Delia McNally	1763	Policy 49	The policy is considered to be legally compliant. Agree with East Boldon Forum policy EB3 on Design Code.	Support noted.
LP1946	Barratt Homes	1764	Policy 49	Supports Policy 49.	Support noted.

Appendix J – Chapter 14 – Transport and Infrastructure

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy SP25					
LP0303	National Highways	1765	SP25	It is considered that SP25 could be supported subject to some minor alterations.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP1164	Gateshead Council	1767	SP25	The aims of SP25 are supported. Further information and discussions are requested in relation to traffic modelling. Until this is resolved the Duty to Co-operate has not been met.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Gateshead Council.
LP0645	Delia McNally	1768	SP25	The policy is not considered to be sound. The Plan does not set out how additional infrastructure needs in the East Boldon area will be met, including school places, healthcare provision and traffic congestion. Remove site GA2 or significantly reduce the 263 homes proposed for this site.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP1938	Alan Howard Becke and Susan Shilling	1769	SP25	The policy is not considered to be sound or to meet the Duty to Cooperate. The Plan does not set out how additional infrastructure needs will be met, including school places and healthcare provision.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing

Appendix J – Chapter 14 – Transport and Infrastructure

					growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1944	Avant Homes North East	1770	SP25	The policy is not considered to be sound. It is important that the Council clarifies that any provision of infrastructure in relation to development should only need to mitigate for the effects of the development, rather than be required to improve existing deficiencies in provision.	We believe the policy to be sound and no change is needed. Point 1 of Policy SP25 incorporates the necessary flexibility to ensure that improving any deficiencies in existing provision is only required when they would be exacerbated as a result of development.
LP1946	Barratt Homes	1771	SP25	Supportive of policy SP25	Support is noted and welcomed.
LP1953	Bellway Homes	1773	SP25	The policy is not considered to be sound. It does not refer to viability. The policy needs to cross-refer to Policy 60, which references viability.	We believe the policy to be sound and no change is needed. The Plan should be read as a whole. Cross-referencing between different policies is not considered to be necessary.
LP1417	Bellway Homes	1774	SP25		
LP0949	Lesley Younger	1775	SP25	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Development will worsen traffic congestion and pollution in East Boldon.	We believe the policy to be sound and no change is needed. There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to. Policy 2 provides clear guidance on how Air Quality issues would be considered for future development proposals. The Local Plan includes policies which seek to support a modal shift towards sustainable and active transport by supporting infrastructure improvements and reducing reliance on private vehicles.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1776	SP25	Policy SP25 is not sound as it is not considered to be reasonable for development to have to rectify existing deficiencies.	We believe the plan to be sound and no change is needed. Point 1 of Policy SP25 incorporates the necessary flexibility to ensure that improving any deficiencies in existing provision is only required when they would be exacerbated as a result of development.
LP1149	Banks Group	1777	SP25	Supportive of SP25 but in terms of the IDP, considers it important to distinguish between existing infrastructure problems that are required to be	We believe the plan to be sound and no change is needed. Point 1 of Policy SP25 incorporates the necessary flexibility to ensure that improving any

Appendix J – Chapter 14 – Transport and Infrastructure

				addressed regardless of new development and those directly attributable to new development.	deficiencies in existing provision is only required when they would be exacerbated as a result of development.
LP1409	Jean Eckert	1778	SP25	The policy is not considered to be legally compliant or sound. Item 4vii of Policy 51 (working with Network Rail to assess the implications of full barrier operation at Tileshead and Boldon level crossings) should be removed from this Plan and the council be made to fully account for all of the Transforming Cities Fund proposals.	We believe the policy to be legally compliant, sound and to comply with the Duty to Cooperate. The council will continue to work with Network Rail to understand the implications of level crossing upgrades at Tileshead and Boldon level crossings in respect of road safety and traffic flows.
LP1979	Emma Johnston	1779	SP25	The policy is not considered to be sound. The Plan fails to set out how additional infrastructure needs will be met, including school places, healthcare provision and road networks in East Boldon.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0945	Grahame Tobin	1780	SP25	The policy is not considered to be sound. The Plan fails to set out how additional infrastructure needs will be met, including school places and healthcare provision. The plan needs to set out the true infrastructure requirements across the villages as it has done for Fellgate.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1989	Julie Price	1781	SP25	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. Development of the land south of Fellgate, will worsen traffic congestion and pollution. The allocation should be removed from the Plan.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The Fellgate Sustainable Growth Area has been robustly considered through the plan preparation process and supporting

Appendix J – Chapter 14 – Transport and Infrastructure

					evidence base. Policy SP8 sets out clear criteria to address and mitigate impacts of development.
LP0585	David Milne	1782	SP25	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. It has not been positively prepared, does not meet the needs of residents, is not objectively assessed and has not been prepared to the government's latest guidance.	We believe the plan to be sound and no change is needed. The Local Plan has been produced in accordance with the NPPF (September 2023) and subsequent transitional arrangements set out in the NPPF (December 2023).
LP2037	Brenda Forrest	1783	SP25	The Plan fails to set out how additional infrastructure needs will be met, including school places, healthcare provision and road networks in Boldon.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP2061	STEP	1784	SP25	The policy has not been positively prepared. It does not ensure there is sewage capacity in the existing network to cope with new development.	We believe the policy to be sound and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.
LP2187	Gillian Johnston	1785	SP25	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. It has not been positively prepared and does not ensure there is sewage capacity in the existing network to cope with new development. Amend Policy SP25 to include a more robust statement about the design of	We believe the policy to be sound and no change is needed. Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations.

Appendix J – Chapter 14 – Transport and Infrastructure

				infrastructure which takes climate- change resilience into account.	
Policy 50					
LP1933	Howard Lawrence	1786	Policy 50	The policy is not considered to be sound. Policy 50 does not contain sufficient detail about how appropriate social, environmental, and physical infrastructure will be provided to cater for the impact of new development on local communities. Policy 50 should be amended to provide more detail about delivery of appropriate social, environmental and physical infrastructure will be achieved to mitigate the impact of new development on local communities.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0645	Delia McNally	1787	Policy 50	Supportive of Policy 50.	Support noted and welcomed.
LP0685 / LP1616	Roy Wilburn	1788	Policy 50	The policy is not considered to be sound. Policy 50 does not contain sufficient detail about how physical infrastructure will be provided within the East Boldon Neighbourhood Area. Policy 50 should be amended to provide more detail. Policies in Neighbourhood Plans should be acknowledged.	<p>We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).</p> <p>The Local Plan acknowledges the relationship between the Local Plan and Neighbourhood Plans and regard has been had to these Plan in the preparation of the Local Plan.</p>
LP1938	Alan Howard Becke and Susan Shilling	1789	Policy 50	The policy is not considered to be sound or to meet the Duty to Cooperate. The Policy does not contain sufficient detail about how appropriate social, environmental and physical infrastructure will be provided to cater for the impact of new developments on existing local communities.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).

Appendix J – Chapter 14 – Transport and Infrastructure

LP1946	Barratt Homes	1790	Policy 50	Supportive of Policy 50.	Support noted and welcomed.
LP0905	Joe Thompson	1791	Policy 50	The policy is not considered to be sound. The policy does not give sufficient detail about how the infrastructure of East Boldon, such as healthcare provision, the road network and school places will be supported to cope with the increase in housing numbers. Policy 50 should be amended to provide more detail about how the delivery of appropriate social, environmental and physical infrastructure will be achieved to mitigate the impact of new development on local communities.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP0916	Eileen Thompson	1792	Policy 50	The policy is not considered to be sound. The Plan fails to set out how additional infrastructure needs will be met, including school places, healthcare provision and road networks in East Boldon. Reduce the number of houses proposed for East Boldon and provide clear and deliverable proposals for infrastructure that are proportionate to development proposals.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1954	East Boldon Neighbourhood Forum	1793	Policy 50	The policy is not considered to be sound. The Plan fails to set out how additional infrastructure needs will be met, including school places, healthcare provision and road networks in East Boldon. Policy 50 should be amended to provide more detail about how the delivery of appropriate social, environmental and physical infrastructure will be achieved to mitigate the impact of new development on local communities. This could include the acknowledgement of the policies within a Neighbourhood Plan within a Neighbourhood Forum area.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to. The Local Plan acknowledges the relationship between the Local Plan and Neighbourhood Plans and regard has

Appendix J – Chapter 14 – Transport and Infrastructure

					been had to these Plan in the preparation of the Local Plan.
LP0949	Lesley Younger	1794	Policy 50	The policy is not considered to be legally compliant, sound or to meet the Duty to Cooperate. The Plan fails to set out how additional infrastructure needs will be met, including school places and healthcare provision. More detail is needed about how the delivery of infrastructure will be achieved, and realistic costings identified.	We believe the policy to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1).
LP1966	NHS Property Services Ltd	1795	Policy 50	Policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land. To ensure the Plan is positively prepared and effective, NHSPS are seeking the modifications to Policy 50.	We believe the policy to be sound but would be willing to consider minor modifications in accordance with some of the suggestions raised.
LP1983	Dave Hutchinson	1796	Policy 50	The policy is not considered to be sound. The Plan fails to set out how additional infrastructure needs will be met, including school places, healthcare provision and road networks in East Boldon. Policy 50 should be amended to provide more detail about how the delivery of appropriate social, environmental and physical infrastructure will be Achieved.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1334	Keep Boldon Green	1798	Policy 50	The policy is not considered to be sound. The Plan fails to set out how additional infrastructure needs will be met, including school places, healthcare provision and road networks in East Boldon. Policy 50 should be amended to provide more detail about how the delivery of appropriate social, environmental and physical infrastructure will be achieved to mitigate the	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a

Appendix J – Chapter 14 – Transport and Infrastructure

				<p>impact of new development on local communities. This could include the acknowledgement of Neighbourhood Plan policies.</p>	<p>range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.</p> <p>The Local Plan acknowledges the relationship between the Local Plan and Neighbourhood Plans and regard has been had to these Plan in the preparation of the Local Plan.</p>
Policy SP26					
LP0303	National Highways	1799	SP26	Amend Policy SP26 so that all new developments seek improvements to sustainable travel accessibility.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP1164	Gateshead Council	1800	SP26	The aims of SP25 are supported. However, further information is requested in relation to traffic modelling. Further discussions are required. Until this is resolved the policy is not considered to meet the Duty to Co-operate.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Gateshead Council.
LP0645	Delia McNally	1801	SP26	The policy is not considered to be sound. Development will worsen infrastructure capacity in East Boldon including traffic and will reduce air quality. Remove site GA2 or significantly reduce the 263 homes proposed for this site.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). The allocation has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development.
LP1944	Avant Homes North East	1802	SP26	The policy is not considered to be sound. Greater clarity is needed on type, scale and proportionality of the requirement to provide new and/or improved sustainable travel infrastructure.	We believe the Plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions raised.

Appendix J – Chapter 14 – Transport and Infrastructure

				The requirement all new homes are located no more than 400m from a bus stop, is too restrictive. Reword policy SP26 sub-section 3 and sub-section 4 (v).	
LP1946	Barratt Homes	1803	SP26	Supportive of Policy SP26	Support noted and welcomed.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1804	SP26	Concerns that the requirement that all new homes are located no more than 400m from a bus stop, is too restrictive. Remove the reference to the 400m requirement.	We believe the Plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions raised.
LP1964	Persimmon Homes	1805	SP26	The policy is not considered to be sound and has not been positively prepared. Concerned that the requirement that all new homes are located no more than 400m from a bus stop, is too restrictive.	We believe the Plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions raised.
LP1149	Banks Group	1806	SP26	Supportive of SP26 but the requirement that all new development should be no further than 400m from a bus stop needs to be more flexible.	We believe the Plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions raised.
LP1968	Network Rail	1807	SP26	Transport Statements/Assessments should include consideration of the impact of the scheme upon operational railway level crossings and railway stations. Section 4(v) should be modified to include reference to improving accessibility to national rail stations.	We believe the plan to be sound and no change is needed. There are no National Rail stations in South Tyneside.
Policy 51					
LP0303	National Highways	1808	Policy 51	Policy 52 should be amended to reflect the Strategic Highways Report.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP0645	Delia McNally	1809	Policy 51	The policy is not considered to be sound as it is not clear how infrastructure will be delivered in East Boldon. Remove site GA2 or significantly reduce the 263 homes proposed for this site.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a

Appendix J – Chapter 14 – Transport and Infrastructure

					range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1946	Barratt Homes	1810	Policy 51	Supportive of the policy.	Support noted and welcomed.
LP1968	Network Rail	1811	Policy 51	Welcomes the opportunity to work closely with the council to assess the implications of full barrier operation at Tiledshed and Boldon Level Crossings.	Comments noted and welcomed.
LP1409	Jean Eckert	1812	Policy 51	The policy is not considered to be sound. Item 4 vii of Policy 51 (working with Network Rail to assess the implications of full barrier operation at Tiledshed and Boldon level crossings) is presented as an ongoing dilemma. It should be removed from the Plan and the council be made to fully account for all the Transforming Cities Fund proposals.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The council will continue to work with Network Rail to understand the implications of level crossing upgrades at Tiledshed and Boldon level crossings in respect of road safety and traffic flows.
LP2007	Dan Parr	1813	Policy 51	The policy is not considered to be sound or legally compliant and does not comply with the duty to co-operate. Evidence set out in traffic modelling is flawed and traffic congestion will worsen in and around Fellgate.	We believe the plan to be sound and no change is needed. We believe the Local Plan evidence is robust.
LP0585	David Milne	1814	Policy 51	The policy is not considered to be sound or compliant with the duty to co-operate. Development will worsen traffic congestion.	We believe the plan to be sound and no change is needed. The traffic modelling that has been undertaken shows that the impact of the proposed development on the highway network can be mitigated. Planning applications will need to be accompanied by a Transport Statement or Transport Assessment and a Travel Plan, showing how the impact of the development proposal on the highway network will be mitigated.
LP1847	Andrea George	1815	Policy 51	The proposal of a highways flyover at Tiledshed Crossing will increase air and noise pollution. The impacts of the A19 flyover at Testos should be analysed.	We believe the plan to be sound and no change is needed. The Local Plan does not propose a fly-over at Tiledsheds.

Appendix J – Chapter 14 – Transport and Infrastructure

LP2020	Lawrence Taylor	1816	Policy 51	The policy is not considered to be sound or legally compliant and does not comply with the duty to co-operate. Evidence set out in traffic modelling is flawed and traffic congestion will worsen. A new road network survey should be initiated, and improvements should be made in how the results are communicated to residents.	We believe the policy to be sound and no change is needed. The traffic modelling was undertaken by consultants with the relevant technical expertise and experience and the council considers it to be robust.
LP2025	Anthony Pollock	1817	Policy 51	The proposal of a highways flyover at Tiledshed Crossing will increase air and noise pollution. The impacts of the A19 flyover at Testos should be analysed.	We believe the plan to be sound and no change is needed. The Local Plan does not propose a fly-over at Tiledsheds.
LP2027	Karen King	1818	Policy 51	The policy is not considered to be sound based on the evidence and conclusions from the Local Road Network - Traffic Capacity Assessment. Development of the land south of Fellgate will worsen traffic congestion.	We believe the policy to be sound and no change is needed. Traffic modelling shows that the impact of the proposed development on the highway network can be mitigated.
Policy 52					
LP0645	Delia McNally	1819	Policy 52	Supportive of Policy 52	Support noted and welcomed.
LP1946	Barratt Homes	1820	Policy 52	Supportive of Policy 52	Support noted and welcomed.
LP1958	Sunderland City Council	1821	Policy 52	Welcomes support for the re-opening of the Leamside Line, as well as safeguarding a railway alignment between South Shields and Sunderland.	Support noted and welcomed.
LP1964	Persimmon Homes	1822	Policy 52	The policy is not considered to be sound. Policies Map is not legible in relation to the safeguarded metro and rail land.	Comment noted
LP1968	Network Rail	1823	Policy 52 Para 14.28	Supportive of the policy. No reference to the potential for rail freight when considering the reinstatement of the Leamside Line. Para 14.28 is not clear.	We consider the plan to be sound but we are willing to consider minor modifications in accordance with some of the suggestions raised.
LP1409	Jean Eckert	1824	Policy 52	The plans for the infrastructure contained in this policy are well advanced and are included in as part of the region's bid for the funding of the	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The schemes referred to by the respondent will be significant

Appendix J – Chapter 14 – Transport and Infrastructure

				<p>Leamside Line and the Washington Metro Loop. These proposals will create the need for the closing of the level crossings, and so the flyover, as it is intended to increase the rail traffic on the Durham Coast Line.</p> <p>Policy 52 is not considered to be sound. It should be removed from Plan and the council made to account for these proposals and provide fair consultations.</p>	improvements to the transport infrastructure of the region and it is important that council supports them.
Policy 53					
LP0645	Delia McNally	1825	Policy 53	Supportive of Policy 53	Support noted and welcomed.
LP1946	Barratt Homes	1826	Policy 53	Supportive of Policy 53	Support noted and welcomed.

Appendix J – Chapter 15 – Waste and Minerals

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy 54					
LP0645	Delia McNally	1827	Policy 54	Considers the policy legally compliant.	Support noted.
LP1946	Barratt Homes	1828	Policy 54	Supports Policy 54.	Support noted.
LP2037	Brenda Forrest	1829	Policy 54	Notes that there are regular discharges of untreated sewage into the sea at Whitburn and nothing has been done to stop or reduce this. Does not consider that there is sufficient capacity to cope with the proposed housing development.	The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). Northumbrian Water has advised that it has sufficient network and treatment capacity to support the proposed development allocations. The Environment Agency has also not raised any concerns regarding the proposed development allocations. We believe the Plan to be sound and no change is required.
Policy 55					
LP0645	Delia McNally	1830	Policy 55	Considers the policy legally compliant.	Support noted.
LP1946	Barratt Homes	1831	Policy 55	Supports Policy 55.	Support noted.
Policy 56					
LP1234	Mineral Products Association	1832	Policy 56, Policies Map	Suggests that the policy is split in to two separate policies. The first policy should make provision for a steady and adequate supply of minerals with a commitment to maintaining the landbank requirements stated in the NPPF. The second policy should focus on the safeguarding of	We believe the policy to be sound but are willing to consider some minor modifications regarding the policy title and policies map clarity.

Appendix J – Chapter 15 – Waste and Minerals

				mineral resources, minerals infrastructure and facilitate prior extraction. The policies map is overcrowded and difficult to highlight Minerals Safeguarding Areas.	
LP1946	Barratt Homes	1833	Policy 56	Supports Policy 56.	Support noted.
LP1918	CEMEX UK	1834	Policy 56	Supports Policy 56.	Support noted.
Policy 57					
LP1946	Barratt Homes	1834	Policy	Supports Policy 57.	Support noted.

Appendix J – Chapter 16 – Implementation and Monitoring

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Policy 58					
LP1931	Historic England	1835	Policy 58	Supports Policy 58	Support noted.
LP1049 / LP1663	Laverick Hall Farm Ltd and the Dean & Chapter of Durham Cathedral (jointly)	1836	Policy 58	The policy is not considered to be sound. It should be made clear what circumstances would trigger a review. The contingency measures are not sufficient to address a shortfall in housing supply. Recommend an additional contingency measure should be added to Policy 58 to state: "A partial or full review of the Local Plan where it is not possible to evidence a rolling five-year supply of deliverable housing sites, or that housing delivery is falling below the Housing Delivery Test over a rolling three year period."	The policy refers to implementing corresponding contingency measures as set out within the Implementation and Monitoring Framework (Appendix 3). This includes a plan review where necessary. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP1944	Avant Homes North East	1837	Policy 58	The policy is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Reference to reviews should be significantly strengthened. Consider other alternative measures such as granting planning permission for development on sustainably located unallocated sites and consider the role of safeguarded land should the council fall short against housing requirement or Housing Delivery Test (HDT).	The policy refers to implementing corresponding contingency measures as set out within the Implementation and Monitoring Framework (Appendix 3). The council considers the plan to be sound but would be willing to consider minor modifications raised in relation to Policy 13: Windfall Sites in accordance with some of the suggestions made regarding Policy 58.
LP1946	Barratt Homes	1838	Policy 58	Supports Policy 58	Support noted.
LP1953	Bellway Homes	1839	Policy 58	The measures outlined to actively monitor how the Local Plan policies are performing are too narrow and on this basis the policy is unsound for being ineffective.	The policy refers to implementing corresponding contingency measures as set out within the Implementation and Monitoring Framework (Appendix 3). The council considers the plan to be sound but would be willing to consider minor modifications raised in

Appendix J – Chapter 16 – Implementation and Monitoring

				Consider granting planning permission for unallocated sites in sustainable locations not covered by Policy 13.	relation to Policy 13: Windfall Sites in accordance with some of the suggestions made regarding Policy 58.
LP1138	Home Builders Federation	1840	Policy 58	Policy 58 is not considered to be sound as it is not positively prepared, justified or consistent with national policy. it is considered that the Council may want to consider alternate measures such as the granting of planning permission for unallocated sites in sustainable locations. The Council may also want to consider how this policy sits with the Housing Delivery Test and the presumption in favour of sustainable development as set out in the NPPF.	The policy refers to implementing corresponding contingency measures as set out within the Implementation and Monitoring Framework (Appendix 3). The council considers the plan to be sound but would be willing to consider minor modifications raised in relation to Policy 13: Windfall Sites in accordance with some of the suggestions made regarding Policy 58.
LP1417	Bellway Homes	1841	Policy 58	The measures outlined to actively monitor how the Local Plan policies are performing are too narrow and on this basis the policy is unsound for being ineffective. Consider granting planning permission for unallocated sites in sustainable locations not covered by Policy 13.	The policy refers to implementing corresponding contingency measures as set out within the Implementation and Monitoring Framework (Appendix 3). The council considers the plan to be sound but would be willing to consider minor modifications raised in relation to Policy 13: Windfall Sites in accordance with some of the suggestions made regarding Policy 58.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1842	Policy 58, Appendix 3	The policy is not considered to be sound. Whilst Appendix 3 includes the option to review the Plan, this has not been carried through into the various options set out in points 1 to 7 of Policy 58 as an option against which performance is to be measured.	The policy refers to implementing corresponding contingency measures as set out within the Implementation and Monitoring Framework (Appendix 3). This includes a plan review where necessary. The council considers the plan to be sound but would be willing to consider minor modifications in accordance with some of the suggestions made.
LP1964	Persimmon Homes	1843	Policy 58	Policy 58 is not considered to be sound as it is not consistent with national policy. The action points	The policy refers to implementing corresponding contingency measures as set out within the

Appendix J – Chapter 16 – Implementation and Monitoring

				are not positively prepared. There is little flexibility in the housing numbers in the Plan. It is not understood how a review of allocations would resolve delivery in a timely manner. A more positive approach is to allow unallocated sites in sustainable locations to come forward.	Implementation and Monitoring Framework (Appendix 3). The council considers the plan to be sound but would be willing to consider minor modifications raised in relation to Policy 13: Windfall Sites in accordance with some of the suggestions made regarding Policy 58.
Policy 59					
LP0303	National Highways	1844	Policy 59	It is proposed that the wording is amended regarding the timing and prioritisation of delivery	The council's response is set out in the Statement of Common Ground between South Tyneside Council and National Highways.
LP0645	Delia McNally	1845	Policy 59	Considers the allocation GA2 should either be removed or housing numbers significantly reduced as currently not sustainable.	We believe the plan to be sound and no change is needed. The allocation has been robustly considered through the plan preparation process and supporting evidence base. The "key considerations" for GA2 in Policy SP7 sets out clear criteria to address and mitigate impacts of development
LP1944	Avant Homes North East	1846	Policy 59	The policy is not considered to be sound. The provisions of Policy 59 are similar in nature to those in Policy SP25: Infrastructure. This is unnecessary duplication.	We believe the plan to be sound and no change is needed. The policies are not considered to be duplicative.
LP1946	Barratt Homes	1847	Policy 59	Supports Policy 59.	Support noted.
LP1953	Bellway Homes	1849	Policy 59	The policy is not considered to be sound as it replicates Policy SP25 and is therefore inconsistent with the NPPF.	We believe the plan to be sound and no change is needed. The policies are not considered to be duplicative. Policy SP25 sets the strategic context for infrastructure delivery. Policy 59 provides detail on how infrastructure delivery will be assessed.
LP1138	Home Builders Federation	1897	Policy 59	Policy 59 is not considered to be sound as it is not positively prepared, not justified and not consistent with national policy. Notes similarities between this policy and Policy SP25: Infrastructure, and queries if both are necessary.	We believe the plan to be sound and no change is needed. The policies are not considered to be duplicative. Policy SP25 sets the strategic context for infrastructure delivery. Policy 59 provides detail on how infrastructure delivery will be assessed.

Appendix J – Chapter 16 – Implementation and Monitoring

LP1417	Bellway Homes	1850	Policy 59	The policy is not considered to be sound as it replicates Policy SP25 and is therefore inconsistent with the NPPF.	We believe the plan to be sound and no change is needed. The policies are not considered to be duplicative. Policy SP25 sets the strategic context for infrastructure delivery. Policy 59 provides detail on how infrastructure delivery will be assessed.
LP0949	Lesley Younger	1851	Policy 59	The policy is not considered to be legally compliant or sound or to meet the Duty to Cooperate. The infrastructure in East Boldon is already at capacity. Reduce housing allocation in the East Boldon area.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	1852	Policy 59	Considers the policy fails to concisely reflect the three relevant tests of planning obligations that are set out clearly within the NPPF. The policy wording could be significantly sharpened through direct referencing to this section of the NPPF.	We believe the Plan to be sound but would be willing to consider modifications to Policy 59 to more clearly reflect the three relevant tests of planning obligations that are set out in the NPPF.
LP1966	NHS Property Services Ltd	1853	Policy 59	The provision of adequate healthcare infrastructure should be given a high priority in the supporting text. Recommends the Planning Obligations SPD is updated and suggests processes for determining the appropriate form of contribution towards healthcare.	We believe the plan to be sound and no change is needed. It is not considered necessary to make specific reference to healthcare in the supporting text. Reference to future planning obligation guidance is included in paragraph 16.12.
LP1987	Brenda Horton	1854	Policy 59	The policy is not considered to be legally compliant or sound or to meet the Duty to Cooperate. The infrastructure in East Boldon is already at capacity and increased pollution is a concern.	We believe the plan to be sound and no change is needed. The council works closely with infrastructure providers to ensure that strategic and local level infrastructure and services can be maintained / provided at the appropriate level for the distribution of housing growth proposed. Further detail on this is set out in the

Appendix J – Chapter 16 – Implementation and Monitoring

					Infrastructure Delivery Plan (2024) (INV1). There are a range of policies within the Local Plan in relation to transport and infrastructure, which any proposal coming forward for a development would need to adhere to.
Policy 60					
LP1915	Sport England	1855	Policy 60	Supportive of the policy. However, the 2008 SPD requires updating to reflect the findings of the Playing Pitch Strategy.	The council's response is set out in the Statement of Common Ground between South Tyneside Council and Sport England.
LP0645	Delia McNally	1856	Policy 60	The policy is not considered to be sound due to concerns over developer contributions.	We believe the plan to be sound and no change is needed.
LP0685 / LP1616	Roy Wilburn	1857	Policy 60	The policy is not considered to be legally compliant. Further clarity over section 106 agreements is sought.	We believe the Plan to be legally compliant, sound and to comply with the Duty to Cooperate. The policy is considered to be clear.
LP1944	Avant Homes North East	1858	Policy 60, para 16.11	Policy 60 is not sound as it is not positively prepared, not justified, not effective, and is not consistent with national policy. Paragraph 16.11 only expands forward funded infrastructure projects in advance of housing growth. No specific examples of the types and scale of infrastructure required are given. Little detail of where s.106 monies are expected to be required. Further information is requested about the circumstances where retrospective s.106 contributions will be sought.	We believe the Plan to be sound but would be willing to consider modifications to Policy 60 regarding retrospective contributions.
LP1946	Barratt Homes	1859	Policy 60	Supports Policy 60.	Support noted.
LP1960	Hellens Land Ltd and the Trustees of the T.J.Jacobson Will Trust	1860	Policy 60	Supports Policy 60.	Support noted.
LP1966	NHS Property Services Ltd	1861	Policy 60	Recommends the SPD is updated to determine the appropriate form of developer contributions to healthcare. Supporting text should emphasise	We believe the plan to be sound and no change is needed. We consider that this issue is already covered by

Appendix J – Chapter 16 – Implementation and Monitoring

				that the NHS will need to work with the Council in the formulation of appropriate mitigation measures.	paragraphs 16.6 and 16.12 of the Publication Draft Local Plan.
LP0945	Grahame Tobin	1862	Policy 60, Point 2	The policy is not considered to be sound. If an applicant contends that the economic viability of development is not sufficient to fund the required infrastructure, then permission should be refused. The economics of any site is for the developer to consider before bringing forward any proposals.	We believe the plan to be sound and no change is needed. Paragraph 58 of the NPPF (September 2023) states “It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage”. Therefore, the NPPF clearly recognises that there can be circumstances which justify an applicant submitting a viability assessment.

Appendix J – Appendices and Glossary

Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
Appendix 1: List of Superseded Policies					
No comments received					
Appendix 2: List of Supplementary Planning Documents (SPD)					
No comments received					
Appendix 3: Implementation and Monitoring					
LP1931	Historic England	1887	Appendix 3	Number of applications approved contrary to policy and Number of locally significant heritage assets. Suggests this may be difficult to ascertain and may be better rephrased as number of assets on the local list.	South Tyneside are committed to continue to work with Historic England on heritage matters as set out in the Statement of Common Ground between the parties.
Appendix 4: Retail Centre Boundaries					
No comments received					
Appendix 5: Glossary					
LP1931	Historic England	1888	Appendix 5	There are a number of terms in the glossary which we consider need updating to reflect national policy and legislation.	South Tyneside are committed to continue to work with Historic England on heritage matters as set out in the Statement of Common Ground between the parties.

APPENDIX K: REPRESENTATIONS RELATING TO THE SUSTAINABILITY APPRAISAL (2024) AND HABITATS REGULATIONS ASSESSMENT (2024)

Regulation 19 Sustainability Appraisal Representations					
Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
LP2188	Angela Armstrong	SA001	SP21 - Natural environment and SP8 - Fellgate	Comments raised in relation to SP8 and SP21. Objection to the loss of Green Belt land for development and potential negative impact on the natural environment and trees.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed.
LP1990	John Bage	SA002	The social, environmental and economic effects	Objection to SP8 due negative social, environmental and economic effects. Issues raised include loss of green space, health impacts and traffic congestion.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed.
LP1698	Michelle Cook	SA003			

				Objection to SP8. Does not consider the policy to be sound as exceptional circumstances to amend the Green Belt have not been demonstrated.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
LP1697	Raymond Cook	SA004			
LP2189	Nicholas Wraith	SA005			
LP2190	Allison Cook	SA006			
LP1982	Whitburn Neighbourhood Forum	SA007	SA main report: Chapter 2 on the methodology and the sustainability objectives SA appendix	<p>The Sustainability Appraisal is not fit for purpose.</p> <p>Sustainability objective 2: too narrow set of indicators for site assessments and should include wildlife corridors and general biodiversity impacts, linking it to the wader surveys conducted.</p> <p>Sustainability Objective 4: should include an indicator for site allocations the presence of Best and Most Versatile Agricultural Land.</p> <p>Sustainability Objective 7: Only considers public</p>	<p>We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. The indicators used to assess the effects of site options on biodiversity are appropriate and proportionate, given the strategic nature of the SA.</p> <p>The assessment of site options against SA objective 4 does already involve consideration of whether sites contain best and most versatile agricultural land.</p> <p>The focus of SA objective 7 is on sustainable transport links. Active travel is captured under SA objective 5 which considers access to public rights of way and GI corridors, as</p>

			<p>transport and not active travel.</p> <p>Sustainability Objective 8: There is no negative impact possible for objective SO8 on town centres.</p> <p>Individual site assessment: Land north of Shearwater (SWH026): assessment contains errors and is unsound:</p> <p>SO2 on biodiversity: does not acknowledge the evidence report 'Wader Survey' and does not consider that this land is in a wildlife corridor (also see below on SO5).</p> <p>SO4 on efficient land use: this should be a significant negative impact, because of the loss of Best and Most Versatile Agricultural land. It is in agricultural use as horse grazing.</p> <p>SO5 on green infrastructure: The site is within the wildlife network and should be classed as</p>	<p>well as SA objective 8 which considers the distance of sites to town and village centres.</p> <p>Positive effects are identified for SA objective 8 where site options are close enough that they should increase footfall and use of town and village centres and their facilities. Where a site is more than 1km away, a neutral effect is identified (+/-). It is not considered proportionate for a site option to be appraised as having a negative effect on town and village centres if it is more than 1km away.</p> <p>All site options including SWH026 have been appraised on a consistent basis, in line with the appraisal criteria set out in Appendix E of the SA report. The evidence study referred to is not taken into account in the SA as there is a need to appraise a large number of site options consistently, drawing only on information that is available for all site options. This is proportionate, given the strategic nature of the SA.</p> <p>The effect identified for SA objective 4 is based on the agricultural land</p>
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				<p>GBI. The SA should consider the current GI boundaries, meaning that the site effects will be negative.</p> <p>SO8 on town centres: the impacts should be negative, due to the error in distance to the nearest town centre.</p> <p>Objection to green infrastructure corridors have been drawn up without following a sound methodology and evidence base. GI Strategy does not include wildlife corridors around GA6. The Sustainability Appraisal assesses the impacts of the site not on the current GI corridor, but on the proposed one, and therefore excludes an assessment of the impacts on GI. Concerns raised with regard to engagement with Green and Blue Infrastructure Strategy Study.</p>	<p>quality; therefore, the minor negative effect is correct in accordance with the appraisal criteria.</p> <p>In terms of GI corridors, the SA is based on the latest GBI Study (2022), which has also been used to inform the Local Plan policies map.</p> <p>Distances to town centres have been measured using GIS data showing the Town Centre boundary.</p>
LP2186	Natural England	SA008	Objective 4 and Objective 5	Support for Sustainability Objectives 1, 2, 4 and 5.	Support for SA Objectives welcomed. The indicators are

				Negative effects noted in relation to Local Plan policies. Suggests review of monitoring indicators.	proposed at this stage and may be subject to change.
LP1964	Persimmon Homes	SA009	Employment Growth, Housing Growth	Spatial Options for housing have been constrained and the SA does not demonstrate that the spatial distribution of housing follows a logical hierarchy, and sustainable development in all market areas or that a hierarchy of settlements has been established. The SA does not consider an option which explores the possibility of a new settlement. A large-scale urban extension has been proposed, however, there is no complete way of understanding that this is the most sustainable form of development in the borough when it hasn't been compared against the option of a new settlement.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. It is considered that the SA considers all reasonable and appropriate options for housing in South Tyneside.
LP2064	South Tyneside Green Party	SA010		Local Plan has increased amount of employment	We consider the Sustainability Appraisal (SUB3) to be robust and no

LP2065	Chris Davies	SA011		land required in Regulation 19. This is not justified by the evidence base, the amount of land allocated for employment is too high and should be utilised for housing development. The removal of Wardley Colliery from the Green Belt is not justified. The Local Plan must be revised to take forward preferred options for employment land which result in a much lower amount of land allocated for employment. SP14 must be withdrawn from the Plan. More of the land in the existing urban areas allocated in the Local Plan for employment must be allocated for housing.	change is needed. The Local Plan is required to plan for the economic needs for the borough alongside its housing requirements. The employment need for South Tyneside is set out in the Employment Land Review (2023) (EMP1) and the Employment Land Technical Paper (2024) (EMP2). We consider that both documents are robust.
LP1917	Angela Beattie	SA014			
LP2022	Matthew Johnston	SA015			
LP2023	Jaqueline Johnston	SA016			
LP2024	Christopher Johnston	SA017			
LP0636	Kevin Tindle	SA018			
LP2025	Anthony Pollock	SA019			
LP1756	Ian Hudson	SA020			
LP2048	Jennie and Ann West	SA021			
LP2049	Nicola, David and Megan West	SA022			
LP2050	Bev, Jon and Robyn Olds	SA023			
LP2051	Joyce and Bill Hills	SA024			
LP2052	Hilary, Mammed and Alex Bagher	SA025			

LP2053	Joanne, Christopher, Jack and Harry West	SA026			
LP0088	Andrew Davison	SA027			
LP2054	Lauren and Nicholas Bagher	SA028			
LP1771	Russell Hewitson	SA029			
LP1767	Andrea Hewitson	SA030			
LP1769	Moyra Fairweather	SA031			
LP1916	Dennis Grieves	SA034			
LP1417	Bellway	SA012		Support Green Belt release but object to the policy due to the exclusion of land interests. Local Plan should provide higher level of housing growth. Contests that Land at North Farm (East) (SHLAA site: SBC004) should be allocated within the Local Plan. Suggests that SA assessment would be more favourable.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. The site has been subject to SA in line with the criteria detailed in the SA report, to ensure consistency with the appraisal of other alternative options. The appraisal is based largely on GIS datasets. To amend the SA as suggested by the consultee would introduce inconsistencies in the methodology applied across all site options.

LP1931	Historic England	SA013		<p>Support for amendments to Scoping Report to support the SA.</p> <p>Para 5.81, Table 6.1, Table 6.2 are considered to be sound.</p> <p>Table 6.4 - Unsound - P6 – do not agree that policy P6 should score positively against SA Objective 6 for cultural heritage.</p> <p>Policy P30 - Unsound - consider a positive score can be achieved with amendments but current SA Objective 6 should be negative.</p> <p>Table 6.8 - Unsound - Policy P38 – a negative score should be attributed to SA Objective 6 on cultural heritage against this policy, but this can be a positive or neutral score with suggested amendments. Suggest minor changes to</p>	<p>We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed.</p> <p>The effects of SP5 and SP8 on the historic environment are based on the Council's assessment of sensitivity for the site options (SOS009 and SFG075), see Chapter 5 of the SA report. The potential for a more positive effect to be identified for SP9 is noted.</p> <p>Comments in relation to P6 relate more to the Council's evidence base than the SA directly.</p> <p>Comments in relation to Policies P30, P38, 42 and 43 relate to the wording of the policies rather than the SA directly although the suggestion of negative effects for P30 and P38 is noted.</p>
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				<p>policies 42 and 43 on the local plan. With these changes we agree a double positive against SA Objective 6 for these policies.</p> <p>Table 6.9 - Partially sound - We suggest minor changes to policies 42 and 43 on the local plan. With these changes we agree a double positive against SA Objective 6 for these policies. Minor changes required to score strongly positive against SA Objective 6 for policies 42 and 43.</p>	
LP1960	Hellens Land Ltd and the Trustees of the T.J. Jacobson Will Trust	SA032	Health Impact Assessments and appendix F	<p>Questions need for Health Impact Assessments when the SA has been produced as an integrated assessment with HIA included. Support for assessment of GA3 (Appendix F)</p>	<p>We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. Support for GA3 welcomed. It is considered that the HIA policy requirement is intended to assess the localised health impacts associated with development and should be considered on a site-by-site basis at planning application stage.</p>

LP1954	East Boldon Neighbourhood Forum	SA033	GA2	Objection to GA2 Land at North Farm.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. Consultee disagrees with the allocation of the site and refers to the SA findings in support of their argument. Comments do not directly relate to the methodology or findings of the SA.
LP0585	David Milne	SA035	Development and Infrastructure	Does not consider that the Local Plan is the most appropriate strategy when assessed against reasonable alternative. Does not agree the plan is effective or has been prepared correctly due to Green Belt development and lack of brownfield development. The plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed.	We consider the Sustainability Appraisal (SUB3) to be robust and no change is needed. The council considers that a sound approach has been undertaken in considering the Green Belt for release through the Local Plan. The Green Belt Exceptional Circumstances Paper (2024) (GRB2) concludes that there are strategic-level exceptional circumstances to alter the Green Belt boundary.
Regulation 19 Habitat Regulation Assessment Representations					
Respondent ID	Respondent name	Rep ID	Policy, paragraph or table no.	Main issues raised	Council Response
LP0744	Eric Mason	HRA001		Objection to SP8 due to impacts on wildlife.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly

					relate to the HRA for the Publication draft Local Plan.
LP0585	David Milne	HRA002		Page was not available. Objection to Green Belt development.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan. The HRA was available on the council website throughout the consultation period.
LP0726	Brian Goodman	HRA003		Negative effect on natural environment from housing development.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP2145	Elsie Hardie	HRA004		Objection to development due to negative impacts on natural environment.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP2191	Chloe Elizabeth Ritchie	HRA005		Objection to SP8 due to impacts on wildlife and infrastructure.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP1934	Norman Elliott	HRA006		Objection to development of Green Belt.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.

LP2008	Duncan Donnelly	HRA007		Objection to Green Belt development in Fellgate due to negative impacts.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP1990	John Bage	HRA008		The emerging Local Plan will adversely affect the ecological integrity of a European wildlife site and should not proceed.	We consider the HRA (SUB4) robust, and no change is needed. The Publication draft Local Plan HRA does not identify any adverse effects on Habitat sites. No amendment needed.
LP2139	Stephen Browne	HRA009		Objection to farmland and Green Belt development.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP2071	Chris Grievson	HRA010		No comments made.	Noted
LP2055	Stephen Kingdom	HRA011		Objection to Green Belt development due to negative impacts on wildlife, farming and infrastructure.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP0780	William Harvey	HRA012		Objection to SP8 including loss of Green Belt, impact on wildlife, pollution, flooding, infrastructure and loss of a farm.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP1314	Valerie Harvey	HRA013			
LP2192	Nicholas Wraith	HRA016			
LP2193	Allison Cook	HRA017			

LP1659	Christine Oliver	HRA019			
LP2020	Lawrence Taylor	HRA022			
LP1698	Michelle Cook	HRA014		Objection to SP8 due to impact on Green Belt and wildlife. Does not consider the proposal to be sound.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP1697	Raymond Cook	HRA015			
LP1982	Whitburn Neighbourhood Forum	HRA018		<p>The HRA does not comply with the Habitats Regulations. The HRA has not considered sewage outflow at Whitburn. No appropriate assessment has been made of impacts from an increase in sewage discharge into the Durham Coast SAC and Northumbria Coast SPA.</p> <p>Allocated sites in Whitburn are within 400m of the Durham Coast SAC and significant effects cannot be ruled out. The HRA screens out urban effects but does not provide a justification. The HRA does not apply the precautionary principle and cannot rule out that a significant effect may be</p>	The council considers the South Tyneside Habitat Regulation Assessment (2023) (SUB4) to be robust. No change is needed.

				likely. An appropriate assessment is needed. The HRA and Local Plan are unsound and are not in line with the Habitats Regulations.	
LP2194	Tracey Hird	HRA020		Objection to GA2 North Farm due to impact on wildlife.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP2182	Barry Davison	HRA021		Objection to SP8 including loss of Green Belt, impact on wildlife, pollution, flooding and infrastructure.	We consider the HRA (SUB4) robust, and no change is needed. The comments made do not directly relate to the HRA for the Publication draft Local Plan.
LP2186	Natural England	HRA023		Support for the HRA. Agrees with assessment of hydrological and water quality. Agrees with the assessment of recreational impacts. Considers there to be value in progressing a Statement of Common Ground.	Support for HRA welcomed. South Tyneside Council welcomes the opportunity to progress a Statement of Common Ground.

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