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*In order to keep these documents to an appropriate size the number of representors featured
within each document may vary*

Response ID ANON-5JMM-6ZYD-6

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 10:43:19

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

This area is one of a few greenbelt areas in South tyneside. It is there to stop urban sprawl. It is a farmers livelihood, a wildlife home, it is prone to flooding as has been proven in the past. The roads near our est are already a nightmare without increased pressure of thousands of more vehicles from new housing.

2 What is your name?

Name:
Rose Garvin

3 What is your email address?

Email:

[REDACTED]

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

Response ID ANON-5JMM-6ZZ2-N

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-06 12:07:24

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

Fellgate is prone to flooding which will only get worse if the new development goes ahead. Durham drive where the new entrance will be is already a nightmare at school times. Traffic now leaving and entering fellgate is a nightmare with out more traffic on these roads. Greenbelt land should NEVER be built on it's there to stop urban sprawl and protect wildlife.

2 What is your name?

Name:

Rose garvin

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

Response ID ANON-5JMM-6ZYQ-K

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 19:10:11

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

I am a resident of the adjacent estate and am fully opposed to this proposed housing development. The importance of maintaining green belt corridors cannot be underestimated, and we have lost so much green land in our local area already (and in adjacent areas such as Follingsby). I am an Ecologist by trade (bird surveying pre-green energy installation) and have already seen changes in local avifauna in the last 20 years; Yellow Wagtail lost, Yellowhammer almost lost, many other red list species just clinging on. A large scale development as planned would undoubtedly be the nail in the coffin for many bird species (designated as of conservation concern by JNCC), as well as preventing the wildlife corridors for the last few Brown Hares and Roe Deers in the area. At a time when rewilding and habitat restoration are buzz words, to plough ahead with this green belt development is tantamount to vandalism.

2 What is your name?

Name:
Mark Newsome

3 What is your email address?

Email:

[REDACTED]

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

Response ID ANON-TJBH-TDGB-9

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-01-21 13:34:30

Policy SP8: Fellgate Sustainable Growth Area

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

As a resident of Fellgate for over 40 years I am strongly opposed to the SP8 Proposal, which covers an area larger than the existing estate (113%), for the following reasons relating to Soundness.:

1) Increased risk of Flooding

We currently have problems with flooding on Fellgate. Existing Climate Change and predicted warmer wetter winters, exacerbated by covering a large adjacent area with buildings and infrastructure, will only increase the likelihood of regular and severe flooding to Fellgate.

Even after the £2.5M spent in 2015 on Surface Water Management the Site proposed for SP8 already remains sodden for several days after a storm passes through, with excess water running along Durham Drive, and houses near the shops have been flooded to several inches or more.

2) Insufficient Infrastructure to handle extra traffic volume

The new development will result in approximately 2000 extra vehicles hitting the already severely congested A194 at peak times, both morning and evening, via the Mill Lane Roundabout, or jamming up the Fellgate exit via Fellgate Avenue.

The impact will not only be on Fellgate residents, but on commuters and businesses from South Shields and the surrounding areas, all being delayed and frustrated through additional congestion.

Roundabout improvements take time and money, and can only ease the situation slightly, as the problem is caused by too much volume at a pinch point.

3) Destruction of Greenbelt

There is a wildlife corridor running around the whole of the Fellgate Estate.

The Plan shows two significant breaks in this corridor, to the south side, where the proposed Development Plots are shown.

The Plan will adversely and severely impact on what nature has taken decades to establish and bring to maturity. This includes the wooded areas, meadowland, hedgerows, waterways and ponds, together with the wildlife which has moved into the evolving habitat (recently Hares and nesting Swans).

4) More Suitable Site already identified

None of the above need to be inflicted on the residents, general public and the environment.

South Tyneside Strategic Land Review – Character Area Site Assessments (January 2018) concluded that virtually all the proposed parcels of land covered by SP8 (or SP6 as it was then) were “Sites Not Considered Suitable”. If the criteria were valid then, they should not have changed but the conclusion has. - What is the justification?

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

Conversely, FG18 and FG18b (32.8 Hectares) were “Sites considered potentially suitable”, but they are not being put forward for development at this time – Why not?

Note:

SP8 Fellgate Sustainable Growth Area Site Capacity and Opportunities Paper 2024 shows that the total site is 58 Hectares, of which 35 are required for Houses.

I believe that FG18 and FG18b (plus a piece of FG18a) should be reconsidered for SP8. This could provide direct access to two major roads (A19 and A184) and will therefore not add to congestion on the A194 previously mentioned, as well as not adversely impacting on Flood Risk to Fellgate Estate or the Fellgate Estate Greenbelt. Also, ‘Undergrounding’ would not be necessary (see below), and design of and construction of the plots will not be severely impacted by overhead lines and pylons.

If an alternative site is not identified, then the following should be taken into consideration:

Fundamental Design Flaws in the Indicative Layout.

460M of New Frontage

a) No Car Parking Provision

Fellgate already suffers from a lack of sufficient car parking areas with many residents being compelled to park on the ring road. Unless an extra lane is added to Durham Drive and designated a parking bay then the road will become impassable if residents park on both sides.

Putting yellow lines on the existing road will only make matters worse and lead to conflict between residents fighting over the remaining areas available for parking.

b) Inappropriate Type of Dwelling / Density

Most of the New Frontage (250M out of 460M) is shown as High Density, i.e. 2.5 to 3 storey Townhouses or Terraced properties.

They face towards low density 2 storey existing Fellgate semi's, with large open green spaces.

This will create a massive clash, a 250M Berlin Wall if you like, which flies in the face of Draft Local Plan Directive 5.5 "Particular attention to be paid to layout, scale, height, design and massing to ensure that the development is of a high-quality design that responds to local character."

Existing residents will be denied views across the open green belt they have enjoyed since the sixties and face a detrimental impact on their environment and enjoyment.

Suggestions to Mitigate the Impact

1) A Continuous Greenbelt of 50-90 Metres should be maintained.

I strongly believe that leaving a minimum of 50-90 metres green belt buffer between the Fellgate ring-road and the new development (using the southern edges of the two flood defence ponds as guidelines), would go a long way to relieving the concerns of many Fellgate residents with regard to wildlife preservation, habitat preservation, visual appeal and healthy lifestyle.

It could also prove to be a valuable contingency as it would allow for significant expansion of the two flood Basins should need arise in the future.

2) To accommodate the buildings displaced by this proposal, some 3.6 Hectares in total, I suggest that the Overhead Cables be Undergrounded, and the pylons removed freeing up some 5.3 Hectares, as follows:

The existing overhead cables and pylons seem to have had a major impact on what may be feasible, and so limited the opportunities for planners.

The most obvious solution would be Undergrounding - replacing overhead cables and pylons with underground cables.

I know that for a new installation this is initially significantly more costly, although there are paybacks over time, but in this instance the solution would be win/win.

See: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020014/EN020014-001084-Iwan%20Jones.pdf>

The above, which is based on experience and modelling, shows that the cost of undergrounding cables is between £565k and £986k per kilometre, depending on the complexity of the terrain and infrastructure involved.

The terrain in question is open farmland, so let's call it £750k per kilometre. The proposed site has a straight run of 1.25 kilometres between 6 pylons, so the cost of Undergrounding would be about £950k, say £1M.

However, by removing the overhead cables and 4 pylons, the value of new build houses would improve more than enough to compensate for the initial cost.

The report indicates potential cost impact as follows:

200 houses nearest cables/pylons down in price by 7.5% (average).

So, $200 \times 7.5\%$ of (say) £220k = £3.3M

Another 800 houses would suffer a price reduction of 1.5% (average).

So, $800 \times 1.5\%$ of £220k = £2.64M

Therefore, if the cables and pylons were to be removed it would result in an increase in House Sales of £5.94M, against a cost of £1M for Undergrounding.

The report used is slightly out of date, being 2015, but the relative cost/benefit would be of the same order.

Undergrounding will be significantly beneficial in terms of the environment, visual appeal of area, use of land for improved layouts, reduced risk from accidents and peoples' perception of increased safety from electromagnetic field.

3) Any 'New Frontage' with Fellgate Estate should be Low Density type, with adequate parking.

Low Density housing should be used at the interface of Fellgate and the Proposed Development to integrate in an acceptable and more aesthetic manner.

See separate files for Drawings of my proposals.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Yes

Your personal details

What is your name?

Name:

George Brian Pierce

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:




Support Documents for Response ID ANON-5JMM-6ZFE-M, relating to Scoping Report

pierce brian [REDACTED]

Wed 1/24/2024 11:27 AM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

 2 attachments (3 MB)

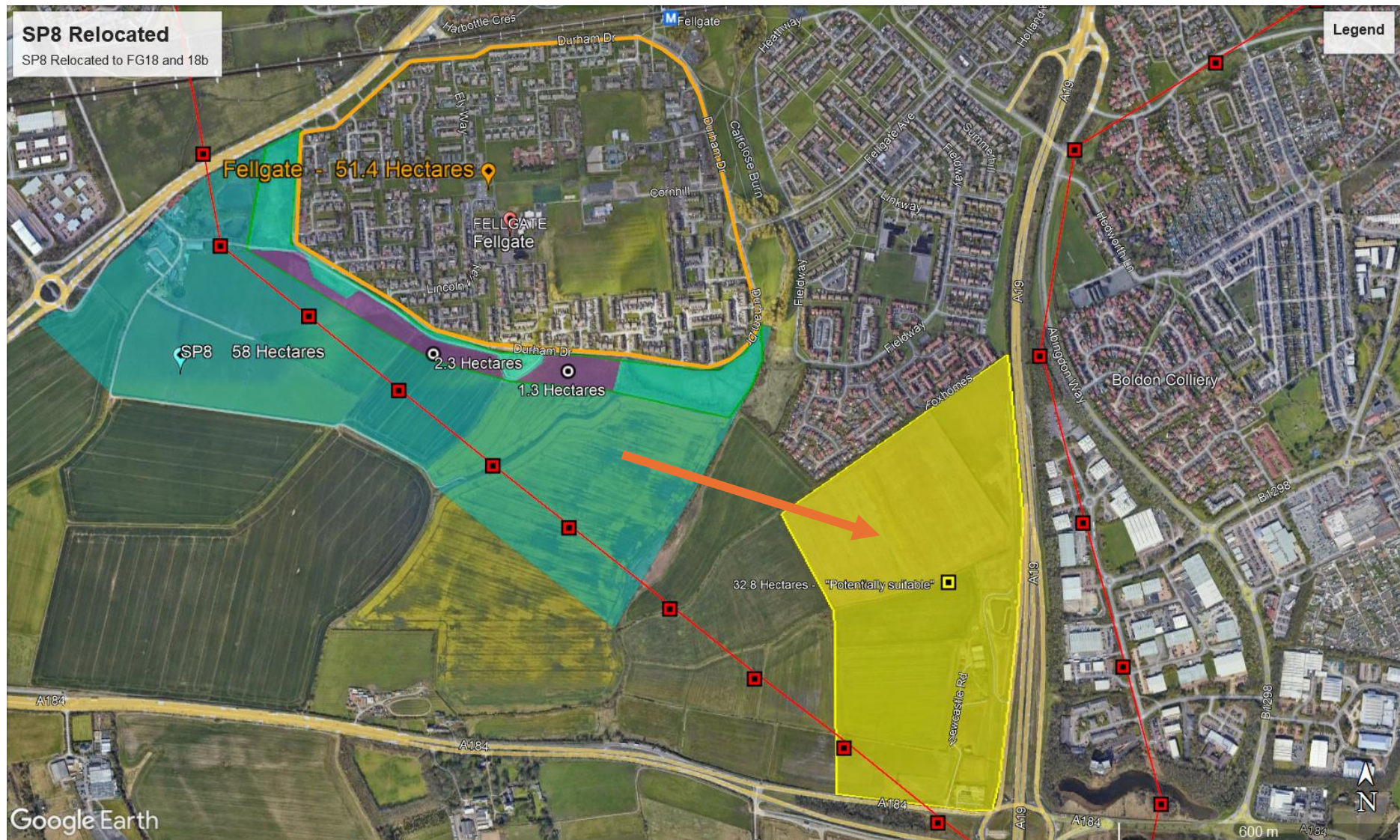
Fellgate 2024 - Map of Proposal 2.docx; Fellgate 2024 - Map of Proposal 1.docx;

*** **WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, **clearly stating your concerns in the email** ***

Please add the two attached files to my online submission.

Many thanks,

G. Brian Pierce





Suggestion to Maintain Greenbelt around Fellgate by Undergrounding Cables, Removing Pylons and moving two purple housing areas into body of SP8 Proposed Area

2) To accommodate the buildings displaced by this proposal, some 3.6 Hectares in total, I suggest that the Overhead Cables be Undergrounded, and the pylons removed freeing up some 5.3 Hectares, as follows:

The existing overhead cables and pylons seem to have had a major impact on what may be feasible, and so limited the opportunities for planners.

The most obvious solution would be Undergrounding - replacing overhead cables and pylons with underground cables.

I know that for a new installation this is initially significantly more costly, although there are paybacks over time, but in this instance the solution would be win/win.

See: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN020014/EN020014-001084-Iwan%20Jones.pdf>

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So, $800 \times 1.5\%$ of £220k = £2.64M

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The report used is slightly out of date, being 2015, but the relative cost/benefit would be of the same order.

Undergrounding will be significantly beneficial in terms of the environment, visual appeal of area, use of land for improved layouts, reduced risk from accidents and peoples' perception of increased safety from electromagnetic field.

3) Any 'New Frontage' with Fellgate Estate should be Low Density type, with adequate parking.

Low Density housing should be used at the interface of Fellgate and the Proposed Development to integrate in an acceptable and more aesthetic manner.

See separate files for Drawings of my proposals.

2 What is your name?

Name:

George Brian Pierce

3 What is your email address?

Email:

[REDACTED]

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

Response ID ANON-5JMM-6Z6K-A

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-16 13:28:12

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

I would be against any building of any sort on this greenbelt land.

2 What is your name?

Name:

Margaret Fletcher

3 What is your email address?

Email:

[REDACTED]

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

Response ID ANON-5JMM-6ZY3-N

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 03:35:16

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

I would be against any building of any sort on the proposed greenbelt land adjacent to Fellgate Estate

2 What is your name?

Name:
Margaret Fletcher

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

Submitted to South Tyneside Publication Draft Local Plan 2023-2040
Submitted on 2024-01-24 15:44:46

Chapter 1: Introduction

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:
No

Support or Object - Sound:
No

Support or Object - Complies with the Duty to Cooperate:
No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Chapter 2: Context

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:
Yes

Support or Object - Sound:
No

Support or Object - Complies with the Duty to Cooperate:
No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Chapter 3: Spatial Vision and Strategic Objectives

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:
Yes

Support or Object - Sound:
No

Support or Object - Complies with the Duty to Cooperate:
No

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The plan should not be approved as it stands. Open spaces need protecting not houses built upon them. Green belt should be safeguarded and its status secured not changed to suit the needs of the few, in particular the sites at the Whitburn lodge and associated horse's field. Views and scenery need to be accessible to all and remain so, not removed with new housing developments. Sewerage systems need massive improvement before any further developments are allowed especially within Whitburn. Whitburn is within the Green Infrastructure (GI) corridor. It also contains important GI assets. It is surrounded by the local wildlife corridor. It forms part of the undeveloped coast. Any development will remove and destroy these important assets.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP1: Presumption in favour of Sustainable Development

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP2: Strategy for Sustainable Development to meet identified needs

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP3: Spatial Strategy for Sustainable Development

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP4: Housing Allocations in the Main Urban Area

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP7: Urban and Village Sustainable Growth Areas

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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Do not remove any sites out from green belt, retain all current green belt and look at areas that could be moved into green belt. no development on current green belt land

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 12: Coastal Change

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Support or Object - Sound:

Support or Object - Complies with the Duty to Cooperate:

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP16: Housing Supply and Delivery

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

The plan should not be approved as it stands. Open spaces need protecting not houses built upon them. Green belt should be safeguarded and its status secured not changed to suit the needs of the few, in particular the sites at the Whitburn lodge and associated horse's field. Views and scenery need to be accessible to all and remain so, not removed with new housing developments. Sewerage systems need massive improvement before any further developments are allowed especially within Whitburn. Whitburn is within the Green Infrastructure (GI) corridor. It also contains important GI assets. It is surrounded by the local wildlife corridor. It forms part of the undeveloped coast. Any development will remove and destroy these important assets.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 14: Housing Density

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 15: Existing Homes

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Support or Object - Sound:

Support or Object - Complies with the Duty to Cooperate:

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 33: Biodiversity, Geodiversity and Ecological Networks

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Support or Object - Sound:

Support or Object - Complies with the Duty to Cooperate:

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 36: Protecting Trees, Woodland and Hedgerows

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 37: Protecting and Enhancing Open Spaces

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 41: Green Belt

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Your personal details

What is your name?

Name:

PETER ONEIL

What is your email address?

Email address:



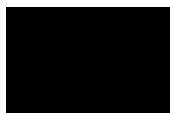
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



Response ID BHLF-RUCU-JV2Y-A

Submitted to Sustainability Appraisal 2024

Submitted on 2024-04-23 14:49:16

Have your say

1 Which section(s) of the SA are you responding to?

Section of the SA:

Employment land

2 Please provide any comments you wish to be considered by the Planning Inspector.

Comments:

3. Objection made regarding Sustainability Appraisal Report 2024 – Employment Land and policy SP14: Wardley Colliery

The Sustainability Appraisal Report 2024 notes that the Local Plan has increased the amount of land required for employment from the Draft Regulation 18 Local Plan. It notes that the level of employment growth underpinning this is high in the context of past trends.

This demonstrates that the Regulation 19 Draft Local Plan is not justified by the evidence base; the amount of land for employment allocated for employment is too high and more of this land needs to be utilised for housing development in existing urban areas. The removal from the Green Belt of the Wardley Colliery site in SP14 is not justified.

The Sustainability Appraisal Report states:

“Preferred Options

4.41 Within the Draft Local Plan 2019, the Council took forward the following preferred options for employment land: □ General Employment Land – Option 2: Policy-on Scenario □ Port and Marine Land – Option 3: Past Completions (net)

4.42 These options were selected because the Council considered them to have the most positive effects on SA objective 9 (encourage and support economic growth within South Tyneside) and SA objective 10 (increase opportunities for employment and education and improve living standards). The Council's reasons for this were set out in the 2019 SA Report.

4.43 In the Draft Regulation 18 Local Plan (June 2022) the Council's preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. The reasons for this were set out in detail in the 2022 Employment Land Technical Paper, which explained that in choosing this scenario the Council was being cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities.”

And

“4.45 In the Regulation 19 Draft Publication Plan, the Council's preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP.’”

The SAR also notes the negative impact of this preferred option for employment land:

“4.26 However, negative effects were recorded against a number of environmental objectives, reflecting the impact that a high economic growth could have upon the environment due to proximity existing designations, and increased impacts on natural resources, potential impacts on biodiversity and wildlife corridors. This level of growth is also likely to require land from the Green Belt to facilitate the growth aspirations; this objective therefore scored negatively against objective 4 (Green Belt) and objective 5 (green infrastructure) due to the potential impacts on the Green Infrastructure corridor.”

The Sustainable Appraisal Non-Technical Summary states in the section assessing the Likely Effects of the Local Plan Options:

“Preferred Options

34. In the Draft Regulation 18 Local Plan (June 2022) the Council's preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. In choosing this scenario the Council had been cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities. In the Regulation 19 Draft Publication Plan, the Council's preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP.’”

3 What is your name?

Name:

Andrew Davison

4 What is your email address?

Email:

5 Who are you responding as?

Resident or Member of the General Public

Organisation:

6 What is your postal address?

Address:





Outlook

Objection to the Local Plan

From Ann West [REDACTED]

Date Sat 3/2/2024 8:04 PM

To Local Plan <Local.Plan@southtyneside.gov.uk>

 1 attachments (182 KB)

South-Tyneside-Green-Party-Response-to-Local-Plan-2024.pdf;

<div style="color: black; background-color: #ffff99; background-clip: padding-box; border: 2px solid black; margin: 5px; padding: 5px; font-family: Arial; font-size: 11pt;">*** WARNING - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, clearly stating your concerns in the email </div>

We the below wish to submit an objection to the Local Plan as it stands and as detailed by the attached Green Party objections, which we agree with and heartedly support.

As residents of Cleadon we are already experiencing problems related to a shortfall in the provision of infrastructure such as congested roads, lack of health services, fully subscribed schools, sewage overspill/inadequate sewage works and seasonal flooding.

The 204 houses that are to be built on the brownfield/industrial site on Cleadon Lane will stretch these services further without adding the additional proposed housing on the Green Belt.

After attending one of the South Tyneside Council planning proposal meetings it appears the only reason the Council want to release these Green Field sites, is the revenue they will receive, but with no guarantee that the developers will provide the necessary infrastructure to support this increase in housing and local population.

Very little consideration has been placed on the benefits to us all of having green areas to promote wellbeing both from an aesthetic element and the ability to get out into nature for activities such as walking and cycling without having the worries of increased traffic and noise.

Yours sincerely

Jennie and Ann West

[REDACTED]
Nicola, David and Megan West

[REDACTED]
Bev, Jon and Robyn Olds

[REDACTED]
Joyce and Bill Hills

[REDACTED]
Hilary, Mammed and Alex Bagher

[REDACTED]



Joanne, Christopher, Jack and Harry West



Andrew Davison



Lauren and Nicholas Bagher



South Tyneside Green Party Response to South Tyneside Regulation 19 Draft Local Plan 2024

1. Objection made specifically regarding Policy SP2: Strategy for Sustainable Development

This policy is not justified by the evidence because it proposes an unsustainable level of growth of housing development; and is not consistent with the NPPF or with other statements of government policy.

This policy must be revised to decrease 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.

In SP2 paragraph 4.9 of the Local Plan it states:

"4.9 To determine the minimum number of homes needed, a local housing need assessment has been conducted using the standard method detailed in the national planning guidance. The standard method uses a formula to identify the minimum number of homes expected to be planned for in a way which addresses projected household growth and any historic under-supply. Using this approach the local housing needs assessment has concluded that for the plan period (1st April 2023 to 31st March 2040) 309 dwellings are required every year. This produces an overall minimum housing requirement of 5,253 new homes over the Plan period. The household projections that inform the housing baseline are the 2014-based household projections. This figure could change upwards or downwards based on new data. South Tyneside's housing requirement will not be 'locked in' until the Plan is submitted to the independent Planning Inspectorate."

The Local Plan is based on inaccurate population projections. Census data show a consistently falling population in South Tyneside, from 157,200 in 1991, to 152,785 in 2001, to 148,127 in 2011, to 147,800 in 2021. Yet the Local Plan assumes a population of 151,936 for 2021, an overestimate of 4,136, and that it would continue to increase over the next 20 years.

Using the Office for National Statistics (ONS) 2014 housing projections produces a housing requirement of 309 per year, a total of 5,253 houses by 2040. The Local Plan would require a total of 77,716 dwellings in South Tyneside by 2040 whereas the 2018 ONS projection is for 75,664. Therefore the Local Plan is for 2,052 more houses than are needed.

The ONS household projection is likely to be revised down given the population trends thus increasing the excess housing provision in the Local Plan.

The East Boldon Neighbourhood Forum received the following statement from the Department for Levelling Up, Housing & Communities, written by Alan C Scott, Planning policy adviser on behalf of the Secretary of State:

“In 2018 the Framework introduced a standard method for calculating local housing need to make the process simple, quick and transparent. “The standard method does not impose a target; it is still up to the local authority to determine its housing requirement, and this includes taking local circumstances and restraints such as Green Belt into account”.

The NPPF paragraph 5 and 6 states:

“5. National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.

6. Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.”

Michael Jenrick, then Secretary of State for Housing, Communities and Local Government, made a Written Statement 16th December 2020:

“There were many consultation responses which did not fully recognise that the standard method for assessing Local Housing Need does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for housing in an area. It is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made.”

Michael Gove, Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations, made a Commons Statement on 19th December 2023:

“Today’s update to the National Planning Policy Framework (NPPF)

It provides clearer protection for the Green Belt, clarity on how future housing supply should be assessed in plans and on the responsibility of urban authorities to play their full part in protecting the character of precious neighbourhoods.

The new NPPF will: facilitate flexibility for local authorities in relation to local housing need; clarify a local lock on any changes to Green Belt boundaries;

The new NPPF makes clear that the outcome of the standard method is an advisory starting point in plan making for establishing the housing requirements for an area.”

The above is supported by guidance in The House of Commons Library published on 27 August 2021 “Calculating housing need in the planning system (England)” which states in 2.4:

“A starting point, not a target? Land constraints and the standard method. The standard method is intended to be the starting point in determining how many homes an LPA can and should deliver, but is not a target. LPAs must also take account (for example) of land constraints, such as the Green Belt.”

<https://commonslibrary.parliament.uk/research-briefings/cbp-9268/>

This means that South Tyneside Council is able to determine its housing requirement and can take into account the restraint of the Green Belt.

2. Objection to development on the Green Belt, made specifically regarding Policies SP3: Spatial Strategy for Sustainable Development and SP7: Urban and Village Sustainable Growth Areas

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 Local Plan must be revised to remove the proposed amendment to the Green Belt boundary to allocate additional land for housing and to withdraw all of the sites proposed for removal from the Green Belt: GA1-6 and SP8.

The Green Belt land allocation in the Local Plan is for 2,308 new homes but there is no justification for building on this precious resource. The Green Belt does not need to be built on and therefore the least harm to this resource is no further development at all on the Green Belt and exceptional circumstances have not been established. The Local Plan must be revised in order to meet the requirement to be sound on the basis of being justified, as an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence; and on the basis of being consistent with national policy.

In the Local Plan, Policy SP3: Spatial Strategy for Sustainable Development proposes amending the Green Belt boundary to allocate additional land for housing and Policy SP7 Urban and Village Sustainable Growth Areas proposes the removal of sites from the Green Belt and allocation for housing development.

The Local Plan states in Policy SP3: Spatial Strategy for sustainable development:

“To meet the identified needs in Policy SP2 and to facilitate sustainable growth, the Plan will:

- 1. Support the sustainability of existing communities by focusing growth within the Main Urban Area including South Shields, Hebburn and Jarrow*
- 2. Secure the sustainability and vitality of the villages of Cleadon, Whitburn and the Boldons by supporting growth which respects the distinctive character of each village*
- 3. Encourage the re-use of suitable and viable brownfield land and, where appropriate, encourage higher development densities.*
- 4. Ensure the delivery of housing in sustainable locations through the allocation of sites in the Main Urban Area and by amending the Green Belt boundary to allocate Urban and Village sustainable growth areas*
- 5. Create a new sustainable, community within the Fellgate Sustainable Growth Area (Policy SP8) by providing homes and community facilities.*
- 6. Prioritise the regeneration of South Shields Riverside, South Shields Town Centre, Fowler Street Improvement Area, and the Foreshore Improvement Area*
- 7. Prioritise economic development in designated Employment Areas, including the Port of Tyne, that are accessible by a range of transport modes and allocate additional land at Wardley Colliery*
- 8. Enhance and strengthen green infrastructure, ecological networks and Green Belt throughout South Tyneside and between neighbouring authorities.*

The National Planning Policy Framework (NPPF) states:

“140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”

As demonstrated in Objection 1 above, there is no evidence that the housing requirement for the Plan period is at a level requiring development on the Green Belt. The strategic need has not been proven, for example there has been no cooperation with neighbouring local authorities which have Local Plans that intend to cumulatively build in excess of 19,000 houses above their respective ONS 2018 housing projections.

Sunderland Local Plan –	10,755 excess houses by 2033
Gateshead Local Plan –	6,337 excess houses by 2030
North Tyneside Local Plan -	2,238 excess houses by 2032

A planning appeal decision has confirmed the protected status of the Green Belt. This decision reiterates and reinforces the protection from inappropriate development given to the Green Belt in national planning policy.

Broke Hill golf course

In the Broke Hill case in Sevenoaks, Kent, the Inspector confirmed that, where planning policies protect areas of particular importance and provide a clear reason for refusing the development, the so-called “tilted balance” presumption in favour of granting planning permission does not apply.

For Broke Hill, the planning policies in this case related to protection of the Green Belt. This is especially important as Sevenoaks does not have the required five-year supply of housing land nor has it met the government’s housing delivery test for 2021. The inspector noted a number of benefits of the proposed development including provision of affordable housing. However, he concluded that notwithstanding the lack of five-year housing supply, the housing delivery test, and the benefits, this did not outweigh the harm that would be caused to the Green Belt, and were not sufficient to override national and local planning policies protecting the Green Belt. “The tilted balance is not invoked, however, because the Framework at Paragraph 11d(i) and footnote 7 protects both areas and assets of particular importance, which include the Green Belt, and provides a clear reason to dismiss the appeal.” Stephen Wilkinson, Inspector Planning Inspectorate decision Broke Hill golf course 31 January 2022

This case along with ministerial statements demonstrates that the Local Plan fails to be consistent with national planning policy to protect the Green Belt, as specified in paragraph 11 of the National Planning Policy Framework.

The Local Plan must be revised to remove the proposed amendment to the Green Belt boundary to allocate additional land for housing and to withdraw all of the sites proposed for removal from the Green Belt.

Furthermore, the Local Plan is not justified because the NPPF states:

“141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum

density standards in town and city centres and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”

Regarding paragraph “a”, it has not been proven that all brownfield sites have been considered.

There are underutilised sites such as areas in South Shields town centre where previously developed land is used for car parking rather than housing like the area at the Mill Dam in South Shields, the former Staithes House and surrounding land near the town centre has been cleared for development for decades. The large office building at Harton Quay was leased by BT Group until last year but BT Group then closed its office and redeployed its 500 staff to other parts of the North East.

These are areas close to South Shields transport interchange and so would satisfy paragraph “b” the need to promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.

The failure to rent out office space also drawn into question the planned 200,000 sq ft of office space in the adjacent Holborn development especially as the Utilitywise office building just down river had to be converted to flats after lying empty for a long period.

Planners overlooked possible brownfield sites across South Tyneside. Questions raised over validity of the reasons for rejection have not been answered. Some examples are the health clinic site near the ambulance station on Boldon Lane, the Pickwick pub in Biddick Hall, the former Methodist church on Bede Burn Road, the former Park Hotel on Lawe Road have not been included in the Local Plan.

Immediately after the Regulation 18 consultation in 2022, planning permission was given for 446 houses on the former Hawthorn Leslie shipyard that had lain redundant for several years. This was not included in the Regulation 18 Draft Plan. A similar situation exists at the former Rohm and Hass brownfield site near Jarrow town centre that would comply with 141 a) and b). This land if designated for industry could be released for housing as the land designated for employment in the Regulation 19 Local Plan is not justified by the evidence.

A further statement which is insufficient is paragraph 4.31, Sustainable Urban and Village Extensions:

“The Council has undertaken an extensive Green Belt review to identify land which would cause the least harm to the purposes of the Green Belt, that is considered suitable for development, and that could create a new defensible Green Belt boundary. Through this work, the Council has also established the exceptional circumstances to justify amending the Green Belt boundary at each location.

Following consultation on the Plan, the Council will undertake a Green Belt boundary review which will review the entire Green Belt boundary to ensure that it has a strong and defensible boundary as required by the NPPF.”

It has been shown that the Green Belt does not need to be built on and therefore the least harm to this resource is no further development at all on the Green Belt and exceptional circumstances have not been established.

Regarding paragraph “c”, there is no evidence that the aggregated housing assessments of the neighbouring authorities has been compared with the projected population levels of these authorities to show that there will be no overall supply. The simple statement in 4.28 in the Local Plan is insufficient:

“28. Prior to identifying land in the Green Belt the Council has, as part of Duty to Cooperate, discussed whether neighbouring authorities could accommodate additional housing. As set out in the Duty to Cooperate Statement, neighbouring authorities have confirmed that they would be unable to provide land to meet South Tyneside’s needs.”

The duty to cooperate has not been evidenced as required by guidance such as PAS – Doing your duty practice update [doing-your-duty-practice--1a3.pdf \(local.gov.uk\)](https://www.local.gov.uk/doing-your-duty-practice--1a3.pdf)

The recommendations in this have not been followed including number 10:

“10. Plans should reflect joint working and cooperation to address larger than local issues. In many cases, joint studies with other local planning authorities formed part of the evidence used to demonstrate compliance with the duty. Past cooperation put many local planning authorities in a strong position, particularly where this has resulted in the preparation of sub-regional strategies, joint studies or common methodologies on SHMA, Strategic Flood Risk Assessment, economic assessments, Green Infrastructure studies, landscape and renewables assessments, and transport studies.”

This failure is evident in the vast over provision of housing as previously shown and shared infrastructure for example the health and sewage systems between South Tyneside and Sunderland as well as employment at IAMP. This shows that the Plan is not sound.

3. Objection made regarding Sustainability Appraisal Report 2024 – Employment Land and policy SP14: Wardley Colliery

The Sustainability Appraisal Report 2024 notes that the Local Plan has increased the amount of land required for employment from the Draft Regulation 18 Local Plan. It notes that the level of employment growth underpinning this is high in the context of past trends.

This demonstrates that the Regulation 19 Draft Local Plan is not justified by the evidence base; the amount of land for employment allocated for employment is too high and more of this land needs to be utilised for housing development in existing urban areas. The removal from the Green Belt of the Wardley Colliery site in SP14 is not justified.

The Sustainability Appraisal Report states:

“Preferred Options

4.41 Within the Draft Local Plan 2019, the Council took forward the following preferred options for employment land: ■ General Employment Land – Option 2: Policy-on Scenario ■ Port and Marine Land – Option 3: Past Completions (net)

4.42 These options were selected because the Council considered them to have the most positive effects on SA objective 9 (encourage and support economic growth within South Tyneside) and SA objective 10 (increase opportunities for employment and education and improve living standards). The Council’s reasons for this were set out in the 2019 SA Report.

4.43 In the Draft Regulation 18 Local Plan (June 2022) the Council’s preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. The reasons for this were set out in detail in the 2022 Employment Land Technical Paper, which explained that in choosing this scenario the Council was being cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities.”

And

“4.45 In the Regulation 19 Draft Publication Plan, the Council’s preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP’.”

The SAR also notes the negative impact of this preferred option for employment land:

“4.26 However, negative effects were recorded against a number of environmental objectives, reflecting the impact that a high economic growth could have upon the environment due to proximity existing designations, and increased impacts on natural resources, potential impacts on biodiversity and wildlife corridors. This level of growth is also likely to require land from the Green Belt to facilitate the growth aspirations; this objective therefore scored negatively against objective 4 (Green

Belt) and objective 5 (green infrastructure) due to the potential impacts on the Green Infrastructure corridor.”

The Sustainable Appraisal Non-Technical Summary states in the section assessing the Likely Effects of the Local Plan Options:

“Preferred Options

34. In the Draft Regulation 18 Local Plan (June 2022) the Council’s preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. In choosing this scenario the Council had been cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities. In the Regulation 19 Draft Publication Plan, the Council’s preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP’.”

4. Objection made regarding Density Report 2024 and paragraph 8.24 of the Local Plan

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.

The Density Report 2024 states:

“2.3 Paragraph 125 of the NPPF highlights the importance of avoiding homes being built at low densities, where there is an anticipated shortage of land for meeting identified housing needs. Planning policies should avoid homes being built at low densities and ensure optimal use of land by using minimum density standards. These standards aim to uplift the average density of residential development and the use of these standards should be used in other parts of the plan area. Minimum density standards should also be used in a way which ensures that applications which fail to make efficient use of land be refused.”

It states in the Summary

“4.1 Following the four assessments several conclusions can be drawn with regards to density patterns throughout South Tyneside. Since the previous Density study in 2018:

- *The average density of sites assessed was 66 dwellings per hectare based on net site area. This is an increase of 16 dwellings per hectare since the previous study.*
- *The assessments showed that density declined as site area increased and that sites less than 1 hectare had a density significantly higher than those over 1 hectare. Sites less than 1 hectare had an average density of 82 dwellings per hectare. Sites over 1 hectare had a density of 40 dwellings per hectare.*
- *In general sites with a higher yield had typically lower densities. Sites with less than 50 dwellings had an average density of 50 dwellings per hectare whereas sites with more than 250 dwellings had an average density of 28 dwellings per hectare.*
- *Sites in the urban area of South Shields had the highest densities with an average of 72 dwellings per hectare. This is likely due to the nature of the area and the large proportion of smaller sites.*
- *Compared to the standard density buffers in Policy SC3 of the adopted LDF and the Strategic Housing Land Availability Assessment higher densities were achieved across all three categories. “*

However, the Recommendations for Housing Density which have been utilised by the Regulation 19 Draft Local Plan are lower than the densities which have been achieved. The Density Report states:

“6.1 Housing yield must ultimately be determined by design. However, for the purposes of estimating housing yield as part of the Strategic Housing Land Availability Assessment and Local Plan site selection process the following density calculations are recommended:

- *Average 60 dwellings per hectare on sites within 400m in the Jarrow and Inner South Shields character areas (higher densities may also be appropriate on a site by site basis e.g. by the riverside on sites such as Holborn and Hawthorn Leslie);*
- *Average 55 dwellings per hectare on sites within 400m in the rest of the borough;*
- *Average 45 dwellings per hectare on sites between 400m – 800m in the rest of the borough; and*
- *Average 35 dwellings per hectare on sites beyond 800m in the rest of the borough.*

6.2 These densities will be used to estimate site capacities in the Strategic Housing Land Availability Assessment where other information (e.g. planning applications, information from developers etc.) is not available. Should this information be available it will be used.”

The Density Report 2024 also underestimates the housing densities which have been achieved because two very large urban brownfield sites have been excluded from the assessment:

“3.2 Whilst permission was given to 26 sites during this period only 24 sites will be used in this study. The sites at Leslie Hawthorn and Holborn have been omitted from this study as due to the nature of those sites they present an anomaly in the

densities. These sites have a much higher density as to be viable sites for the developers more dwellings on site were required. These sites have a much higher proportion of flats and apartments than others of this size and location. Therefore, to be able to analyse patterns and trends in the data these 2 sites have been treated as anomalies.”

If these two sites were included in the assessment, the average density achieved would be higher and the discrepancy between this and the recommendations for average density for the Local Plan would be even greater.

5. Objection made specifically regarding Policy 18: Affordable Housing, Policy 19: Housing Mix and Policy 20: Technical Design Standards for New Homes

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.

In the section on Housing Allocations the Local Plan states:

“5.4 When allocating sites to meet the housing requirement, the Plan has looked to ensure the right homes are delivered in the right places, taking into account need, demand, deliverability, sustainability and improving choice.”

The SHMA 2023 has identified an annual need for 361 affordable homes each year across the borough which justifies the need for a robust affordable housing policy which will provide mechanisms to help meet this affordable need. Yet the same document states in the Executive Summary:

“It is recommended that the current target for 75% market and 25% affordable is maintained.” And in Paragraph 7.10 states: *“The SHMA would suggest that an overall target of 25% affordable housing should continue to be applied. This will be subject to viability testing before a target can be established for affordable housing in the emerging Local Plan.”*

The proposed proportion of affordable homes in Cleadon and East Boldon is 30%, but as median house prices in this area are £225,000 the accepted definition of affordable being 80% of market value means they will still be unaffordable to the very people requiring this provision.

The NPPF states *“62. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”*

Particular needs identified in the SHMA 2023 are:

- *“Increasing and diversifying the supply of specialist housing for older people. There is a need for 3,060 more units of accommodation for older people by 2040 comprising 1,803 C3 units, 885 C2 Extra Care units and 372 C2 Residential care units*
- *Based on an assessment of additional needs and longer-term demographics, a minimum of 5% of new dwellings should be built to M4(3) wheelchair accessible standard; and all other new dwellings should be built to M4(2) accessible and adaptable standard.”*

However the Local Plan fails to implement these recommendations in full as Policy 20: Technical Design Standards for New Homes states:

*“1. To meet the needs of older people and people with disabilities, a minimum of 5% of new build housing in developments of 50 homes or more shall be built to Building Regulations Requirement M4(3) (wheelchair user dwellings).
2. All residential dwellings shall be designed to be built to meet Building Regulations Requirement M4(2): (Accessible and adaptable dwellings) except where it can be demonstrated that this is impractical or unviable due to site specific constraints.”*

Policy 20 introduces a condition that this target for wheelchair user dwellings (ie *Building Regulations Requirement M4(3)*) will only apply in housing developments of 50 homes or more. This means that the Local Plan is not justified by the evidence of the need for these type of homes.

6. Support for Policy 16: Houses in Multiple Occupation

We welcome Policy 16 Houses in Multiple Occupation (HMO) as this is justified by the evidence of clustering of HMOs in particular areas of the borough and the need for further measures in paragraph 2 of the policy for the Lawe Top Article 4 Direction area.

7. Objection made specifically regarding Policy 1 Promoting Healthy Communities and Policy 2 Air Quality; and SP5: Former Brinkburn Comprehensive School and SP6: Former Chuter Ede Education Centre

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.

The Local Plan proposes the development of several vital community open spaces, for example the playing field land at Chuter Ede and Brinkburn School, despite stating in Policy 1:

*“The Council and its partners, including the NHS, will seek to improve the health, wellbeing and quality of life of South Tyneside residents, reduce health inequalities, and to help people live longer and healthier lives. This will be achieved by:
1. Supporting new development which: i. Increases opportunities for physical activity and active travel through the provision of good quality sport and recreation facilities and safe and accessible walking, cycling and public transport networks.”*

and

“iii. Enhances the green and blue infrastructure network and supports climate change mitigation and adaptation.”

These community open spaces must be protected and removed from the Local Plan as sites for development. The importance of these community open spaces is recognised in NPPF paragraph 98, 20-23, 26 and 92.

Building on playing fields for example at Chuter Ede has the exact opposite effect to the objective, increasing the local population while removing green space playing fields that are used for exercise.

There is little in the Local Plan that would fulfil the Strategic Objectives for Promoting Healthy Communities. In fact, some parts of the plan make the situation worse including the proposed development in areas that will promote car use such as in Cleadon, East Boldon and Whitburn. These developments will typically have two cars per household, adding potentially thousands of car journeys on an already congested road system. This will have a detrimental effect road safety and on the local environment due to noise and exhaust emissions. Some areas have air pollution levels already in excess of the World Health Organisation recommended maximums. These vehicle journeys will only make this more dangerous as there are no safe levels for these pollutants.

The Local Plan states in paragraph 6.14: *“The importance of good air quality is recognised by the World Health Organisation which produced a series of standards that have been adopted by the European Commission and subsequently the UK”.*

A Local Authority recognising this will be aware that the World Health Organisation (WHO) air quality standards were revised in 2021 and the recommended pollutant levels, to be achieved, were revised down by a considerable amount. NOTE: These are not safe levels as scientists do not consider any amount to be safe. It is inconceivable that the UK national standards will not be reduced to reflect these changes.

In the Local Plan, Policy 2: Air Quality states *“2. Where significant air quality impacts are likely to be generated by the development, an appropriate air quality assessment will be required”*. Due to the changes in WHO levels it is reasonable to predict large areas of the Borough will exceed these and the proposed developments in Policy SP7: Urban and Village Sustainable Growth Areas in particular will result in unsafe air pollution.

The council has a duty as far as reasonably practicable to ensure the health and safety of its residents. Given the above, the Local Plan must be revised to take into consideration the results of the proposed developments on air quality and specified measures that would reduce pollution levels to the minimum possible.

NPPF states in 186: *“Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.”*

The Local Plan has failed to identify these opportunities adequately and therefore is not consistent with the NPPF and this demonstrates that the Local Plan is not sound.

NPPF states: *“31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned...”*

The revised WHO air pollution levels are relevant and up-to-date and should be a material consideration.

8. Objection made specifically regarding Section 7: Meeting the Challenge of Climate Change, Flooding and Coastal Change

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 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.

National legislation and guidance strongly stress the central role of the planning system in securing radical reductions in greenhouse gas emissions and require Local Plans to:

The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal.

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. A good example from another area is Reading Council: *"The council's 2019 Local Plan requires that all new residential developments of ten or more homes are built to zero carbon standards if possible."* Zero carbon is an achievable standard.

Adoption of this strategy aligns with the councils own stated aims of the Economic Recovery Plan 2020 to *Catalyse green and sustainable growth by maximising the potential of our low-carbon and digital assets and expertise.*

With regards to Policy 15 much is to be welcomed. 15.1 states *Improve the condition of existing homes by enhancing energy efficiency and reducing carbon emissions in existing buildings* And 15.4 *Facilitate improvements to properties that have traditionally suffered from poor management and under-investment*

However, currently demolition is placed far too highly as an option for the current housing stock. Refitting and retrofitting is by far the less carbon intensive approach so demolition must be de-prioritised.

The Local Plan must be revised in order to bring it into compliance with legislative and policy requirements around climate change and the councils stated ambitions.

9. Objection made specifically regarding Policy 6: Renewables and Low Carbon Energy Generation

The Local Plan is not sound because this policy is not consistent with national policy.

NPPF 156 states: *"Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning."*

We welcome Policy 6 paragraph 2 supporting the inclusion of renewable energy into developments, but the text is not strong enough, and once again, will not change business as usual development approaches. A requirement to include and maximise on-site renewable energy generation needs to be folded into an overall green house gas emissions policy, as seen in the London Plan, policy S12¹.

We welcome Policy 6 paragraph 4, the inclusion of policies requiring development to connect to district heating networks, however this policy needs to be made significantly stronger. The best example of which we are aware is draft policy SI13 of the draft London Plan. As the whole of South Tyneside is located over disused mine-

¹ London Plan – policy S12 - www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/draft-new-london-plan/chapter-9-sustainable-infrastructure/policy-si2-minimising#r-SI2

workings more heating schemes like the “Hebburn Minewater Project” should be invested in for housing schemes.

10. Objection made specifically regarding Policy 10 Disposal of Foul Water and Policy 11 Protecting Water Quality

The Local Plan is not justified because these policies are not able to ensure the Objectives for Protecting Water Quality will be achieved; and is not consistent with national policy.

The Local Plan does not refer to the current significant level of sewage pollution in South Tyneside. Population levels have increased considerably in the UK since Victorian times yet we are still using combined sewers that were constructed in the 19th century. If more housing development is permitted, especially on green spaces, more pressure will be exerted on an already failing sewage system. However, in the consultation on the Draft Local Plan, South Tyneside Council confirmed that no extra sewage will be added to the existing infrastructure on the recommendations of Northumbrian Water who have assured them the existing system will cope.

NPPF states “20. *Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ...*
b) infrastructure for ...wastewater”

NPPF states: “185. *Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.*”

The Environmental Permitting Regulations 2016 Permits to discharge untreated sewage from Combined Sewer Overflows into watercourses during heavy rainfall are issued to water companies and regulated by the Environment Agency. There is growing evidence to show that these permits are being abused. 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.

The Environment Agency (EA) has been required to install Event Duration Monitors (EDMs) in all Combined Sewer Overflows (CSOs). These record the number of discharges and the duration of the discharges. The Whitburn system remains in

breach of environmental law as of March 2021, but the EA want to wait 10 years to 'assess' the system.

The data supplied by the authorities needs to be treated with caution. In March 2020 the EA issued an apology after their published sewage discharge records for Whitburn for 2019 were challenged. They were forced to increase the volume of CSO discharges for Whitburn by 10% from 683,676 cubic metres to 760,993.5 cubic metres. In March 2021 Northumbrian Water issued an apology after their published untreated sewage discharge records for Hendon Sewage treatment works for 2019 were challenged. They were forced to increase their published hours of untreated discharges in 2019 from Hendon Sewage Treatment works by 4,000% from 15 hours 52 mins to 646 hours.

Sewage pollution is a contributor to climate change. Seagrasses can absorb more carbon up to 40 times faster than terrestrial forests and these ecosystems become sources of CO₂ emissions when they are degraded or destroyed. A major driver of seagrass decline is nutrient pollution from sewage. A study has shown that 90% of the seagrass meadows in the UK have been lost to pollution. Locally, the seagrass meadows in the River Tyne estuary have been devastated by sewage flowing from nearby Combined Sewer Overflows.

Sewage pollution causes harm to public health. Recent epidemiological studies show a close relationship between contact with polluted waters and the incidence of gastro-intestinal, eye, ear, nose and throat infections or irritations and respiratory symptoms. This is a recognised problem for surfers, kite surfers, windsurfers, sailors, kayakers and wild swimmers. Even the dog walkers, joggers and walkers who all enjoy the access to South Tyneside's riverside and beaches throughout the year are at risk from sewage pollution.

Public Health is a material planning consideration. Local authorities have important and wide-ranging public health functions, for example under the Public Health (Control of Disease) Act 1984. This legislation adopts an 'all-hazards' approach and provides South Tyneside Council with the necessary powers to control human health risks arising from infection or contamination of any form including chemicals and radiation. Statutory duties for public health were conferred on local authorities by the Health and Social Care Act 2012. Local authorities (and directors of public health acting on their behalf) now have a critical role in protecting the health of their population, both in terms of helping to prevent threats arising and in ensuring appropriate responses when things do go wrong.

Health considerations are capable of being material planning considerations. This is recognised in the NPPF which includes the following statement at paragraph 92: *"Planning policies and decisions should aim to achieve healthy, inclusive and safe places."*

The health implications of exposure to the levels of sewage pollution regularly discharged into the River Tyne and on to the beaches of South Tyneside must be a material planning consideration with respect to future developments as, without an improvement in sewage treatment capacity, more development will bring about an inevitable increase in sewage pollution.

Response drafted by South Tyneside Green Party February 2024

SP3 Spatial Strategy for sustainable development Objection

Ian Sturrock <[REDACTED]>

Sat 3/2/2024 3:52 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

 1 attachments (18 KB)

Objection re SP3 Spatial Strategy for sustainable Development.docx;

*** **WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, **clearly stating your concerns in the email** ***

I attach a copy of the objection prepared by Cllrs David Herbert & Shirley Ford which I agree with and would like to register.

My name is Ian Sturrock

Mobile [REDACTED]

Email [REDACTED]
[REDACTED]

I do not wish to speak at the public examination

Objection compiled by Cllrs David Herbert and Shirley Ford

SP3 Spatial Strategy for sustainable Development

Objection – the policy has not been positively prepared to deliver sustainable development

SP3 - To meet the identified needs in Policy SP2 and to facilitate sustainable growth, the Plan will:

1. Support the sustainability of existing communities by focusing growth within the Main Urban Area including South Shields, Hebburn and Jarrow
2. Secure the sustainability and vitality of the villages of Cleadon, Whitburn and the Boldons by supporting growth which respects the distinctive character of each village
3. Encourage the re-use of suitable and viable brownfield land and, where appropriate, encourage higher development densities

Objective 2

The Plan proposes increased housing on green belt;

GA4 Cleadon Village – West Hall Farm 259 houses

GA2 East Boldon – North Farm 263 houses

GA5 Whitburn – Whitburn Lodge 30 houses

GA6 Whitburn – North of Shearwater 41 houses

This is on top of the 202 houses already given planning permission at Cleadon Lane on the boundary between Cleadon and East Boldon along with 9 at the nearby Mayflower site.

The plan has not secured the sustainability of the villages as the infrastructure to support the proposed developments does not exist and there are no viable plans to improve the lack of them including.

- Lack of school places.
- Lack of medical facilities. The area the south and East of South Tyneside has been identified in the plan as having insufficient access to medical services. Colliery Court Medical Group has already stopped taking new patients.
- Lack of road capacity which already results in congestion with the associated air pollution and greenhouse gases.
- Lack of wastewater capacity that already results in regular sewage discharges into the environment
- Risks from flooding. North Farm is in a flood risk zone 2 and 3 and West Hall Farm is a very low lying area where farm land is permanently flooded for long periods and road surface flooding occurs.

The additional developments will have a detrimental impact on the character of the villages and is counter to the purpose of the green belt as set out in the NPPF to;

- Prevent urban sprawl
- Keep land permanently open
- Essential characteristics are openness and permanence
- Restrict urban sprawl
- Prevent neighbouring towns merging
- Safeguard the countryside from encroachment
- Assist urban regeneration, encouraging recycling derelict & urban land

The car dependant developments will have a detrimental effect on the environment and climate change.

The proposed developments are not consistent with the following National Planning Policy Framework sections:

NPPF Paragraph 11:

- a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

and

20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

and

32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation

measures should be proposed (or, where this is not possible, compensatory measures should be considered).

Examining plans

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

and

123. Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and*
- b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.*

Response ID ANON-TJBH-TD58-D

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-02 08:29:31

Policy SP2: Strategy for Sustainable Development to meet identified needs

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Object to 2.2 – the basis for the calculation of the number of new homes proposed is not sound or credible. It uses out of date statistics to calculate the number of homes needed and this results in an overestimate. The number of homes proposed is based on the 2014 household projections, which have been shown to be an overestimate by the 2021 Census.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP3: Spatial Strategy for Sustainable Development

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Object to 3.2- the policy has not been positively prepared to deliver sustainable development in the East Boldon Neighbourhood Plan area. There are currently 1,860 homes in the EBNP area and the addition of 474 new homes will bring an unsustainable level of growth which will have a detrimental impact on the local infrastructure of the area and on the distinctive character of the village.

Object to 3.4 – the policy is not justified, uses out of date evidence and exceptional circumstances case to amend the Green Belt boundary has not been made. The issue was considered by the Independent Examiner for the East Boldon Neighbourhood Plan, who considered that it was appropriate to retain the Green Belt around the village in order to meet housing need in the plan area.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP7: Urban and Village Sustainable Growth Areas

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Object to GA2 – Land at North Farm This proposal is not justified and is not effective in delivering sustainable development. It is in conflict with the adopted East Boldon Neighbourhood Plan as it is outside the settlement boundary approved in the plan. The Green Belt Review Site Assessment for this site is not correct as it says development will only have a moderate impact. 263 new homes on the site will have a considerable impact as evidenced by the Traffic Assessment and Infrastructure development Plan.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP16: Housing Supply and Delivery

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Object to 16.2 – Provision of at least 263 homes in the EBNP area -the policy is not sound or justified. This figure does not include 202 homes given conditional approval at Cleadon Lane or 9 homes with permission at Mayflower Glass. It is not based on housing need but on an arbitrary allocation of land. The total number of new homes planned will result in 26% increase in the size of the village and as result the distinctiveness of the village will be lost. The infrastructure of the village is inappropriate for this increase in size.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Your personal details

What is your name?

Name:

Stewart Miller

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:





17 March 2024

Dear Sir/Madam

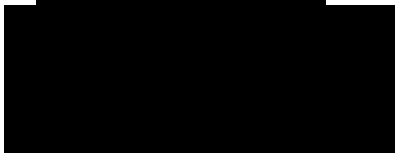
These points encompass my views on the proposed developments in the village of East Boldon.

I have chosen to object in this format rather than to fill in pages and pages of detailed objections, designed to put off any objectors by the sheer volume of the text.

Please leave East Boldon alone and build houses elsewhere in the area that is much more sustainable.

DO NOT CHANGE THIS BEAUTIFUL VILLAGE

Yours faithfully
Zilla Rees



Points

1. SP2 –Strategy for Sustainable development to meet identified need

Object to 2.2 – the basis for the calculation of the number of new homes proposed is not sound or credible.

It uses out of date statistics to calculate the number of homes needed and this results in an overestimate. The number of homes proposed is based on the 2014 household projections, which have been shown to be an overestimate by the 2021 Census.

2. SP3 Spatial Strategy for sustainable development

Object to 3.2- the policy has not been positively prepared to deliver sustainable development in the East Boldon Neighbourhood Plan area.

There are currently 1,860 homes in the EBNP area and the addition of 474 new homes will bring an unsustainable level of growth which will have a detrimental impact on the local infrastructure of the area and on the distinctive character of the village.

Object to 3.4 – the policy is not justified, uses out of date evidence and exceptional circumstances case to amend the Green Belt boundary has not been made.

The issue was considered by the Independent Examiner for the East Boldon Neighbourhood Plan, who considered that it was appropriate to retain the Green Belt around the village in order to meet housing need in the plan area.

3. SP7: Urban and Village sustainable Growth Areas

Object to GA2 – Land at North Farm This proposal is not justified and is not effective in delivering sustainable development.

It is in conflict with the adopted East Boldon Neighbourhood Plan as it is outside the settlement boundary approved in the plan. The Green Belt Review Site Assessment for this site is not correct as it says development will only have a moderate impact. 263 new homes on the site will have a considerable impact as evidenced by the Traffic Assessment and Infrastructure development Plan.

4. SP16 Housing Supply and Delivery

Object to 16.2 – Provision of at least 263 homes in the EBNP area -the policy is not sound or justified.

This figure does not include 202 homes given conditional approval at Cleadon Lane or 9 homes with permission at Mavflower Glass. It is not based on housing need but on an arbitrary allocation of land. The total number of

GA2 Land at North Farm, Boker Lane, Boldon (263 houses)

This proposal is not justified and is not effective in delivering sustainable development. We object to this site being allocated for housing for the following reasons:

CONTRADICTION OF THE NEIGHBOURHOOD PLAN

The development of the site is a major reversal of the East Boldon Neighbourhood Plan agreed at referendum in 2021.

LOSS OF VILLAGE IDENTITY

The Green Belt Review Site Assessment undervalues the importance of the site.

The development of the site will reduce the gap, in terms of distance, between Boldon and South Shields and the open space and separation along Boker Lane will be lost, effectively merging East and West Boldon.

INCREASED RISK OF FLOODING

There is a risk of surface water flooding for this site (it is located within Flood Zones 2 and 3) and the development of the site will have significant negative effects towards the climate change objective.

DAMAGE TO THE ENVIRONMENT

The site is within the wildlife corridor, is located within 50m of a SSSI and 250 m of a local wildlife site and nature reserve. The Sustainability Appraisal (SA) states that a significant negative effect is expected in relation to the objective of conserving and enhancing biodiversity.

LOSS OF AGRICULTURAL LAND

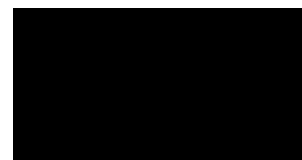
The development of the site which is in agricultural use would result in the loss of Grade 3 agricultural land and the SA states that is therefore considered to have a significant negative effect in relation to the objective of protecting our soils and promoting efficient land use.

OVERLOAD ON INFRASTRUCTURE

The development of 263 houses on this site will have a major impact on the infrastructure of the village including the need for an extra 66 extra primary school places and 33 extra secondary school places. The Infrastructure Delivery Plan indicates a lack of capacity in local primary schools.

EXTREME INCREASE IN TRAFFIC - ALREADY OVER CAPACITY

The Traffic Capacity Assessment shows that the site would contribute significant additional capacity through the A184/ Boker Lane junction, which is already over capacity at the evening peak. When the impact of full barrier closure at the Tilesheeds level crossing is included the impact on this junction is even greater. Similar impact is forecast for the Sunderland Road/ Station Road junction.



Response ID ANON-5JMM-6ZFX-7

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-01-23 12:18:44

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

This development plan has been ongoing for many years, I feel you won't stop until you get your way and ruin the Fellgate area.

The fields are full of wildlife which will be destroyed,

We have had flooding issues in the past that were fixed but recently the water levels have been very high on the flooding defense, with 1200 homes Fellgate will become a flood site.

The roads around are very busy between 0700-0930am and 4 - 7pm already, making one of the entrance points on Fellgate will add to the traffic and it will become gridlocked and make everyone's life very miserable.

This is a crazy plan to develop on Fellgate, I can see developments all over South Tyneside, birth rates are not up, there are plenty of unoccupied Council houses.

If this development get approval, what compensation will the residents of Fellgate receive for all the years of misery that this will lead to from noise/mess/traffic making peoples quality of life very poor. In a world where we focus on peoples wellbeing, this is totally against that!! We need Green belt to enjoy and unwind, South Tyneside is currently a nice place to live, not so much in the future unfortunately if this goes ahead!

2 What is your name?

Name:
Jamie Herrett

3 What is your email address?


Email:


4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:


Response ID ANON-5JMM-6ZHZ-B

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-03-03 21:21:36

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

The SP8 plan is not sound. Plans to build on this land were not considered sound in 2016 and were rejected. No explanation is given for this reversal and the rejection of other sites not on the green belt but within the borough. The traffic harm survey appears to have been conducted during Covid Lockdown and therefore is grossly underestimated and not a true reflection of the problems that may be caused. The process is not been legally compliant as comment on the consultation process has not been made available to those without internet access or with disabilities. Many requests for paper based forms were ignored and only responded to with only 4 days to the deadline. Furthermore, many hundreds of residents were misdirected to the wrong web page to make comment. This error was only discovered through due diligence from a small handful of residents who only had a short time to share the correct web page. This error, or at worst, obfuscation has denied many of participation.

Greater clarity and easy access to information needs to be presented to those residents who will be affected by the proposal. The plan refers to mitigating harm on many occasions but does clarify harm to whom or to what. It speaks of solutions in vague generalisation with no specific plans. Significant harm to people and the environment is likely to result from the narrow traffic corridor that will be created through the existing estates of Hedworth and Fellgate thereby facilitating a short cut to the A194 by-passing rush hour congestion. This will increase pollution and decrease road safety in a high residential area. This contradicts the local authority's own green policies. The infrastructure was created in the late 1960s and is not fit for purpose for any new housing development off Durham Drive which is a single lane road used for residential parking and access.

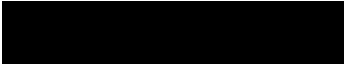
The SP8 plan poses more questions than answers to the thousands of residents who already live on the neighbouring estates of Hedworth and Fellgate. Concern over increased traffic through two residential estates, the loss of a local food producing farm plus the lengthy disruption a huge building project will create so close to an existing residential area have not been adequately addressed. Residents have openly questioned the need for additional schools and recreational facilities proposed, as such facilities and 3 schools already exist within the community and could be expanded if needed.

2 What is your name?

Name:
Neil Johnson

3 What is your email address?

Email:



4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:



Submitted to South Tyneside Publication Draft Local Plan 2023-2040
Submitted on 2024-03-03 21:53:02

Chapter 1: Introduction

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Has failed to adequately provide access to enable comment for those with limited access to internet or have a disability. Not everyone has been given a fair chance to offer comment and have it formally recorded.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP8: Fellgate Sustainable Growth Area

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

The SP8 plan is not sound. Plans to build on this land were not considered sound in 2016 and were rejected. No explanation is given for this reversal and the rejection of other sites not on the green belt but within the borough. The traffic harm survey appears to have been conducted during Covid Lockdown and therefore is grossly underestimated, and not a true reflection of the problems that may be caused. The process is not been legally compliant, as comment on the consultation process has not been made available to those without internet access or with disabilities. Many requests for paper based forms were ignored and only responded to with only 4 days to the deadline. Furthermore, many hundreds of residents were misdirected to the wrong web page to make comment. This error was only discovered through due diligence from a small handful of residents who only had a short time to share the correct web page. This error, or at worst, obfuscation has denied many of participation.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

Greater clarity and easy access to information needs to be presented to those residents who will be affected by the proposal. The plan refers to mitigating harm on many occasions but does not define harm or to whom or what the harm is directed. It speaks of solutions in vague generalisation with no specific plans.

Significant harm to people and the environment is likely to result from the narrow traffic corridor that will be created through the existing estates of Hedworth and Fellgate thereby facilitating a short cut to the A194 by-passing rush hour congestion. This will increase pollution and decrease road safety in a high residential area. This contradicts the local authority's own green policies. The infrastructure was created in the late 1960s and is not fit for purpose for any new housing development around Durham Drive, which is a single lane road used for residential parking and access.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

I consider it essential and vital to participate in the oral part of the examination. The SP8 plan poses more questions than answers to the thousands of residents who already live on the neighbouring estates of Hedworth and Fellgate. Concern over increased traffic through two residential estates, the loss of a local food producing farm plus the lengthy disruption a huge building project will create so close to an existing residential area have not been adequately addressed. Residents have openly questioned the need for an additional school and recreational facilities proposed, as such facilities and 3 schools already exist within the community and could be expanded if needed.

Policy 41: Green Belt

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

The SP8 plan is not sound. Plans to build on this Green Belt land were not considered sound in 2016 and were rejected. No explanation is given for this reversal only a few years later. 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 underestimated. The process is not been legally compliant as comment on the consultation process has not been made available to those without internet access or with disabilities. Many requests for paper based forms were ignored and only responded to with only 4 days to the deadline. These paper forms were limited in number and not readily available from local authority offices. Furthermore, many hundreds of residents were misdirected to the wrong web page to make comment. This error was only discovered through due diligence from a small handful of residents who only had a few days to share the correct web page. This error, or at worst, obfuscation has denied many of participation.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

The housing plan needs to be modified. The high density housing proposed on the Green Belt of SP8 is the smallest in terms of land area. This could be moved to one of at least 6 other sites within the borough some of which are not green belt. The low density housing appears to be placed in a much sought after location with open views across green belt. The attraction of the open views for the low density housing is stated in the plan giving the implication of a unique selling point. The loss of green belt in order to sell high end housing does not appear to be ethical or in line with local policies.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

I consider it essential and vital to participate in the oral part of the examination. The SP8 plan poses more questions than answers to the thousands of residents who already live on the neighbouring estates of Hedworth and Fellgate. Concern over increased traffic through two residential estates, the loss of a local food producing farm plus the lengthy disruption a huge building project will create so close to an existing residential area have not been adequately addressed. Residents have openly questioned the need for additional schools and recreational facilities proposed, as such facilities and 3 schools already exist within the community and could be expanded if needed.

Your personal details

What is your name?

Name:

Neil Johnson

What is your email address?

Email address:

[REDACTED]

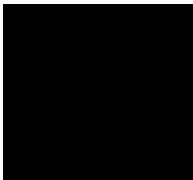
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



Response ID ANON-5JMM-6ZYZ-V

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-26 20:59:28

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

We don't need this. There is quite a lot of wildlife in the area. STC is supposed to have an animal charter. It's obvious STC are ignoring this.

2 What is your name?

Name:

Martin Brown

3 What is your email address?

Email:

[REDACTED]

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-11 17:34:43

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

Yes I totally disagree this plan. We will no longer be a village but a town. I have lived here 24 yrs. We do not want our green land taken and not at the metro station car park also where we walk our dogs. This area is starved of public transport as it is bus wise and if you are bringing more and more people here in that amount of numbers it will be chaos. Are you guaranteeing more buses and what about are emergency services access.

What about are wildlife and the walk around in that area.

Can you guarantee our safety who will be the majority of people moving in? will police checks be carried out on new residents without history - some are fleeing crimes they have committed - private landlords rent to anyone who will be keeping an eye on them they don't care ,putting our children and animals at risk. When you are on waiting list for houses it is a record of your stability .

This is a disaster and many people will sell their homes .Our crime rate will go up and you will be creating a ghetto in what was a lovely place to live in.

2 What is your name?

Name:

Catherine Steele

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

Fellgate

veronica craig [REDACTED]

Tue 1/23/2024 12:11 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

*** **WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, **clearly stating your concerns in the email** ***

I have difficulty expressing how horrified I am at the proposed building of 1200 houses on Fellgate. Mainly because your using farmland, not just greenbelt and we should all be trying to increase our farming to limit imports.

Also before Northumbrian Water spent millions on flood defence. The estate always had problems with flooding. However the water board document stated their improvements as well as the vast farmland would eliminate the problem. Which it has as we've had no flooding since.

However I dread to think what will happen with the concrete created by building 1200 houses.

The council will have to compensate residents for the damage.

Apart from losing the farmland the surrounding roads can not cope with 2000 more cars.

The metro car park can't cope with the existing cars so certainly couldn't cope with more.

And traffic jams are terrible at the moment.

Monkton roundabout can't be improved anymore, It already has 3 lanes. What else can you do?

I don't think this plan of so many houses has been properly considered .

Sent from [Outlook for Android](#)

Fellgate

veronica craig [REDACTED]

Sun 3/3/2024 12:25 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

*** **WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, **clearly stating your concerns in the email** ***

I wish to point out that these proposals are totally against everything you propose to aim at.
To build on a working farm the only farm in Jarrow, when government are saying we import far too much food.
To build houses far and above what is needed in the area due to reduction in birth rate.
The amount of houses already built in Hebburn will easily cover the amount needed.
The fresh air and healthy countryside what everyone needs and was a godsend during the covid lockdown. Everyone spent exercise time walking the 2 miles around Fellgate.
What about biodiversity?
Barn owls, bats, hawks, foxes.
Noise pollution, air pollution air and light, during and after building.
Then the traffic problems from at least another 1000 cars.
All the roads will be massively effected, and they already have problems at rush hour.
The flooding is another huge problem, which Northumbrian Water tried to rectify but said in their report it would work because of the surrounding farmland, which would soak up surrounding water.
That wont happen with 1200 houses on the farmland.

PLEASE reconsider.

Sent from [Outlook for Android](#)

Response ID BHLF-5JMM-6ZYR-M

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 09:45:43

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

I have difficulty expressing how horrified I am at the proposed building of 1200 houses on Fellgate. Mainly because your using farmland, not just greenbelt and we should all be trying to increase our farming to limit imports. Also before Northumbrian Water spent millions on flood defence. The estate always had problems with flooding. However the water board document stated their improvements as well as the vast farmland would eliminate the problem. Which it has as we've had no flooding since. However I dread to think what will happen with the concrete created by building 1200 houses. The council will have to compensate residents for the damage. Apart from losing the farmland the surrounding roads can not cope with 2000 more cars. The metro car park can't cope with the existing cars so certainly couldn't cope with more. And traffic jams are terrible at the moment. Monkton roundabout can't be improved anymore, It already has 3 lanes. What else can you do? I don't think this plan of so many houses has been properly considered .

2 What is your name?

Name:
Veronica Craig

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

n/a

RE: South Tyneside Publication Draft Local Plan (Regulation 19) public consultation

Sunny Ali <[REDACTED]>

Wed 2/14/2024 4:58 PM

To: Local Plan <[REDACTED]>

Cc: Andrew Inch <[REDACTED]>

>; Matthew Clifford <[REDACTED]>

<>; Paul Dixon

>; FINCH James <[REDACTED]>

📎 2 attachments (892 KB)

AA.23.30.07 South Tyneside Publication Draft Local Plan (Regulation 19) - National Highways Response to LPA.pdf; AA.23.30.02 South Tyneside Publication Draft Local Plan (Regulation 19) - TM ISSUE.pdf;

*** **WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, clearly stating your concerns in the email ***

Dear Andrew,

Thank you for consulting National Highways on the above mentioned South Tyneside Publication Draft Local Plan (Regulation 19) public consultation. Please see attached our formal letter and the accompanying Technical Memorandum for your courtesy.

As always any questions, please do not hesitate to get in touch

Regards

Sunny

Sunny Ali MTCP | Regional Spatial Planning Manager

Operations Yorkshire, North East and Humberside, National Highways

Mobile: [REDACTED]

Latest DfT Adopted Town & Country Planning Links:

DfT Circular 01/2022

<https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>

Planning and the strategic road network in England:

<https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>

From: Local Plan <Local.Plan@southtyneside.gov.uk>

Sent: Tuesday, January 23, 2024 11:04 AM

Subject: South Tyneside Publication Draft Local Plan (Regulation 19) public consultation

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/

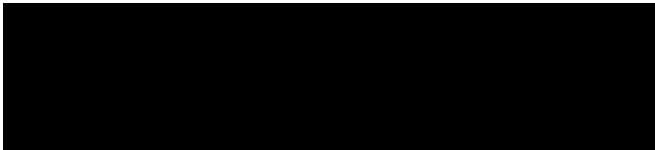
Email: Local.plan@southtyneside.gov.uk

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 Ingham
Senior Manager - Planning

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South Tyneside Publication Draft Local Plan (Regulation 19)

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Date: 14th February 2023
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Introduction

South Tyneside Council [STC] 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.

STC has also consulted National Highways on its Fellgate Sustainable Growth Area Supplementary Planning Document [SPD] Scoping Report (2024) public consultation.

Jacobs Systra Joint Venture [JSJV] has reviewed the following evidence:

- STC Publication Draft Local Plan: 2023 to 2040 [STDLP]
- STC Draft Local Plan Policies Map
- STC Duty to Cooperate Statement [DtC]
- STC 2024 Infrastructure Delivery Plan [IDP]
- STC Fellgate Sustainable Growth Area SPD Scoping Report [Fellgate SPD]
- Strategic Road Network [SRN] Forecast Report
- SRN Model Development Report [MDR]

Key comments are underlined.

SRN in South Tyneside

The South Tyneside Local Authority boundary is presented in Figure 1 and the extent of the SRN within South Tyneside is presented in Figure 2.

Extent

Figure 1: South Tyneside Local Authority boundary

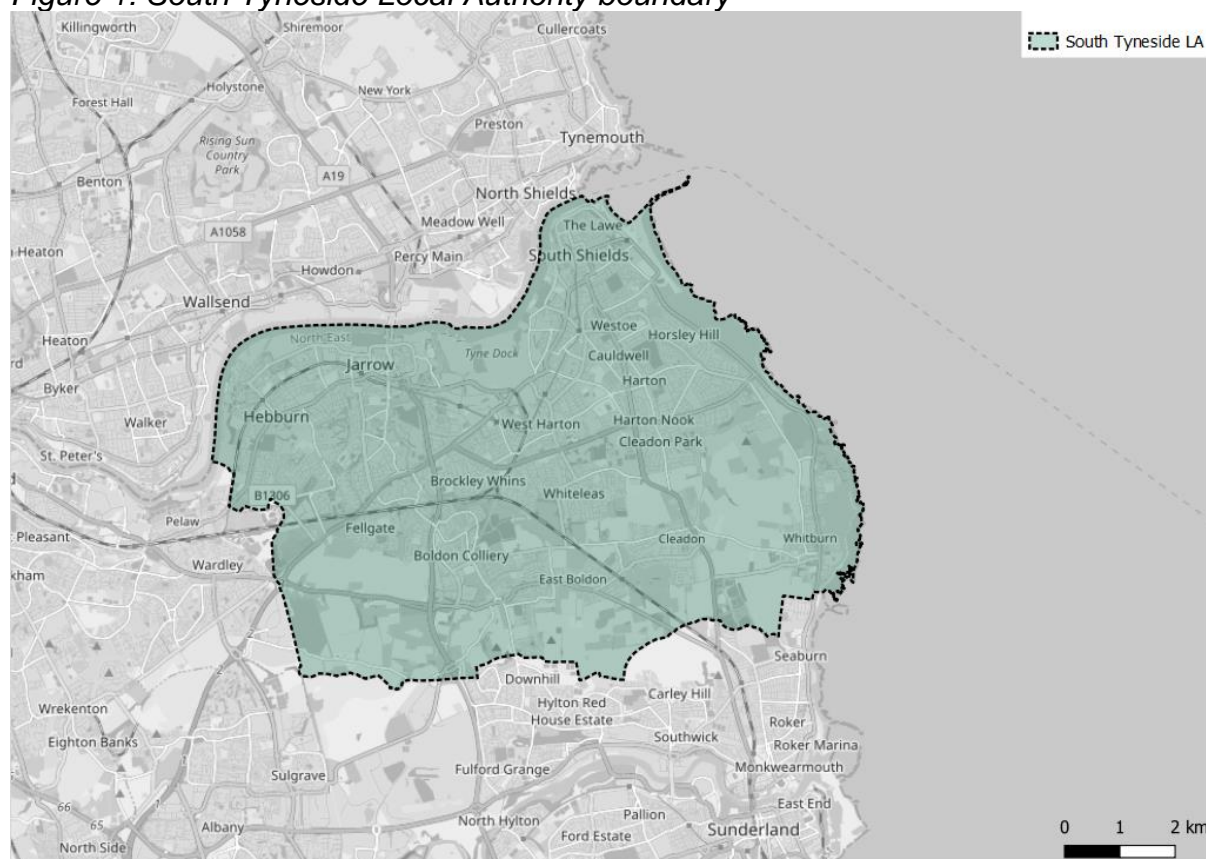
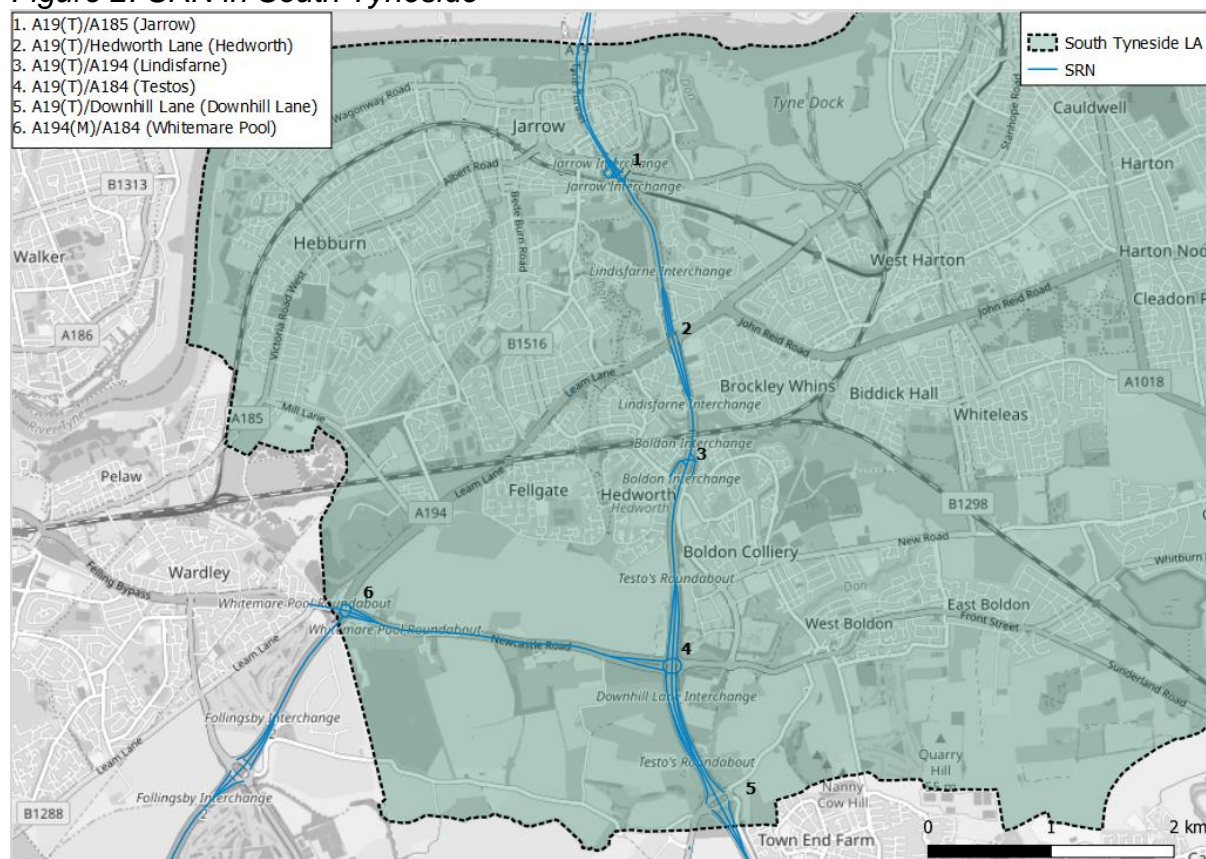


Figure 2: SRN in South Tyneside



As presented in

Figure 2, the SRN within South Tyneside comprises 6 Junctions:

1. A19(T)/A185 (Jarrow)
2. A19(T)/Hedworth Lane (Hedworth)
3. A19(T)/A194 (Lindisfarne)
4. A19(T)/A184 (Testos)
5. A19(T)/Downhill Lane (Downhill Lane)
6. A194(M)/A184 (Whitemare Pool)

There are two sections of SRN mainline within South Tyneside:

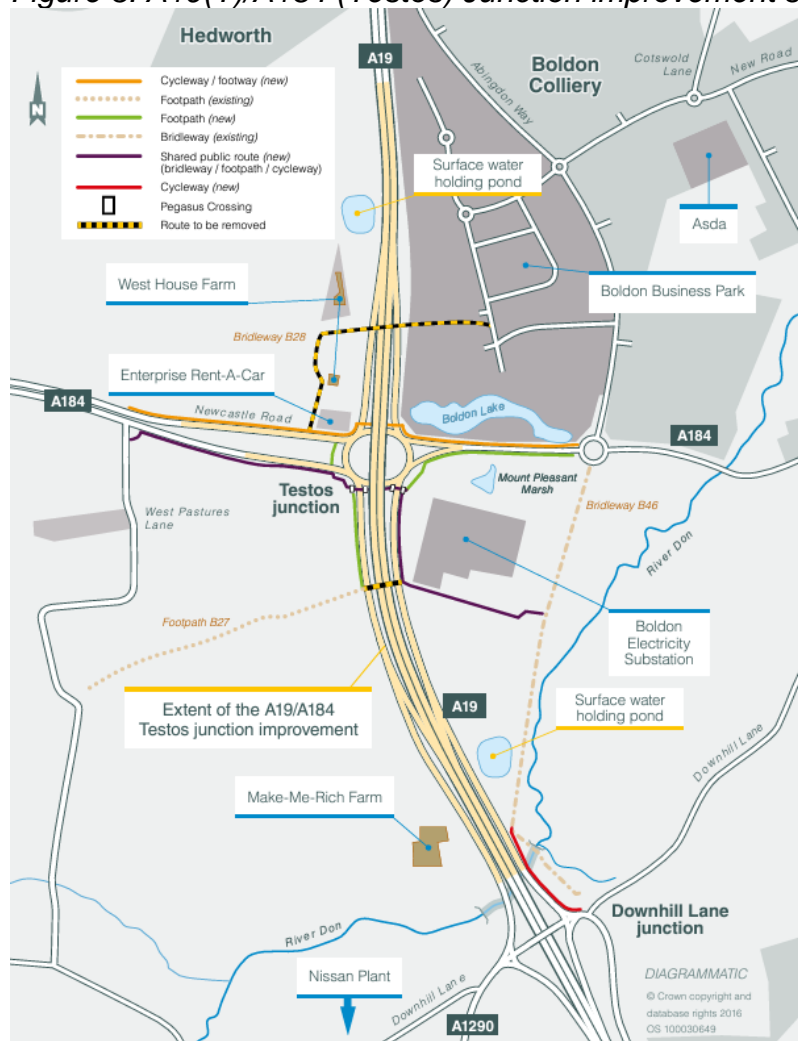
- The A19, which provides a strategic north-south route between the Tyne Tunnel to Sunderland City Council's Local Authority; and
- The A184, which provides an east-west link between the A19(T)/A184 (Testos) Junction and the A194(M)/A184 (Whitemare Pool) Junction.

The A194(M) also forms part of the SRN. A small section of the A194(M) south of the A194(M)/A184 (Whitemare Pool) Junction is within South Tyneside.

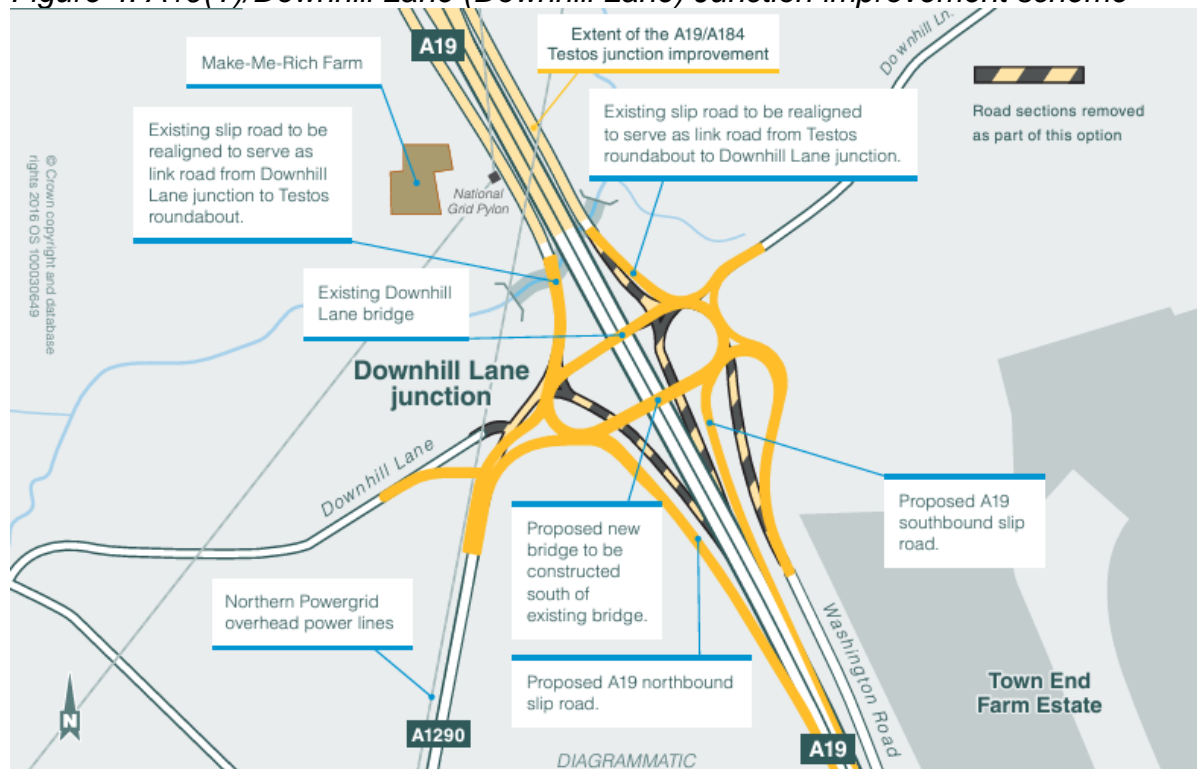
Improvements

In 2021, National Highways completed a major improvement scheme at the A19(T)/A184 (Testos) Junction. The scheme diagram is presented in Figure 3.

Figure 3: A19(T)/A184 (Testos) Junction improvement scheme



In 2022, National Highways completed a major improvement scheme at the A19(T)/Downhill Lane (Downhill Lane) Junction. The scheme diagram is presented in Figure 4.

Figure 4: A19(T)/Downhill Lane (Downhill Lane) Junction improvement scheme

An A19 northbound lane gain scheme from the A19(T)/A185 (Jarrow) Junction to A19(T)/A194 (Lindisfarne) Junction was also previously delivered.

Previous National Highways reviews

National Highways' South Tyneside Infrastructure Study (JSJV reference: AB.21.13)

In March 2022, National Highways undertook assessments to determine the impact of STC's site allocations at the SRN.

STC provided updated (regulation 18) Local Plan allocations (in Autumn 2021), which JSJV used to develop forecast traffic flows for 2027, 2032 and a nominal post-plan year of 2037. The flows were then tested in the National Highways Aimsun Next model covering the SRN and key parts of the Local Road Network within South Tyneside.

The base Aimsun Next model was built using traffic data from 2018, and that no account was taken of the impacts of the COVID pandemic. However, analysis of TRIS data showed no clear pattern of post-Covid changes to traffic patterns since 2018, and potential adjustments were not carried out due to project timescales.

The modelling results showed that the network operation was considered acceptable in 2027 for both the morning and evening periods. Recently delivered schemes continued to provide benefits over the operation of the network in 2018.

By 2032 however, the network was forecast to experience significant queueing, particularly at the A194(M)/A184 Whiteware Pool Junction and on the A19 northbound approaching the A19 / A185 Jarrow Junction. Local road delays were also observed, particularly along the A185 Newcastle Road east of the Lindisfarne Roundabout. However, the majority of the congestion was addressed by mitigation measures including the A194/A184 White Mare Pool half through-about scheme.

By 2037 the network was forecast to experience severe queueing, particularly on the A19 between Lindisfarne and Jarrow junctions and consequently on adjacent local

roads such as the A185 and Newcastle Road. The key constraint identified was the capacity of the Tyne Tunnel, so no scheme was tested. It is possible that adjusting the modelled flows to take account of COVID impacts would extend the period for which the network continues to operate effectively with the current capacity for traffic crossing the Tyne, however this additional testing did not form part of the task.

With regards to the STDLP, the above shows that increases in traffic flows in South Tyneside and the wider North East region will exert pressure on both the SRN and the local road network. Therefore, it is crucial that key policy documents such as the STDLP not only take account of key infrastructure requirements over the Local Plan period, but also act as a robust framework by which to assess potential developments that could generate vehicular trips and place further pressure on the highway network.

Draft Infrastructure Delivery Plan (JSJV reference: AA.22.02.27)

In May 2022, National Highways was consulted by STC on a draft IDP.

National Highways made the following comments regarding the IDP:

- National Highways requested that the IDP states that all development should deliver sustainable transport by ensuring that any vehicular traffic generated by new development, following the implementation of sustainable transport measures, can be safely accommodated on the local network and SRN.
- National Highways requested that the IDP states that there is potential that additional mitigation that is not identified at the Local Plan stage will be required.
- National Highways request that the link between sustainable transport measures and the resulting vehicular traffic generation is made more explicit.

With regards to the IDP schedule, it was requested that the schedule should be amended to include an additional column, titled “Consultee”, which should clearly state who the lead organisation is and who the lead organisation must consult.

It was also stated that an indicative note should be included within the IDP stating that ‘interim improvements at the A194(M) / A184 White Mare Pool junction’ will be required in the short-term, including, for example, improvements to the northbound and westbound approaches.

National Highways supported proposals to increase the patronage of the Metro and to remove trips from the SRN, although noting that this should ideally be achieved by combining sustainable modes. The proposed parking extension at Fellgate Metro Station may increase the need to travel on the SRN by car, therefore National Highways requested to be consulted on any relevant feasibility study for this scheme. The additional car parking spaces are likely to result in traffic increases at either the A19 Lindisfarne junction or the A194(M) / A184 White Mare pool junction. National Highways therefore suggested that the IDP should consider active travel solutions that do not encourage single vehicle (car) trips on the SRN.

Regulation 18 Local Plan (JSJV reference: AA.22.02.43)

In August 2022, National Highways was consulted on STC’s Draft Local Plan (Regulation 18) and Sustainability Appraisal. National Highways reviewed the following evidence:

- South Tyneside Draft Local Plan 2021-2039
- South Tyneside Council Draft Local Plan Policies Map
- Infrastructure Delivery Plan (2022)

National Highways provided comments on the following matters:

- Site allocations, in terms of site requirements and proximity to the SRN
- Policies/objectives of significant relevance to National Highways
- Content of the draft policies map
- A19(T)/A185 (Jarrow) northbound diverge interim mitigation

A funding bid was prepared by STC to deliver a major improvement scheme at the A194(M) / A184 Whiteware Pool Junction. This scheme would have mitigated the entire impact of STC's (draft) Local Plan. JSJV understands that this funding bid was not submitted, and no alternative funding was identified.

National Highways' comments at the Regulation 18 stage did not directly result in a 'Soundness' outcome.

DfT Circular 01/2022

In December 2022, the Department for Transport [DfT] published its policy paper: "Strategic road network and the delivery of sustainable development" [DfT Circular 01/2022]. National Highways' previous reviews (listed above) were undertaken in line with DfT Circular 02/2013, which was the prevailing planning policy at the time. JSJV's review within this TM has been undertaken in line with the requirements of DfT Circular 01/2022, specifically:

- Principles of sustainable development (paragraphs 11-17)
- New connections and capacity enhancements (paragraphs 18 – 25)
- General principles for plan-making (paragraphs 26 – 30)
- Evidence base requirements for plan-making (paragraphs 31 – 33)
- Infrastructure delivery (paragraph 34)
- Integration strategies (paragraphs 35 – 36)
- Other plan-making requirements and site allocations (paragraphs 37-38).

SRN Forecast Report and SRN MDR

Background

In 2023, STC and National Highways jointly commissioned a study to update National Highways' South Tyneside Infrastructure Study with the new set of Local Plan allocations.

MDR

For this current study, the previous model, A19ST18hy, was updated to post-COVID 2022 traffic flows (with the model renamed A19ST22hy) and to include any highway improvements that have been implemented across the network.

Two sources of data were used to build the 2022 base traffic demand:

- 2022 Junction Turning Count (JTC) data
- 2022 National Highways TRIS data

The model was successfully calibrated in accordance with TAG guidance, with 98% and 92% of the turns and links meeting either criteria 1 or 2 for both peak periods, which is well above the 85% target.

The model was successfully validated in accordance with TAG guidance, with 83% of the routes meeting validation criteria for morning and evening periods. While the pass target is 85%, journey times are considered validated due to limited number of routes (six) and only one of the routes not meeting the criteria.

The A19ST22hy model is considered suitable for use in testing Local Plan impacts.

Scenarios

The SRN forecast report states:

South Tyneside Council provided an uncertainty log in June 2023, containing developments to be included within the assessments. The log included expected build out by 2030 and 2035, as well as the total build beyond the plan period. The model years have therefore been adopted as 2030, 2035 and a nominal post-plan year of 2040.

Accordingly, six scenarios consisting of Do Minimum and Do Something for 2030, 2035 and 2040 have been tested to assess the impact of South Tyneside Local Plan.

The 2040 Do Minimum scenario demonstrates the impact of end of plan traffic on the network with only committed improvements, while the 2040 Do Something scenario shows improvements achieved from the identified intervention schemes.

The 2030 and 2035 scenarios use the phased traffic demand from local plan developments to identify the broad time period when the need for intervention schemes arises. It should be noted that if a scheme is required by 2035 (for example) but not for 2030, then it will need to be delivered some point between 2030 and 2035. The study does not identify the specific year which could be early in the 5-year period. The scope of the study provided these 5-year increments but not the more detailed testing to identify at exactly which year or quantum of development each scheme is required.

JSJV would suggest that the scenarios which have been assessed comply with the requirements of DfT Circular 01/2022. This is because the scenarios allow “New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth [to] be identified as part of the plan-making process” (DfT Circular, paragraph 29)”. Furthermore, it is appropriate to not identify at exactly which year or quantum of development each scheme is required because this will be identified by Transport Assessments for at the planning application stage:

DfT Circular 01/2022, paragraph 51: “Where a transport assessment indicates that a development would have an unacceptable safety impact or the residual cumulative impacts on the SRN would be severe, the developer must identify when, in relation to the occupation of the development, transport improvements become necessary.”

JSJV would, however, suggest that that timescales for SRN scheme delivery that are identified at the local plan stage should be documented in an agreed Joint Position Statement [mou] between National Highways and STC.

Infrastructure schemes

The assessments includes two infrastructure schemes as “committed infrastructure schemes”: “Mill lane 5-arm roundabout” and “IAMP bridge and International Drive scheme”

The SRN forecast report states the following regarding the “Mill lane 5-arm roundabout”:

“Mill lane 5-arm roundabout provides access to the proposed residential development at Land South of Fellgate, and hence is included in scenarios where traffic from the said development is included. The inclusion of this scheme does not imply acceptance of the scheme by either National Highways or South Tyneside Council, this is subject to normal planning requirements. The scheme drawings were provided previously by the developer’s consultant and are used to provide site access without prejudice.”

JSJV would suggest that it is appropriate for this to be considered as committed because it is required for the site access of a local plan allocation, however, a Transport Assessment will be required to demonstrate the sufficiency and safety of the site access arrangements in detail.

The SRN forecast report states the following regarding the “IAMP bridge and International Drive scheme”:

“IAMP bridge provides an east-west connection across the A19 south of Downhill Lane Interchange, connecting Washington Road to the A1290. The crossroads following the bridge and extensions at International Drive on either side of the A1290 provide loading points for IAMP traffic”

The assessments also includes two proposed SRN mitigation schemes:

- **Whitemare Pool widening scheme:** The White Mare Pool widening scheme proposes an additional lane on the north approach arm and the following east circulatory at the roundabout, increasing from three to four lanes, with two lanes each dedicated for southward and westward movements. Additionally widening from two to three lanes is proposed for the east approach arm (off-slip road), and south approach arm from Follingsby Lane to Whitemare Pool
- **Lindisfarne southbound lane gain:** The Lindisfarne southbound lane gain scheme proposes widening from two to three lanes from Jarrow to Lindisfarne section, along with upgrades of the merge and diverge to a lane gain and lane drop respectively.

JSJV has provided comments on the proposed SRN mitigation schemes later in this TM.

Traffic demand and development

The SRN forecast report states:

“The forecast demand was constructed from the Committed and Local Plan developments in the uncertainty log. Additionally, Local Plan development information provided by North Tyneside Council, Gateshead Council and Sunderland City Council for development sites neighbouring the South Tyneside Local Authority has been used for forecast demand construction.

Any site with less than 30 residential units is excluded due to its minimal impact on the overall network operation.

For committed development no phasing is assumed, meaning all scenarios include the full quantum of committed development.”

JSJV supports the above approach.

The SRN forecast report states:

“Trip generation and distribution from the proposed development at IAMP is calculated using the same methodology. However the peaks for the development are considerably different from the network peaks due to the IAMP shift patterns. Hence 15-minute matrices are produced for IAMP traffic based on the shift information from the latest consented planning application. The IAMP traffic is split among the centroids in the development area according to proportions from the Area Action Plan.”

JSJV supports the above approach but would suggest that the shift information that has been assessed should have been document in the SRN forecast report to allow for review.

The total quantum of development within South Tyneside which was considered for forecast demand construction for each scenario year is presented in Table 1.

Table 1: Development quantity by year for modelled scenarios

Development	2030 scenario	2035 scenario	2040 scenario
Residential (dwelling units)	2,376	3,983	4,937
Employment (hectare)	166	208	208

JSJV has compared the content of Table 1 with STLP later in this TM.

Vehicle trip rates contained within National Highways’ traffic distribution tool GraHAM have been used for the assessments. The SRN forecast report states:

“The generic vehicle trip rates contained in GraHAM are split by land-use types for both housing and employment. For all residential sites, a generic ‘Mixed Private’ vehicle trip rate has been selected; this is an assumed ‘worst-case’ option. For all employment sites, a generic B1/B2/B8 land-use trip rate has been selected. SYSTRA has not considered how the varying scales, locations, and accessibility of proposed developments vary on a site-by site basis. Consequently, the selected trip rates are considered suitable for high-level analysis only and site-specific analysis may be required for the planning application stage.”

JSJV would suggest that the proposed trip generation methodology does not fully comply with the requirements of DfT Circular 01/2022. This is because the vehicle trip rates take no account for any sustainable transport improvements proposed within the STLP and cannot, therefore, be considered to be residual traffic flows.

DfT Circular 01/20202 paragraph 31 states that:

“The company will expect this process [the Local Plan evidence base] to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.”

The approach taken in the SRN forecasting report does not consider any options for reducing the need to travel.

JSJV would suggest that the accessibility of proposed developments are likely to vary on a site-by site basis and this should have been considered in the assessment methodology. For example, modal split census data for each middle super output area in South Tyneside could have been combined with person trip rates to derive trip rates that are considerate of local travel patterns. This may have resulted in a lower trip generation for some sites than has been assessed due to, for example, the proximity of the Tyne and Wear Metro in South Tyneside providing good level of sustainable accessibility to many areas.

JSJV would also suggest that the assessment could have considered the proportions of people who work from home in South Tyneside.

Overall, JSJV would suggest that whilst the assessment methodology is not fully compliant with DfT Circular 01/2022, it does provide a robust assessment of the SRN mitigation requirements for the STLP.

It is stated that “A separate GraHAM assessment has been undertaken each development site in South Tyneside Council so each site has its own specific trip distribution”. JSJV would suggest that the report should have appended the outputs of the trip distribution results to allow for review.

The SRN forecast report states:

The approach to identifying trips for residential and employment sites includes an element of double counting. To reduce this while maintaining a robust approach, trips to and from proposed employment sites within South Tyneside are only included if the other end of the trip is outside South Tyneside. Trips from origins within South Tyneside to new employment sites are assumed to be double counted with trips from new residential sites and are therefore excluded.

JSJV would suggest that this is an overly simplistic interpretation, but acknowledges that a methodology for the removal of double counted trips is required to ensure a realistic assessment is undertaken. Given that the trip generation associated with the number of residential allocations outweighs the trip generation associated with the employment allocations, the methodology is accepted.

JSJV would suggest that the methodologies adopted for deriving traffic profiles and base traffic flows are appropriate.

The SRN forecast report states:

“To forecast traffic levels for vans and HGVs, background growth factors have been calculated based on the 2022 Road Traffic Projections (RTP) from DfT.”

JSJV would suggest that whilst TEMPro could have been used to obtain a local growth rate, the use of RTF factors is considered robust.

Overall, JSJV would suggest that the approach taken has identified the mitigation requirements for the STLP and this is in line with DfT Circular 01/2022. JSJV would, however, suggest that, in line with DfT Circular 01/2022, the development promoters for planning applications will need to be seeking to reduce the need to travel and maximise their site’s accessibility via sustainable modes; this matter must be appropriately reflected in policy wording in the STLP.

Results

Notwithstanding the above comments regarding the assessment methodology, JSJV has reviewed the assessment results presented in the SRN forecast report.

JSJV would suggest that the following conclusions, as stated in the SRN forecast report, are accurate interpretations of the assessment results:

- 2040 Do Minimum Results:
 - There are significant northbound and southbound queues at White Mare Pool junction in 2040 Do Minimum scenario morning and evening periods.
 - Delays from White Mare Pool junction cascade to Lindisfarne junction resulting in northbound queues extending beyond the off-slip and on to the A19 mainline in both morning and evening periods
 - In the evening period, the A19 southbound diverge queues at Lindisfarne junction also extend beyond the off-slip and on to the A19 mainline.
- 2040 Do Something Results:
 - The delays at White Mare Pool junction are considerably less in the 2040 Do Something scenario (with the White Mare Pool widening and Lindisfarne lane gain) for both morning and evening periods compared to both the 2040 Do Minimum and 2022 base scenario.
 - At Lindisfarne junction, the A19 northbound and southbound diverge queues remain well within the off-slips in the morning period and will not cause a safety concern for National Highways.
 - For the evening period, there are minimal queues on the A19 northbound diverge at Lindisfarne junction. The A19 southbound diverge queues are still significant but are contained within the proposed lane gain, reducing their safety impact.
- Interim test results
 - The White Mare Pool widening scheme is required before 2030 and the Lindisfarne southbound lane gain scheme is required before 2035 for satisfactory operation of the network.

Conclusions

The SRN forecast report makes the following conclusions:

- The study shows that the network cannot accommodate Local Plan traffic without any interventions, with significant delays building up to the end of plan period in 2040.
- The proposed infrastructure schemes, widening at White Mare Pool junction (including a lane gain from Follingsby Lane junction) and Lindisfarne southbound lane gain, are required for satisfactory network operation, with the former required from 2030 and the latter from 2035.
- The scheme at Jarrow identified in an earlier assessment of the network is not required for the Local Plan developments. This is because end of plan traffic demand constructed for this study is lower than previous forecasts, due to minimal growth between 2019 and 2022 as well as a lower development quantum after developments which are already built were accounted for. The Jarrow scheme may still be required in the next Plan period.
- The capacity of the Tyne Tunnel, north of the network, remains a constraint for the northbound throughput of the tested network.

JSJV would suggest that the above conclusions are robust in terms their interpretation of the assessment results that have been reported.

JSJV would reiterate that by site-by-site variation in term of trip generation and the impact of sustainable transport local plan mitigation for modal shift will need to be fully considered at the planning application stage.

STLP

This section of the TM reviews the policies within the STLP. The first section covers Policies requiring National Highways' comment (policy wording changes) and the second covers policy that JSJV would suggest National Highways should support. Any policies not referred to are policies that JSJV would suggest are not relevant to National Highways.

Policies requiring National Highways' comment

The following comments (in Table 1) are made on policies that National Highways has specific concern with and require National Highways to make a recommendation with regard these concerns.

Table 1 – National Highways policy comments

Policy reference	Policy title	JSJV comments
SP2(4)	Strategy for Sustainable Development to meet identified needs	The policy states that the STLP will deliver 5,778 dwellings. The SRN Forecast report only assessed the impact of 4,937 dwellings within the Plan period. <u>Initially, JSJV would suggest that STC should explain the reasoning for this variance.</u>
SP18	Housing Supply and Delivery	
SP2(6)	Strategy for Sustainable Development to meet identified needs	The policy states that the STLP will deliver 36.6ha of employment land. The SRN Forecast report assessed the impact of 208ha of employment land within the Plan period. <u>Initially, JSJV would suggest that STC should explain the reasoning for this variance.</u>
SP19	Strategic Economic Development	The policy states "Maintaining a portfolio of 261.5ha of land for general economic development and a further 187.2 ha of land for specialist port and river-related development". The SRN Forecast report assessed the impact of 208ha of employment land within the Plan period. <u>Initially, JSJV would suggest that STC should explain the reasoning for this variance.</u>
SP6	Fellgate Sustainable Growth Area	<u>JSJV would suggest that STC should provide a quantifiable frequency for what it considers to be a high-quality bus service.</u> <u>JSJV would also suggest that policy wording changes are required to ensure that the allocation boundary with the SRN is appropriately maintained.</u>

54	Improving capacity on the road network	The policy includes “junction Improvements at A19/A185/Tyne Tunnel”. This was not identified as being required in the SRN Forecasting Report. <u>JSJV would, therefore, suggest that reference to this mitigation scheme should be removed.</u>
SP26	New development	<p>The policy states that new developments should “Provide or contribute towards the provision of new and/or improved sustainable travel infrastructure where the predicted number of additional trips will lead to a cumulative increase in car-based trips”.</p> <p><u>In line with DfT Circular 01/2022, JSJV would suggest that all new developments should be seeking improve their sustainable travel accessibility and the policy wording is, therefore, inappropriate because it creates an unnecessary criteria that is linked “a cumulative increase in car-based trips”.</u></p>
61	Delivering Infrastructure	<p>The policy states that “The timing and prioritisation in the delivery of essential infrastructure will accord with the priority needs established through the IDP”. JSJV would suggest that this policy wording should be changed to:</p> <p><u>The timing and prioritisation in the delivery of essential infrastructure will broadly accord with the priority needs established through the IDP, however, the exact timing of any required infrastructure will be identified through the Transport Assessment and Travel Plan process at the planning application stage.</u></p>

JSJV would suggest that National Highways should provide further detailed comments on site allocation requirements in due course.

Policies that JSJV would suggest National Highways should support

The following comments (in Table 2) are made on policies that National Highways can support.

Table 2 – National Highways policy support

Policy	Policy wording that JSJV supports
Policy SP17: Climate Change To meet the challenge of mitigating	Facilitating a modal shift in transport by maximising the ability to make trips by public transport, sustainable and active modes of transport.
Policy 5: Reducing energy consumption and carbon emissions	Measures that enable sustainable lifestyles for the occupants of the buildings, including electric car charging points

Policy 24: Safeguarding land at CEMEX Jarrow Aggregates Wharf	Development proposals will need to demonstrate how any the impacts on the strategic road network will be mitigated
Policy SP26: New Development	Where appropriate, be supported by a Transport Statement or Transport Assessment and a Travel Plan Mitigate impacts on the strategic and/or local highway network arising from the development itself, or the cumulative impacts of development, through the provision of, or contribution towards, necessary and relevant transport improvements, including those secured by legal agreement
Policy 53: Accessible and Sustainable Travel	JSJV supports the wording of this policy.

JSJV would suggest that National Highways should discuss adding the following wording to the STLP with STC: “The transport implications of development must be addressed as part of any planning application, where relevant this could include through Transport Assessments, Transport Statements and Travel Plans. All development shall deliver sustainable transport by: ensuring that any vehicular traffic generated by new development, following the implementation of sustainable transport measures, can be safely accommodated on the local and strategic highway network and does not cause an unacceptable increase in congestion or air pollution and that severe congestion can be overcome by appropriate transport improvements”.

Policies Map

Having reviewed the detailed policies map provided alongside the STLP, JSJV is not satisfied that all relevant National Highways infrastructure requirements are shown on the policies map. JSJV would suggest that the policies map is amended to show National Highways’ infrastructure requirements in the STLP area.

Fellgate SPD

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 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 SPD includes a policy context section, but no consideration is given to DfT Circular 01/2022. JSJV would suggest that due the scale of the site and its proximity to the SRN, additional wording is required within the SPD to state that the policy requirements of DfT Circular 01/2022 will need to be complied with at the planning application stage.

JSJV is supportive of STC's approach to prepare a SPD but would suggest that National Highways should give more consideration to the site requirements and policies within the STLP that will be examined.

IDP

JSJV supports the approach for the IDP to be a “an iterative and ‘live’ document”. JSJV would, however, suggest a JPS between National Highways and STC should state that the IDP is a living document and that it should be updated periodically, and therefore given the timescales of the Plan and the changing environments that could occur over the life of the Plan, any emerging patterns or evidence that identifies a potential need for further consideration of the SRN can be undertaken as part of that process.

JSJV supports the fact that the IDP does not make any presumptions that infrastructure will be funded through a future Road Investment Strategy.

JSJV supports the fact that the mitigation requirements in the IDP reflect those that were identified as being required in the SRN Forecast Report.

The IDP states: “With respect to the proposed strategic housing allocation: Fellgate Sustainable Growth Area, the Council, working in partnership with National Highways, is also seeking to encourage modal transfer to active travel and public transport modes in order to minimise trip generation by the private car”. JSJV would reiterate that this should have been considered in the traffic demand methodology in the SRN Forecasting Report.

The IDP states:

“The Council and National Highways are working together to further develop a delivery plan for the implementation of these measures and any further schemes which may be required to mitigate the plan. Details of this will be included in a Memorandum of Understanding between the two parties.”

JSJV understands that at the time of writing a Memorandum of Understanding [MoU] has not been signed. JSJV recommends that National Highways continues to work with STC to resolve any outstanding issues.

JSJV would state that “Appendix 2 – Infrastructure Delivery Schedule” includes “A19(T)/A185 Tyne Tunnels southern portal junction improvements” as a desirable scheme with the lead organisation as National Highways / STC. This was not identified as being required in the SRN Forecasting Report. JSJV would, therefore, suggest that reference to this mitigation scheme should be removed.

JSJV would suggest that the IDP for the following schemes should be updated to reflect the timescales identified in the SRN forecast report and should be titles as ‘essential’ mitigation:

- A194(M)/A194/A184(T) White Mare Pool Junction enhancement/realignment
- A19 Southbound Lane Gain / Lane Drop - A185 through to A194

Duty to Cooperate

JSJV would support the following statements in STC's DtC Statement:

The Council will continue to liaise with National Highways regarding the impacts of the Plan on the SRN.

The Council does not consider that there are any substantial areas of disagreement with National Highways. However it is recognised that the impact of the Plan on the SRN is a key strategic issue. Therefore the Council is working towards signing a Statement of Common Ground with National Highways.

Summary and Conclusions

On the basis of this review, the recommendation to National Highways in relation to this Local Plan consultation is:

Recommended Wording Changes – Subject to minor alterations as identified above, National Highways would be in a position to support the Reg.19 consultation.

This review has highlighted the need for further evidence as follows:

- 1) Clarification regarding policy wording that does not match the findings of the SRN forecast report;
- 2) Revised policies map showing SRN mitigation;
- 3) Revised IDP in line with the SRN forecast report.
- 4) Memorandum of Understanding [MoU] has not been signed. National Highways continues to work with STC to resolve any outstanding issues.

Our ref: LPTWSouthTyneside / AA.23.30.02
Your ref:

Sunny Ali
Regional Spatial Planner



FAO: Andrew Inch

14 February 2024

Dear Andrew,

South Tyneside Publication Draft Local Plan (Regulation 19)

Thank you for your consultation request for South Tyneside Council's Publication Draft Local Plan 2023-2040.

We have reviewed the submitted evidence and a summary of our position is described within this response. Detailed comments are provided in the attached Technical Memorandum referenced TM01, dated 14 February 2024 and provided by our consultant JSJV on our behalf.

Strategic Road Network Forecast Report and Model Development Report

We jointly commissioned the above study to assess the impact of the Local Plan allocations on the Strategic Road Network. The key findings of the assessment were as follows:

- 2040 Do Minimum Results:
 - There are significant northbound and southbound queues at White Mare Pool junction in 2040 Do Minimum scenario morning and evening periods.
 - Delays from White Mare Pool junction cascade to Lindisfarne junction resulting in northbound queues extending beyond the off-slip and on to the A19 mainline in both morning and evening periods
 - In the evening period, the A19 southbound diverge queues at Lindisfarne junction also extend beyond the off-slip and on to the A19 mainline.
- 2040 Do Something Results:
 - The delays at White Mare Pool junction are considerably less in the 2040 Do Something scenario (with the White Mare Pool widening and Lindisfarne lane gain) for both morning and evening periods compared to both the 2040 Do Minimum and 2022 base scenario.

- At Lindisfarne junction, the A19 northbound and southbound diverge queues remain well within the off-slips in the morning period and will not cause a safety concern for National Highways.
- For the evening period, there are minimal queues on the A19 northbound diverge at Lindisfarne junction. The A19 southbound diverge queues are still significant but are contained within the proposed lane gain, reducing their safety impact.
- The capacity of the Tyne Tunnel, north of the network, remains a constraint for the northbound throughput of the tested network.
- Interim test results
 - The White Mare Pool widening scheme is required before 2030 and the Lindisfarne southbound lane gain scheme is required before 2035 for satisfactory operation of the network.

We consider that the above conclusions present a robust transport evidence base in support of your plan. However, it is emphasised that individual site assessments will be required at the planning application stage and these cannot rely on the findings of the Local Plan assessments.

STC Publication Draft Local Plan: 2023 to 2040

We have reviewed the policies within this document. Within our Technical Memorandum, we have identified policies that require further clarification or suggested amendment to the policy wording. We have also identified policies that we fully support. Any policies not referred to are policies that are not relevant to National Highways.

STC Draft Local Plan Policies Map

We request that you review the Policies Map to ensure it reflects all relevant National Highways infrastructure requirements identified in the Strategic Road Network Forecast Report and Model Development Report.

Infrastructure Delivery Plan (IDP)

We support the approach for the IDP to be a “an iterative and ‘live’ document”.

We request that you review the IDP to ensure it reflects all relevant National Highways infrastructure requirements identified in the Strategic Road Network Forecast Report and Model Development Report.

We also request that the IDP is amended to state that it is a living document and that it will be reviewed and updated periodically, and therefore given the timescales of the Plan and the changing environments that could occur over the life of the Plan, any

emerging patterns or evidence that identifies a potential need for further consideration of the SRN can be undertaken as part of that process.

Joint Position Statement

Further to resolution of the above issues, we require the preparation of a Joint Position Statement between National Highways and STC that identifies timescales for scheme delivery of the identified SRN Improvements outlined above.


Duty to Cooperate

National Highways has a long and successful history of working with South Tyneside Council in terms of plan preparation and scheme delivery and we look forward to continued working with you to deliver your local plan aspirations in a safe and sustainable manner.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely



Sunny Ali
Regional Spatial Planner
Email: 

Objection

LP0306 - Delia Orr

Delia Orr [REDACTED]

Sun 3/3/2024 7:59 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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Sent from my I am objecting to proposed plan for the building on moor lane Cleadon village. This land is farmed land and is at the rear of my property on [REDACTED] It is prone to flooding and my garden which adjoins the field is subject to surface water already any building would worsen this problem..Also the volume of traffic would increase and would become unacceptable access to Sunderland Road is difficult now? Where would traffic flow it's impossible. I do school run to village school and it's already unmanageable and the local school is overstretched. Also and significant is the wildlife in the field where proposed building takes place is full of wildlife pheasants birds hedgehogs field mice to name a few. This is my objection



Response ID ANON-5JMM-6ZFQ-Z

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-01-23 15:58:47

Have your say

1 Do you have any comments to make in relation to the Scoping Report?

Comments:

I don't agree with the plan at all, the removal of green belt land is appalling.
There will be a huge risk of flooding to the new property and existing houses on fellgate.
Fellgate is a quite, calm place to live and this will change all of that with extra traffic that the roads aren't build to carry.
There is no provision for an extra comprehensive school when the local schools are so over subscribed that local children are forced to travel into South Shields are there are not enough places in Jarrow School, this will have a massive impact on children already living locally.

2 What is your name?

Name:
Jill Todd

3 What is your email address?

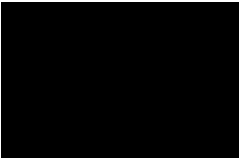
Email:


4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:


Objections to local plan

Alex Air [REDACTED]

Mon 2/26/2024 11:01 AM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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1. Objection made specifically regarding Policy SP2: Strategy for Sustainable Development

This policy is not justified by the evidence because it proposes an unsustainable level of growth of housing development; and is not consistent with the NPPF or with other statements of government policy.

This policy must be revised to decrease 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.

In SP2 paragraph 4.9 of the Local Plan it states:

"4.9 To determine the minimum number of homes needed, a local housing need assessment has been conducted using the standard method detailed in the national planning guidance. The standard method uses a formula to identify the minimum number of homes expected to be planned for in a way which addresses projected household growth and any historic under-supply. Using this approach the local housing needs assessment has concluded that for the plan period (1st April 2023 to 31st March 2040) 309 dwellings are required every year. This produces an overall minimum housing requirement of 5,253 new homes over the Plan period. The household projections that inform the housing baseline are the 2014-based household projections. This figure could change upwards or downwards based on new data. South Tyneside's housing requirement will not be 'locked in' until the Plan is submitted to the independent Planning Inspectorate."

The Local Plan is based on inaccurate population projections. Census data show a consistently falling population in South Tyneside, from 157,200 in 1991, to 152,785 in 2001, to 148,127 in 2011, to 147,800 in 2021. Yet the Local Plan assumes a population of 151,936 for 2021, an overestimate of 4,136, and that it would continue to increase over the next 20 years.

Using the Office for National Statistics (ONS) 2014 housing projections produces a housing requirement of 309 per year, a total of 5,253 houses by 2040. The Local Plan would require a total of 77,716 dwellings in South Tyneside by 2040 whereas the 2018 ONS projection is for 75,664. Therefore the Local Plan is for 2,052 more houses than are needed.

The ONS household projection is likely to be revised down given the population trends thus increasing the excess housing provision in the Local Plan.

The East Boldon Neighbourhood Forum received the following statement from the Department for Levelling Up, Housing & Communities, written by Alan C Scott, Planning policy adviser on behalf of the Secretary of State:

“In 2018 the Framework introduced a standard method for calculating local housing need to make the process simple, quick and transparent. “The standard method does not impose a target; it is still up to the local authority to determine its housing requirement, and this includes taking local circumstances and restraints such as Green Belt into account”.

The NPPF paragraph 5 and 6 states:

“5. National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.

6. Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.”

Michael Jenrick, then Secretary of State for Housing, Communities and Local Government, made a Written Statement 16th December 2020:

“There were many consultation responses which did not fully recognise that the standard method for assessing Local Housing Need does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for housing in an area. It is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made.”

Michael Gove, Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations, made a Commons Statement on 19th December 2023:

“Today’s update to the National Planning Policy Framework (NPPF)

It provides clearer protection for the Green Belt, clarity on how future housing supply should be assessed in plans and on the responsibility of urban authorities to play their full part in protecting the character of precious neighbourhoods.

The new NPPF will: facilitate flexibility for local authorities in relation to local housing need; clarify a local lock on any changes to Green Belt boundaries;

The new NPPF makes clear that the outcome of the standard method is an advisory starting point in plan making for establishing the housing requirements for an area."

The above is supported by guidance in The House of Commons Library published on 27 August 2021 "Calculating housing need in the planning system (England)" which states in 2.4:

"A starting point, not a target? Land constraints and the standard method. The standard method is intended to be the starting point in determining how many homes an LPA can and should deliver, but is not a target. LPAs must also take account (for example) of land constraints, such as the Green Belt."

<https://commonslibrary.parliament.uk/research-briefings/cbp-9268/>

This means that South Tyneside Council is able to determine its housing requirement and can take into account the restraint of the Green Belt.

2. Objection to development on the Green Belt, made specifically regarding Policies SP3: Spatial Strategy for Sustainable Development and SP7: Urban and Village Sustainable Growth Areas

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 Local Plan must be revised to remove the proposed amendment to the Green Belt boundary to allocate additional land for housing and to withdraw all of the sites proposed for removal from the Green Belt: GA1-6 and SP8.

The Green Belt land allocation in the Local Plan is for 2,308 new homes but there is no justification for building on this precious resource. The Green Belt does not need to be built on and therefore the least harm to this resource is no further development at all on the Green Belt and exceptional circumstances have not been established. The Local Plan must be revised in order to meet the requirement to be sound on the basis of being justified, as an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence; and on the basis of being consistent with national policy.

In the Local Plan, Policy SP3: Spatial Strategy for Sustainable Development proposes amending the Green Belt boundary to allocate additional land for housing and Policy SP7 Urban and Village Sustainable Growth Areas proposes the removal of sites from the Green Belt and allocation for housing development.

The Local Plan states in Policy SP3: Spatial Strategy for sustainable development:

"To meet the identified needs in Policy SP2 and to facilitate sustainable growth, the Plan will:

1. Support the sustainability of existing communities by focusing growth within the Main Urban Area including South Shields, Hebburn and Jarrow

2. *Secure the sustainability and vitality of the villages of Cleadon, Whitburn and the Boldons by supporting growth which respects the distinctive character of each village*
3. *Encourage the re-use of suitable and viable brownfield land and, where appropriate, encourage higher development densities.*
4. *Ensure the delivery of housing in sustainable locations through the allocation of sites in the Main Urban Area and by amending the Green Belt boundary to allocate Urban and Village sustainable growth areas*
5. *Create a new sustainable, community within the Fellgate Sustainable Growth Area (Policy SP8) by providing homes and community facilities.*
6. *Prioritise the regeneration of South Shields Riverside, South Shields Town Centre, Fowler Street Improvement Area, and the Foreshore Improvement Area*
7. *Prioritise economic development in designated Employment Areas, including the Port of Tyne, that are accessible by a range of transport modes and allocate additional land at Wardley Colliery*
8. *Enhance and strengthen green infrastructure, ecological networks and Green Belt throughout South Tyneside and between neighbouring authorities.*

The National Planning Policy Framework (NPPF) states:

“140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”

As demonstrated in Objection 1 above, there is no evidence that the housing requirement for the Plan period is at a level requiring development on the Green Belt. The strategic need has not been proven, for example there has been no cooperation with neighbouring local authorities which have Local Plans that intend to cumulatively build in excess of 19,000 houses above their respective ONS 2018 housing projections.

Sunderland Local Plan –	10,755 excess houses by 2033
Gateshead Local Plan –	6,337 excess houses by 2030
North Tyneside Local Plan -	2,238 excess houses by 2032

A planning appeal decision has confirmed the protected status of the Green Belt. This decision reiterates and reinforces the protection from inappropriate development given to the Green Belt in national planning policy.

Broke Hill golf course

In the Broke Hill case in Sevenoaks, Kent, the Inspector confirmed that, where planning policies protect areas of particular importance and provide a clear reason for refusing the development, the so-called “tilted balance” presumption in favour of granting planning permission does not apply.

For Broke Hill, the planning policies in this case related to protection of the Green Belt. This is especially important as Sevenoaks does not have the required five-year supply

of housing land nor has it met the government's housing delivery test for 2021. The inspector noted a number of benefits of the proposed development including provision of affordable housing. However, he concluded that notwithstanding the lack of five-year housing supply, the housing delivery test, and the benefits, this did not outweigh the harm that would be caused to the Green Belt, and were not sufficient to override national and local planning policies protecting the Green Belt. "The tilted balance is not invoked, however, because the Framework at Paragraph 11d(i) and footnote 7 protects both areas and assets of particular importance, which include the Green Belt, and provides a clear reason to dismiss the appeal." Stephen Wilkinson, Inspector Planning Inspectorate decision Broke Hill golf course 31 January 2022

This case along with ministerial statements demonstrates that the Local Plan fails to be consistent with national planning policy to protect the Green Belt, as specified in paragraph 11 of the National Planning Policy Framework.

The Local Plan must be revised to remove the proposed amendment to the Green Belt boundary to allocate additional land for housing and to withdraw all of the sites proposed for removal from the Green Belt.

Furthermore, the Local Plan is not justified because the NPPF states:

"141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;
b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport;
and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

Regarding paragraph "a", it has not been proven that all brownfield sites have been considered.

There are underutilised sites such as areas in South Shields town centre where previously developed land is used for car parking rather than housing like the area at the Mill Dam in South Shields, the former Staithes House and surrounding land near the town centre has been cleared for development for decades. The large office building at Harton Quay was leased by BT Group until last year but BT Group then closed its office and redeployed its 500 staff to other parts of the North East.

These are areas close to South Shields transport interchange and so would satisfy paragraph "b" the need to promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.

The failure to rent out office space also drawn into question the planned 200,000 sq ft of office space in the adjacent Holborn development especially as the Utilitywise office building just down river had to be converted to flats after lying empty for a long period. Planners overlooked possible brownfield sites across South Tyneside. Questions raised over validity of the reasons for rejection have not been answered. Some examples are the health clinic site near the ambulance station on Boldon Lane, the Pickwick pub in Biddick Hall, the former Methodist church on Bede Burn Road, the former Park Hotel on Lawe Road have not been included in the Local Plan.

Immediately after the Regulation 18 consultation in 2022, planning permission was given for 446 houses on the former Hawthorn Leslie shipyard that had lain redundant for several years. This was not included in the Regulation 18 Draft Plan. A similar situation exists at the former Rohm and Hass brownfield site near Jarrow town centre that would comply with 141 a) and b). This land if designated for industry could be released for housing as the land designated for employment in the Regulation 19 Local Plan is not justified by the evidence.

A further statement which is insufficient is paragraph 4.31, Sustainable Urban and Village Extensions:

“The Council has undertaken an extensive Green Belt review to identify land which would cause the least harm to the purposes of the Green Belt, that is considered suitable for development, and that could create a new defensible Green Belt boundary. Through this work, the Council has also established the exceptional circumstances to justify amending the Green Belt boundary at each location. Following consultation on the Plan, the Council will undertake a Green Belt boundary review which will review the entire Green Belt boundary to ensure that it has a strong and defensible boundary as required by the NPPF.”

It has been shown that the Green Belt does not need to be built on and therefore the least harm to this resource is no further development at all on the Green Belt and exceptional circumstances have not been established.

Regarding paragraph “c”, there is no evidence that the aggregated housing assessments of the neighbouring authorities has been compared with the projected population levels of these authorities to show that there will be no overall supply. The simple statement in 4.28 in the Local Plan is insufficient:

“28. Prior to identifying land in the Green Belt the Council has, as part of Duty to Cooperate, discussed whether neighbouring authorities could accommodate additional housing. As set out in the Duty to Cooperate Statement, neighbouring authorities have confirmed that they would be unable to provide land to meet South Tyneside’s needs.”

The duty to cooperate has not been evidenced as required by guidance such as PAS – Doing your duty practice update [doing-your-duty-practice--1a3.pdf \(local.gov.uk\)](#)

The recommendations in this have not been followed including number 10:

“10. Plans should reflect joint working and cooperation to address larger than local issues. In many cases, joint studies with other local planning authorities formed part of the evidence used to demonstrate compliance with the duty. Past cooperation put many

local planning authorities in a strong position, particularly where this has resulted in the preparation of sub-regional strategies, joint studies or common methodologies on SHMA, Strategic Flood Risk Assessment, economic assessments, Green Infrastructure studies, landscape and renewables assessments, and transport studies.”

This failure is evident in the vast over provision of housing as previously shown and shared infrastructure for example the health and sewage systems between South Tyneside and Sunderland as well as employment at IAMP. This shows that the Plan is not sound.

3. Objection made regarding Sustainability Appraisal Report 2024 – Employment Land and policy SP14: Wardley Colliery

The Sustainability Appraisal Report 2024 notes that the Local Plan has increased the amount of land required for employment from the Draft Regulation 18 Local Plan. It notes that the level of employment growth underpinning this is high in the context of past trends.

This demonstrates that the Regulation 19 Draft Local Plan is not justified by the evidence base; the amount of land for employment allocated for employment is too high and more of this land needs to be utilised for housing development in existing urban areas. The removal from the Green Belt of the Wardley Colliery site in SP14 is not justified.

The Sustainability Appraisal Report states:

“Preferred Options

4.41 Within the Draft Local Plan 2019, the Council took forward the following preferred options for employment land: ■ General Employment Land – Option 2: Policy-on Scenario ■ Port and Marine Land – Option 3: Past Completions (net)

4.42 These options were selected because the Council considered them to have the most positive effects on SA objective 9 (encourage and support economic growth within South Tyneside) and SA objective 10 (increase opportunities for employment and education and improve living standards). The Council’s reasons for this were set out in the 2019 SA Report.

4.43 In the Draft Regulation 18 Local Plan (June 2022) the Council’s preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. The reasons for this were set out in detail in the 2022 Employment Land Technical Paper, which explained that in choosing this scenario the Council was being cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities.”

And

“4.45 In the Regulation 19 Draft Publication Plan, the Council’s preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution

that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP’.”

The SAR also notes the negative impact of this preferred option for employment land:

“4.26 However, negative effects were recorded against a number of environmental objectives, reflecting the impact that a high economic growth could have upon the environment due to proximity existing designations, and increased impacts on natural resources, potential impacts on biodiversity and wildlife corridors. This level of growth is also likely to require land from the Green Belt to facilitate the growth aspirations; this objective therefore scored negatively against objective 4 (Green Belt) and objective 5 (green infrastructure) due to the potential impacts on the Green Infrastructure corridor.”

The Sustainable Appraisal Non-Technical Summary states in the section assessing the Likely Effects of the Local Plan Options:

“Preferred Options

34. In the Draft Regulation 18 Local Plan (June 2022) the Council’s preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. In choosing this scenario the Council had been cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities. In the Regulation 19 Draft Publication Plan, the Council’s preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP’.”

4. Objection made regarding Density Report 2024 and paragraph 8.24 of the Local Plan

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.

The Density Report 2024 states:

“2.3 Paragraph 125 of the NPPF highlights the importance of avoiding homes being built at low densities, where there is an anticipated shortage of land for meeting identified housing needs. Planning policies should avoid homes being built at low densities and ensure optimal use of land by using minimum density standards. These standards aim to uplift the average density of residential development and the use of these standards should be used in other parts of the plan area. Minimum density standards should also be used in a way which ensures that applications which fail to make efficient use of land be refused.”

It states in the Summary

“4.1 Following the four assessments several conclusions can be drawn with regards to density patterns throughout South Tyneside. Since the previous Density study in 2018:

- The average density of sites assessed was 66 dwellings per hectare based on net site area. This is an increase of 16 dwellings per hectare since the previous study.*
- The assessments showed that density declined as site area increased and that sites less than 1 hectare had a density significantly higher than those over 1 hectare. Sites less than 1 hectare had an average density of 82 dwellings per hectare. Sites over 1 hectare had a density of 40 dwellings per hectare.*
- In general sites with a higher yield had typically lower densities. Sites with less than 50 dwellings had an average density of 50 dwellings per hectare whereas sites with more than 250 dwellings had an average density of 28 dwellings per hectare.*
- Sites in the urban area of South Shields had the highest densities with an average of 72 dwellings per hectare. This is likely due to the nature of the area and the large proportion of smaller sites.*
- Compared to the standard density buffers in Policy SC3 of the adopted LDF and the Strategic Housing Land Availability Assessment higher densities were achieved across all three categories. “*

However, the Recommendations for Housing Density which have been utilised by the Regulation 19 Draft Local Plan are lower than the densities which have been achieved. The Density Report states:

“6.1 Housing yield must ultimately be determined by design. However, for the purposes of estimating housing yield as part of the Strategic Housing Land Availability Assessment and Local Plan site selection process the following density calculations are recommended:

- Average 60 dwellings per hectare on sites within 400m in the Jarrow and Inner South Shields character areas (higher densities may also be appropriate on a site by site basis e.g. by the riverside on sites such as Holborn and Hawthorn Leslie);*
- Average 55 dwellings per hectare on sites within 400m in the rest of the borough;*
- Average 45 dwellings per hectare on sites between 400m – 800m in the rest of the borough; and*
- Average 35 dwellings per hectare on sites beyond 800m in the rest of the borough.*

6.2 These densities will be used to estimate site capacities in the Strategic Housing Land Availability Assessment where other information (e.g. planning applications, information from developers etc.) is not available. Should this information be available it will be used.”

The Density Report 2024 also underestimates the housing densities which have been achieved because two very large urban brownfield sites have been excluded from the assessment:

“3.2 Whilst permission was given to 26 sites during this period only 24 sites will be used in this study. The sites at Leslie Hawthorn and Holborn have been omitted from this study as due to the nature of those sites they present an anomaly in the densities. These sites have a much higher density as to be viable sites for the developers more dwellings on site were required. These sites have a much higher proportion of flats and apartments than others of this size and location. Therefore, to be able to analyse patterns and trends in the data these 2 sites have been treated as anomalies.”

If these two sites were included in the assessment, the average density achieved would be higher and the discrepancy between this and the recommendations for average density for the Local Plan would be even greater.

5. Objection made specifically regarding Policy 18: Affordable Housing, Policy 19: Housing Mix and Policy 20: Technical Design Standards for New Homes

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.

In the section on Housing Allocations the Local Plan states:

“5.4 When allocating sites to meet the housing requirement, the Plan has looked to ensure the right homes are delivered in the right places, taking into account need, demand, deliverability, sustainability and improving choice.”

The SHMA 2023 has identified an annual need for 361 affordable homes each year across the borough which justifies the need for a robust affordable housing policy which will provide mechanisms to help meet this affordable need. Yet the same document states in the Executive Summary:

“It is recommended that the current target for 75% market and 25% affordable is maintained.” And in Paragraph 7.10 states: *“The SHMA would suggest that an overall target of 25% affordable housing should continue to be applied. This will be subject to viability testing before a target can be established for affordable housing in the emerging Local Plan.”*

The proposed proportion of affordable homes in Cleadon and East Boldon is 30%, but as median house prices in this area are £225,000 the accepted definition of affordable being 80% of market value means they will still be unaffordable to the very people requiring this provision.

The NPPF states *“62. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”*

Particular needs identified in the SHMA 2023 are:

- *“Increasing and diversifying the supply of specialist housing for older people. There is a need for 3,060 more units of accommodation for older people by 2040 comprising 1,803 C3 units, 885 C2 Extra Care units and 372 C2 Residential care units*

- *Based on an assessment of additional needs and longer-term demographics, a minimum of 5% of new dwellings should be built to M4(3) wheelchair accessible standard; and all other new dwellings should be built to M4(2) accessible and adaptable standard.”*

However the Local Plan fails to implement these recommendations in full as Policy 20: Technical Design Standards for New Homes states:

- “1. To meet the needs of older people and people with disabilities, a minimum of 5% of new build housing in developments of 50 homes or more shall be built to Building Regulations Requirement M4(3) (wheelchair user dwellings).*
- 2. All residential dwellings shall be designed to be built to meet Building Regulations Requirement M4(2): (Accessible and adaptable dwellings) except where it can be demonstrated that this is impractical or unviable due to site specific constraints.”*

Policy 20 introduces a condition that this target for wheelchair user dwellings (ie *Building Regulations Requirement M4(3)* will only apply in housing developments of 50 homes or more. This means that the Local Plan is not justified by the evidence of the need for these type of homes.

6. Support for Policy 16: Houses in Multiple Occupation

We welcome Policy 16 Houses in Multiple Occupation (HMO) as this is justified by the evidence of clustering of HMOs in particular areas of the borough and the need for further measures in paragraph 2 of the policy for the Lawe Top Article 4 Direction area.

7. Objection made specifically regarding Policy 1 Promoting Healthy Communities and Policy 2 Air Quality; and SP5: Former Brinkburn Comprehensive School and SP6: Former Chuter Ede Education Centre

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.

The Local Plan proposes the development of several vital community open spaces, for example the playing field land at Chuter Ede and Brinkburn School, despite stating in Policy 1:

“The Council and its partners, including the NHS, will seek to improve the health, wellbeing and quality of life of South Tyneside residents, reduce health inequalities, and to help people live longer and healthier lives. This will be achieved by: 1. Supporting new development which: i. Increases opportunities for physical activity and active travel through the provision of good quality sport and recreation facilities and safe and accessible walking, cycling and public transport networks.”

and

“iii. Enhances the green and blue infrastructure network and supports climate change mitigation and adaptation.”

These community open spaces must be protected and removed from the Local Plan as sites for development. The importance of these community open spaces is recognised in NPPF paragraph 98, 20-23, 26 and 92.

Building on playing fields for example at Chuter Ede has the exact opposite effect to the objective, increasing the local population while removing green space playing fields that are used for exercise.

There is little in the Local Plan that would fulfil the Strategic Objectives for Promoting Healthy Communities. In fact, some parts of the plan make the situation worse including the proposed development in areas that will promote car use such as in Cleadon, East Boldon and Whitburn. These developments will typically have two cars per household, adding potentially thousands of car journeys on an already congested road system. This will have a detrimental effect road safety and on the local environment due to noise and exhaust emissions. Some areas have air pollution levels already in excess of the World Health Organisation recommended maximums. These vehicle journeys will only make this more dangerous as there are no safe levels for these pollutants.

The Local Plan states in paragraph 6.14: *“The importance of good air quality is recognised by the World Health Organisation which produced a series of standards that have been adopted by the European Commission and subsequently the UK”.*

A Local Authority recognising this will be aware that the World Health Organisation (WHO) air quality standards were revised in 2021 and the recommended pollutant levels, to be achieved, were revised down by a considerable amount. NOTE: These are not safe levels as scientists do not consider any amount to be safe. It is inconceivable that the UK national standards will not be reduced to reflect these changes.

In the Local Plan, Policy 2: Air Quality states *“2. Where significant air quality impacts are likely to be generated by the development, an appropriate air quality assessment will be required”*. Due to the changes in WHO levels it is reasonable to predict large areas of the Borough will exceed these and the proposed developments in Policy SP7: Urban and Village Sustainable Growth Areas in particular will result in unsafe air pollution.

The council has a duty as far as reasonably practicable to ensure the health and safety of its residents. Given the above, the Local Plan must be revised to take into consideration the results of the proposed developments on air quality and specified measures that would reduce pollution levels to the minimum possible.

NPPF states in 186: *“Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.”*

The Local Plan has failed to identify these opportunities adequately and therefore is not consistent with the NPPF and this demonstrates that the Local Plan is not sound.

NPPF states: *“31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned...”*

The revised WHO air pollution levels are relevant and up-to-date and should be a material consideration.

8. Objection made specifically regarding Section 7: Meeting the Challenge of Climate Change, Flooding and Coastal Change

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 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. National legislation and guidance strongly stress the central role of the planning system in securing radical reductions in greenhouse gas emissions and require Local Plans to: The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal.

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. A good example from another area is Reading Council: *“The council’s 2019 Local Plan requires that all new residential developments of ten or more homes are built to zero carbon standards if possible.”* Zero carbon is an achievable standard.

Adoption of this strategy aligns with the councils own stated aims of the Economic Recovery Plan 2020 to *Catalyse green and sustainable growth by maximising the potential of our low-carbon and digital assets and expertise.*

With regards to Policy 15 much is to be welcomed. 15.1 states *Improve the condition of existing homes by enhancing energy efficiency and reducing carbon emissions in existing buildings* And 15.4 *Facilitate improvements to properties that have traditionally suffered from poor management and under-investment*

However, currently demolition is placed far too highly as an option for the current housing stock. Refitting and retrofitting is by far the less carbon intensive approach so demolition must be de-prioritised.

The Local Plan must be revised in order to bring it into compliance with legislative and policy requirements around climate change and the councils stated ambitions.

9. Objection made specifically regarding Policy 6: Renewables and Low Carbon Energy Generation

The Local Plan is not sound because this policy is not consistent with national policy.

NPPF 156 states: *“Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”*

We welcome Policy 6 paragraph 2 supporting the inclusion of renewable energy into developments, but the text is not strong enough, and once again, will not change business as usual development approaches. A requirement to include and maximise on-site renewable energy generation needs to be folded into an overall green house gas emissions policy, as seen in the London Plan, policy S12.

We welcome Policy 6 paragraph 4, the inclusion of policies requiring development to connect to district heating networks, however this policy needs to be made significantly stronger. The best example of which we are aware is draft policy SI13 of the draft London Plan. As the whole of South Tyneside is located over disused mine-workings more heating schemes like the “HebburnMinewater Project” should be invested in for housing schemes.

10. Objection made specifically regarding Policy 10 Disposal of Foul Water and Policy 11 Protecting Water Quality

The Local Plan is not justified because these policies are not able to ensure the Objectives for Protecting Water Quality will be achieved; and is not consistent with national policy.

The Local Plan does not refer to the current significant level of sewage pollution in South Tyneside. Population levels have increased considerably in the UK since Victorian times yet we are still using combined sewers that were constructed in the 19th century. If more housing development is permitted, especially on green spaces, more pressure will be exerted on an already failing sewage system. However, in the consultation on the Draft Local Plan, South Tyneside Council confirmed that no extra

sewage will be added to the existing infrastructure on the recommendations of Northumbrian Water who have assured them the existing system will cope. NPPF states *“20.Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... b) infrastructure for ...wastewater”*

NPPF states: *“185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”*

The Environmental Permitting Regulations 2016 Permits to discharge untreated sewage from Combined Sewer Overflows into watercourses during heavy rainfall are issued to water companies and regulated by the Environment Agency. There is growing evidence to show that these permits are being abused. 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.

The Environment Agency (EA) has been required to install Event Duration Monitors (EDMs) in all Combined Sewer Overflows (CSOs). These record the number of discharges and the duration of the discharges. The Whitburn system remains in breach of environmental law as of March 2021, but the EA want to wait 10 years to ‘assess’ the system.

The data supplied by the authorities needs to be treated with caution. In March 2020 the EA issued an apology after their published sewage discharge records for Whitburn for 2019 were challenged. They were forced to increase the volume of CSO discharges for Whitburn by 10% from 683,676 cubic metres to 760,993.5 cubic metres. In March 2021 Northumbrian Water issued an apology after their published untreated sewage discharge records for Hendon Sewage treatment works for 2019 were challenged. They were forced to increase their published hours of untreated discharges in 2019 from Hendon Sewage Treatment works by 4,000% from 15 hours 52 mins to 646 hours.

Sewage pollution is a contributor to climate change. Seagrasses can absorb more carbon up to 40 times faster than terrestrial forests and these ecosystems become sources of CO2 emissions when they are degraded or destroyed. A major driver of seagrass decline is nutrient pollution from sewage. A study has shown that 90% of the seagrass meadows in the UK have been lost to pollution. Locally, the seagrass meadows in the River Tyne estuary have been devastated by sewage flowing from nearby Combined Sewer Overflows.

Sewage pollution causes harm to public health. Recent epidemiological studies show a close relationship between contact with polluted waters and the incidence of gastro-

intestinal, eye, ear, nose and throat infections or irritations and respiratory symptoms. This is a recognised problem for surfers, kite surfers, windsurfers, sailors, kayakers and wild swimmers. Even the dog walkers, joggers and walkers who all enjoy the access to South Tyneside's riverside and beaches throughout the year are at risk from sewage pollution.

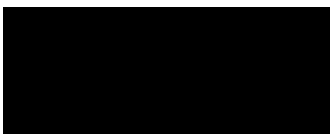
Public Health is a material planning consideration. Local authorities have important and wide-ranging public health functions, for example under the Public Health (Control of Disease) Act 1984. This legislation adopts an 'all-hazards' approach and provides South Tyneside Council with the necessary powers to control human health risks arising from infection or contamination of any form including chemicals and radiation. Statutory duties for public health were conferred on local authorities by the Health and Social Care Act 2012. Local authorities (and directors of public health acting on their behalf) now have a critical role in protecting the health of their population, both in terms of helping to prevent threats arising and in ensuring appropriate responses when things do go wrong.

Health considerations are capable of being material planning considerations. This is recognised in the NPPF which includes the following statement at paragraph 92: *"Planning policies and decisions should aim to achieve healthy, inclusive and safe places."*

The health implications of exposure to the levels of sewage pollution regularly discharged into the River Tyne and on to the beaches of South Tyneside must be a material planning consideration with respect to future developments as, without an improvement in sewage treatment capacity, more development will bring about an inevitable increase in sewage pollution.

Best Regards,

Alex Air




Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report

Andrew Murphy [REDACTED]

Thu 2/29/2024 8:03 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

 1 attachments (1 MB)

Site Local Plan Representation 23_02_2024.docx;

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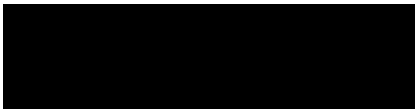
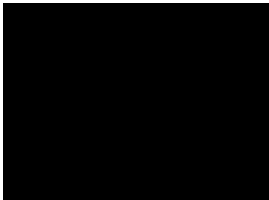
Dear Sir/Madam,

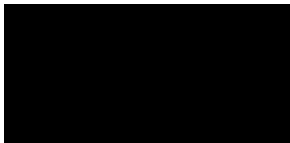
Please find attached a document containing my full comments regarding the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report.

This is linked to my response ID ANON-5JMM-6ZU8-P.

I am submitting this on behalf of:

Charles McBride,





Telephone [redacted] - Email [redacted]

Ref No : CM-STC/LPR-002

Site Name: Fellgate SP8 Sustainable Growth Area

Local Plan SP6 SHLAA SFG072. Sequential test Site Name Fellgate Sustainable Growth Area

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Introduction

The proposed classification of the Fellgate Sustainable Growth Area, as delineated in the Sequential Flood Test 2022, categorises the site entirely within Flood Zone 1, suggesting no significant risk of surface water flooding. The report also minimises the potential for fluvial or tidal climate change impacts, effectively endorsing the development as suitable. However, my objections, supported by historical evidence and current assessments, reveal a considerable misjudgment of the actual flood risk:

1. **Flood Risk Assessment:**

The land earmarked for development serves as a natural floodplain, which has historically experienced substantial flooding events in 2005, 2010, and 2012.

2. **Flood Defence Evaluation:**

Despite the construction of flood defences in 2016, these measures have proven to be marginally effective, struggling to mitigate flooding as recently as 2024 following heavy rainfall. The development could intensify the flood risk for the existing community. As per <https://www.gov.uk/check-long-term-flood-risk>, the current surface water flood risk for the area is categorised as 'MEDIUM', even with defences.

3. **Environmental Impact:**

The floodplain is crucial for natural water management and local biodiversity. Development on this land risks eradicating these natural defenses, endangering local wildlife habitats, and disrupting established water cycles.

4. **Infrastructure Concerns:**

I harbour significant doubts about the sufficiency of our existing infrastructure to manage the increased runoff and water flow the new development could generate.

Historical Flooding Events

Surface water flooding in the Fellgate area dates back to the early days of the estate. Shortly after residents moved into their homes in 1971/72, areas such as Durham Drive, Rippon Square, Oxford Way, and The Glade - then part of the Meadows Estate in the district of Boldon Colliery - experienced flooding.

Over the years, numerous flooding events have occurred. The first recording of flooding was on 18 October 2005 by the South Tyneside Council (STC) in the [Neighbourhood Services Scrutiny Committee Report](#), which noted flooding events in June and August of that year.

Section 6 of the report specifically identifies the Hollow / Wellway as badly affected by runoff from adjacent school fields. It is crucial to note, however, that the report only addresses council-owned properties, which had to be evacuated due to their homes being uninhabitable. There is a concerning lack of detailed information about other areas of the estate, particularly the privately-owned sections to the south, which also faced flooding issues.

Local community testimonies have highlighted five major flooding events that were reported to the local authority. It should be possible to verify these incidents by checking the call-out history records with Northumbrian Water and the Tyne & Wear Fire Service. The reported dates of significant flooding are as follows: June/August 2005, June 2006; 31st August 2008; 10th December 2010; 28th June 2012; and 24th September 2012. These events were predominantly due to surface water runoff from the agricultural land of West Fellgate Farm, which led to extensive flooding of access roads and properties. Notably, the Lakeside Public House was inundated, resulting in its closure and consequent financial losses.

I would like to direct your attention to the information collected about the flooding event on 10th December 2010. This incident, which affected Durham Drive, Litchfield Way, Lancaster Way, and Leicester Way, raised significant concerns that require explanation from South Tyneside Council (STC). The severity of the flooding led to road closures, the deployment of the fire brigade, and council emergency services, as well as the evacuation of numerous families from their homes. The loss of electrical power for 16 hours, amidst temperatures below 3 degrees Celsius, exacerbated the situation. Some families were displaced for up to six months or longer due to the damage.

The historical evidence of surface water flooding from the agricultural land of West Fellgate Farm is now undeniable. I must emphasise the need for STC, as the Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010, to provide a thorough record of all local flooding events in South Tyneside.

Furthermore, I draw your attention to the [STC Preliminary Flood Risk Assessment \(PFRA\) report, reference number STC/PFRA/11/01](#), published on 21st June 2011. It is concerning that this document contains no reference to the significant flooding event that occurred in December 2010 on the Fellgate estate, despite there being ample time to record the event and amend the report accordingly. This omission is particularly troubling given the extensive impact on the Fellgate community that day. The below photograph provides visual evidence of the flooding.



10th December 2010 photograph shows flood water coming off the field and around the stone bus shelter.

I have highlighted below some sections of the [South Tyneside Council Preliminary Flood Risk Assessment \(STC PFRA\) report, reference no. STC/PFRA/11/01.](#)

Section 2.3 - Public Engagement

The report states that STC recognises the value of public input in flood risk management and aims to adhere to the Environment Agency's guidelines for communicating with communities. It is worth noting that there was significant public engagement, media coverage, and local councillor involvement following the flooding on 10th December 2010, which means the STC's senior management were well-informed about the local community's impact.

Section on Long Term Developments

The report references Planning Policy Statement 25 (PPS25), emphasising that developments should not increase flood risk and should be directed away from high-risk areas. It mentions that exceptions to this policy must not significantly increase risk.

Section 4.3 - Consequences of Historic Flooding

The report acknowledges the lack of sufficient data to conclude the impact of historic flooding events. However, the significant flooding event of December 2010, occurring merely six months before the report's finalisation, should have been included. The omission of this recent event suggests a failure to follow the documentation requirements established by the Flood and Water Management Act (FWMA) passed in April 2010.

Section 7.1 - Future Preliminary Flood Risk Assessment Requirements

The PFRA concludes that there are no 'significant flood risk areas' in South Tyneside, indicating no need for further flood risk management planning. The absence of the December 2010 flooding data is a critical oversight, given its significance. As a Lead Local Flood Authority (LLFA), STC is obliged to investigate and record locally significant flood events. The exclusion of such a pertinent incident undermines the credibility of the assessment and disregards the LLFA's duty to maintain accurate and comprehensive flood records.

Consequences of Flood Events of 2012

After the flood events of June and September, including the significant 'Thunder Thursday' on 28th June, the area experienced severe flooding once more. The deluge, originating from the agricultural land of West Fellgate Farm, inundated homes and local businesses across Fellgate.

Homeowners who had previously been flooded and evacuated in 2010 found themselves facing the same distressing situation - properties submerged and rendered uninhabitable. Affected residents were forced to relocate to temporary accommodations, with the daunting understanding that it could take six to twelve months to make their homes habitable once again.



28th June 2012 photograph shows flood water coming off field and around the new bus shelter .



This photograph from the 28th June 2012 identifies part of the location of proposed 2024 Local Plan development site.

Community Involvement

In response to the persistent flooding, the community in 2013, facilitated by elected councillors, sought public meetings with senior representatives of the South Tyneside Council (STC) to discuss a permanent resolution to the area's flooding issues. These meetings, attended by over 150 residents, unfortunately yielded unsatisfactory responses.

Representatives informed attendees that no action could be taken until the completion of a comprehensive surface water management study, which would then inform the development of a flood risk management strategy for South Tyneside.

The community's campaigning efforts continued throughout 2013 and 2014. The local MP for Jarrow engaged with the Secretary of State for the Environment to secure funding for the area.

Additionally, residents participated in Community Area Forum (CAF) and Place Select Committee meetings.

During the 2014 Place Select Committee meeting, it was disclosed that the council had received a draft of the study in December 2013, but there was no clarity on whether it included any proposed measures for the Fellgate area. This lack of transparency and decisive action has understandably led to a profound sense of frustration among the residents, who are eager for a timely resolution from the STC.

Ref: [South Tyneside SWMP Final Report 9Y0387/RR01/302821/Leeds April 2014](#)

After initially issuing a draft copy to the council in December 2013, the Surface Water Management Plan (SWMP) report received its final approval four months later. This delay was attributed to advisories stating that effective solutions for surface water flooding in South Tyneside could not be proposed until the completion of this crucial study. The SWMP was designed to craft a strategic approach for managing flood risks across the region. Within its findings, the SWMP pinpointed five specific areas in need of in-depth evaluation and possible interventions to mitigate surface water flooding risks. These areas include Cleadon Lea, Cleadon Sunderland Road, Fellgate, Lindisfarne Roundabout, and New Market Walk, all identified as priorities for further study and action.

Section 3.4, titled "Identification of Hot Spots," marks Fellgate as a newly recognised hot spot, which enables more thorough examination of the area. The primary goal has shifted towards evaluating measures to diminish surface water flooding, formulating a Surface Water Management Plan, and securing either full or partial funding for addressing these flooding issues, as highlighted in the report.

Referencing the Surface Water Management Plan (SWMP), it identified five areas recommended for a comprehensive evaluation and exploration of solutions to mitigate surface water flooding. These areas include Cleadon Lea, Cleadon Sunderland Road, Fellgate, Lindisfarne Roundabout, and New Market Walk. Of particular interest is the Cleadon Lea area. Further, I wish to highlight a specific segment from the [Cleadon Lea Drainage Study conducted by the South Tyneside Council in August 2009, documented in the Final Report with Reference](#)

[9V3427/R01/303392](#). This study offers critical insights pertinent to our discussion on flood risk management.

The Cleadon Lea residential area, located in South Tyneside, is of particular concern. This area, situated immediately north of the residential zone and along the southern edge of two agricultural fields, has experienced previous instances of surface water accumulation. This accumulation has led to minor flooding incidents affecting a public footpath and the gardens of nearby homes, as well as potentially diminishing the productivity of the adjacent arable land. Identified for detailed evaluation, this area was the focus of a drainage study that explored all possible flood defence mechanisms and the associated funding options. It's important to highlight that the flooding noted here was minor, unlike the more significant events observed in the Fellgate Estate. This raises a question: given the thoroughness of such reports, why were these findings not incorporated into the South Tyneside SWMP Reports of 2011 or 2014?

Fellgate Flood Defence Scheme

The Fellgate Flood Defence Scheme represents a collaborative effort between Northumbrian Water and the South Tyneside Council, aimed at addressing flooding concerns. This initiative, which focused on mitigating flood risks for the Fellgate Housing estate, was successfully concluded in 2016. Gaining national recognition, the project was financially supported by the Environment Agency with a contribution of £800,000, with the total expenditure surpassing £1.2 million.

I want to highlight key observations from the "Fellgate Surface Water Management (2016)" article, featured in the Chronicle and elaborated on [waterprojectsonline.com in their customer case study report](#). This piece provides valuable insights into the project's outcomes and the approaches taken to protect the Fellgate area from flood risks.

From the report:

“Detention basins: A detention basin is a normally dry depression, where during storm conditions; excess surface water is stored and then slowly drains at a controlled rate to a receiving watercourse or surface water sewer. Basins were of irregular, curving shape to give a natural appearance and had gently sloping sides to provide access for grass cutting and maintenance.

Measures were installed in the following locations:

Detention basins in fields south of Durham Drive to intercept a watercourse and field drainage.”

It's important to specify the functionality of each detention basin more clearly in the report. Among the two basins located in the fields south of Durham Drive, one is designated for intercepting a watercourse, while the other should be recognised for managing surface water runoff, a significant contributor to the area's flooding issues. This distinction is vital for understanding the basins' roles in flood mitigation. The significance of surface water runoff is further illustrated by a photograph from 28th June 2012, showing floodwater near a new bus shelter, as documented in the section "Consequences of Flood Events of 2012."

Additionally, there seems to be a hesitancy in acknowledging the presence of surface water issues on the agricultural lands of West Fellgate Farm in any documentation produced by the South Tyneside Council (STC), as observed in various sections of the provided information.

Proper maintenance of the gullies by riparian landowners and the STC, especially ensuring the culvert next to the A194 was clear of debris, could have potentially mitigated flooding impacts. Such maintenance might have not only reduced flooding effects but could also have lowered the overall costs associated with the Flood Defence Scheme.

[South Tyneside Council Level 1 Strategic Flood Risk Assessment - Final Report v4](#)

I share concerns similar to those I have with other flood report documents regarding their utility in offering a fully transparent analysis or historical data on current and future flooding issues. This is crucial for supporting the Local Planning Authority's (LPA) assessment of future development sites. Additionally, there's a need for these documents to provide data that can inform the application of the Sequential Test, which is instrumental in evaluating and guiding development in relation to flood risk. The lack of comprehensive data and transparent analyses in these reports could potentially undermine the effectiveness of planning and risk management strategies aimed at mitigating flood impacts on future development projects.

South Tyneside Level 1 Strategic Flood Risk Assessment Addendum

1.3.4 Site-specific Flood Risk Assessment A site-specific Flood Risk Assessment should assess whether a potential development is likely to be affected by current or future flooding, accounting for the impacts of climate change, from any source. This should include referencing this SFRA to establish sources of flooding. Further analysis should be performed to improve the understanding of flood risk including agreement with the LPA and the EA on areas of functional floodplain that may not have been robustly defined within this SFRA due to the absence of appropriate EA modeling information. The LLFA should be consulted on risk from surface water and from ordinary watercourses.

Draft Local Plan Policy Maps

Site Frameworks for Publication Draft Local Plan 2023 to 2040

I would draw to your attention Map; Land South of Fellgate Constraints Page 31

Sections in dark blue identified as a 1-30 years weather event, these areas have had in the past 19 years 3 significant flooding events 2005 2010 and 2012 can this assessment also be attributed to information from the STC PFRA report ref no STC/PFRA/11/01

February 2024

The photographs below show that the flood defences are barely holding back the water off the fields in February 2024. Following a night of heavy downpours the fields in the photographs are where the proposed housing development will be.

Current photograph 9/2/24



Current photograph 9/2/24



Conclusion

In conclusion, my submission aimed to underscore the critical concerns I hold regarding the local plan, guided by a detailed examination of various documents. Through this review, it became evident that significant flood events on the 10th of December, 2010, and the 28th June 2012, within our region, were not documented as mandated by the Flood and Water Management Act (FWMA) passed in April 2010. This oversight omits crucial data essential for future flood risk management endeavours, particularly in investigating flooding incidents. Such information is foundational for producing up-to-date Level 1 Strategic Flood Risk Assessments (SFRA), which are instrumental in implementing the sequential and exception tests. The

absence of this vital data compromises the integrity of flood risk assessments and, by extension, the soundness of future development decisions based on these assessments.

4.2.2 South Tyneside Preliminary Flood Risk Assessments 2011 and 2017

The first cycle PFRA for South Tyneside was submitted to the EA in June 2011. The PFRA provides a high level overview of local flood risk, from sources including surface water, groundwater and ordinary watercourses. The second cycle PFRA, reviewed during 2017 used all relevant current flood risk data and information to update the 2011 version, and was agreed with the EA in December 2017. There has been no change to the assessment of risk in the borough of South Tyneside since the previous 2011 PFRA. The PFRA methodology, based on the EA's Final PFRA Guidance and DEFRA's Guidance on selecting Flood Risk Areas, did not identify any Flood Risk Areas within South Tyneside. The PFRA has evidence of 152 historic incidents within the borough, which have varied greatly in their impact and significance. These events, however have not caused 'significant harmful consequences' although these flood incidents may have been significant on a local level. The PFRA confirms that there are no 'significant flood risk areas' in relation to surface water, groundwater and ordinary watercourses within South Tyneside. The PFRA still recognised the need to produce a Flood and Coastal Risk Management Strategy (2017-2022) for the area however, as part of STCs obligations as a LLFA under the Flood and Water Management Act. See Section 4.7.4.

The omission of the flooding event on the 10th of December, 2010, from the 2011 Preliminary Flood Risk Assessment (PFRA) for the Fellgate Estate, and similarly, the exclusion of the 28th June 2012 flooding event from the 2014 report, significantly undermines the accuracy and reliability of these assessments. The assertion made in the sections of the South Tyneside Preliminary Flood Risk Assessments of 2011 and 2017—that there has been "no change to the assessment of risk in the borough of South Tyneside since the previous 2011 PFRA"—is

consequently misleading. By failing to document these critical events, the reports do not fully represent the surface water flooding risks to the Fellgate Estate. The consequences of such omissions extend beyond inaccuracies in documentation; they directly impact the lives of residents through property damage, financial loss, emotional distress, and health issues, all of which have been experienced by those living in Fellgate. This oversight not only affects the validity of the flood risk assessments but also compromises the development of effective flood risk management strategies, leaving communities inadequately protected against future events.

Given the revelations that the significant flooding event of the 10th December 2010 on the Fellgate Estate was not documented in the 2011 Surface Water Management Plan (SWMP) Final Report, it is imperative that complete transparency is maintained moving forward. The absence of such crucial information, which had considerable impact on residents and businesses, highlights a significant oversight in the reporting process. Consequently, there is a clear need for an external, independent audit to reassess the findings and methodologies employed in these assessments.

Moreover, the validity of the Sequential Test assessment for the Fellgate Sustainable Growth Area, particularly in Flood Zone 1 (FZ1), requires thorough clarification. The claim made in sections 4.2.2 of the South Tyneside Preliminary Flood Risk Assessments for 2011 and 2017, suggesting no change in the borough's flood risk since the 2011 PFRA, stands on questionable ground. This assertion, when juxtaposed with the missing documentation of critical flood events, casts doubt on the accuracy and reliability of these reports.

In light of these concerns, it is crucial that the inspectorate undertakes a comprehensive fact-check of all the information presented in this representation document. Only through such a rigorous review can the integrity of the flood risk assessments be assured, ensuring that future planning and development decisions are made on the basis of accurate, reliable, and complete data. This step is essential not only for rectifying past oversights but also for safeguarding the interests and well-being of the community against future flood risks.


Response to Draft Local Plan and Reg 19 etc

David Milne [REDACTED]

Thu 2/29/2024 1: [REDACTED]

To: Local Plan : [REDACTED]

Cc: Cllr Geraldine Kilgour [REDACTED]

 2 attachments (535 KB)

David Milne Response to local plan and Reg 19.pdf; Greenbelt Response to the local plan ver 4.docx;

*** **WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, **clearly stating your concerns in the email** ***

Please find my resubmission of my response to the local plan and other associated documents and consultations. Can you please send a return email as acknowledgement.

Response to – South Tyneside Publication – Draft Local Plan 2023-2040

29th February 2024

Local Plan

<https://haveyoursay.southtyneside.gov.uk/spatial-planning/south-tyneside-publication-draft-local-plan-2023-2/>

Chapter 1: Introduction

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Through my submission I have answered YES to all cases where “Legally Compliant” response is required this is because I do not believe the council would publish data is non-compliant although very controversial.

The local plan is very poorly constructed and extremely difficult for the average person to understand and comment on. The consultation was very poorly communicated to the older residents and many have found it difficult to obtain information regarding the plan. The plan should be reconsidered. and many sections are very hard for the average person to understand. Building on the greenbelt at Fellgate and other areas throughout the borough should be removed from the plan and alternative brownfield sites utilised. The local plan should also be resubmitted to represent the government’s latest guidance which clearly states brown field and commercial sites should be utilised in preference to the Greenbelt. This latest government announcement was on brownfield sites on 13th Feb, but it appears the council is unwilling or not prepared to look at changing the plans.

The council’s inability to use brownfield sites for housing when they are concentrating on bringing industry to the IAMP site should mean they look to use brownfield sites for all housing needs.

Brown field sites should always be considered before greenbelt sites. The local plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. And because residents have not been adequately informed it does not comply. the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. I feel the loss of greenbelt, environmental issues, pollution noise and air pollution and risk of flooding both during building and after the work. Traffic will impact on all surrounding roads that cannot cope at present, including Durham Drive, Fellgate Avenue etc.

The plan has been very poorly advertised of the consultation, use of data etc. Few residents actually knew there was any consultation taking place, with the same being said for Regulation 19. The land at Fellgate has been the subject of consultations on numerous previous occasions and each time the council received hundreds of responses to these.

This time only around 90 responses were received. 80+ people visited each of the consultations at Hedworth CA many of these going to both consultations.

The original consultation also did not include respondent’s personal details, so it is impossible to tell where replies were from and from which council wards. The council team managing the data said

this was not required data due to the extra COSTs of requesting the data. Odd that as part of the Regulation 19 this is a legal requirement and adding an extra field and downloading the data in the original consultation would have been a low-cost inclusion.

The data due to poor design of the consulting survey included residents who were clearly against building on the Fellgate greenbelt in their written comments but they responded as not sure rather than against. The council did not take this into account and classed those as not sure even to the point where some comments were replied to thank you for your not sure feedback.

It could be said that the data from the original consultation was not accurate, many full responses were greatly reduced on the information provided by the council, many responses was a reduced to a couple of lines. Responses from those in favour appearing to have more words than those that were against. The information provided by the council on the responses was not filterable, meaning it was not easy to analyse the data. Theoretically Councillors could therefore not use the data easily unless they read 100+ pages per consultation section and analysed the feedback themselves.

The councils' responses to those that replied were simply in the main standard replies. If replies included proposed changes or use of brownfield sites as an example this was simply responded to as not in line with the council's policy. This means that the council did not take into account any other actions other than their own.

Chapter 2: Context

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

I understand our online and paper petitions which sadly the council has no legal obligation to even acknowledge, I would ask for these to be considered as it demonstrates the feelings of the residents. The petitions, also demonstrates how poorly the council advertised the consultations when a single post on a resident page can get so much traction in such a short space of time, it shows how poorly the consultations were advertised.

The online petition has in excess off 1200 signatures and the paper petition is still being added to and is currently uncollated but final count of this will identify the strength feelings of the residents. Many people have signed the petition in just over 6 days of the online petition going live on the 29th February 2024 over a 1200 had signed and it is still growing.

This is more than double the number who replied to the consultation itself.

The local plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

But - It must not have a negative impact on existing residents. This has not been done.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Obviously, this has NOT been done to latest government policy on use of greenbelt has recently changed.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. It cannot be effective to destroy greenbelt and ignore brown field sites

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Because the greenbelt is being considered I do not believe the plan is being prepared correctly it will have a negative impact on people's lives including physical and mental health.

Key problem is the that plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed, the information about what this is, is not clear in my opinion.

Chapter 3: Spatial Vision and Strategic Objectives

Legally Compliant – YES?

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

The negative impacts include Increased number of people using the estate to get to the metro.

Loss of farm land and jobs associated, I believe the farmer who is a tenant does not want to lose the land.

Potential poor use of population expansion models, may mean South Tyneside does not need the houses planned.

I believe the greenbelt use over brownfield sites in the borough are not been considered the use of brownfield sites for residential use effectively. For example, one site the Rohm Haas, derelict for nearly 10 years. Although it is contaminated it could be cleared at a cost. with a small number of changes this land could capture all of the houses that are proposed to be built on the greenbelt. The council wants to use the land for industry, and will not reconsider this. the councils team suggests the site is not in a viable location for residential due to having industrial units at the top and bottom of the site, however, they are ignoring the fact that there are houses right across the road from the site and similar housing has been built just up the road at Hebburn. Businesses at the ends of the site could be relocated to other sites in the borough, freeing up all the land that is needed. The council may believe this site is unsuitable or may be expensive to clean up. But what is the council going to do just leave it forever and sweep it under the political carpet.

Critically Brownfield site are in the news this month, with councils being told to use brownfields for development see below link.

Therefore, Brown field sites should be considered before greenbelt sites. The local plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. And because residents have not been adequately informed it does not comply.

Policy 1: Promoting Healthy Communities

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

The loss of greenbelt will damage wildlife in the area, including all native species of birds and rabbits and field mice and rabbits & foxes and all other wildlife including those protected including birds of prey and bats and many others. Other problems include additional pollution, including noise, air and light during and after the building process. This will all have an effect on the mental and physical health of the residents of the area.

Policy 2: Air Quality

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Additional traffic and subsequent pollution will have a negative impact on the residents. Additional pollution, including noise, air and light during and after the building process.

Policy 22: Protecting Employment Uses

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Loss of farm land and jobs associated, I believe the farmer who is a tenant does not want to lose the land. I understand jobs will be created but similar jobs would also be created if brown field sites were used.

Policy 3: Pollution

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Problems include additional pollution, including noise, air and light during and after the building process. I feel the loss of greenbelt, environmental issues, pollution noise and air pollution and risk of flooding both during building and after the work. Traffic impact on all surrounding roads that cannot cope at present, including Durham Drive, Fellgate Avenue etc.

Policy 33: Biodiversity, Geodiversity and Ecological Networks

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Building on greenbelt will not enhance the natural environment it will destroy it.

Policy 34: Internationally, Nationally and Locally Important Sites

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Building houses on Greenbelt will not promote the Internationally, Nationally and Locally Important Sites. It will make the borough look like it does not care about the environment to the outside world.

Policy 35: Delivering Biodiversity Net Gain

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the destruction of the greenbelt enhance the natural environment. Impact on the environment will be greatly increased by building on the greenbelt. Those for the local plan included parties who would or could see a gain for the land being built on. This included the land owners and estate agents who wanted all of the land built on. But it is all at the cost of the greenbelt. South Tyneside has one of the lowest percentages of greenbelt land in the surrounding areas.

Policy 36: Protecting Trees, Woodland and Hedgerows

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the destruction of the greenbelt possibly be protecting the trees and woodland and hedgerows.

Policy 37: Protecting and Enhancing Open Spaces

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the destruction of the greenbelt possibly enhance open spaces.

Policy 40: Agricultural Land

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the removal of greenbelt agricultural land be a positive to the borough or even the whole country we need crops and food and more home-grown food. This proposal would help to destroy the very little farm land we already have in the region.

Policy 41: Green Belt

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the removal of the greenbelt enhance the natural environment,

Policy 45: Development Affecting Non-Designated Heritage Assets

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the destruction of the greenbelt enhance or contribute to the designated heritage assets.

Policy 51: Improving capacity on the road network

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can increasing the number of houses and population and therefore increasing the necessary capacity of the road network be good for the region. The roads network is already severely compromised particularly at rush hours which can be demonstrated by traffic jams most morning and evening on the A194 and other roads around the region.

Policy 7: Flood Risk and Water Management

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

A few years ago, the council implement a flood prevention scheme to elevate the problems of flooding on the estate. How can flood risk be reduced by destroying natural soak away land and putting roads and houses in the place of farm land. The reports should be revisited and taken into consideration.

Policy 8: Flood Risk Assessment and Drainage Strategy

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can flood risk be reduced by destroying natural soak away land and putting roads and houses in the place of farm land.

Policy 9: Sustainable Drainage Systems

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

The burns which are used to take away rainfall already get blocked and back up due to excess water entering them. By removal of the natural soak away the area will be liable to increased flood risk.

Policy SP1: Presumption in favour of Sustainable Development

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

I believe the use brownfield sites before greenbelt sites in the borough are been considered because of the costs to build associated with reclaiming brownfield land. Virgin Greenbelt land cannot be replaced and, in a time, where we are all supposed to respect the environment and go green the council is putting profit before people's health.

The council wants to use such land for industry or commercial development, and will not reconsider this. the councils team suggests the sites is not in a financially viable location for residential due to having old industrial units on many sites site, however, they are ignoring the fact that there are similar housing projects throughout the region and the whole country. Including just up the road at Hebburn. The council may believe that various sites are unsuitable or may be expensive to clean up. But what is the council going to do just leave it forever and sweep it under the political carpet.

Critically Brownfield site are in the news this month, with councils being told to use brownfields for development see below link.

<https://www.gov.uk/government/news/build-on-brownfield-now-gove-tells-underperforming-councils>

Policy SP14: Wardley Colliery

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

The use of any greenbelt land should never be the regions and councils go to solution. Just because other areas may be more expensive to clear or reuse, we have limited green spaces and as so green spaces should be re-introduced and not used for development when urban commercial and retail sites are in decline.

Policy SP16: Housing Supply and Delivery

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Potential poor use of population expansion models, may mean South Tyneside does not need the houses planned.

Policy SP18: Employment Land for General Economic Development

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

The greenbelt use over brownfield sites in the borough are not been considered the use of brownfield sites for residential use effectively. For example, one site the Rohm Haas, derelict for nearly 10 years, with a small number of changes this land could capture all of the houses that are proposed to be built on the greenbelt. The council wants to use the land for industry, and will not reconsider this. the councils team suggests the site is not in a viable location for residential due to having industrial units at the top and bottom of the site, however, they are ignoring the fact that there are houses right across the road from the site and similar housing has been built just up the road at Hebburn. Businesses at the ends of the site could be relocated to other sites in the borough, freeing up all the land that is needed. The council may believe this site is unsuitable or may be expensive to clean up. But what is the council going to do just leave it forever and sweep it under the political carpet. The population of the borough is in decline we do not need additional houses. It's all about greed the council wants to attract more people to the borough to increase its revenue from council tax etc and by doing so the council don't care about global warming or the environment or traffic problems or people's health or wildlife or even food production. The council do not care about any individual or the community at large. ITS ALL ABOUT THE MONEY.

Policy SP2: Strategy for Sustainable Development to meet identified needs

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Loss of farm land and jobs associated, we believe the farmer who is a tenant does not want to lose the land and therefore his employment. We understand jobs will be created but similar jobs would also be created if brown field sites were used.

Policy SP21: Natural Environment

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Building on greenbelt will not enhance the natural environment it will destroy it. How can the destruction of the greenbelt enhance the natural environment. Impact on the environment will be greatly increased by building on the greenbelt. Those for the local plan included parties who would or could see a gain for the land being built on. This included the land owners and estate agents who

wanted all of the land built on. But it is all at the cost of the greenbelt. South Tyneside has one of the lowest percentages of greenbelt land in the surrounding areas. Obviously, the council have overlooked their statutory obligations to enhance biodiversity and geodiversity.

Policy SP22: Green and Blue Infrastructure

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

How can the removal of our green spaces and green and blue infrastructure have benefits to the community. Environmental impacts such as risk flooding and air pollution the loss of greenbelt, environmental issues, pollution noise and air both during building and after the work. Traffic impact on all surrounding roads that cannot cope at present, including Durham Drive, Fellgate Avenue plus many others.

Flooding, the plans go against the council's flood recommendation to not build on the greenbelt. Health including mental health of residents. And the general quality of life will be diminished for our local community.

Policy SP25: Infrastructure

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Positively prepared – the local plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

But - It must not have a negative impact on existing residents.

Justified – the local plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Key problem is the local plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed, the information about what this is, is not clear. it has also not been prepared to the government's latest guidance.

Policy SP3: Spatial Strategy for Sustainable Development

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

Consistent with national policy – the local plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Because the greenbelt is being considered I do not believe the local plan is being prepared correctly it will have a negative impact on people's lives including physical and mental health and wellbeing.

Key problem is the local plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed, the information about what this is, is not clear.

Policy SP7: Urban and Village Sustainable Growth Areas

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

I believe this policy is fundamentally flawed. Consistent with national policy – the local plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Because the greenbelt is being considered we do not believe the local plan is being prepared correctly it will have a negative impact on people's lives including physical and mental health.

Key problem is the local plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed, the information about what this is, is not clear.

Policy SP8: Fellgate Sustainable Growth Area

Legally Compliant – YES

Sound – NO

Complies with the Duty of Cooperation – NO

Comments

The loss of greenbelt, environmental issues, pollution noise and air quality, both during building and after the work. Traffic impact on all surrounding roads that cannot cope at present, including Durham Drive, Fellgate Avenue and around the region.

Flooding, the plans go against the council's flood recommendation to not build on the greenbelt. Health including mental health of residents. And the general quality of life will be diminished for our local community.

Habitat Regulation

<https://haveyoursay.southtyneside.gov.uk/spatial-planning/copy-of-hra/>

Comments - the loss of greenbelt will damage wildlife in the area, including all native species of birds and rabbits and field mice and rabbits & foxes and all other wildlife including those protected including birds of prey and bats and many others. Other problems Include additional pollution, including noise, air and light during and after the building process.

Sustainability

<https://haveyoursay.southtyneside.gov.uk/spatial-planning/sustainability-appraisal-2024/>

Comments -The local plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

But - It must not have a negative impact on existing residents. This has not been done.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Obviously, this has not been done as government policy on use of greenbelt has recently changed.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. It cannot be effective to destroy greenbelt and ignore brown field sites

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Because the greenbelt is being considered I do not believe the plan is being prepared correctly it will have a negative impact on people's lives including physical and mental health.

Key problem is the plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed, the information about what this is, is not clear.

Fellgate Growth

<https://haveyoursay.southtyneside.gov.uk/spatial-planning/fellgate-sustainable-growth-area-supplementary-pla/>

Comments -We feel the loss of greenbelt, environmental issues, pollution noise and air both during building and after the work. Traffic impact on all surrounding roads that cannot cope at present, including Durham Drive, Fellgate Avenue and around the region.

Flooding, the plans go against the council's flood recommendation to not build on the greenbelt. Health including mental health of residents.

Increased number of people using the estate to get to the metro.

Loss of farm land and jobs associated, we believe the farmer who is a tenant does not want to lose the land.

Potential poor use of population expansion models, may mean South Tyneside does not need the houses planned.

Critically Brownfield sites are in the news this month, with councils being told to use brownfields for development see below link.

<https://www.gov.uk/government/news/build-on-brownfield-now-gove-tells-underperforming-councils>

We believe the greenbelt use over brownfield sites in the borough are not been considered the use of brownfield sites for residential use effectively. For example, one site the Rohm Haas, derelict for nearly 10 years, with a small number of changes this land could capture all of the houses that are proposed to be built on the greenbelt. The council wants to use the land for industry, and will not reconsider this. the councils team suggests the site is not in a viable location for residential due to having industrial units at the top and bottom of the site, however, they are ignoring the fact that there are houses right across the road from the site and similar housing has been built just up the road at Hebburn. Businesses at the ends of the site could be relocated to other sites in the borough, freeing up all the land that is needed. The council may believe this site is unsuitable or may be expensive to clean up. But what is the council going to do just leave it forever and sweep it under the political carpet.

Your personal details (Required)

What is your name?

David Milne

What is your email address?

[REDACTED]

Who are you responding as?

YES - Resident or Member of the General Public

NO Statutory Consultee

NO Agent

NO Landowner

NO Neighbourhood Forum

NO Other Organisation (please specify)

What is your postal address?

[REDACTED]

This document must be submitted to the following address by Sunday 3rd March 2024

Address to send this document is: -

Spatial Planning, Development Services, Regeneration and Environment,
South Tyneside Council,
Town Hall and Civic Offices,
Westoe Road,
South Shields,
Tyne & Wear,
NE33 2RL

(<mailto:local.plan@southtyneside.gov.uk>)

This document was emailed to the above email address on 29th February 2024 and also copied to Councillor Geraldine Kilgour.



Submitted to South Tyneside Publication Draft Local Plan 2023-2040
Submitted on 2024-02-11 10:42:17

Policy SP8: Fellgate Sustainable Growth Area

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:
No

Support or Object - Sound:
No

Support or Object - Complies with the Duty to Cooperate:
No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Greenbelt is a pressure part of our country which cannot be replaced once destroyed. We should be planting trees not building houses on Greenbelt. As well as reducing CO2 Greenbelt is a natural soak away to reduce the risks of flooding. There is no shortage of housing in the Borough but where housing needs replacing brown field sites and existing housing sites should be reutilised instead of utilising countryside. Existing roads are already badly congested at peak times and further housing around the A194 will only increase pollution and traffic jams.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

Use brownfield and replace existing houses with better quality affordable homes.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Yes

Your personal details

What is your name?

Name:
David Milne

What is your email address?

Email address:

Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:

Response ID ANON-TJBH-TDGM-M

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-01-16 21:20:58

Chapter 1: Introduction

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

No

Support or Object- Sound:

No

Support or Object- Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Greenbelt is to be built on.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination).

You will need to say why this 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.:

Cancel project

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Chapter 2: Context

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

No

Support or Object- Sound:

No

Support or Object- Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Residents do not wish this to proceed.

Risk of flooding to existing Fellgate Estate increased.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination).

You will need to say why this 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.:

Cancel project

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP8: Fellgate Sustainable Growth Area

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

No

Support or Object- Sound:

No

Support or Object- Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Residents do not want greenbelt destruction.

Increased risk of flooding as soak away of greenbelt farm land taken away.

Increased traffic by introducing 1200 new homes estimate at least 2400 additional cars on roads which although recently upgraded are still not coping with traffic which can be shown by morning rush hour traffic where traffic is queuing from Fellgate Estate past Mill House Lane roundabout and all the way to Whitemere Pool roundabout. People's lives will be interrupted and standard of living destroyed.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

Houses are not really needed as not a shortage of houses in South Tyneside

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 1: Promoting Healthy Communities

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

No

Support or Object- Sound:

No

Support or Object- Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Stress caused is unacceptable

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 3: Pollution

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

No

Support or Object- Sound:

No

Support or Object- Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

1200 new homes will create considerable greenhouse gases. Estimated 2400 additional cars will produce considerable pollution. Destruction of greenbelt and associated trees and plants and farmers' crops will have a negative impact on the environment.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP15: Climate Change

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Distraction of the greenbelt and associated trees and plants and crops will have a negative effect on the environment and contribute to climate change. Additional unnecessary homes and additional traffic will also have a negative effect.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 41: Green Belt

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Greenbelt is there to protect the area from merging with other areas. It provides a nice environment for the public and wildlife and valuable open space promoting good mental and physical health. The Land produces valuable crops. Trees and plants reduce carbon and global warming.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Your personal details

What is your name?

Name:

David Milne

What is your email address?

Email address:

[Redacted]

Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:

[Redacted]

Response ID BHLF-RUCU-JV24-5

Submitted to Sustainability Appraisal 2024
Submitted on 2024-04-25 13:28:15

Have your say

1 Which section(s) of the SA are you responding to?

Section of the SA:

development and infrastructure

2 Please provide any comments you wish to be considered by the Planning Inspector.

Comments:

Sustainability

<https://haveyoursay.southtyneside.gov.uk/spatial-planning/sustainability-appraisal-2024/>

Comments -The local plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

But - It must not have a negative impact on existing residents. This has not been done.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Obviously, this has not been done as government policy on use of greenbelt has recently changed.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities. It cannot be effective to destroy greenbelt and ignore brown field sites

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. Because the greenbelt is being considered I do not believe the plan is being prepared correctly it will have a negative impact on people's lives including physical and mental health.

Key problem is the plan has not been positively prepared, it does not consider the residents of the borough and is not objectively assessed, the information about what this is, is not clear.

3 What is your name?

Name:

David Milne

4 What is your email address?

Email:

5 Who are you responding as?

Resident or Member of the General Public

Organisation:

6 What is your postal address?

Address:

[REDACTED]

Response ID ANON-KS7E-7C1S-R

Submitted to Habitat Regulations Assessment 2024
Submitted on 2024-02-26 21:46:39

Introduction

1 Do you have any comments relation to the HRA?

Comments:

Page was not available

But why is greenbelt to be used and why are south tyneside planning making it very hard for residents to access the information?

2 What is your name?

Name:

David Milne

3 What is your email address?

Email:

[REDACTED]

4 What is your postal address?

Address:

[REDACTED]

5 What is your organisation?

Myself

Houses/Solar Farm on Moor Lane, Cleadon.

Marie Newton [REDACTED]

Sat 3/2/2024 11:44 AM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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I wish to object to any future development on greenbelt land at Moor Lane, Cleadon including housing and solar farm. The amenities in Cleadon Village, ie school is full to capacity, road networks will not cope with hundreds of extra cars etc, , sewerage and drainage will be inadequate for development.

Marie Newton

Response ID ANON-TJBH-TDSU-8

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-29 13:15:48

Chapter 1: Introduction

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

Support or Object- Sound:

Support or Object- Complies with the Duty to Cooperate:

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy SP4: Housing Allocations in the Main Urban Area

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

Support or Object- Sound:

Support or Object- Complies with the Duty to Cooperate:

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Policy 4: Contaminated Land and Ground Stability

Do you consider that the element of the Local Plan you are responding to meets the statutory tests of Legal Compliance, Soundness or Duty to Cooperate?

Support or Object- Legally Compliant:

Yes

Support or Object- Sound:

Yes

Support or Object- Complies with the Duty to Cooperate:

Yes

If you wish to support or object to the legal compliance or soundness of the Local Plan or with the Duty to Cooperate, 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.:

The Coal Authority are pleased to see and support the inclusion of this policy which requires land stability issues to be addressed as part of development proposals. The Coal Authority are also pleased to see the inclusion of supporting paragraphs 6.24 - 6.32 which provide additional commentary and context to the policy.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination).

You will need to say why this 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.:

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Your personal details

What is your name?

Name:

Melanie Lindsley

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Statutory Consultee

Organisation:

The Coal Authority

What is your postal address?

Address:

[REDACTED]

Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report (2024) Consultation .

[REDACTED]
Fri 2/23/2024 10:23 AM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

📎 1 attachments (88 KB)

Consultation-Response-PPO-014-302-466.docx;

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Dear Mr Inch

Following receipt of your consultation on 8 January 2024, please find attached our response.

If you would like to discuss this matter further, please contact the Planning team on the number below.

Regards

The Coal Authority Planning Team

<https://www.gov.uk/coalauthority>

[REDACTED]
<https://www.gov.uk/coalauthority>

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Making a better future for people and the environment in mining areas. Like us on [Facebook](#) or follow us on [Twitter](#) and [LinkedIn](#).



The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

W: www.gov.uk/coalauthority

For the attention of: Mr Inch – Senior Manager – Planning

South Tyneside Council

By Email: Local.plan@southtyneside.gov.uk

23rd February 2024

Dear Mr Inch

Re: Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report (2024) Consultation

Thank you for your notification of the 8th January 2024 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that only a very small area of the site, western corner, is identified as falling within the defined Development High Risk Area due to past surface mining activity. We hold no records of any coal mining features at surface or shallow depth within the remainder of the site.

Any built development proposed in areas where coal mining features are recorded to be present may need to be supported by a Coal Mining Risk Assessment. We have no specific comments to make on the SPD as drafted.

Yours sincerely

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

Objection to the Draft Local Plan

Ian Beattie [REDACTED]

Tue 2/27/2024 8:35 AM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

***** WARNING** - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: email.quarantine@southtyneside.gov.uk, **clearly stating your concerns in the email** ***

1. Objection made specifically regarding Policy SP2: Strategy for Sustainable Development

This policy is not justified by the evidence because it proposes an unsustainable level of growth of housing development; and is not consistent with the NPPF or with other statements of government policy.

This policy must be revised to decrease 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.

In SP2 paragraph 4.9 of the Local Plan it states:

"4.9 To determine the minimum number of homes needed, a local housing need assessment has been conducted using the standard method detailed in the national planning guidance. The standard method uses a formula to identify the minimum number of homes expected to be planned for in a way which addresses projected household growth and any historic under-supply. Using this approach the local housing needs assessment has concluded that for the plan period (1st April 2023 to 31st March 2040) 309 dwellings are required every year. This produces an overall minimum housing requirement of 5,253 new homes over the Plan period. The household projections that inform the housing baseline are the 2014-based household projections. This figure could change upwards or downwards based on new data. South Tyneside's housing requirement will not be 'locked in' until the Plan is submitted to the independent Planning Inspectorate."

The Local Plan is based on inaccurate population projections. Census data show a consistently falling population in South Tyneside, from 157,200 in 1991, to 152,785 in 2001, to 148,127 in 2011, to 147,800 in 2021. Yet the Local Plan assumes a population of 151,936 for 2021, an overestimate of 4,136, and that it would continue to increase over the next 20 years.

Using the Office for National Statistics (ONS) 2014 housing projections produces a housing requirement of 309 per year, a total of 5,253 houses by 2040. The Local Plan would require a total of 77,716 dwellings in South Tyneside by 2040 whereas the 2018 ONS projection is for 75,664. Therefore the Local Plan is for 2,052 more houses than are needed.

The ONS household projection is likely to be revised down given the population trends thus increasing the excess housing provision in the Local Plan.

The East Boldon Neighbourhood Forum received the following statement from the Department for Levelling Up, Housing & Communities, written by Alan C Scott, Planning policy adviser on behalf of the Secretary of State:

"In 2018 the Framework introduced a standard method for calculating local housing need to make the process simple, quick and transparent. "The standard method does not impose a target; it is still up to the local authority to determine its housing requirement, and this includes taking local circumstances and restraints such as Green Belt into account".

The NPPF paragraph 5 and 6 states:

“5. National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.

6. Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission.”

Michael Jenrick, then Secretary of State for Housing, Communities and Local Government, made a Written Statement 16th December 2020:

“There were many consultation responses which did not fully recognise that the standard method for assessing Local Housing Need does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for housing in an area. It is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made.”

Michael Gove, Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations, made a Commons Statement on 19th December 2023:

“Today’s update to the National Planning Policy Framework (NPPF)

It provides clearer protection for the Green Belt, clarity on how future housing supply should be assessed in plans and on the responsibility of urban authorities to play their full part in protecting the character of precious neighbourhoods.

The new NPPF will: facilitate flexibility for local authorities in relation to local housing need; clarify a local lock on any changes to Green Belt boundaries;

The new NPPF makes clear that the outcome of the standard method is an advisory starting point in plan making for establishing the housing requirements for an area.”

The above is supported by guidance in The House of Commons Library published on 27 August 2021 “Calculating housing need in the planning system (England)” which states in 2.4:

“A starting point, not a target? Land constraints and the standard method. The standard method is intended to be the starting point in determining how many homes an LPA can and should deliver, but is not a target. LPAs must also take account (for example) of land constraints, such as the Green Belt.”

<https://commonslibrary.parliament.uk/research-briefings/cbp-9268/>

This means that South Tyneside Council is able to determine its housing requirement and can take into account the restraint of the Green Belt.

2. Objection to development on the Green Belt, made specifically regarding Policies SP3: Spatial Strategy for Sustainable Development and SP7: Urban and Village Sustainable Growth Areas

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 Local Plan must be revised to remove the proposed amendment to the Green Belt boundary to allocate additional land for housing and to withdraw all of the sites proposed for removal from the Green Belt: GA1-6 and SP8.

The Green Belt land allocation in the Local Plan is for 2,308 new homes but there is no justification for building on this precious resource. The Green Belt does not need to be built on and therefore the least harm to this resource is no further development at all on the Green Belt and exceptional circumstances have not been established. The Local Plan must be revised in order to meet the requirement to be sound on the basis of being justified, as an appropriate strategy, taking into account the reasonable alternatives and based on proportionate evidence; and on the basis of being consistent with national policy.

In the Local Plan, Policy SP3: Spatial Strategy for Sustainable Development proposes amending the Green Belt boundary to allocate additional land for housing and Policy SP7 Urban and Village Sustainable Growth Areas proposes the removal of sites from the Green Belt and allocation for housing development.

The Local Plan states in Policy SP3: Spatial Strategy for sustainable development:

“To meet the identified needs in Policy SP2 and to facilitate sustainable growth, the Plan will:

- 1. Support the sustainability of existing communities by focusing growth within the Main Urban Area including South Shields, Hebburn and Jarrow*
- 2. Secure the sustainability and vitality of the villages of Cleadon, Whitburn and the Boldons by supporting growth which respects the distinctive character of each village*
- 3. Encourage the re-use of suitable and viable brownfield land and, where appropriate, encourage higher development densities.*
- 4. Ensure the delivery of housing in sustainable locations through the allocation of sites in the Main Urban Area and by amending the Green Belt boundary to allocate Urban and Village sustainable growth areas*
- 5. Create a new sustainable, community within the Fellgate Sustainable Growth Area (Policy SP8) by providing homes and community facilities.*
- 6. Prioritise the regeneration of South Shields Riverside, South Shields Town Centre, Fowler Street Improvement Area, and the Foreshore Improvement Area*
- 7. Prioritise economic development in designated Employment Areas, including the Port of Tyne, that are accessible by a range of transport modes and allocate additional land at Wardley Colliery*
- 8. Enhance and strengthen green infrastructure, ecological networks and Green Belt throughout South Tyneside and between neighbouring authorities.*

The National Planning Policy Framework (NPPF) states:

“140. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period”

As demonstrated in Objection 1 above, there is no evidence that the housing requirement for the Plan period is at a level requiring development on the Green Belt. The strategic need has not been proven, for example there has been no cooperation with neighbouring local authorities which have Local Plans that intend to cumulatively build in excess of 19,000 houses above their respective ONS 2018 housing projections.

Sunderland Local Plan –	10,755 excess houses by 2033
Gateshead Local Plan –	6,337 excess houses by 2030
North Tyneside Local Plan -	2,238 excess houses by 2032

A planning appeal decision has confirmed the protected status of the Green Belt. This decision reiterates and reinforces the protection from inappropriate development given to the Green Belt in national planning policy.

Broke Hill golf course

In the Broke Hill case in Sevenoaks, Kent, the Inspector confirmed that, where planning policies protect areas of particular importance and provide a clear reason for refusing the development, the so-called “tilted balance” presumption in favour of granting planning permission does not apply.

For Broke Hill, the planning policies in this case related to protection of the Green Belt. This is especially important as Sevenoaks does not have the required five-year supply of housing land nor has it met the government's housing delivery test for 2021. The inspector noted a number of benefits of the proposed development including provision of affordable housing. However, he concluded that notwithstanding the lack of five-year housing supply, the housing delivery test, and the benefits, this did not outweigh the harm that would be caused to the Green Belt, and were not sufficient to override national and local planning policies protecting the Green Belt. "The tilted balance is not invoked, however, because the Framework at Paragraph 11d(i) and footnote 7 protects both areas and assets of particular importance, which include the Green Belt, and provides a clear reason to dismiss the appeal." Stephen Wilkinson, Inspector Planning Inspectorate decision Broke Hill golf course 31 January 2022

This case along with ministerial statements demonstrates that the Local Plan fails to be consistent with national planning policy to protect the Green Belt, as specified in paragraph 11 of the National Planning Policy Framework.

The Local Plan must be revised to remove the proposed amendment to the Green Belt boundary to allocate additional land for housing and to withdraw all of the sites proposed for removal from the Green Belt.

Furthermore, the Local Plan is not justified because the NPPF states:

"141. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."*

Regarding paragraph "a", it has not been proven that all brownfield sites have been considered.

There are underutilised sites such as areas in South Shields town centre where previously developed land is used for car parking rather than housing like the area at the Mill Dam in South Shields, the former Staithes House and surrounding land near the town centre has been cleared for development for decades. The large office building at Harton Quay was leased by BT Group until last year but BT Group then closed its office and redeployed its 500 staff to other parts of the North East.

These are areas close to South Shields transport interchange and so would satisfy paragraph "b" the need to promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.

The failure to rent out office space also drawn into question the planned 200,000 sq ft of office space in the adjacent Holborn development especially as the Utilitywise office building just down river had to be converted to flats after lying empty for a long period.

Planners overlooked possible brownfield sites across South Tyneside. Questions raised over validity of the reasons for rejection have not been answered. Some examples are the health clinic site near the ambulance station on Boldon Lane, the Pickwick pub in Biddick Hall, the former Methodist church on Bede Burn Road, the former Park Hotel on Lawe Road have not been included in the Local Plan.

Immediately after the Regulation 18 consultation in 2022, planning permission was given for 446 houses on the former Hawthorn Leslie shipyard that had lain redundant for several years. This was not included in the Regulation 18 Draft Plan. A similar situation exists at the former Rohm and Hass brownfield site near Jarrow town centre that would comply with 141 a) and b). This land if designated for industry could be released for housing as the land designated for employment in the Regulation 19 Local Plan is not justified by the evidence.

A further statement which is insufficient is paragraph 4.31, Sustainable Urban and Village Extensions:

“The Council has undertaken an extensive Green Belt review to identify land which would cause the least harm to the purposes of the Green Belt, that is considered suitable for development, and that could create a new defensible Green Belt boundary. Through this work, the Council has also established the exceptional circumstances to justify amending the Green Belt boundary at each location. Following consultation on the Plan, the Council will undertake a Green Belt boundary review which will review the entire Green Belt boundary to ensure that it has a strong and defensible boundary as required by the NPPF.”

It has been shown that the Green Belt does not need to be built on and therefore the least harm to this resource is no further development at all on the Green Belt and exceptional circumstances have not been established.

Regarding paragraph “c”, there is no evidence that the aggregated housing assessments of the neighbouring authorities has been compared with the projected population levels of these authorities to show that there will be no overall supply. The simple statement in 4.28 in the Local Plan is insufficient:

“28. Prior to identifying land in the Green Belt the Council has, as part of Duty to Cooperate, discussed whether neighbouring authorities could accommodate additional housing. As set out in the Duty to Cooperate Statement, neighbouring authorities have confirmed that they would be unable to provide land to meet South Tyneside’s needs.”

The duty to cooperate has not been evidenced as required by guidance such as PAS – Doing your duty practice update [doing-your-duty-practice--1a3.pdf \(local.gov.uk\)](#)

The recommendations in this have not been followed including number 10:

“10. Plans should reflect joint working and cooperation to address larger than local issues. In many cases, joint studies with other local planning authorities formed part of the evidence used to demonstrate compliance with the duty. Past cooperation put many local planning authorities in a strong position, particularly where this has resulted in the preparation of sub-regional strategies, joint studies or common methodologies on SHMA, Strategic Flood Risk Assessment, economic assessments, Green Infrastructure studies, landscape and renewables assessments, and transport studies.”

This failure is evident in the vast over provision of housing as previously shown and shared infrastructure for example the health and sewage systems between South Tyneside and Sunderland as well as employment at IAMP. This shows that the Plan is not sound.

3. Objection made regarding Sustainability Appraisal Report 2024 – Employment Land and policy SP14: Wardley Colliery

The Sustainability Appraisal Report 2024 notes that the Local Plan has increased the amount of land required for employment from the Draft Regulation 18 Local Plan. It notes that the level of employment growth underpinning this is high in the context of past trends.

This demonstrates that the Regulation 19 Draft Local Plan is not justified by the evidence base; the amount of land for employment allocated for employment is too high and more of this land needs to be utilised for housing development in existing urban areas. The removal from the Green Belt of the Wardley Colliery site in SP14 is not justified.

The Sustainability Appraisal Report states:

“Preferred Options

4.41 Within the Draft Local Plan 2019, the Council took forward the following preferred options for employment land: ■ General Employment Land – Option 2: Policy-on Scenario ■ Port and Marine Land – Option 3: Past Completions (net)

4.42 These options were selected because the Council considered them to have the most positive effects on SA objective 9 (encourage and support economic growth within South Tyneside) and SA objective 10 (increase opportunities for employment and education and improve living standards). The Council’s reasons for this were set out in the 2019 SA Report.

4.43 In the Draft Regulation 18 Local Plan (June 2022) the Council’s preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. The reasons for this were set out in detail in the 2022 Employment Land Technical Paper, which explained that in choosing this scenario the Council was being cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities.”

And

“4.45 In the Regulation 19 Draft Publication Plan, the Council’s preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP’.”

The SAR also notes the negative impact of this preferred option for employment land:

“4.26 However, negative effects were recorded against a number of environmental objectives, reflecting the impact that a high economic growth could have upon the environment due to proximity existing designations, and increased impacts on natural resources, potential impacts on biodiversity and wildlife corridors. This level of growth is also likely to require land from the Green Belt to facilitate the growth aspirations; this objective therefore scored negatively against objective 4 (Green Belt) and objective 5 (green infrastructure) due to the potential impacts on the Green Infrastructure corridor.”

The Sustainable Appraisal Non-Technical Summary states in the section assessing the Likely Effects of the Local Plan Options:

“Preferred Options

34. In the Draft Regulation 18 Local Plan (June 2022) the Council’s preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. In choosing this scenario the Council had been cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities. In the Regulation 19 Draft Publication Plan, the Council’s preferred scenario for employment land requirements over the Plan period is the Policy-on Labour Demand Scenario. As explained in the 2023 Employment Land Technical Paper, the level of employment growth underpinning this scenario, which seeks to capture the impacts of IAMP on the general employment land market, is high in the context of past trends. The 2023 ELR advises that the IAMP proposals are expected to create significant employment opportunities in the wider supply chain. However, the ELR does caution that the ability to fully take advantage of these opportunities will depend on the ‘ability to offer good quality employment sites, with good access to the strategic road network and in close proximity to the IAMP’.”

4. Objection made regarding Density Report 2024 and paragraph 8.24 of the Local Plan

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.

The Density Report 2024 states:

“2.3 Paragraph 125 of the NPPF highlights the importance of avoiding homes being built at low densities, where there is an anticipated shortage of land for meeting identified housing needs. Planning policies should avoid homes being built at low densities and ensure optimal use of land by using minimum density standards. These standards aim to uplift the average density of residential development and the use of these standards should be used in other parts of the plan area. Minimum density standards should also be used in a way which ensures that applications which fail to make efficient use of land be refused.”

It states in the Summary

“4.1 Following the four assessments several conclusions can be drawn with regards to density patterns throughout South Tyneside. Since the previous Density study in 2018:

- The average density of sites assessed was 66 dwellings per hectare based on net site area. This is an increase of 16 dwellings per hectare since the previous study.*
- The assessments showed that density declined as site area increased and that sites less than 1 hectare had a density significantly higher than those over 1 hectare. Sites less than 1 hectare had an average density of 82 dwellings per hectare. Sites over 1 hectare had a density of 40 dwellings per hectare.*
- In general sites with a higher yield had typically lower densities. Sites with less than 50 dwellings had an average density of 50 dwellings per hectare whereas sites with more than 250 dwellings had an average density of 28 dwellings per hectare.*
- Sites in the urban area of South Shields had the highest densities with an average of 72 dwellings per hectare. This is likely due to the nature of the area and the large proportion of smaller sites.*

• Compared to the standard density buffers in Policy SC3 of the adopted LDF and the Strategic Housing Land Availability Assessment higher densities were achieved across all three categories. “

However, the Recommendations for Housing Density which have been utilised by the Regulation 19 Draft Local Plan are lower than the densities which have been achieved. The Density Report states:

“6.1 Housing yield must ultimately be determined by design. However, for the purposes of estimating housing yield as part of the Strategic Housing Land Availability Assessment and Local Plan site selection process the following density calculations are recommended:

- *Average 60 dwellings per hectare on sites within 400m in the Jarrow and Inner South Shields character areas (higher densities may also be appropriate on a site by site basis e.g. by the riverside on sites such as Holborn and Hawthorn Leslie);*
- *Average 55 dwellings per hectare on sites within 400m in the rest of the borough;*
- *Average 45 dwellings per hectare on sites between 400m – 800m in the rest of the borough; and*
- *Average 35 dwellings per hectare on sites beyond 800m in the rest of the borough.*

6.2 These densities will be used to estimate site capacities in the Strategic Housing Land Availability Assessment where other information (e.g. planning applications, information from developers etc.) is not available. Should this information be available it will be used.”

The Density Report 2024 also underestimates the housing densities which have been achieved because two very large urban brownfield sites have been excluded from the assessment:

“3.2 Whilst permission was given to 26 sites during this period only 24 sites will be used in this study. The sites at Leslie Hawthorn and Holborn have been omitted from this study as due to the nature of those sites they present an anomaly in the densities. These sites have a much higher density as to be viable sites for the developers more dwellings on site were required. These sites have a much higher proportion of flats and apartments than others of this size and location. Therefore, to be able to analyse patterns and trends in the data these 2 sites have been treated as anomalies.”

If these two sites were included in the assessment, the average density achieved would be higher and the discrepancy between this and the recommendations for average density for the Local Plan would be even greater.

5. Objection made specifically regarding Policy 18: Affordable Housing, Policy 19: Housing Mix and Policy 20: Technical Design Standards for New Homes

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.

In the section on Housing Allocations the Local Plan states:

“5.4 When allocating sites to meet the housing requirement, the Plan has looked to ensure the right homes are delivered in the right places, taking into account need, demand, deliverability, sustainability and improving choice.”

The SHMA 2023 has identified an annual need for 361 affordable homes each year across the borough which justifies the need for a robust affordable housing policy which will provide mechanisms to help meet this affordable need. Yet the same document states in the Executive Summary:

“It is recommended that the current target for 75% market and 25% affordable is maintained.” And in Paragraph 7.10 states: *“The SHMA would suggest that an overall target of 25% affordable housing should continue to be applied. This will be subject to viability testing before a target can be established for affordable housing in the emerging Local Plan.”*

The proposed proportion of affordable homes in Cleadon and East Boldon is 30%, but as median house prices in this area are £225,000 the accepted definition of affordable being 80% of market value means they will still be unaffordable to the very people requiring this provision.

The NPPF states “62. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).”

Particular needs identified in the SHMA 2023 are:

- *“Increasing and diversifying the supply of specialist housing for older people. There is a need for 3,060 more units of accommodation for older people by 2040 comprising 1,803 C3 units, 885 C2 Extra Care units and 372 C2 Residential care units*
- *Based on an assessment of additional needs and longer-term demographics, a minimum of 5% of new dwellings should be built to M4(3) wheelchair accessible standard; and all other new dwellings should be built to M4(2) accessible and adaptable standard.”*

However the Local Plan fails to implement these recommendations in full as

Policy 20: Technical Design Standards for New Homes states:

“1. To meet the needs of older people and people with disabilities, a minimum of 5% of new build housing in developments of 50 homes or more shall be built to Building Regulations Requirement M4(3) (wheelchair user dwellings).

2. All residential dwellings shall be designed to be built to meet Building Regulations Requirement M4(2): (Accessible and adaptable dwellings) except where it can be demonstrated that this is impractical or unviable due to sitespecific constraints.”

Policy 20 introduces a condition that this target for wheelchair user dwellings (ie *Building Regulations Requirement M4(3)*) will only apply in housing developments of 50 homes or more. This means that the Local Plan is not justified by the evidence of the need for these type of homes.

6. Support for Policy 16: Houses in Multiple Occupation

We welcome Policy 16 Houses in Multiple Occupation (HMO) as this is justified by the evidence of clustering of HMOs in particular areas of the borough and the need for further measures in paragraph 2 of the policy for the Lawe Top Article 4 Direction area.

7. Objection made specifically regarding Policy 1 Promoting Healthy Communities and Policy 2 Air Quality; and SP5: Former Brinkburn Comprehensive School and SP6: Former Chuter Ede Education Centre

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.

The Local Plan proposes the development of several vital community open spaces, for example the playing field land at Chuter Ede and Brinkburn School, despite stating in Policy 1:

“The Council and its partners, including the NHS, will seek to improve the health, wellbeing and quality of life of South Tyneside residents, reduce health inequalities, and to help people live longer and healthier lives. This will be achieved by: 1.Supporting new development which: i. Increases opportunities for physical activity and active travel through the provision of good quality sport and recreation facilities and safe and accessible walking, cycling and public transport networks.”

and

“iii. Enhances the green and blue infrastructure network and supports climate change mitigation and adaptation.”

These community open spaces must be protected and removed from the Local Plan as sites for development. The importance of these community open spaces is recognised in NPPF paragraph 98, 20-23, 26 and 92.

Building on playing fields for example at Chuter Ede has the exact opposite effect to the objective, increasing the local population while removing green space playing fields that are used for exercise.

There is little in the Local Plan that would fulfil the Strategic Objectives for Promoting Healthy Communities. In fact, some parts of the plan make the situation worse including the proposed development in areas that will promote car use such as in Cleadon, East Boldon and Whitburn. These developments will typically have two cars per household, adding potentially thousands of car journeys on an already congested road system. This will have a detrimental effect road safety and on the local environment due to noise and exhaust emissions. Some areas have air pollution levels already in excess of the World Health Organisation recommended maximums. These vehicle journeys will only make this more dangerous as there are no safe levels for these pollutants.

The Local Plan states in paragraph 6.14: *“The importance of good air quality is recognised by the World Health Organisation which produced a series of standards that have been adopted by the European Commission and subsequently the UK”*.

A Local Authority recognising this will be aware that the World Health Organisation (WHO) air quality standards were revised in 2021 and the recommended pollutant levels, to be achieved, were revised down by a considerable amount. NOTE: These are not safe levels as scientists do not consider any amount to be safe. It is inconceivable that the UK national standards will not be reduced to reflect these changes.

In the Local Plan, Policy 2: Air Quality states *“2. Where significant air quality impacts are likely to be generated by the development, an appropriate air quality assessment will be required”*. Due to the changes in WHO levels it is reasonable to predict large areas of the Borough will exceed these and the proposed developments in Policy SP7: Urban and Village Sustainable Growth Areas in particular will result in unsafe air pollution.

The council has a duty as far as reasonably practicable to ensure the health and safety of its residents. Given the above, the Local Plan must be revised to take into consideration the results of the proposed developments on air quality and specified measures that would reduce pollution levels to the minimum possible.

NPPF states in 186: *“Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.”*

The Local Plan has failed to identify these opportunities adequately and therefore is not consistent with the NPPF and this demonstrates that the Local Plan is not sound.

NPPF states: *“31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned...”*

The revised WHO air pollution levels are relevant and up-to-date and should be a material consideration.

8. Objection made specifically regarding Section 7: Meeting the Challenge of Climate Change, Flooding and Coastal Change

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 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.

National legislation and guidance strongly stress the central role of the planning system in securing radical reductions in greenhouse gas emissions and require Local Plans to:

The policies should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal.

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. A good example from another area is Reading Council: *"The council's 2019 Local Plan requires that all new residential developments of ten or more homes are built to zero carbon standards if possible." Zero carbon is an achievable standard.*

Adoption of this strategy aligns with the council's own stated aims of the Economic Recovery Plan 2020 to *Catalyse green and sustainable growth by maximising the potential of our low-carbon and digital assets and expertise.*

With regards to Policy 15 much is to be welcomed. 15.1 states *Improve the condition of existing homes by enhancing energy efficiency and reducing carbon emissions in existing buildings* And 15.4 *Facilitate improvements to properties that have traditionally suffered from poor management and under-investment*

However, currently demolition is placed far too highly as an option for the current housing stock. Refitting and retrofitting is by far the less carbon intensive approach so demolition must be de-prioritised.

The Local Plan must be revised in order to bring it into compliance with legislative and policy requirements around climate change and the council's stated ambitions.

9. Objection made specifically regarding Policy 6: Renewables and Low Carbon Energy Generation

The Local Plan is not sound because this policy is not consistent with national policy.

NPPF 156 states: *"Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning."*

We welcome Policy 6 paragraph 2 supporting the inclusion of renewable energy into developments, but the text is not strong enough, and once again, will not change business as usual development approaches. A requirement to include and maximise on-site renewable energy generation needs to be folded into an overall green house gas emissions policy, as seen in the London Plan, policy S12.

We welcome Policy 6 paragraph 4, the inclusion of policies requiring development to connect to district heating networks, however this policy needs to be made significantly stronger. The best example of which we are aware is draft policy SI13 of the draft London Plan. As the whole of South Tyneside is located over disused mine-workings more heating schemes like the "Hebburn Minewater Project" should be invested in for housing schemes.

10. Objection made specifically regarding Policy 10 Disposal of Foul Water and Policy 11 Protecting Water Quality

The Local Plan is not justified because these policies are not able to ensure the Objectives for Protecting Water Quality will be achieved; and is not consistent with national policy.

The Local Plan does not refer to the current significant level of sewage pollution in South Tyneside. Population levels have increased considerably in the UK since Victorian times yet we are still using combined sewers that were constructed in the 19th century.

If more housing development is permitted, especially on green spaces, more pressure will be exerted on an already failing sewage system. However, in the consultation on the Draft Local Plan, South Tyneside Council confirmed that no extra sewage will be added to the existing infrastructure on the recommendations of Northumbrian Water who have assured them the existing system will cope. NPPF states *“20.Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ...*

b) infrastructure for ...wastewater”

NPPF states: *“185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”*

The Environmental Permitting Regulations 2016 Permits to discharge untreated sewage from Combined Sewer Overflows into watercourses during heavy rainfall are issued to water companies and regulated by the Environment Agency. There is growing evidence to show that these permits are being abused. 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.

The Environment Agency (EA) has been required to install Event Duration Monitors (EDMs) in all Combined Sewer Overflows (CSOs). These record the number of discharges and the duration of the discharges. The Whitburn system remains in breach of environmental law as of March 2021, but the EA want to wait 10 years to ‘assess’ the system.

The data supplied by the authorities needs to be treated with caution. In March 2020 the EA issued an apology after their published sewage discharge records for Whitburn for 2019 were challenged. They were forced to increase the volume of CSO discharges for Whitburn by 10% from 683,676 cubic metres to 760,993.5 cubic metres. In March 2021 Northumbrian Water issued an apology after their published untreated sewage discharge records for Hendon Sewage treatment works for 2019 were challenged. They were forced to increase their published hours of untreated discharges in 2019 from Hendon Sewage Treatment works by 4,000% from 15 hours 52 mins to 646 hours.

Sewage pollution is a contributor to climate change. Seagrasses can absorb more carbon up to 40 times faster than terrestrial forests and these ecosystems become sources of CO₂ emissions when they are degraded or destroyed. A major driver of seagrass decline is nutrient pollution from sewage. A study has shown that 90% of the seagrass meadows in the UK have been lost to pollution. Locally, the seagrass meadows in the River Tyne estuary have been devastated by sewage flowing from nearby Combined Sewer Overflows.

Sewage pollution causes harm to public health. Recent epidemiological studies show a close relationship between contact with polluted waters and the incidence of gastro-intestinal, eye, ear, nose and throat infections or irritations and respiratory symptoms. This is a recognised problem for surfers, kite surfers, windsurfers, sailors, kayakers and wild swimmers. Even the dog walkers, joggers and walkers who all enjoy the access to South Tyneside’s riverside and beaches throughout the year are at risk from sewage pollution.

Public Health is a material planning consideration. Local authorities have important and wide-ranging public health functions, for example under the Public Health (Control of Disease) Act 1984. This legislation adopts an ‘all-hazards’ approach and provides South Tyneside Council with the necessary powers to control human health risks arising from infection or contamination of any form

including chemicals and radiation. Statutory duties for public health were conferred on local authorities by the Health and Social Care Act 2012. Local authorities (and directors of public health acting on their behalf) now have a critical role in protecting the health of their population, both in terms of helping to prevent threats arising and in ensuring appropriate responses when things do go wrong.

Health considerations are capable of being material planning considerations. This is recognised in the NPPF which includes the following statement at paragraph 92: *“Planning policies and decisions should aim to achieve healthy, inclusive and safe places.”*

The health implications of exposure to the levels of sewage pollution regularly discharged into the River Tyne and on to the beaches of South Tyneside must be a material planning consideration with respect to future developments as, without an improvement in sewage treatment capacity, more development will bring about an inevitable increase in sewage pollution.

This objection is in addition to and supportive of any previous objections which I have submitted.

I confirm that I would be willing to speak at the Examination in Public

Ian Beattie



Email



Objections - Draft Local Plan

Ian Beattie

Sat 2/24/2024 8:21 AM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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I wish to object to the Draft Local Plan (Regulation 19) on the grounds of it being unsound.

The Draft Local Plan is not sound for the reasons given below. It is not positively prepared or justified and does not meet local needs as identified by the evidence. A number of reasonable alternatives have not been fully investigated. It is not consistent with NPPF policy.

I object to the release of any green belt land but specifically the area referenced GA4 West Hall Farm (Moor Lane, Cleadon) in the Draft Plan which in previous consultations received the highest number of objections of all proposed development sites in the borough. These objections were evidence based, logical, valid and clearly demonstrated the concerns of the residents. The Council has a duty to take previous objections into account when developing a Local Plan. These objections have not been addressed by the Council Planners and render the Plan unsound.

The Council's own summary of the 2016 Consultation stated that "By far the most contentious sites were the West Hall Farm site" (BC44 in the plan at that time)

"BC44 received 804 objections, the most of any site."

Despite this overwhelming opposition to release of green belt land to develop BC44, (re-referenced under various numbers in later revisions of the Plan and now GA4), the Council have not addressed these objections but instead have waged a war of attrition against local residents by pursuing green belt release despite opposition and as such have rendered the Consultation process irrelevant. South Tyneside Council have a responsibility to take the objections of their residents into account but clearly have not done so. The process is flawed and as such unsound.

The latest version of the plan leaves many important questions unanswered. The conclusions are not clearly proven and alternative solutions have not been fully explored. The Draft Plan is therefore unsound.

With regard to Greenbelt the NPPF requires that the Council MUST prove that SPECIAL CIRCUMSTANCES exist which justify release of green belt land. Evidence of such exceptional circumstances must be provided and fully justified. Such special circumstances have not been proven as they do not exist in South Tyneside and as such the Plan is unsound.

The plan does not:

Prevent or restrict urban sprawl or prevent the merger with neighbouring towns and urban areas - the Plan does not prevent urban sprawl - in fact it encourages the merger of Sunderland and South Tyneside. The release of GA4 Green belt for house building will result in a significant reduction of the separation distance between Sunderland's urban fringe and that of South Tyneside as such leading to a potential merging of urban areas, a narrowing of the wildlife corridor and reduction in Green belt.

During previous consultation the Council Planners attempted to unilaterally redraw the Green belt boundary to align it with the southern boundary of GA4 (then designated as BC44) in an underhand effort to support their attempts to develop the land for housing. **THIS UNACCEPTABLY POOR STANDARD OF BEHAVIOUR CLEARLY DEMONSTRATED TO LOCAL RESIDENTS THE LENGTHS TO WHICH THE COUNCIL WERE PREPARED TO GO TO FORCE THROUGH THESE UNWANTED DEVELOPMENTS.** This change of boundary was spotted by residents, subsequently challenged during a meeting with the Planning Director, Mr George Mansbridge on 15/08/2018 and quietly dropped by the Council Planners but remains a clear example of the war of attrition waged by the Council and its Planning Officers to wear down resident resistance to development on Green belt. It is clearly proof that the Council is ignoring the objections of local residents and attempting to undermine valid objections and dismiss genuine resident concerns.

Retain openness of the landscape or keep the area permanently open - development will close this land off, restrict views and openness.

The plan does not assist in the regeneration of urban, derelict or industrial land. There are still many derelict/previously industrial sites within the borough. All such brown field sites should be fully developed before any green belt is released. Only 30 dwellings from brownfield sites have been identified in the Plan. This demonstrates that the Council is not serious about regeneration before Green belt release. This Plan is unsound.

Government statements, both verbal and written, must also be taken into account when developing a Local Plan. One such statement made it clear that areas of constraint eg. green belt should not be considered for development.

There are many examples of Government statements protecting green belt from development, and these, coupled to strong extensive resident opposition provides evidence that this Plan is flawed. For example Michael Gove, Secretary of State has stated recently that the national government housing assessment numbers are advisory not compulsory. They are not a target. This has removed an excuse previously used by South Tyneside Council to justify release of Green belt. South Tyneside Council have long hidden behind the excuse that they are being "forced" to build houses by National Government.

Mr Gove also stated that there is no need to review Green belt boundaries to meet housing estimates. He stated that it is better to increase urban density in preference to Green belt erosion.

In December 2023 he also states that "LPAs must take account of land constraints, such as Green belt."

In 2019 Ester McVey then Minister of State (for Housing, Communities and Local Government) wrote to Broxtowe Council reminding them that they must "maximise the potential of previously developed land for new development when planning to meet housing need."

No response was received from South Tyneside Council when this matter was raised with them.

South Tyneside Council clearly has its own responsibility to calculate housing and must take into account the restraint of the Green belt.

South Tyneside Council must also prove that they have considered all reasonable alternatives before releasing Green belt for development. Greenbelt is precious and once gone is gone forever!

New homes should be located close to areas of employment to meet the objectives of reducing commuting travel and associated pollution.

Vacant or partially vacant industrial or office buildings should be prioritised for dwellings before the release of Green belt for development. There are many examples of these vacant buildings in South Tyneside.

The Plan is not justified as it proposes an unsustainable level of housing development to meet an unrealistic level of population growth which has not been objectively calculated.

There remain many vacant dwellings in South Tyneside proving that the Council has alternatives to developing Green belt land. The 2021 ONS census showed that the number of unoccupied dwellings was increasing and at that point represented 5.4% of properties in South Tyneside - approximately 3900 dwellings. If even 50% of these properties were brought back into occupation there would be no need to release Green belt for additional housing. The Council is not doing enough in this area. All reasonable steps must be taken to fully utilise this housing stock prior to releasing Green belt.

Figures from the latest census show clearly that the population of South Tyneside is decreasing. Despite this the Draft Plan proposes to build a total of two thousand and thirteen (2013) more houses than the 2018 ONS projection stated were necessary - and to release Green belt land to do so. This is ridiculous! In addition the ONS housing projection for South Tyneside fell by 2.6% between 2014 and 2018. - approximately in line with the reduction in population.

The Local Plan does not address the need for affordable housing, homes for the elderly, or wheelchair friendly homes and as such does not meet the objectively assessed needs of resident population profile.

NPPF also refers to the need to liaise with adjoining authorities to ensure soundness. There is no evidence that this has occurred or that appropriate and specific correction to the South Tyneside Plan has taken as a result.

Neighbouring authorities plan to build in excess of the required number of properties thus absorbing a significant portion of housing requirement identified. Yet South Tyneside Council proposes to build even more homes than are required on Green belt land.

South Tyneside already has one of the highest population densities on NE England with 22.94 people per hectare compared to 3.08 for NE England in total and 4.04 overall for England. These figures are frightening. Its residents are being deprived of the undoubted benefits of local green belt. Why on earth release more of this valuable resource for development of unwanted and unneeded houses?

South Tyneside Council has a current debt level of £600 million and it's apparent determination to develop Greenbelt would appear to be linked to their desire to build executive high cost/high Council tax style housing on Greenbelt to help alleviate this debt. The Council have demonstrated an unrelenting desire to target GA4/BC44 for development since the 2016 SLR release despite strong local opposition. The evidential data used by the Council on its site comparison documents is flawed but resident objections remain unanswered. This is a scandal.

The December 2023 update to the NPPF strengthens the protection against out of character developments. The proposed development of GA4 may well result in the building of properties which are not in keeping with those existing nearby. For example they will be on very much smaller plots given the overall size of the proposed development area combined with the number of proposed properties. This is not in keeping with existing housing and will alter the character of the village significantly. The development of similar properties to those existing would result in the new dwellings being unaffordable to the majority of pensioners or first time buyers. This Plan does not provide sustainable housing of the type required in South Tyneside. The rural view of the village on approach from the South will be adversely altered by a modern housing estate. Significantly this view was referred to in a Conservation Management report during a previous review of this site as follows:

“The rural edge along the Eastern side of the village (Cleadow) provides a glimpse of its historic setting with open fields, hedgerows and a belt of mature trees”

The updated NPPF now also means that developers must take an evidence based approach relating to food producing land before proposing to develop it for housing.

GA4 is currently valuable productive agricultural land. The proposed development will reduce food production at a time of food shortages, price increases and agricultural land shortages. In addition local agricultural employment will be jeopardised. The NPPF clearly strengthens protection for agricultural land. Why has this not been taken into account in the Plan?

The Draft Plan is not justified regarding Flood Controls and Disposal of Foul Water.

The Draft Plan does not address flood risk. Various flood alleviation schemes have been carried out in and around the Cleadon area with very little success. GA4 is currently flooded as are the adjoining fields which have been flooded for months.

The well documented pollution scandal has generated a huge increase in public awareness of the limitations of the current drainage and sewage systems resulting in the illegal release of millions of cubic meters of untreated sewage into water courses and directly into the sea by local water authorities. This has led to serious levels of pollution.

Locally Northumbrian Water were forced to apologise after their untreated discharge records relating to their Hendon Sewage treatment works were proven to be incorrect by a staggering 4000%. This creates suspicion that other records are false and as such must be treated with caution.

It is obvious to local residents that the drainage and sewage systems can not cope currently. If additional properties are built this pollution will increase leading to risk of illness, contamination or worse.

The Plan is not justified by the evidence and as such should be withdrawn and revised.

Previous objections based on increased pollution, reduced air quality, lack of infrastructure e.g. roads, traffic congestion and delays, transport, shortages of doctors, dentists, child care facilities, nurseries, schools, adverse climate impacts and the reduction or illumination of wild life habitat and biodiversity all remain unanswered by this Draft proposal.

It is clearly unfit for purpose and should be urgently revised.

Summarising:

The Draft Plan leaves many leading questions unanswered.

The Plans conclusions are not clearly proven eg.the special circumstances justifying release of green belt land. The evidence based on experiences of living locally and reductions in quality of life does not support the proposals contained in the Plan.

The Council have repeatedly chosen to ignore the views of residents.

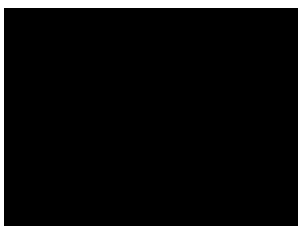
Its proposals are flawed.

The Council has not fully explored or considered alternative options.

Neither has it made a clear case to release green belt for development.

It is therefore unlawful & unsound and should be withdrawn.

I would be grateful for a reply to the objections raised above.



Email



Objections to the South Tyneside Draft Local Plan

Ian Beattie

Wed 2/21/2024 12:42 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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I wish to object in the strongest terms regarding the soundness of the most recent version of the South Tyneside Local Draft Plan, published in early 2024 particularly the proposed release of green belt land in the borough for housing development.

The Local Draft Plan is not sound for the reasons given below. It is not positively prepared or justified and does not meet local needs as identified by the evidence. A number of reasonable alternatives have not been fully investigated. It is not consistent with NPPF policy.

I object to the release of any green belt land but specifically the area referenced GA4 West Hall Farm (Moor Lane, Cleadon) in the Draft Plan which in previous consultations received the highest number of objections of all proposed development sites in the borough. These objections were evidence based, logical, valid and clearly demonstrated the concerns of the residents. The Council has a duty to take previous objections into account when developing a Local Plan. These objections have not been addressed by the Council Planners and render the Plan unsound.

The Council's own summary of the 2016 Consultation stated that "By far the most contentious sites were the West Hall Farm site" (BC44 in the plan at that time)

"BC44 received 804 objections, the most of any site."

Despite this overwhelming opposition to release of green belt land to develop BC44, (re-referenced under various numbers in later revisions of the Plan and now GA4), the Council have not addressed these objections but instead have waged a war of attrition against local residents by pursuing green belt release despite opposition and as such have rendered the Consultation process irrelevant. South Tyneside Council have a responsibility to take the objections of their residents into account but clearly have not done so. The process is flawed and as such unsound.

The latest version of the plan leaves many important questions unanswered. The conclusions are not clearly proven and alternative solutions have not been fully explored. The Draft Plan is therefore unsound.

With regard to Greenbelt the NPPF requires that the Council MUST prove that SPECIAL CIRCUMSTANCES exist which justify release of green belt land. Evidence of such exceptional circumstances must be provided and fully justified. Such special circumstances have not been proven as they do not exist in South Tyneside and as such the Plan is unsound.

The plan does not:

Prevent or restrict urban sprawl or prevent the merger with neighbouring towns and urban areas - the Plan does not prevent urban sprawl - in fact it encourages the merger of Sunderland and South

Tyneside. The release of GA4 Green belt for house building will result in a significant reduction of the separation distance between Sunderland's urban fringe and that of South Tyneside as such leading to a potential merging of urban areas, a narrowing of the wildlife corridor and reduction in Green belt.

During previous consultation the Council Planners attempted to unilaterally redraw the Green belt boundary to align it with the southern boundary of GA4 (then designated as BC44) in an underhand effort to support their attempts to develop the land for housing. **THIS UNACCEPTABLY POOR STANDARD OF BEHAVIOUR CLEARLY DEMONSTRATED TO LOCAL RESIDENTS THE LENGTHS TO WHICH THE COUNCIL WERE PREPARED TO GO TO FORCE THROUGH THESE UNWANTED DEVELOPMENTS.** This change of boundary was spotted by residents, subsequently challenged during a meeting with the Planning Director, Mr George Mansbridge on 15/08/2018 and quietly dropped by the Council Planners but remains a clear example of the war of attrition waged by the Council and its Planning Officers to wear down resident resistance to development on Green belt. It is clearly proof that the Council is ignoring the objections of local residents and attempting to undermine valid objections and dismiss genuine resident concerns.

Retain openness of the landscape or keep the area permanently open - development will close this land off, restrict views and openness.

The plan does not assist in the regeneration of urban, derelict or industrial land. There are still many derelict/previously industrial sites within the borough. All such brown field sites should be fully developed before any green belt is released. Only 30 dwellings from brownfield sites have been identified in the Plan. This demonstrates that the Council is not serious about regeneration before Green belt release. This Plan is unsound.

Government statements, both verbal and written, must also be taken into account when developing a Local Plan. One such statement made it clear that areas of constraint eg. green belt should not be considered for development.

There are many examples of Government statements protecting green belt from development, and these, coupled to strong extensive resident opposition provides evidence that this Plan is flawed. For example Michael Gove, Secretary of State has stated recently that the national government housing assessment numbers are advisory not compulsory. They are not a target. This has removed an excuse previously used by South Tyneside Council to justify release of Green belt. South Tyneside Council have long hidden behind the excuse that they are being "forced" to build houses by National Government.

Mr Gove also stated that there is no need to review Green belt boundaries to meet housing estimates. He stated that it is better to increase urban density in preference to Green belt erosion.

In December 2023 he also states that "LPAs must take account of land constraints, such as Green belt."

In 2019 Ester McVey then Minister of State (for Housing, Communities and Local Government) wrote to Broxtowe Council reminding them that they must "maximise the potential of previously developed land for new development when planning to meet housing need."

No response was received from South Tyneside Council when this matter was raised with them.

South Tyneside Council clearly has its own responsibility to calculate housing and must take into account the restraint of the Green belt.

South Tyneside Council must also prove that they have considered all reasonable alternatives before releasing Green belt for development. Greenbelt is precious and once gone is gone forever!

New homes should be located close to areas of employment to meet the objectives of reducing commuting travel and associated pollution.

Vacant or partially vacant industrial or office buildings should be prioritised for dwellings before the release of Green belt for development. There are many examples of these vacant buildings in South Tyneside.

The Plan is not justified as it proposes an unsustainable level of housing development to meet an unrealistic level of population growth which has not been objectively calculated.

There remain many vacant dwellings in South Tyneside proving that the Council has alternatives to developing Green belt land. The 2021 ONS census showed that the number of unoccupied dwellings was increasing and at that point represented 5.4% of properties in South Tyneside - approximately 3900 dwellings. If even 50% of these properties were brought back into occupation there would be no need to release Green belt for additional housing. The Council is not doing enough in this area. All reasonable steps must be taken to fully utilise this housing stock prior to releasing Green belt.

Figures from the latest census show clearly that the population of South Tyneside is decreasing. Despite this the Draft Plan proposes to build a total of two thousand and thirteen (2013) more houses than the 2018 ONS projection stated were necessary - and to release Green belt land to do so. This is ridiculous! In addition the ONS housing projection for South Tyneside fell by 2.6% between 2014 and 2018. - approximately in line with the reduction in population.

The Local Plan does not address the need for affordable housing, homes for the elderly, or wheelchair friendly homes and as such does not meet the objectively assessed needs of resident population profile.

NPPF also refers to the need to liaise with adjoining authorities to ensure soundness. There is no evidence that this has occurred or that appropriate and specific correction to the South Tyneside Plan has taken as a result.

Neighbouring authorities plan to build in excess of the required number of properties thus absorbing a significant portion of housing requirement identified. Yet South Tyneside Council proposes to build even more homes than are required on Green belt land.

South Tyneside already has one of the highest population densities on NE England with 22.94 people per hectare compared to 3.08 for NE England in total and 4.04 overall for England. These figures are frightening. Its residents are being deprived of the undoubted benefits of local green belt. Why on earth release more of this valuable resource for development of unwanted and unneeded houses?

South Tyneside Council has a current debt level of £600 million and it's apparent determination to develop Greenbelt would appear to be linked to their desire to build executive high cost/high Council tax style housing on Greenbelt to help alleviate this debt. The Council have demonstrated an unrelenting desire to target GA4/BC44 for development since the 2016 SLR release despite strong local opposition. The evidential data used by the Council on its site comparison documents is flawed but resident objections remain unanswered. This is a scandal.

The December 2023 update to the NPPF strengthens the protection against out of character developments. The proposed development of GA4 may well result in the building of properties which are not in keeping with those existing nearby. For example they will be on very much smaller plots given the overall size of the proposed development area combined with the number of proposed properties. This is not in keeping with existing housing and will alter the character of the village significantly. The development of similar properties to those existing would result in the new dwellings being unaffordable to the majority of pensioners or first time buyers. This Plan does not provide sustainable housing of the type required in South Tyneside. The rural view of the village on approach from the South will be adversely altered by a modern housing estate. Significantly this view was referred to in a Conservation Management report during a previous review of this site as follows:

"The rural edge along the Eastern side of the village (Cleadow) provides a glimpse of its historic setting with open fields, hedgerows and a belt of mature trees"

The updated NPPF now also means that developers must take an evidence based approach relating to food producing land before proposing to develop it for housing.

GA4 is currently valuable productive agricultural land. The proposed development will reduce food production at a time of food shortages, price increases and agricultural land shortages. In addition local agricultural employment will be jeopardised. The NPPF clearly strengthens protection for agricultural land. Why has this not been taken into account in the Plan?

The Draft Plan is not justified regarding Flood Controls and Disposal of Foul Water.

The Draft Plan does not address flood risk. Various flood alleviation schemes have been carried out in and around the Cleadon area with very little success. GA4 is currently flooded as are the adjoining fields which have been flooded for months.

The well documented pollution scandal has generated a huge increase in public awareness of the limitations of the current drainage and sewage systems resulting in the illegal release of millions of cubic meters of untreated sewage into water courses and directly into the sea by local water authorities. This has lead to serious levels of pollution.

Locally Northumbrian Water were forced to apologise after their untreated discharge records relating to their Hendon Sewage treatment works were proven to be incorrect by a staggering 4000%. This creates suspicion that other records are false and as such must be treated with caution.

It is obvious to local residents that the drainage and sewage systems can not cope currently. If additional properties are built this pollution will increase leading to risk of illness, contamination or worse.

The Plan is not justified by the evidence and as such should be withdrawn and revised.

Previous objections based on increased pollution, reduced air quality, lack of infrastructure e.g. roads, traffic congestion and delays, transport, shortages of doctors, dentists, child care facilities, nurseries, schools, adverse climate impacts and the reduction or illumination of wild life habitat and biodiversity all remain unanswered by this Draft proposal.

It is clearly unfit for purpose and should be urgently revised.

In conclusion:

The Draft Plan leaves many leading questions unanswered.

The Plans conclusions are not clearly proven eg.the special circumstances justifying release of green belt land. The evidence based on experiences of living locally and reductions in quality of life does not support the proposals contained in the Plan.

The Council have repeatedly chosen to ignor the views of residents.

It's proposals are flawed.

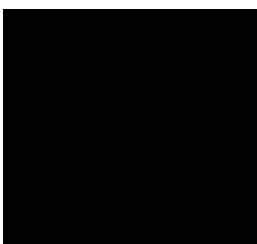
The Council has not fully explored or considered alternative options.

Neither has it made a clear case to release green belt for development.

It is therefore unlawful & unsound and should be withdrawn.

I confirm that I would be willing to speak at the Examination in Public.

I would be grateful for a reply to the objections raised above.



Fwd: Objections to the Local Plan 2024-2040

Kathleen Ramm [REDACTED]

Thu 2/29/2024 11:17 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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Dear Sir/Madam,

I should like to register my objections to the Local Plan as detailed by my sister, Kathleen Ramm.

I agree entirely with her submission.

Your sincerely,

Janet Ramm
[REDACTED]

Sent from my iPad

Begin forwarded message:

From: Kathleen Ramm [REDACTED]
Date: 26 February 2024 at 19:18:53 GMT
To: Kathleen Ramm [REDACTED]
Subject: Fwd: Objections to the Local Plan 2024-2040

Sent from my iPad

Begin forwarded message:

From: Kathleen Ramm [REDACTED]
Date: 25 February 2024 at 20:22:21 GMT
To: local.plan@southtyneside.gov.uk
Subject: Objections to the Local Plan 2024-2040

To whom it may concern :

The final draft of the above plan needs to be radically changed and improved especially in respect of the proposed use of Green Belt land for housing. The residents of East Boldon and Cleadon value their green belt extremely highly.

On or around 10th February 2024 Michael Gove, the Housing Secretary announced changes to the law which will scrap the size and time limits on turning office blocks into homes for residential use. Councils are to be allowed to turn offices into homes as soon as they become vacant. The aim of the strategy is to ensure that new housing is focused on already built up areas to limit development sprawling into the outskirts of villages.

I understand that there are office blocks such as this in South Shields town. In this case there should be no need to build on the Green Belt.

The housing developments proposed by the Council are as follows:

Boker Lane 263 houses (Local Plan 2024)

Moore Lane 259 houses (Local Plan 2024)

Cleadon Lane 202 houses (Local Plan 2023)

Mayflower Glass 9 houses (Local Plan 2023)

Total 733 houses in Cleadon and East Boldon

In addition 400 houses are proposed to be built at Town End Farm in Sunderland but close to West Boldon and 1200 houses at South Fellgate, both in the Green Belt.

The purposes of the Green Belt according to the National Policy Planning Framework (NPPF) are as follows:

- to prevent urban sprawl
- to keep land permanently open
- to retain the essential character and openness of the villages and the land
- to restrict and prevent neighbouring towns merging
- to safeguard the countryside from encroachment
- to assist urban regeneration, encouraging the recycling of derelict buildings and urban land.

The Green Belt may only be altered in exceptional circumstances. These must be fully evidenced and justified.

Those wishing to take Green Belt land for building must demonstrate that all other reasonable options have been fully examined.

The permanence of the Green Belt maximises the use of brownfield and underdeveloped land. In this case only thirty houses from small brownfield sites have been identified as available.

The Green Belt optimises the density of developments in town centres with appropriate infrastructure.

Proposals must have been informed by discussion with neighbouring authorities (see Townend Farm and South Fellgate figures).

The whole point of the Green Belt, when it was created, is that it is permanent. In this case there are no exceptional circumstances.

STATEMENTS OF HOUSING NEEDS in South Tyneside to 2040 produced by the Office of National Statistics (ONS)

These figures are well out of date and overestimated.

Houses required ONS 2014 77,425

Houses required ONS 2018 75,412

Overestimate 2013

These figures include the 72,081 homes already in existence in South Tyneside.

There are no more recent figures.

The Council's housing targets are well above the figures projected by the ONS. There is actually no population growth in South Tyneside and this has been the case for many years. Moreover an analysis of properties available to buy or rent shows that there is no excess demand.

There are no positives here but it is to be hoped that new homes can be built in converted offices in the town centre following Mr Gove's recent intervention and that the Green Belt is kept intact.

OTHER OBJECTIONS to the Local Plan:

The natural environment will be ruined as the site is a wildlife corridor.

For example mixed hedges on the Ash Path to the east of the Boker Lane site have been full of birdsong from robins, blackbirds, long tailed tits, bluetits, great tits, bullfinches, green finches, chaffinches and long eared owls which are rare visitors to Britain, in the last three weeks. The path is also a corridor for pipistrelle bats. This is only one of many mature hedges which would be ruined if housing plans go ahead.

If the mature hedges of Cleadon and East Boldon are damaged or destroyed we shall have only a silent spring.

The infrastructure will be unable to cope with the extra sewage created. Sewage is already discharged into the sea at times of heavy rain which are now very frequent indeed as the result of climate change.

There is a obvious risk of flooding as another result of excessive rain and climate change.

Valuable agricultural land will be lost when it is most needed for food security.

Traffic is already well over capacity and the air quality in East Boldon Front Street is already terrible.

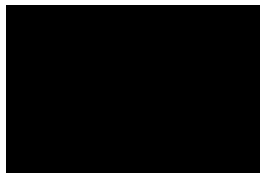
Infrastructure will be overwhelmed.

Village identity will be lost as villages are merged.

Finally I understand that the proposed development on the Boker Lane site is in contravention of the Neighbourhood Plan.

Yours sincerely,

Kathleen Ramm,



Sent from my iPad

Objections to the Local Plan 2024-2040

Kathleen Ramm [REDACTED]

Sun 2/25/2024 8:22 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

<div style="color: black; background-color: #ffff99; background-clip: padding-box; border: 2px solid black; margin: 5px; padding: 5px; font-family: Arial; font-size: 11pt;">*** WARNING - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to: <a

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To

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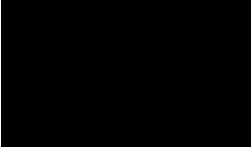
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Yours sincerely,

Kathleen Ramm,



Sent from my iPad

Kevin Barnes- Objection points concerning the new Local Plan

Kevin Barnes [REDACTED]

Sat 2/24/2024 1:27 PM

To: Local Plan <Local.Plan@southtyneside.gov.uk>

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Objections to the Local Plan

Kevin Barnes, [REDACTED]

SP3 Spatial Strategy for sustainable Development

Objection – the policy has not been positively prepared to deliver sustainable development

SP3 - To meet the identified needs in Policy SP2 and to facilitate sustainable growth, the Plan will:

1. Support the sustainability of existing communities by focusing growth within the Main Urban Area including South Shields, Hebburn and Jarrow
2. Secure the sustainability and vitality of the villages of Cleadon, Whitburn and the Boldons by supporting growth which respects the distinctive character of each village
3. Encourage the re-use of suitable and viable brownfield land and, where appropriate, encourage higher development densities

Objective 2

The Plan proposes increased housing on green belt;

GA4 Cleadon Village – West Hall Farm 259 houses

GA2 East Boldon – North Farm 263 houses

GA5 Whitburn – Whitburn Lodge 30 houses

GA6 Whitburn – North of Shearwater 41 houses

This is on top of the 202 houses already given planning permission at Cleadon Lane on the boundary between Cleadon and East Boldon along with 9 at the nearby Mayflower site.

The plan has not secured the sustainability of the villages as the infrastructure to support the proposed developments does not exist and there are no viable plans to improve the lack of them including.

- Lack of school places.
- Lack of medical facilities. The area the south and East of South Tyneside has been identified in the plan as having insufficient access to medical services. Colliery Court Medical Group has already stopped taking new patients.
- Lack of road capacity which already results in congestion with the associated air pollution and greenhouse gases.
- Lack of wastewater capacity that already results in regular sewage discharges into the environment
- Risks from flooding. North Farm is in a flood risk zone 2 and 3 and West Hall Farm is a very low lying area where farm land is permanently flooded for long periods and road surface flooding occurs.

The additional developments will have a detrimental impact on the character of the villages and is counter to the purpose of the green belt as set out in the NPPF to;

- Prevent urban sprawl
- Keep land permanently open
- Essential characteristics are openness and permanence
- Restrict urban sprawl
- Prevent neighbouring towns merging
- Safeguard the countryside from encroachment
- Assist urban regeneration, encouraging recycling derelict & urban land

The car dependant developments will have a detrimental effect on the environment and climate change.

The proposed developments are not consistent with the following National Planning Policy Framework sections:

NPPF Paragraph 11:

- 1. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

and

20. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

and

32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).

Examining plans

35. Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are

- 1. Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- 2. Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- 3. Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- 4. Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

and

123. Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and*
- b) make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.*

Kevin Barnes.

