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

FW: Policy SP8 Fellgate Sustainable Growth Area

Planning applications <Planningapplications@southtyneside.gov.uk>

Thu 1/18/2024 10:46 AM

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

Kind regards

Tricia

From: Geoff Careless [REDACTED]

Sent: Thursday, January 18, 2024 10:40 AM

To: Planning applications <Planningapplications@southtyneside.gov.uk>

Subject: Policy SP8 Fellgate Sustainable Growth Area

*** **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** ***

Hello

I wish to make a formal complaint regards South Tyneside Councils plans for the development of green belt Land near the Fellgate Estate.

The removal of land from the Greenbelt South Of Fellgate is an appalling proposal.

This will have a negative impact on the wellbeing of resident currently living on Fellgate and will have a detrimental effect on the environment

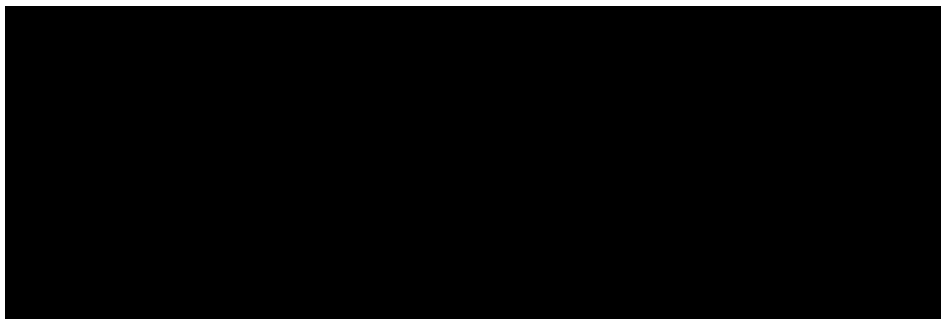
The proposal is not sustainably sound, as it can be seen as a cash grab as opposed to consideration of our future environmental sustainability

I currently live on the Fellgate Estate and see this proposal will have serious consequences for my family

Best regards,

Geoffrey Careless

Operations Manager UK



E-mail: [REDACTED]

Company Reg. No: 159809

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Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-27 15:46:52

Have your say

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

Comments:

"Development of green belt land should not be considered in the current environment. The failure to both retain and maintain areas of environmental importance has led to global warming and severe environmental impacts. As we concrete the green belt areas, we see increased areas of flooding, one which Fellgate residents have experience of. Whilst this can be minimised, our continual use of greenbelt land leads to severe impact of residents currently in the area"

2 What is your name?

Name:
Geoffrey Careless

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-TJBH-TDG3-T

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-01-18 10:25:16

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:

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.:

The introductions makes reference to green belt. It is the council's intention to remove this green belt. This therefore makes the plan unsound.

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.:

Make every effort to maintain green belt and sustainable environmental area

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

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 three town centres of South Shields, Hebburn and Narrow are no longer hubs for retail activity. This is due to lack of investment from the local authority, lack of freelancing in South Shields and a failure to attract suitable retailers. The poor health in the area will be effected by the council's plan to remove the green belt land.

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.:

Invest in the area by attracting suitable businesses into the area. The council must offer incentives for business to do so.

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

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 council has failed to attract business into the area, with many commercial property empty. The plan to develop the green belt land on Fellgate will not attract business and will be detrimental to the wellbeing of current residents. Fellgate houses both a retirement home and support home, both the residents of which will be effected by the proposal.

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

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 health of South Tyneside residents is generally worse than the local and national average, therefore health and wellbeing must be included in this plan. The building on greenbelt land and increasing the number of available homes does not do this. It places increased pressures on the local services and amenities, and is further detrimental to the health and well being of residents.

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?:

Consider investment in improving the health and wellbeing of residents as opposed to simply building further homes

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

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.:

Promote healthy lifestyles and ensure the development of safe and inclusive communities for all.

This is not being met for current residents in the area, with the proposed development seen as having the potential for creating detrimental impact.

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:

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.:

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. The removal of green belt land will have a detrimental effect on the continued sustainability of the area. The decline of green belt land does not attract residents or business to the 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 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:

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.:

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 SP5: Former Brinkburn Comprehensive School

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.:

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 SP6: Land at former Chuter Ede Education Centre

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.:

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:

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.:

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.:

Development of green belt land should not be considered in the current environment. The failure to both retain and maintain areas of environmental importance has led to global warming and severe environmental impacts. As we concrete the green belt areas, we see increased areas of flooding, one which Fellgate residents have experience of. Whilst this can be minimised, our continual use of greenbelt land leads to severe impact of residents currently in the 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.:

Retain the green belt land, which underpins the commitment to sustainability and environmental targets

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

Policy SP9: Strategic Vision for South Shields Town Centre Regeneration

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.:

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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 SP10: South Shields Riverside Regeneration 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:

Yes

Support or Object - Sound:

Yes

Support or Object - Complies with the Duty to Cooperate:

Yes

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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 SP11: South Shields Town Centre College Regeneration Site

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

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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 SP12: Fowler Street Improvement 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:

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.:

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 SP13: Foreshore Improvement 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:

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.:

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 SP14: Wardley Colliery

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.:

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:

Geoffrey Careless

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-5JMM-6ZYW-S

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 09:48:55

Have your say

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

Comments:

I wish to make a formal complaint regards South Tyneside Councils plans for the development of green belt Land near the Fellgate Estate.

The removal of land from the Greenbelt South Of Fellgate is an appalling proposal.

This will have a negative impact on the wellbeing of resident currently living on Fellgate and will have a detrimental effect on the environment

The proposal is not sustainably sound, as it can be seen as a cash grab as opposed to consideration of our future environmental sustainability

I currently live on the Fellgate Estate and see this proposal will have serious consequences for my family

2 What is your name?

Name:
Geoffrey Careless

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

Response ID ANON-TJBH-TD3R-5

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-18 16:28:03

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:

Yes

Support or Object - Sound:

No

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.:

Again, I expect Council to have met the Legally compliant and Duty to cooperate sections.

The soundness is a matter of opinion and is up for debate.

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.:

See Section 41 Greenbelt submission.

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

I reserve the right to be informed of the possibility of attending the inspection phase.

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:

Yes

Support or Object - Sound:

No

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.:

Again, Legally compliant and Duty to cooperate are the Council's responsibility.

The soundness aspect is subject to discussion and objection by residents.

This may be a duplicate posting as there appears to be multiple reports that can be responded to with some not being seen by the inspector - this has been very confusing.

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.:

Greenbelt Response

From report (314 pages!!):

https://www.southtyneside.gov.uk/media/6897/South-Tyneside-Green-Belt-Study-November-2023/pdf/Green_Belt_Study_2023.pdf?m=638400437402200000

Report section 1.5 The National Planning Policy Framework (NPPF) states in Paragraphs 139 and 140 that Green Belt boundaries should only be altered

where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

And

‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...’

This and multiple other regulations mitigate against ANY development on the Greenbelt.

Relative Scale:

3.9 A scale of four harm ratings is used: Very High, High, Moderate and Low/No

This is based on “Professional judgement”

There does not seem to be any criteria mention of harm to existing dwellings and their residents? (so criteria are set up to ignore the views of residents?)

Greenbelt Harm areas from part of report based on 1 aspect:

Current housebuilding opposite Fellgate, filling in the area opposite the A194 does not get a mention and is already giving a feeling of being hemmed in.

Initial possibility would be to have all the No/Low impact areas developed rather than the Moderate of Fellgate and making use of areas that have the shortest possible boundaries with existing properties and have the protection of existing residents given a lot more weight!

Much mention on the current plan of new development having “vistas” and “varied density of housing” with sufficient resources and facilities for new purchasers.

There is no real mention of current dwellings and loss of THEIR vistas, increased pressure on THEIR facilities in the area or compensatory changes to mitigate the effects on THEM of any building on Greenbelt!

Chapter 5 does mention this aspect in minimal detail, mainly in terms of biodiversity etc. but it depends how seriously this will be acted on and how existing residents would be communicated with and protected?

The new issue of Biodiversity Net Gain may be relevant?

This aspect of the plan has been totally neglected and could get residents more accepting if strong protection and compensatory activities were included and agreed up front.

The Council should have demonstrated this at the meetings (Jan 2024) and this would likely have had a great positive effect on attitudes.

Appendix C of the report, purports to list more examples of such options.

From p.277/8

Various measures are proposed but nothing about protection of existing residents and their vistas, traffic, increased pressure on public transport, flood prevention already in place and safety aspects.

I believe any developer coming along will aim to make maximum profit whilst totally ignoring anything they are not forced to do by the Local Authority.

Any thought of compensatory works to protect the rights of current residents will also be ignored and this cannot be allowed to happen!

In that sense, the LA plan is critical and compensatory works must be communicated and decided in conjunction with existing residents, planned in detail and rigorously imposed on the developers.

Doug Shearer

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

I reserve the right to be contacted and to attend the oral part of the examination.

Your personal details

What is your name?

Name:

Mr Douglas Shearer

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-TD3Y-C

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-06 18:44:27

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:

Yes

Support or Object - Sound:

No

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.:

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:

Yes

Support or Object - Sound:

No

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.:

I object to the current proposals to build on Fellgate Greenbelt and my attachment sets out my objections and proposals to change this area of the plan.

Greenbelt Response

From report (314 pages!!):

https://www.southtyneside.gov.uk/media/6897/South-Tyneside-Green-Belt-Study-November-2023/pdf/Green_Belt_Study_2023.pdf?m=638400437402200000

Report section 1.5 The National Planning Policy Framework (NPPF) states in Paragraphs 139 and 140 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

And

‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...’

This and multiple other regulations mitigate against ANY development on the Greenbelt.

Relative Scale:

3.9 A scale of four harm ratings is used: Very High, High, Moderate and Low/No

This is based on “Professional judgement”

There does not seem to be any criteria mention of harm to existing dwellings and their residents? (so criteria are set up to ignore the views of residents?)

Greenbelt Harm areas from part of report based on 1 aspect:

Picture deleted but comes from the report mentioned above

Current housebuilding opposite Fellgate, filling in the area opposite the A194 does not get a mention and is already giving a feeling of being hemmed in.

Initial possibility would be to have all the No/Low impact areas developed rather than the Moderate of Fellgate and making use of areas that have the shortest possible boundaries with existing properties and have the protection of existing residents given a lot more weight!

Much mention on the current plan of new development having “vistas” and “varied density of housing” with sufficient resources and facilities for new purchasers.

There is no real mention of current dwellings and loss of THEIR vistas, increased pressure on THEIR facilities in the area or compensatory changes to mitigate the effects on THEM of any building on Greenbelt!

Chapter 5 does mention this aspect in minimal detail, mainly in terms of biodiversity etc. but it depends how seriously this will be acted on and how existing residents would be communicated with and protected?

This aspect of the plan has been totally neglected and could get residents more accepting if strong protection and compensatory activities were included and agreed up front.

The Council should have demonstrated this at the meetings (Jan 2024) and this would likely have had a great positive effect on attitudes.

Appendix C of the report, purports to list more examples of such options.

From p.277/8

Various measures are proposed but nothing about protection of existing residents and their vistas, traffic, increased pressure on public transport, flood prevention already in place and safety aspects.

I believe any developer coming along will aim to make maximum profit whilst totally ignoring anything they are not forced to do by the Local Authority.

Any thought of compensatory works to protect the rights of current residents will also be ignored and this cannot be allowed to happen!

In that sense, the LA plan is critical and compensatory works must be communicated and decided in conjunction with existing residents, planned in detail and rigorously imposed on the developers.

Doug Shearer

doug.shearer@gmail.com

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.:

See previous box..

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

I reserve the right to be contacted to see if I can attend.

Your personal details

What is your name?

Name:

Mr Douglas Shearer

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 ANON-TJBH-TDGA-8

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-01-25 21:15:15

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:

Yes

Support or Object - Sound:

No

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.:

I have to assume that the plan has been prepared in a legal manner due to the massive amount of information provided. The job of the Council is to review the legal framework and comply with it therefore it is the Council Officers responsibility (which should be checked by the inspector) to ensure this aspect has been properly completed.

Again, regarding cooperation it is the Officers duty to ensure this has been done and the Inspector to verify.

It is in the soundness aspect where I make my comments.

Our comments concern the Fellgate area.

We made a previous submission on this platform in 2022 which appear to have been ignored, especially regarding the sanctity of Greenbelt and everything that flows from that.

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 overarching issue is that of the sanctity of the Greenbelt which has been held to apply for the 47 years we have lived here.

We continue to believe that there should be no development on this area.

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

I may wish to attend and require to be informed of my ability to do so.

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:

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 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:

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 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:

Yes

Support or Object - Sound:

No

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.:

See chapter 1 as this applies to all questions.

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.:

- We continue to object to any development on the Greenbelt.
- The SLR of 2018 stated that this area was "Not suitable for development" - nothing has changed.
- We do not understand how the term "sustainable" can be used for any development as it will require ongoing resources.
- We accept that a plan is needed to avoid speculative development.
- The current offering has, we believe, major flaws and does not appear to have been generated by actually looking at potential issues "on the ground".
- This will produce longer term problems if the comments below are, again, ignored and we really hope that residents suggestions will be acted on.

Comments based on:

<http://tinyurl.com/FellgateGrowthArea>

Traffic

- This is the most critical issue as it will have serious impact on the existing estate due to the likelihood of perhaps an extra 2400 or more vehicles (maybe 2 per property as a conservative estimate?) trying to get in and out.
- There is only ONE supplementary roundabout proposed, discharging onto an already busy (and in our view already dangerous) Mill Lane which is due to vehicles encroaching on the inside lane whilst heading towards White Mare Pool.
- The current proposal shows an additional TWO roundabouts and ONE junction on the Southern side of Durham Drive which is unacceptable for the following reasons:
 - This area is plagued by parked vehicles often reducing the road to one lane for substantial random distances.
 - This can only be resolved by creating additional lay-bys/parking on either or both sides of the road.
 - Vehicles from any new housing will likely want to access the A19 using a "rat run" of Fellgate Avenue (already busy at peak times) and producing more traffic on Durham Drive.
 - The current 20 MPH speed limit is blatantly ignored by many vehicles and there has been (as far as we are aware) no surveys or enforcement action. This problem would likely be further aggravated by more traffic.
 - The issue of routes to Fellgate Metro would be certain to cause more traffic and parking issues as the current spaces are already full during the day with restrictions in place to protect nearby residential streets.

One solution to some this would be to create a route direct to A184 which, as well as reducing traffic on Durham Drive and local roads would make it much more convenient for users to get to main travelling routes and local amenities such as supermarkets nearby.

This would remove the need for multiple access routes onto Fellgate apart from the obvious need for a local route to Fellgate Metro (but restricted to pedestrians/cyclists and buses ONLY with suitable enforcement measures)

Flooding

Substantial work has been done to protect Fellgate from floods, which we are grateful for and we assume this will help avoid any further problems on the estate.

We are very concerned (SUDS standards accepted) that the design of any development would disrupt this plan and need reassurance that any additional housing would not affect drainage conditions.

We would expect that the existing flood basins would be able to be extended and space must be left so that they can be joined up if necessary. No building should be done that would prevent future flood prevention measures as no one can be certain of conditions in the future.

This brings us on to.

Separation and Density

To be fair to both existing and any new residents, create acceptable separation and retain view aspects for as many as possible we suggest (as in our previous submission, apparently ignored?):

- The best solution would be to have a new estate with the planned for facilities either to the East, West or South of any encroachment of Greenbelt.
- The high density area should be moved as far to the East as possible on the current proposal.
- Adequate separation with the absolute minimum being the area proposed to allow for the flood basins to be joined up (20m?) along the entire length of Durham Drive. This should be screened by the existing hedges. This would give maximum possible privacy to all residents and retain some sort of visual aspect (which is mentioned for the low density area with large vistas across the fields whilst being denied to existing residents)
- We remain uncertain about the “new frontages” mentioned in the document (3.3.3 Site Opportunities) but assume it relates to the previous point?
- No high density homes should be more than 2 storeys as this would produce unacceptable encroachment on current residents views.

Paths and access

- The Western green space, pylon zone and Eastern green space should be joined with a coherent path system, specifically from the pylon area to the Eastern green space.
- The paths will need two separate routes with cyclists confined to their own for safety reasons (often ignored!)
- There should be access for existing residents to any and all green spaces proposed.
- Current green spaces are not easily accessible and some have been abused in the past.

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

Again, I may wish to attend and require to be considered if this is necessary

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:

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?:

Your personal details

What is your name?

Name:

Mr Douglas Shearer

What is your email address?

Email address:

[REDACTED]

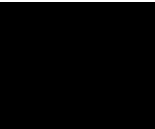
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



Greenbelt Response

From report (314 pages!!):

https://www.southtyneside.gov.uk/media/6897/South-Tyneside-Green-Belt-Study-November-2023/pdf/Green_Belt_Study_2023.pdf?m=638400437402200000

Report section 1.5 The National Planning Policy Framework (NPPF) states in Paragraphs 139 and 140 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.

And

‘inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances...’

This and multiple other regulations mitigate against ANY development on the Greenbelt.

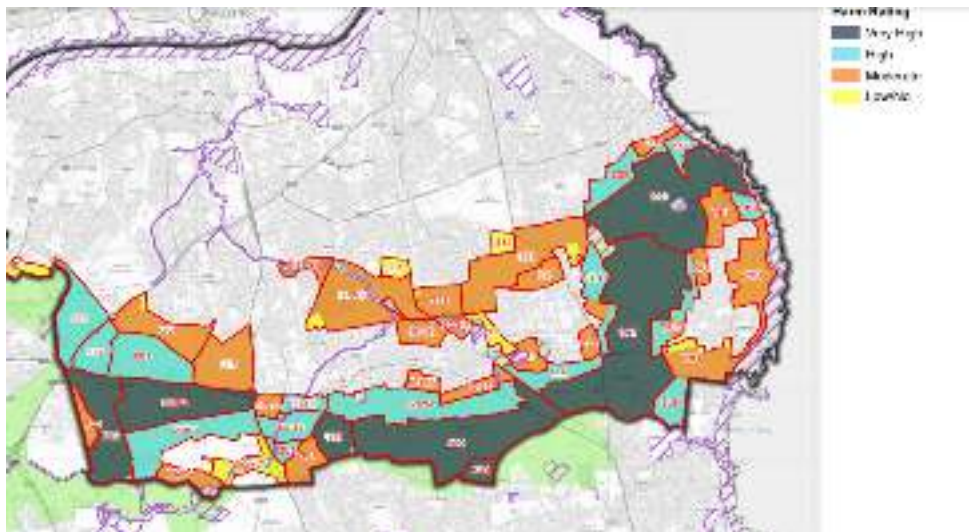
Relative Scale:

3.9 A scale of four harm ratings is used: Very High, High, Moderate and Low/No

This is based on “Professional judgement”

There does not seem to be any criteria mention of harm to existing dwellings and their residents? (so criteria are set up to ignore the views of residents?)

Greenbelt Harm areas from part of report based on 1 aspect:



Current housebuilding opposite Fellgate, filling in the area opposite the A194 does not get a mention and is already giving a feeling of being hemmed in.

Initial possibility would be to have all the No/Low impact areas developed rather than the Moderate of Fellgate and making use of areas that have the shortest possible boundaries with existing properties and have the protection of existing residents given a lot more weight!

Much mention on the current plan of new development having “vistas” and “varied density of housing” with sufficient resources and facilities for new purchasers.

There is no real mention of current dwellings and loss of THEIR vistas, increased pressure on THEIR facilities in the area or compensatory changes to mitigate the effects on THEM of any building on Greenbelt!

Chapter 5 does mention this aspect in minimal detail, mainly in terms of biodiversity etc. but it depends how seriously this will be acted on and how existing residents would be communicated with and protected?

This aspect of the plan has been totally neglected and could get residents more accepting if strong protection and compensatory activities were included and agreed up front.

The Council should have demonstrated this at the meetings (Jan 2024) and this would likely have had a great positive effect on attitudes.

Appendix C of the report, purports to list more examples of such options.

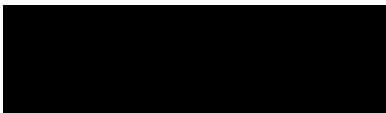
From p.277/8

Various measures are proposed but nothing about protection of existing residents and their vistas, traffic, increased pressure on public transport, flood prevention already in place and safety aspects.

I believe any developer coming along will aim to make maximum profit whilst totally ignoring anything they are not forced to do by the Local Authority.

Any thought of compensatory works to protect the rights of current residents will also be ignored and this cannot be allowed to happen!

In that sense, the LA plan is critical and compensatory works must be communicated and decided in conjunction with existing residents, planned in detail and rigorously imposed on the developers.



Response ID ANON-TJBH-TDG5-V

Submitted to South Tyneside Publication Draft Local Plan 2023-2040
Submitted on 2024-02-01 00:06:56

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 road network is currently gridlock in this area. In rush hour Fellgate Avenue is backed up to Durham Drive. One of the exits from the development will lead onto Durham Drive - this will not be sustainable. The A194 is backed up to the Fellgate entrance from White Mere Pool during peak times. This is a disaster waiting to happen. The road network is not fit for purpose. Move the site to land adjacent to the A184 with full access to Testos.

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.:

Move of plan to land adjacent to A184 with full access to Testos. The current plan is not fit for purpose.

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:
Gavin Craig

What is your email address?

Email address:
[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:
GAV CRAIG

What is your postal address?

Address:
[REDACTED]

Response ID ANON-TJBH-TDGV-W

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-01 13:35:18

Policy SPI 6: 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:

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.:

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?:

The Local Plan stresses the need for housing to be accessible and affordable for our residents. This is a laudable aim. South Tyneside already has a good supply of affordable homes, and the increase will ensure their continued availability. However, the area is poorly served in terms of homes in the higher council tax brackets. There will be professional workers moving into the area to work at expanding sites such as AMAP. If they cannot access preferred homes in South Tyneside they will choose to live in Newcastle, Gateshead or Sunderland. If we are to encourage a population with a diverse skill set that can contribute to our local businesses, we need to offer high quality housing for all budgets.

Your personal details

What is your name?

Name:

Dr Paul Andrew

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 ANON-TJBH-TDGW-X

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-02 08:06:28

Your personal details

What is your name?

Name:

Malcolm McKenzie

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]

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-02 10:08:06

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:

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 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:

Yes

Support or Object- Complies with the Duty to Cooperate:

Yes

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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:

Yes

Support or Object- Complies with the Duty to Cooperate:

Yes

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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 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:

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 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.:

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The plan to destroy the green belt by the provision of 1200 houses, shops, healthcare facilities and school will be disastrous to the existing residents. Fellgate Avenue and Hedworth Lane are congested at peak times and Durham Drive can be like a race track. Even if one considers 50% of homes would have their own cars, that would predict 600 extra vehicles to the area. In addition the proposal suggests increased public transport which would increase the traffic and pollution issues which currently exist. Parking at Fellgate Metro is minimal and the suggested plan could lead to increased inappropriate parking around the area. The proposal seems to assume that residents would all want to walk to the metro!

The whole idea is a disaster for existing residents. Loss of green belt and the destruction of local habitats, along with the pollution caused by increased traffic will have severe impact on physical and mental health of us all.

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:

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.:

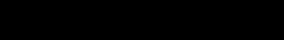
If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:

Your personal details

What is your name?

Name:
Carol Robson

What is your email address?

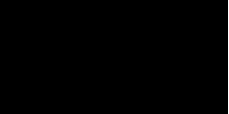
Email address:


Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:


Response ID ANON-TJBH-TD3E-R

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-03 06:57:35

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.:

There will be too much traffic for the estate with only one exit from Durham Drive and one via Hedworth. This means that with extra housing it will be gridlocked all the time.

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.:

No modifications as I'm not agreeing to it at all

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.:

I've told you this in the previous section

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 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:

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 SPI: 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 SP5: Former Brinkburn Comprehensive School

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.:

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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 SP6: Land at former Chuter Ede Education Centre

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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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

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As I mentioned in the first section. My views relate to Fellgate 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 SP9: Strategic Vision for South Shields Town Centre Regeneration

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 SPI0: South Shields Riverside Regeneration 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 SPI1: South Shields Town Centre College Regeneration Site

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 SPI2: Fowler Street Improvement 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 SP13: Foreshore Improvement 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 SP14: Wardley Colliery

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?:

Policy I: 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.:

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 2: Air Quality

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?:

Your personal details

What is your name?

Name:

Christopher Horne

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 ANON-TJBH-TD36-9

Submitted to South Tyneside Publication Draft Local Plan 2023-2040
Submitted on 2024-02-04 17:33:41

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:

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 take the following comments as my objection to the plans for an unsustainable amount of new houses in East Boldon.

Your plans are not consistent with the National Planning Framework.

Your plan does not state the number final number of houses planned for the area.

I do not believe the current number of facilities such as doctors, schools and other amenities are factored into the swell in population that such a large increase in housing will bring about.

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:

Ashley Westall

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]

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-05 20:19:55

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:

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.:

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 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.

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 Tiles Sheds level crossing is included the impact on this junction is even greater. Similar impact is forecast for the Sunderland Road/ Station Road junction.

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:
Steve Wilson

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]

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-05 20:18:34

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:

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.:

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 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.

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 Tiles Sheds level crossing is included the impact on this junction is even greater. Similar impact is forecast for the Sunderland Road/ Station Road junction.

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:

Steve Wilson

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]

The local Plan

Malcolm Bawn [REDACTED]

Sun 2/11/2024 1:54 PM

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

 1 attachments (724 KB)

Interactive_Local_Plan_Consultation_Form copy.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>

Regards

Malcolm Bawn



Regulation 19 Local Plan Consultation Representation Form

Please return this form by midnight on Sunday 3 March 2024.

Data Protection and Freedom of Information

All personal information that you provide will be used solely for the purpose of the consultation on the documents listed in this form. Please note that each comment and the name of the person who made the comment will be featured on our website - comments will not be confidential. Full comments will also be available to view on request. By submitting this response you are agreeing to these conditions.

This form has two parts:

- Part A - Personal details (need only be completed once)
- Part B – Your representation(s).

Please fill in a separate sheet for each representation you wish to make.

This form can also be completed online at haveyoursay.southtyneside.gov.uk

If you are having difficulty submitting representations, please contact local.plan@southtyneside.gov.uk or call 0191 424 7692

Part A: Your Details

	Personal Details*	Agent's Details (if applicable)
Title	Mr	
First Name	Malcolm	
Last Name	Bawn	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Telephone		
Email		

* If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) but complete the full details of the agent.

Part B

Please fill in a separate form for each representation

Name or organisation	Malcolm Bawn
Client (if relevant)	

Section 1: To which section of the Local Plan does this representation relate?

Paragraph	1
Policy	SP7
Policies Map	MAP 8 area GA2

Section 2: Legal Compliance & Duty to Cooperate

Do you consider the Local Plan is (tick as appropriate)	Yes	No
1. Legally compliant		✓
2. Sound		✓
3. In Compliance with the Duty to Cooperate		✓

Section 3: Details of Representation

If you wish to support or object to the legal compliance or soundness of the Local Plan, please use this box to set out and explain your comments. Please be as precise as possible. As a guide, we would recommend no more than a 100 word summary of each point.

The land at North Farm (Boker Lane) has been allowed to go wild for many decades and has now been established has a much needed wildlife corridor. It has been identified for 263 dwellings additional to 211 approved houses (Boldon land and Mayflower glass) already approved. These 263 houses are not needed for an area that has an (i) aging population, (ii) bucking the trend of a national/area population increase with a decline of 0.2% and (iii) is the 4th most populated in the North Eastern 12 local areas.

Section 4: Proposed Modifications

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. *Please be as precise as possible.*

(Continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the Regulation 19 consultation has closed, further submissions will only be at the request /invitation of the Inspector, based on the matters and issues debated at the examination.

Section 5: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? *(Please select one answer with a tick)*

Yes		No	✓
-----	--	----	---

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Section 6:

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Section 7: Being Kept Informed

Would you like to be kept informed of the progress of the Local Plan through to adoption?
(Please select one answer with a tick)

Yes	✓	No	
-----	---	----	--

By submitting a representation, you will also automatically be added to our database and kept informed of the next stage in the Local Plan process. You can opt out any time.

LOCAL PLAN

Thu 2/8/2024 11:08 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** ***

We oppose the Local Plan in its current form and would ask you to take the following into consideration.

On Thursday 18 January we attended a Local Plan Public Consultation meeting to discuss the proposal to build 1200 houses on land at Fellgate.

In 2022 a proposal of 1200 houses to be built at Fellgate was put forward to the residents and many objections were raised. At that time we were assured by our local councillors that "GREEN BELT LAND IS SACROSANCT". This was prior to a local election. No response was made to our objections and in fact nothing more was heard for 2 years. Now post local election it seems that GREEN BELT LAND IS NO LONGER SACROSANCT.

On 18 January 2024 we were told that changes had been made to the Plan, Cleadon, Whitburn and the Boldons had been taken out but 1200 houses to be built on Fellgate remain. Obviously the objections raised in 2022 by residents of Cleadon, Whitburn and the Boldons had been listened to and their objections overturned the decision to build there, the employment of a barrister to endorse their objections no doubt made a difference. Therefore we presume that our objections made in 2022 did not matter and were ignored. We are told that the objections raised in 2022 will not be considered and we must all object again. Are we to believe that they will matter this time.

The Plan is to build on what is now designated a green belt and is currently agricultural farmland which has been farmed by the same family for 5 generations. The farmer is devastated by this decision and rightly so. Is Fellgate farmland, which is currently cultivated, less important than lots of empty fields in Cleadon Whitburn and the Boldons. We were told by the planners that the Fellgate green belt is less important than the land at Cleadon, Whitburn and the Boldons which can be kept as green space. We find it ludicrous that you say the numerous areas of empty fields and scrub land around Cleadon, Whitburn and the Boldons are more important than land at Fellgate which is in agricultural use and we have been advised is of a high grade quality. Might the reason not be that this land is much more expensive than at Fellgate which makes it a cheaper and easier option for the builder and the Council. We were very perturbed to learn that this development included multi-storey dwellings which are not in keeping with the existing dwellings. This proposal will leave Fellgate without any green space buffer between what is already a very large housing estate of over 1200 houses plus a further 1200 house build. Why is it not possible to allow a green space buffer between the existing estate and the new development by moving the house build toward the A184 road thereby ensuring a fair share of green space for everyone. The provision of green belt is to contain urban sprawl by keeping land permanently open, putting less pressure on existing traffic congestion and air quality. We should protect natural and human systems from the

negative impact of climate change by limiting the scope of urban development. Does South Tyneside Council not agree with this fact.

Fellgate has a history of flooding problems and has suffered extensively in the past. In 2012 175 properties were affected by flooding. In 2016 Northumbria Water took over part of the farmland to install a floods defence system. Have flood risks been reviewed against the potential impacts of the proposed development. There is a massive difference between flooding on agricultural land and the risk to over 2400 properties.

We are told that Durham Drive will be accessed from the new development by two locations with the possibility of at least a further 1200 cars with access to what is even now more often than not a one lane road because of so many parked cars. The Durham Drive perimeter road is already a nightmare to circumnavigate and the A194 and Fellgate Avenue are already gridlocked daily during peak times. The Metro car park is already oversubscribed and restricted parking areas are already in place so Durham Drive will become the only place to park when using the Metro. There is currently house building taking place opposite Fellgate estate onto the A194 - more urban sprawl and more traffic.

We would like to ask how many of the senior South Tyneside officials live in Cleadon, Whitburn and the Boldons (whose green space is apparently much more important than ours) and how many live in Fellgate and will have to suffer the consequences of their decision.

Please acknowledge receipt of this email.

John & Linda Winter

Response ID BHLF-5JMM-6ZY2-M

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 14:47:35

Have your say

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

Comments:

We oppose the Local Plan in its current form and would ask you to take the following into consideration.

On Thursday 18 January we attended a Local Plan Public Consultation meeting to discuss the proposal to build 1200 houses on land at Fellgate.

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The Plan is to build on what is now designated a green belt and is currently agricultural farmland which has been farmed by the same family for 5 generations. The farmer is devastated by this decision and rightly so. Is Fellgate farmland, which is currently cultivated, less important than lots of empty fields in Cleadon Whitburn and the Boldons. We were told by the planners that the Fellgate green belt is less important than the land at Cleadon, Whitburn and the Boldons which can be kept as green space. We find it ludicrous that you say the numerous areas of empty fields and scrub land around Cleadon, Whitburn and the Boldons are more important than land at Fellgate which is in agricultural use and we have been advised is of a high grade quality. Might the reason not be that this land is much more expensive than at Fellgate which makes it a cheaper and easier option for the builder and the Council. We were very perturbed to learn that this development included multi-storey dwellings which are not in keeping with the existing dwellings. This proposal will leave Fellgate without any green space buffer between what is already a very large housing estate of over 1200 houses plus a further 1200 house build. Why is it not possible to allow a green space buffer between the existing estate and the new development by moving the house build toward the A184 road thereby ensuring a fair share of green space for everyone. The provision of green belt is to contain urban sprawl by keeping land permanently open, putting less pressure on existing traffic congestion and air quality. We should protect natural and human systems from the negative impact of climate change by limiting the scope of urban development. Does South Tyneside Council not agree with this fact.

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We would like to ask how many of the senior South Tyneside officials live in Cleadon, Whitburn and the Boldons (whose green space is apparently much more important than ours) and how many live in Fellgate and will have to suffer the consequences of their decision.

Please acknowledge receipt of this email.

2 What is your name?

Name:
John & Linda Winter

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

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

Dear Sir

1. The houses being built do not take in to consideration the already over subscribed amenities such as Doctors, Schools and other health care.
2. Neither does the plan make ant provision for rectifying this situation. I noted at the meeting that you are able to forecast the need in the Fellgate area for similar numbers of dwellings but it seems this is not possible for East Boldon and Cleadon. Perhaps you could explain why?
3. Schools and GP surgeries do not spring out of nowhere, the plan does not take in to consideration the time it would take both in planning, tendering and building, in the meantime these people who will have no doubt been lured in to buying properties on the basis of 'good schools' and 'excellent local facilities' will be left in the lurch.
4. There are no guarantees that housing will be mixed accommodation consisting of single story dwellings and affordable housing- again if the council is leading this surely you have a moral obligation within your own area?
5. The number of houses you are stating on the plan does not seem to be accurate and exceeds the number you are actually planning. This is both misleading and unsustainable.

I would appreciate a response to this correspondence.

114

New build homes Cleadon

Mon 2/12/2024 4:38 PM

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

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Dear Sir/Madam,

I wish to convey my that the proposed new property builds in Cleadon should not be allowed.

Objection to Policy 3.2: The policy lacks adequate provisions for promoting sustainable development in the East Boldon Neighbourhood Plan area. With the current 1,860 homes in the area, the proposed addition of 474 new homes would result in an unsustainable level of growth. This rapid expansion would strain local infrastructure and threaten the unique character of the village.

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.

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.

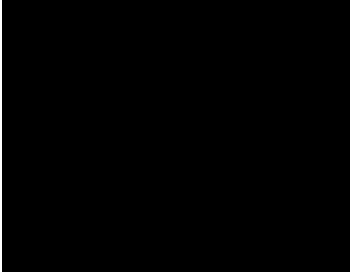
DIMINISHED VILLAGE IDENTITY

The Green Belt Review Site Assessment fails to recognize the significance of the site.

The site's development will diminish the distance between Boldon and South Shields, eradicating the open space and separation along Boker Lane and essentially blending East and West Boldon together.

I appeal to you to reject these plans.

Yours Sincerely, Mr A. Ball



Sent from my iPhone

2024 Local plan

Peter Dewar [REDACTED]

Sun 2/4/2024 6:51 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: email.quarantine@southtyneside.gov.uk, clearly stating your concerns in the email </div>

Following the recent publication regarding the above title, I find it hard to believe that any such plan can be considered without major review of the road situation exiting and egressing the Boldons, at present rush hour traffic is at least bedlam out and in and the almost 1000 cars that 474 homes will create is unmanageable. Further, the current NHS provision is absolutely deplorable, more doctors are needed now! Never mind 474+ new families. As far as education is concerned, the present system is at breaking point, how will the children of 474 new families be educated in the existing stretched system?

Peter Dewar

Sent from my iPhone

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

Thu 2/1/2024 1:40 PM

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

📎 1 attachments (30 KB)

010224 EA response to South Tyneside Publication Draft Local Plan consultation.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 Sir/Madam,

Please find attached Environment Agency response to the above local plan consultation.

Kind regards,

Louise Tait

Planning Advisor, Sustainable Places, North East

Environment Agency

I work part time, available Wednesday, Thursday & Friday

**Creating a better place
for people and wildlife**



This message has been sent using TLS 1.2 Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Spatial Planning
Development Services
Economic Regeneration
South Tyneside Council
Town Hall and Civic Offices
Westoe Road
South Shields
NE33 2RL

Our ref: DN/2006/000319/CS-
05/SB1-L01

Your ref:

Date: 1 February 2024

Dear Sir/Madam

South Tyneside Publication Draft Local Plan (2023-2040) consultation

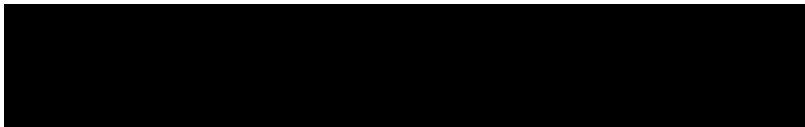
Thank you for referring the above local plan document for the Environment Agency to review. We have the following comments to make.

We have reviewed the Proposed Publication Draft Local Plan Document and we consider it to be **sound**.

Please do not hesitate to contact me if you have any questions regarding this letter.

Yours faithfully

Louise Tait
Planning Advisor



From: SM-MMO-Consultations (MMO)
Sent: 26 January 2024 15:53
To: Local Plan
Subject: FW: South Tyneside Publication Draft Local Plan (Regulation 19) public consultation

*** **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 South Tyneside Council Planning team,

I am writing to confirm you received our MMO standard response for this consultation? If not, please see below. I don't believe any further comment is required from the MMO regarding the draft local plan as there is a sound understanding of the North East Marine Plan, overlap between the terrestrial and marine environments and how the North East Marine Plan policies align with the new local plan policies.

We appreciate the work that has gone into this inclusion from the regular MMO and South Tyneside Council meetings to the specific policies put forward in order for us to assist in the integration of the marine elements. We have received your comments on those North East Marine Plan policies which were not included and this feedback will help inform further work in the marine and terrestrial space.

As the local plan development process continues, if other aspects arise which may impact the coastal or marine environment, further alignments could be made with the marine environment by referring to the North East Marine Plan policies or including 'blue' terminology. It is also important to remember to take a whole-plan approach when informing decisions that may affect the marine environment, looking at all our policies together, rather than in isolation.

Thank you for your cooperation during your local plan development process and we look forward to continuing working with you.

Many thanks,

The Marine Management Organisation

Marine Management Organisation Functions

The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing,

wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the [Coastal Concordat](#). This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of [Marine and Coastal Access Act \(MCAA\) 2009](#) all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK [Marine Policy Statement](#). This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service: soundness self-assessment checklist](#). We have also produced a [guidance note](#) aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our [Explore Marine Plans](#) online digital service.

The adoption of the [North East](#), [North West](#), [South East](#), and [South West Marine Plans](#) in 2021 follows the adoption of the [East Marine Plans](#) in 2014 and the [South Marine Plans](#) in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS

Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a [marine licence](#) in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. We have produced a [guidance note](#) (worked example) on the decision-making process under S58(1) of MCAA,

which decision-makers may find useful. The licensing team can be contacted at:

Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a ‘development plan’ under the [Planning and Compulsory Purchase Act 2004](#). Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application.

Minerals and Waste Local Plans and Local Aggregate Assessments

If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:

- The [Marine Policy Statement \(MPS\)](#), Section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK’s) construction industry.
- The [National Planning Policy Framework \(NPPF\)](#), which sets out policies for national (England) construction mineral supply.
- [The minerals planning practice guidance](#) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- [The national and regional guidelines for aggregates provision in England 2005-2020](#) predict likely aggregate demand over this period, including marine supply.

The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325.

The consultation for the East Statement of Public Participation opened on 15 January 2024. The consultation closes on 12 February 2024. Have your say at <https://consult.defra.gov.uk/mmo/east-marine-plan-spp>

To receive marine planning updates and our newsletter enter your details [here](#)

Our MMO Values: Together we are **Accountable**, **Innovative**, **Engaging** and **Inclusive**
[Website](#) [Blog](#) [Twitter](#) [Facebook](#) [LinkedIn](#) [YouTube](#)



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

You don't often get email from local.plan@southtyneside.gov.uk. [Learn why this is important](#)

Dear Sir / Madam

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

South Tyneside Council has prepared a Publication Draft Local Plan 2023-2040 for consultation in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

A Local Plan sets out the vision and a spatial framework for the future development of a Local Authority area within a plan period. Local Plans address the needs and opportunities in relation to housing, the economy, community facilities and infrastructure. They also act as a basis for protecting and enhancing the natural environment, adapting to climate change, and securing good design.

As a statutory consultee or as someone who has previously requested your details are retained on our consultee database, I am writing to inform you that public consultation on our Local Plan has been extended by **1 week**.

The consultation will now run for 7 weeks from **15th January – Sunday 3rd March 2024**.

Representations at this stage should only be made on the legal compliance and soundness of the Local Plan. That is, has the Plan been prepared in accordance with all legal and procedural requirements, and does the Plan meet the prescribed tests of soundness.

As part of this consultation, copies of the Local Plan will be placed in South Shields Town Hall and Jarrow Town Hall. The Council will also be publishing the Local Plan, supporting documents and consultation material online at www.southtyneside.gov.uk/localplan

The following formal question and answer sessions are planned at the following locations where officers will be available to deliver a short presentation and answer any questions you might have.

Date	Venue	Time
Tuesday 23rd January	Jarrow Focus, Cambrian Street, Jarrow, NE32 3QN	5pm – 7pm
Wednesday 24 th January	Hebburn Central, Glen Street, Hebburn, NE31 1AB	6pm – 8pm
Friday 26 th January	Boldon Community Association, New Road, Boldon Colliery, NE35 9DS	6pm – 8pm

Short presentations will also be given at your local Community Area Forum:

<https://southtyneside.gov.uk/article/15186/CAF-meetings>

From the start of the consultation, everyone will be able to access and download the Local Plan, supporting technical reports and evidence and response forms from our dedicated webpage.

This is also the quickest and easiest way for you to respond: haveyoursay.southtyneside.gov.uk/

The Statement of Representations Procedure for the Publication draft Local Plan can be found at:

www.southtyneside.gov.uk/localplan

Fellgate Sustainable Growth Area Supplementary Planning Document Scoping Report (2024) public consultation

The Fellgate Sustainable Growth Area will be allocated for up to 1200 new dwellings and supporting community infrastructure in the Publication draft Local Plan (2024). To ensure a comprehensive approach to the development of the site, a Masterplan, secured as part of a Supplementary Planning Document (SPD) will be required. The Scoping Report identifies the key objectives of the proposed SPD and is subject to consultation alongside the Publication draft Local Plan.

The purpose of the Scoping Report and consultation is to engage key stakeholders and the public in considering the key issues that the SPD could and should be addressing and the possible approaches, which the document can adopt to address those issues. The Fellgate Sustainable Growth Area SPD Scoping Report can be accessed:

www.southtyneside.gov.uk/localplan

We would like to receive your views on the Fellgate Sustainable Growth Area SPD Scoping Report. The consultation will also run for 7 weeks from **Monday 15 January to Sunday 3rd March 2024**.

The quickest and easiest way for you to respond is via the Fellgate Sustainable Growth Area SPD Scoping Report online consultation platform: haveyoursay.southtyneside.gov.uk/

Submitting comments:

All comments made to the consultation for the Publication draft Local Plan and/ or Fellgate Sustainable Growth Area SPD Scoping Report **must be made in writing and returned by 11.59pm on Sunday 3rd March 2024** in one of the following ways:

Consultation platform: haveyoursay.southtyneside.gov.uk/

Email: Local.plan@southtyneside.gov.uk

Post: Spatial Planning, Development Services, Economic Regeneration, South Tyneside Council, Town Hall and Civic Offices, Westoe Road, South Shields, NE33 2RL.

Following the public consultation, the Local Plan will be formally submitted to the Secretary of State for its formal public Examination before an independent Planning Inspector.

If you require any further information regarding this consultation, please do not hesitate to contact the Spatial Planning Team via telephone number 0191 424 7385.

Yours faithfully



Andrew Inch
Senior Manager - Planning

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South Tyneside Council, Town Hall & Civic Offices, Westoe Road, South Shields, Tyne & Wear, NE33 2RL, Tel: 0191 427 7000, Website: www.southtyneside.gov.uk

This message has been sent using TLS 1.2 The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

(No subject)



Thu 1/23/2024 11:50 AM

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

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I am contacting you to voice my concerns about the proposed development of 1200 houses on the green belt at Fellgate. This loses permanently a good proportion of arable and food producing land which in the current global situation is increasingly important to the independent needs of this country. The plan does not take into account the extra volume of traffic at peak times trying to access the major roads as Fellgate estate has only 2 ways of exit and entry which at peak times are already congested, furthermore the existing metro car park could not cope with the extra cars and at peak times the metro train system would also be overcrowded. I am also concerned about the reason many smaller brown field sites have not been used. A further study should also be made with regard to the local population growth and whether such density of housing is necessary. Has the planning committee also considered the past flooding on the estate and the effect that extra houses will have on the drainage after heavy rainfall.

Yours sincerely David and Kathleen Todd

Response ID BHLF-5JMM-6ZYA-3

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report
Submitted on 2024-02-28 09:39:56

Have your say

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

Comments:

I am contacting you to voice my concerns about the proposed development of 1200 houses on the green belt at Fellgate. This loses permanently a good proportion of arable and food producing land which in the current global situation is increasingly important to the independent needs of this country. The plan does not take into account the extra volume of traffic at peak times trying to access the major roads as Fellgate estate has only 2 ways of exit and entry which at peak times are already congested, furthermore the existing metro car park could not cope with the extra cars and at peak times the metro train system would also be overcrowded. I am also concerned about the reason many smaller brown field sites have not been used. A further study should also be made with regard to the local population growth and whether such density of housing is necessary .Has the planning committee also considered the past flooding on the estate and the effect that extra houses will have on the drainage after heavy rainfall.

2 What is your name?

Name:

David and Kathleen Todd

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-TD35-8

Submitted to South Tyneside Publication Draft Local Plan 2023-2040
Submitted on 2024-02-11 13:43:49

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:
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 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. We live on the main road, and the amount of traffic that currently passes through the village is substantial. The village could become severely congested even further by the building of hundreds of new homes.

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.:

Serious thought needs to be given to the impact that hundreds of more vehicles would have on the lives of residents and the state of the roads.

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

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.:

Up to date statistics need to be used to calculate the number of homes needed so that no more homes than necessary are built.

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

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. We live on the main road, and the amount of traffic that currently passes through the village is substantial. The village could become severely congested even further by the building of hundreds of new homes.

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 plan needs to be modified to significantly reduce the number of proposed new houses for East Boldon so that it does not have an irreversible and detrimental impact on the village.

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

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.:

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

This proposal is not justified and is not effective in delivering sustainable development. I 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 Tiledsheds level crossing is included the impact on this junction is even greater. Similar impact is forecast for the Sunderland Road/ Station Road junction.

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.:

The overall number of houses being proposed to be built needs to be lessened as it will dramatically change the distinctiveness of East Boldon.

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:

Lisa Johnson

What is your email address?

Email address:

[REDACTED]

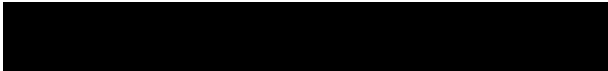
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-02-11 12:55:17

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:

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.:

Flood defences haven't been taken onto account.

Increased traffic in the area hasn't been taken into account. People already use fellgate estate as a shortcut when there is congestion anywhere on the A194 or the A19. Doubling the size of the estate will only compound these issues.

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:

Lee Steadman

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]

South Tyneside Draft Local Plan Consultation

National Grid [REDACTED]

Thu 2/15/2024 9:3

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

📎 1 attachments (70 KB)

15-02 South Tyneside LP.pdf;

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Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards

Tom

Tom Wignall

Graduate Planner

[REDACTED]

[REDACTED]

Our Ref: MV/ 15B901605

15 February 2024

South Tyneside Council
local.plan@southtyneside.gov.uk
via email only

Dear Sir / Madam

**South Tyneside Draft Local Plan Regulation 19 Consultation
January – March 2024
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET.

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Therefore, to ensure that Design Policy 47 is consistent with national policy we would request the inclusion of a policy strand such as:

"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."





Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director



Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

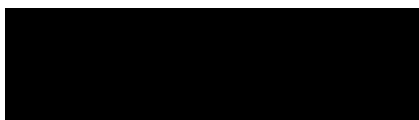
Tiffany Bate, Development Liaison Officer



National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI
Director**



NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact:



South Tyneside Draft Local Plan Consultation

Thu 2/15/2024 9:39 AM

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

📎 1 attachments (67 KB)

15-02 South Tyneside LP Gas.pdf;

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Dear Sir / Madam

We write to you with regards to the current consultations as detailed above in respect of our client, National Gas.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgas.uk@avisonyoung.com if you require any further information or clarification.

Kind Regards

Tom

Tom Wignall

Graduate Planner



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[LinkedIn](#) | [Instagram](#)

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Our Ref: MV/ 15B901605

15 February 2024



South Tyneside Council
local.plan@southtyneside.gov.uk
via email only

Dear Sir / Madam

**South Tyneside Draft Local Plan Regulation 19 Consultation
January – March 2024
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Utilities Design Guidance

The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure.

National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets.

Therefore, to ensure that Design Policy 47 is consistent with national policy we would request the inclusion of a policy strand such as:

"x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites."

Further Advice

National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Gas Transmission assets.



If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

nationalgas.uk@avisonyoung.com

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

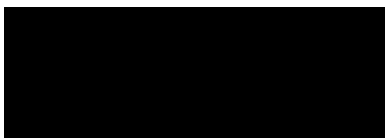
Kam Liddar, Asset Protection Lead

kam.liddar@nationalgas.com

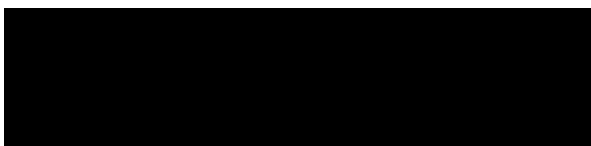
National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI
Director**



National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>


For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Response to Local Plan

Lynn Elves [REDACTED]

Tue 2/20/2024 3:17 PM

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

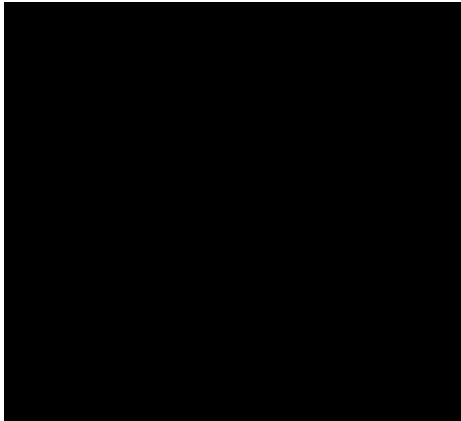
 1 attachments (27 KB)

Objection to Draft Local Plan.docx;

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Sent from [Mail](#) for Windows

Mr Thomas and Mrs Lynn Elves



20th February 2024

RESPONSE TO SOUTH TYNESIDE DRAFT LOCAL PLAN REQUIRING IMPROVEMENT.

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

The Draft Local Plan is based on inaccurate population projections. Census data shows 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. 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.

South Tyneside Council has used a buffer of 15% of the housing requirement, although the buffer can be in the range of 5% to 20%. The buffer needs to be reduced to 5%.

The ONS 2018 housing projection is for 75,412 dwellings by 2039. The Draft Local Plan requires a total of 78,530 dwellings by 2039, some 3118 houses less.

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

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 building on the Green Belt, made specifically regarding Policies SP3 and SP5.

The Green Belt land allocation in the Draft Local Plan is for 1,862 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 for no further development at all on the Green Belt, as exceptional circumstances have not been established. The Draft 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.

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 of, or updating of plans”.

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.

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. These are areas close to South Shields transport interchange and so would satisfy the need to promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport. Planners rejected over 400 possible sites across South Tyneside. Questions raised over the validity of the reasons for rejection have not been answered.

he

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

3. Objection made specifically regarding Section 5 Strategic Allocations.

The Draft Local Plan must be revised because it is not consistent with the NPPF in terms of meeting the housing needs identified in the Strategic Housing Market Assessment (SHMA) and is therefore not sound.

The SHMA has identified an annual need for 209 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. That is around 60% of houses built. Yet the same document supports a target for 75% market and 25% affordable housing mix. 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.

The absence of infrastructure planning in Whitburn, Cleadon and East Boldon is worrying, considering the strain on current infrastructure.

However there appears to be no sites identified in the Draft Local Plan for this type of development

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

The Draft Local Plan must be revised because it is not compliant with the Climate Change Act 2008 and Planning and Compulsory Purchase Act 2004 (as amended) duties and NPPF guidance-carbon accounting and climate mitigation

The increased carbon emissions from the development proposed in the Draft Local Plan will add to South Tyneside's carbon footprint and add to the climate change emergency. The council ignores this, despite declaring a climate emergency. 6489 homes will produce around 39,000 tonnes of CO2 per annum, 200% of the emissions STC have used as their baseline figure to reach zero carbon by 2030.

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 ;

* Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios.

* Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050.

Rainfall is forecast to increase fourfold in the next 40 years and will result in increasing water tables. Excessive rainfall in the last 2 years has resulted in flooding in fields adjacent to the planned development in Cleadon.

A major review of the Draft Local Plan is required in order to bring it into compliance with legislative requirements around climate change.

5. Objection made specifically regarding Policy 1 Promoting Healthy Communities and Policy 2 Air Quality.

The Draft Local Plan must be revised to ensure it is justified; that these policies are able to ensure the Strategic Objectives for Promoting Healthy Communities will be achieved; and to be consistent with National Policy.

There is little in the Draft 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 2 cars per household, adding potentially thousands of car journeys on an already congested road system. This will have a detrimental effect on road safety and on the local environment due to noise and exhaust emissions. Some areas have air pollution levels already in excess of World Health Organisation recommended maximums. These vehicle journeys will only make this more dangerous as there are no safe levels for these pollutants.

NPPF states in 186:” Opportunities to improve air quality or mitigate impacts should be Identified, such as through traffic and travel management, 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 Plan has failed to identify these opportunities adequately and this demonstrates the Plan is not sound.

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

The Draft Local Plan must be revised to ensure it is justified, that these policies are able to ensure the Objectives for Protecting Water Quality will be achieved; and to be consistent with national policy.

The Draft 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 have confirmed that no extra sewage will be added to the existing infrastructure, on the recommendation of Northumbrian Water, who have assured them that 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 :

b) infrastructure for wastewater.

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.

Health considerations are capable of being material planning considerations. This recognised in the NPPF which includes the following statement at paragraph 91.91 “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.

7. Objection made specifically regarding Policy 36 Protecting Trees, Woodland and Hedgerows and Appendix 3 Housing Allocations Requirements.

The Draft Local Plan must be revised to ensure it is justified, that this policy and housing allocations requirements able to ensure the Strategic Objectives for Conserving and Enhancing the National Environment will be achieved; and to be consistent with national policy.

All 3 paragraphs of Policy 36 are weak and will allow the continued felling of healthy, mature trees and hedgerows for development. Therefore an additional paragraph is required to ensure the policy is justified. “ Development which results in the loss or significant damage to healthy, mature trees and native hedgerow, will not be permitted.”

The Draft Local Plan Appendix 3 Housing Allocations Requirements under Key Considerations for each site states “ Mature trees **should** be retained”. This should be revised to read “ Healthy, mature trees and hedgerows **must** be retained”. This will achieve the aim of requiring developers to retain healthy mature trees and hedgerows onsite and incorporate them into designs.

Research shows that mature trees are more effective as a resource for addressing climate change. Mature trees absorb 40kg of carbon dioxide per year (ecotree.green) whereas young trees absorb around 5kg per year (carbonpirates.com)

The preservation of healthy , mature trees and hedgerows must be a priority in the Draft Local Plan. The NPPF also recognises the value of trees and hedgerows to biodiversity and to human health and wellbeing.


South Tyneside Publication Draft Local Plan

Dave McGuire [REDACTED]

Tue 2/20/2024 3:23 PM

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

Cc: [REDACTED] [REDACTED] Andrew Inch <[REDACTED]>

 1 attachments (1 MB)

ST/0876/23/FUL Full planning permission for the erection of 50 residential dwellings with associated infrastructure, landscaping and MUGA reversion Land at Inverness Road, Jarrow NE32 4AJ;

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Dear Sir / Madam

I refer to the above document and your recent consultation with Sport England. Thank you for seeking our views on this matter.

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they should be applied. It provides a framework guiding the preparation of development plan documents, associated evidence base and supplementary planning documents (Planning Policy). It is also a material consideration which should be taken into account when determining applications for planning permission (Development Management). Supporting this core objective, the NPPF states how the planning system should plan positively to achieve healthy places and provide the social, recreational and cultural facilities and services the community needs. This includes:

- enabling and supporting healthy lifestyles, especially where this would address identified local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling (paragraph 96c);
- planning positively for provision and use of shared spaces, community facilities (including sports venues and open space) and other local services (paragraph 97a);
- taking into account and supporting the delivery of local strategies to improve health, social and cultural wellbeing for all sections of the community (paragraph 97b); and
- guarding against unnecessary loss of valued facilities and services (paragraph 97c).

The importance of promoting healthy communities is a key focus of the NPPF in achieving sustainable development. The NPPF states that the overarching social objective of the planning system is: "to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing." (paragraph 8).

The NPPF also states that: "access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities" (paragraph 102). In providing specific detail on planning positively for open space, sport and recreational provision, the NPPF is clear that:

- planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreational facilities and opportunities for new provision (paragraph 102);

- information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate (paragraph 102);
- existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless one of three specific circumstances are met (paragraph 103);
- planning policies and decisions should protect and enhance public rights of way and access including, providing better facilities for users (paragraph 104); and
- land of particular recreational value to a local community can be designated as a Local Green Space affording it greater protection (paragraph 105).

It is against the backdrop of these overarching planning principles that Sport England reviews and comments on Local Plans.

We would wish to offer our support to;

The Plan's theme of promoting the Health and Well Being of the Borough's residents. Policy 1 concentrates specifically upon this matter but runs the risk of being well intentioned but of little practical value to decision-makers without more detailed guidance (such as SPD's or a Design Code) which explains how the policy's intentions are to be embedded into development proposals. Sport England's Active Design guidance is consistent with a number of the policy's requirements and provides a checklist to best practice within schemes. It would make sense to cross reference to this and other aligned guidance if this policy is to have traction.

Policy 37 Protecting and Enhancing Open Spaces.

Policy 60 Developer Contributions – albeit the related SPD on Planning Contributions dates from 2008 and desperately requires updating to reflect the findings of the Playing Pitch Strategy.

We wish to object to the following allocations and policies;

SP5 Former Brinkburn Comprehensive
 SP6 Chuter Ede Education Centre
 H20 Perth Green Youth Centre
 GA1 Hebburn Campus

We also note that designation SP13 – Foreshore Improvement Area, washes over playing field and major sports facilities at Bents Recreation Ground and Gypsies Green Stadium.

The above sites are in whole or part, land used or last used as playing field. As the 2019 Playing Pitch Strategy did not show that there was a surplus of playing pitch provision (across sports both at present and at the end of the plan period) it is necessary for the Plan to show how the playing field will be replaced (prior to development commencing) by;

- playing field of an equivalent quantity; and
- playing field of an equivalent quality; and
- Playing field in a suitable location; and
- Playing field subject to equivalent or better accessibility and management arrangements

We are pleased to note that during the progression of the draft Local Plan to its current stage of preparation, parallel work has been undertaken on a new Playing Pitch Strategy and Action Plan. This latter document is likely to be agreed and 'signed off' by its Steering Group (which includes Sport England and the pitch sport NGBs) over the coming month. Since the 2019 PPS;

- Demand for football has increased. Although there are now more 3G AGPs, and greater use of these facilities for match play, the growing demand means that further capacity for football (both grass playing fields and 3G AGPs) is needed.
- The number of cricket teams playing in the Borough has also increased, but the number of cricket grounds has reduced. Capacity remains constrained, and there is a need for additional pitch provision as well as improvements to the quality of both grass pitches and training facilities.
- Demand for rugby has increased in the mini rugby age groups, but participation in adult and junior rugby has reduced slightly. Whilst the agreement of a lease for Jarrovians RUFC at Lukes Lane has had a positive impact, there remain capacity issues at South Shields Westoe RUFC and uncertainty about facilities for South Shields RUFC.

The 2024 PPS and Action Plan also goes on to identify mitigation measures necessary to address playing field policy issues arising from the draft Local Plan's allocation of playing field sites, albeit curiously the Perth Green allocation is not included in this process.

Taking the remaining sites in turn, the allocation annotation at the former **Brinkburn Comprehensive** washes over the whole site although it is understood some playing field is to be retained. The 2024 PPS suggests that mitigation will be in the form of new playing field provision at Temple Park / Temple Park Junior School and the setting out of pitches on playing field that had previously been used. It is unclear to Sport England whether an equivalent amount of playing field is reprovided at Temple Park. Moreover Temple Park's popularity for pitch sports has declined over the years due to the lack of ancillary facilities close by (such as car parking, changing, storage etc). Sport England is concerned that the site will be unable to match the quality of provision available at Brinkburn. Until these matters are resolved Sport England wishes to object to this allocation.

SP6 Chuter Ede Education Centre – the PPS suggests that the allocation now only includes 1.9Ha of playing field but that it is to be replaced at the Temple Park / Temple Park Junior School and the setting out of pitches on playing field that had previously been used. It is unlikely for the reasons set out above that playing field policy will be met by suggestion in either quantitative or qualitative terms. . Until these matters are resolved Sport England wishes to object to this allocation.

GA1 Hebburn Campus – the proposal results in the loss of 5.3Ha of playing field. The draft Local Plan suggests that there will be investment into existing playing pitches to mitigate for this loss. The PPS suggests that the Clock Playing Field site in Hebburn would be the recipient of this investment. Such a scenario does not meet playing field policy as it is not possible to meet the quantitative test [within NPPF para 103 and Sport England's playing field policy exception 4] by replacing field with existing playing field. The quantity of playing field lost to this allocation is significant and its retention for renewed sporting use could make a significant difference to pitch shortfalls locally. Investment in an existing playing field site is not considered to be proportionate mitigation. Moreover as the PPS recognises, the Clock Playing Field has fallen out of favour with teams because it has no parking, changing and storage facilities and suffers from unrestricted access by other open space users. The Council has given no indication as to how these matters can be tackled. Sport England therefore wishes to object to this allocation.

H20 Perth Green Youth Centre – despite raising this site at the previous Local Plan consultation stage there is no detail in either the Local Plan or the PPS identifying how the site's development will be squared with playing field policy. Instead the Council has sought to bring the site's development forward resulting in Sport England having to object to planning application (see attached). Such an approach does not engender trust that the Council will do the right thing in terms of playing field policy on the more complicated site allocations. Clearly it is necessary for Sport England to object to this allocation.

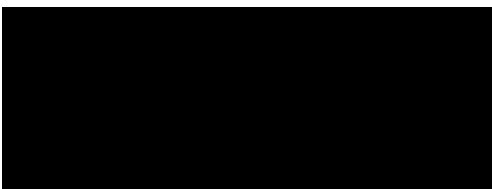
Designation SP13 – Foreshore Improvement Area - Sport England requires recognition within the designation that improvements will be cognisant of playing field policy.



At present, and in light of the above concerns it is necessary for Sport England to object to each of the proposed allocations as the Plan has not demonstrated that playing field policy will be met.

I trust you will give our response your fullest consideration and would be happy to work with the Council in order that our objections can be resolved.

Dave McGuire

Planning Manager



 [Sport England](#)
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[Twitter](#)

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 [Sport England Youtube](#)
[Channel](#)

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

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ST/0876/23/FUL Full planning permission for the erection of 50 residential dwellings with associated infrastructure, landscaping and MUGA
reprovision Land at Inverness Road, Jarrow NE32 4AJ

From [REDACTED]

Date Tue 1/30/2024 5:32 PM

[REDACTED]

Dear Sean Gallagher

Thank you for consulting Sport England on the above application.

Sport England – Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (particularly Para 103) and Sport England's Playing Fields Policy, which is presented within its 'Playing Fields Policy and Guidance Document':

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy.

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply.

The Proposal and Impact on Playing Field

The proposed development leads to the complete loss of the playing field at the site (0.6Ha). The MUGA that adjoins the northern boundary of the playing field is to be relocated within the development.

Assessment against Sport England Policy/NPPF

Playing field policy is a restrictive policy based on a presumption against any development which results in the loss of playing field (in whole or part) or prejudices its use. As such, for development not to encounter an objection from Sport England it must be shown to be of a form covered by one of the exceptions (to the presumption against development) set out in Sport England's playing field policy (see hyperlink above)

Proposals which result in the complete loss of playing must be shown to be in accordance with either exception 1 or exception 4 of Sport England's playing field policy. Exception 1 requires that;

'a robust and up-to-date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport'

The applicant has not suggested that there is an excess of playing field provision, and Sport England can confirm that the South Tyneside Playing Pitch Strategy has actually shown there to be shortfalls in pitch capacity across a number of pitch sports in this part of the borough.

Exception 4 requires that;

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- of equivalent or better quality, and
- of equivalent or greater quantity, and
- in a suitable location, and
- subject to equivalent or better accessibility and management arrangements

With the exception of the MUGA, none of the site's playing field is being replaced.

Instead the applicant has sought to argue that the site does not include playing field within the Planning Statement submitted in support of the application (paras 5.1 – 5.7)

Sport England considers that this is incorrect. Playing field is defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 as being 'the whole of a site which encompasses at least one playing pitch'. The Order goes on to define a playing pitch as being 'a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.'

The aerial photo extract below clearly show that the site meets the definition of playing field;



The aerial photo is from 2008 and proves that the site is playing field and that the applicant has erred in failing to address playing field policy. We trust that the Council will not make the same mistake in its consideration of the application.

Conclusion

In light of the above, Sport England **objects** to the application because it is not considered to accord with any of the exceptions to Sport England's Playing Fields Policy or with Paragraph 103 of the NPPF.

Should the local planning authority be minded to grant planning permission for the proposal, contrary to Sport England's objection then in accordance with The Town and Country Planning (Consultation) (England) Direction 2021, the application should be referred to the Secretary of State, via the Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

If you would like any further information or advice please contact me at the address below

Yours sincerely,

Dave McGuire
Planning Manager

T: [REDACTED]
M: [REDACTED]
F: [REDACTED]



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Local Plan

Dennis Grieves [REDACTED]

Tue 2/20/2024 4:03 PM

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

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South Tyneside Green Party Template 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 \(local.gov.uk\)](#)

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 greenhouse 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.

Dennis Grieves



Sent from my iPad

Local Plan

Dennis Grieves

Tue 2/20/2024 4:06 PM

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

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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.

Dennis Grieves



Sent from my iPad

Response ID BHLF-RUCU-JV2D-N

Submitted to Sustainability Appraisal 2024

Submitted on 2024-04-23 15:37:44

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:

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:

Dennis Grieves

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:



Objection to the Draft Local Plan

Angela Beattie [REDACTED]

Thu 2/29/2024 5:26 PM

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:

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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)

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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.

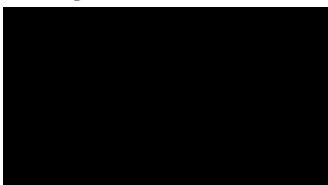
Public Health is a material planning consideration. Local authorities have important and wide-ranging public health functions, for example under the Public Health (Control of Disease) Act 1984. This legislation adopts an 'all-hazards' approach and provides South Tyneside Council with the necessary powers 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.

This is in addition to, and supportive of, my previous objections.

Angela Beattie



Sent from my iPad

Response ID BHLF-RUCU-JV18-8

Submitted to Sustainability Appraisal 2024
Submitted on 2024-04-23 12:58:58

Have your say

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

Section of the SA:

Employment sites

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

Comments:

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:
Angela Beattie

4 What is your email address?

Email:

[REDACTED]

5 Who are you responding as?

Resident or Member of the General Public

Organisation:

6 What is your postal address?

Address:

[REDACTED]