

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

## Response ID ANON-TJBH-TD7H-Y

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 17:17:13

### 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:

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.:

Details of Representation: Policy SP2 - Strategy for Sustainable development to meet identified needs, Page 31

#### Object to 2.2

As a young mother with 3 children living in East Boldon I want to see the green belt protected and the character and uniqueness of the village safeguarded. I think the village can't cope with the housing numbers coming to East Boldon.

The number of homes proposed is based on the 2014 household projections, which have been shown to be an overestimate by the 2021 Census and therefore, this is not a credible base line to use. The draft plan is therefore not sound.

Within a short period of time two draft local plans have been consulted on, each with vastly different figure and each with different sites allocated for housing. There seems to be no science behind the process.

This issue of out of date statistics was highlighted in responses to the last Regulation 18 consultation by many people, but nothing has been done to allay residents concerns over the integrity of the process. The use of green belt land is only needed as a result of using of out of date figures, and the lack of commitment by the Council to make a case for protecting it for more important reasons such as climate change and food production.

In any case, I understand the East Boldon Forum were advised by the Government Office for Levelling Up that the figure produced by the housing formula (standard method) was not mandatory and local circumstances, such as the green belt constraint could be taken into account. This aspect and the importance of the green belt was raised by residents in the Regulation 18 consultation, but local people have not been listened to. I understand the new NPPF now makes it clear that the figure produced by standard method is not mandatory and green belt constraint can be taken into account. The Council could have waited and used the latest regulation but chose to proceed. This seems to fly in the face of the regulation 18 consultation process, where residents were asked to give their views.

The loss of the green belt if sites GA2 and GA3 remain in the plan will have a major impact on wildlife and on the lives of residents who live in the villages of Cleadon, and East Boldon. I hope the views of residents are taken into account, even at this late stage.

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.:

Proposed Modification:

I would like to see a much lower housing figure which takes local circumstances and Green Belt constraint into account, put forward. I would like to see the site GA2 in East Boldon removed and the site in GA4 in Cleadon significantly reduced.

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

No

### 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:

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.:

Details of Representation: Policy SP7, Urban & Village Sustainable Growth Areas, Page 46 – GA2, Land at North Farm

Regarding SP3.2 “The Plan will....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” I believe the plan fail this important test and certainly does not protect the local distinctiveness of the village, takes the wellbeing of its residents into account or protects the environment and wildlife.

There will be a 25% increase in the number of houses in East Boldon with the proposed development of 263 houses at site GA2, the 259 houses at site GA4 and the 202 houses (awaiting legal agreement) at Cleadon Lane. This will result in unsustainable development and an unacceptable impact on the ‘distinctive character of the village’ and the lives of its residents. The existing infrastructure, unlike newly planned communities/development’s, cannot cope with the level of growth propose. The additional 400 houses proposed at site GA3, next to the ward boundary will only add to this scenario.

East Boldon Neighbourhood Plan was supported by 1300 residents in 2021, the Plan plays little regard it and the wish of residents to protect the green belt.

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

This policy has not been positively prepared to deliver sustainable development in the East Boldon 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.:

Proposed Modification:

Significantly reduce the number of houses proposed for GA2 and GA3 under policy SP7 to take account of local circumstances.

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

No

## 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:

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.:

Details of Representation: SP16: Housing Supply and Delivery page 84

‘Making provision for the provision of at least 263 new homes within the designated East Boldon Neighbourhood Forum Area,’

Although the base date for the document is April 2023, the Regulation 19 Local Plan does not acknowledge an additional 202 houses proposed for Cleadon Lane, a site that still awaits formal approval, it being subject to legal ratification. In total, some 470 houses could now come forward within the village of East Boldon. A community of 1,800 dwelling, constrained by its Victorian infrastructure, and ‘at capacity’ services, will be subject to a growth of 26%. I do not believe that this will result in sustainable development. I believe the consultation where the correct numbers were not explained to the community, is at best flawed.

The effect on the village of East Boldon will be made worse by other sites included in the plan that are close by. Site GA4, Land at West Hall Farm, where 259 dwellings are proposed, is immediately adjacent and much of the traffic from this site will travel through East Boldon. The problem of nuisance parking associated with those travelling into East Boldon to use the Metro system will be made worse by this site and by a further 400 dwellings proposed for site GA3 (Land to North of Town End Farm), close by

I believe that the inclusion of GA2 site will result in development that is not sustainable, and will destroy the character and distinctiveness of the village, and therefore does not adhere to the commitment embodied within strategic policy SP3 (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.” In particular, I believe that the number

of houses now coming to East Boldon

will mean that proposal is at odds with some of the key aspects of paragraphs 8 and 9 of the NPPF in respect to sustainable development: Wildlife will be impacted in a way that cannot be mitigated; the wellbeing and health of its residents will suffer, and be affected by the strain on infrastructure, pollution, noise and traffic issues; and the promote a well-designed, beautiful and safe places, with accessible services will not be realised because of the scale of the proposal for site GA2.

I believe the Plan has not been positively prepared to meet the objectively assessed need for homes, services and infrastructure in East Boldon and is not effective in delivering sustainable development in the Forum Area.

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.:

Proposed Modification

Remove or significantly reduce the provision of 263 homes within the designated East Boldon Neighbourhood Forum area.

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

No

## Policy 47: Design Principles

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.:

Details of Representation:

Policy 47 as currently drafted does not specifically provide tree lined streets:

I do not understand why more emphasis is not given to the need of trees to be provided in new developments. The climate and ecological merits of trees are well understood, yet the policy does not set out a firm requirement. I understand that the NPPF sets out the need for tree lined streets. Please could this be included.

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.:

Proposed modification:

Expand policy 47 to include the requirement for tree lined streets.

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

No

## Policy SP25: Infrastructure

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.:



## Details of Representation

Policy 25 does not give sufficient detail about how the infrastructure of East Boldon can, or would be delivered to support a 25% increase in household numbers.

I do not believe the existing infrastructure can be changed in such to deal with the number of houses proposed for East Boldon. The Victorian Road network is at capacity (earlier versions of the local plan seemed to acknowledge this) and will not be able to cope with the additional traffic resulting from the number of houses proposed. Houses are built along the busy A184 linking Sunderland to Newcastle, noise and air pollution is already an issue. Delays are currently experienced at traffic controlled junctions and railway crossings.

The terraced streets near the Metro Station are plagued by people who come for further afield to park their cars and use the train service. This will be made much worse by the location of the sites proposed.

Schools are at capacity and the infant school sits on a restricted site and cannot be expanded. Vehicular access to the junior school (and parking) is problematic.

Dentists and doctors surgeries are full.

The local plan does not seem to sufficiently acknowledge the extent of the current issue, let alone explain in a way that is deliverable, how the increase expansion etc will be dealt with. The reliance on developer contributions to fund improvements, even if these were possible, seems 'pie in the sky'.

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.:

Proposed Modification:

Reduce the numbers of houses proposed for East Boldon so that the infrastructure could cope.

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

No

## Your personal details

What is your name?

Name:

Mrs Emma Johnston

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]

Questions related to Traffic concerns related to Fellgate Sustainable Growth Area SPD

Thu 1/18/2024 9:24 PM

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

📎 1 attachments (23 KB)

Traffic Concerns.docx;

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Hi,

I have this evening made a comment on the:-

[haveyoursay.southtyneside.gov.uk/spatial-planning/fellgate-sustainable-growth-area-supplementary-pla/consultation/intro/](https://haveyoursay.southtyneside.gov.uk/spatial-planning/fellgate-sustainable-growth-area-supplementary-pla/consultation/intro/)

In the ' Do you have any comments to make in relation to the Scoping Report' section I have tried to add an attachment and was directed towards emailing the attachment to yourselves. I want my voice to be heard so I have also cut and pasted the entire comments of the attachments into the relevant section on the Do you have any comments section.

Just in case i have also emailed it to yourselves but this is the receipt number \i received so that you can match it up.

A receipt for your response has been emailed to you from the address **southtyneside@mail1.citizenspace.com** with the subject **"Response received - Response ID: ANON-5JMM-6ZFF-N"**

Many thanks

Dave Green

## Response ID ANON-TJBH-TD7B-S

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 18:23:23

### 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.:

The LP in my opinion does not meet the statutory tests of Legal Compliance. There are numerous occasions where reports, particularly related to transport, included traffic surveys carried out soon after Covid and prior to many hundreds of new homes being built, thereby not reflecting the current additional journeys and congestion. The LP was very poorly publicised and residents have been unable to complete responses in the STC hubs due to a faulty input code. Accessible paper copies of response papers were requested but not made available by the Planning Department. It is my opinion that STC have broken the Equality Law 2010

Soundness: The LP in many areas is sound but it 'masks' the fact that the infrastructure in place and which is planned, does not and is unable to deliver the sustainable development it promises. Infrastructure is of concern due to the amount of housing recently and currently being built around areas within ST resulting in an inability to cope. Jarrow and Hebburn are a prime example due to the many hundreds of new builds which are not accounted for in the reports STC has provided. Current Green Belt land is being sacrificed while Brown Site Land readily available is being ignored.

Duty to Cooperate: STC have engaged with constructively with public bodies etc but the reports that they have provided are inaccurate in that the current status quo related to data has changed since the surveys were carried out. Parts of these reports fail to mitigate current issues let alone predicted ones.

• Transport Local\_PlanTraffic\_Assessment\_2022.pdf fails to identify key areas where mitigation is required.

• Green Belt Land is being sacrificed when Brown site land is readily available

• STC have failed to engage with the public in the areas affected and have excluded them by failing to provide accessible formats in which to respond.

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.:

- STC has the required reports that identify specific Brown site land which should be utilised for building in order to preserve what is left of the Green Belt Land around South Tyneside.

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

YES I have been an active participant in the entire process seeking advice and guidance from various relevant parties.

### 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.:

Legally Compliant:

• Fellgate is on a Green Belt site with a farm, which grows arable crops, provides grazing for 52 horses and which has stood for 5 generations being completely wiped out.

• Brown Field sites are readily

' The Community have been seriously hampered by STC in providing valid responses on Reg 19 within the Consultation period due to: a) Missing Links to relevant web pages b) Hubs being unable to access the relevant site due to incorrect Inputting Codes for the entirety of the Consultation period c) Incorrect advice from Senior Managers

Sound: STC Draft Local Plan 2023 -2040 Page 49:

Point 5 iv. Deliver vehicular access roads to the site, from: a) Mill Lane roundabout on the A194; b) Durham Drive. Mill Lane Roundabout is severely congested during 2 x daily rush hours up the entirety of the road between Lindisfarne and Mill Lane. Durham Drive Is a residential ring road, with residential parking on one side around the estate with 3 schools in close proximity.

STC cannot therefore soundly or lawfully cover:- Point 5 v: Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool Roundabout. THIS CANNOT BE ALLOWED TO HAPPEN

Duty to Co-operate: The transport reports from statutory bodies are inaccurate due to being prepared at the end of the Covid Outbreak and not taking into account the traffic from the many hundreds of houses that have recently been built 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.:

Traffic congestion, regardless of what STC reports have been provided will never be mitigated by a) Mill Lane- Adding an extra arm to Mill Lane roundabout b) Putting an access point from the new development directly onto Durham Drive. This will have a serious detrimental affect on the Mental Health, Wellbeing and Safety of the current Fellgate residents and cause many years of misery in what is already a well established Close Community.

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

YES. I have been a major source of information for the current Fellgate Community participating in Leaflet drops, organising and facilitating meetings etc:

#### Policy 41: Green Belt

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

Fellgate stands on a Green Belt corridor and is home to a great deal of Wildlife, a working farm that provides arable crops as well as grazing for 52 horses. The farm has stood for 5 generations and is a well loved asset within the Community. The path that runs parallel to the Green belt is walked daily by residents of Fellgate. This is essential for the Mental Health and well being of the current well established Fellgate Community. Should the proposed development be granted permission then it may create a new Health Community but it will destroy the current one. This development will last for many years and create untold misery for many.

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.:

Build on identified Brown Field sites.

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

YES. I have been involved in planning meetings, leaflet drops, attendance at meetings throughout the Consultation period and would like to put my points forward.

#### Your personal details

What is your name?

Name:

David Green

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:

Previous customer

What is your postal address?

Address:

[REDACTED]

DAVID GREEN: Traffic concerns related to Fellgate Sustainable Growth Area SPD

**Please refer to:** Policy SP8: Fellgate Sustainable Growth Area (Page 6 of the plan)

Point 5 iv: Deliver vehicular access roads to the site, from:

- a) Mill Lane roundabout on the A194;
- b) Durham Drive

Point 5 v: Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

**During the Ward Event held at today Thursday 18<sup>th</sup> January at Hedworth CA; I raised concerns to the panel that:**

- On a daily basis there is severe congestion between Lindisfarne roundabout up the A194, past the Fellgate entrance from Durham Drive (which is where one of the access points to the development will be, meaning traffic from this will immediately enter traffic congestion) to the Mill Lane roundabout (where the proposed second access point to the development will be). This continues up the A194 to the Whitemare Pool roundabout which has severe congestion on a daily basis.
- At the same time there is also severe congestion approaching the Mill Lane roundabout from Mill Lane itself with traffic attempting to enter the traffic from the industrial units on Mill Lane as well as the traffic from the new housing at The Maples. There will also be traffic from the current development being built which is Monkton Gardens.
- On a daily basis vehicles attempting to get to Fellgate caught up in the congestion from Lindisfarne then tend try a short cut to either:
  - enter the A19 then take the 1<sup>st</sup> slip road off up to the traffic lights and turn right onto Hedworth Lane there by causing severe congestion at the Hedworth Lane/Fellgate Avenue traffic lights. This then causes gridlock from the A19 side of Hedworth Lane.
  - carry slightly on up the A194 then turn left at the Primrose turn off onto Hedworth Lane. They then carry on through the SINGLE LANE 'BOLDON LAD' BRIDGE towards the Hedworth Lane/Fellgate Avenue traffic lights. This then causes gridlock from that side of the Fellgate estate.
- It also needs to be highlighted that the A194 is the main feeder route from South Shields to the A1 past Whitemare Pool. The alternative is turning onto the A19 then heading up to Whitemare Pool via the Testos roundabout on the A184. This then causes additional congestion at Whitemare Pool from the A184. The proposed development will again create further congestion tailing back between the John Reid Road and the Lindisfarne roundabout!

**THE ENTIRE FELLGATE ESTATE IS THEN GRIDLOCKED FROM ALL EXITS WHICH THEN ALSO PREVENTS PUBLIC TRANSPORT AND EMERGENCY VEHICLES FROM ENTERING OR EXITING THE ESTATE. THIS ALSO HIGHLIGHTS HEALTH AND SAFETY CONCERNS RELATED TO EMERGENCY VEHICLE RESPONSE TIMES**

**THIS IS CURRENT AND DOES NOT TAKE INTO ACCOUNT THE TRAFFIC FROM THE PROPOSED NEW DEVELOPMENT WHICH MAY INCLUDE AN ADDITIONAL 1200 + VEHICLES ON A DAILY BASIS**

The response from the panel was that Mill Lane roundabout would be restructured and that there would be an additional Highway structure created on the A194 between Mill Lane and the Whitemare Pool roundabout. It was highlighted by myself and others present that the problems occur before the Mill Lane roundabout and particularly around Durham Drive where there is a proposed access point to the proposed development. There

**was no clarification on whether the new road structures would be in place prior to work commencing on the proposed development! They went on to say that they have contacted Nexus and ASKED them to provide additional public transport options. AS PUBLIC TRANSPORT AT TIMES CANNOT GET ONTO THE ESTATE DUE TO CURRENT CONGESTION AND THE FACT THAT THE METRO AT FELLGATE ALREADY CURRENTLY STRUGGLES DURING PEAK TIMES, WHAT HELP WOULD THIS BE?**

**Please now refer to:** Supporting Evidence:

4.3 which indicates that '*In support of the Publication draft Local Plan, the Council has also prepared a suite of evident base documents* ' one of which is:

- EVIDENCE BASED DOCUMENT – STRATEGIC ROAD NETWORK MODELLING which indicates that Strategic road network modelling has been undertaken for the publication draft local plan.
- *With current traffic congestion the way it is it would be interesting to see what this report indicates in relation to the increased traffic congestion that the proposed development would cause*
- The Council is working with National Highways to determine the impacts the developments could have on the Strategic Highways Network
- *This should highlight the current problems on the A194 leading up to Whitemare Pool but the residents are also concerned about the Local Network ie: Durham Drive/Fellgate Avenue/Hedworth Lane.*

I have done my best to highlight the concerns based around problems within the Strategic Highways Network and the Local Transport Network should this development be approved. I may not have used the correct terminology but I am hopeful that I have highlighted the problems that this development will bring to the residents of Fellgate. In particular I have highlighted the fact that the council has not met:

Policy SP8: Fellgate Sustainable Growth Area (Page 6 of the plan)

Point 5 v: Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

in that they **CANNOT ENSURE** that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

**THE PROPOSED DEVELOPMENT THEREFORE SHOULD NOT BE GRANTED PLANNING PERMISSION**

Response ID ANON-TJBH-TD7A-R

Submitted to South Tyneside Publication Draft Local Plan 2023-2040  
Submitted on 2024-03-03 19:47:11

#### 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:  
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 do not believe the plan to be sound with regard to housing proposals covering the North Farm site (GA2). The plan allows for development of up to approx 430 dwellings on a site that does not have the physical (roads, transport, water and waste management) nor social (access to GP services, early-years education) infrastructure to support an expansion within the East Boldon Neighbourhood area of 26%. I believe the plan does not pay regard to the East Boldon Neighbourhood Plan and the East Boldon Design Code, and that any development is likely to favour non-sustainable private development at the expense of affordable or social housing.

There is no evidence of demand for housing in South Tyneside generally to increase by the scale outlined in this Local Plan. Successive Census data from the 1970s onwards has shown the population in South Tyneside to have remained largely unchanged around the 115,000 residents mark with little variation.

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.:

On the basis of soundness - Remove site North Farm GA2 from housing development proposals entirely.

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

No

#### Your personal details

What is your name?

Name:  
Lee Woolston

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 2024-03-03 16:34:55

### 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:

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.:

The approach to remove sites from Green Belt is unsound: it is not justified and not in line with national policy.

Even though the Local Plan will be based on the NPPF before its update in December 2023, the national policy on Green Belt has not altered, but has merely been clarified. This is stated in the consultation on changes to the NPPF, which changed NPPF policies on Green Belt 'to make clear that local planning authorities are not required to review and alter Green Belt boundaries if this would be the only way of meeting need in full'.

Local authorities need to show exceptional circumstances for taking land out of the green belt, and housing need alone is not an exceptional circumstance. As national policy does not require local authorities to review Green Belt boundaries just to meet housing need, but requires local authorities to show exceptional circumstances for taking land out of Green Belt, this therefore means that housing need alone is not an exceptional circumstance. Yet the ST Local Plan states that 'The case for change exists in any case where the development requirement exceeds what which can be satisfactorily and confidently delivered within the urban areas. This need constitutes exceptional circumstances' (p 36). The submitted paper 'Green Belt: Exceptional Circumstances Paper' also only argues that exceptional circumstances apply because of housing need alone. The reason to take land out of the green belt has not been sufficiently justified and the Plan is therefore unsound.

It is also important to consider that the Whitburn Neighbourhood Forum has carried out regular engagement with the residents of Whitburn. This has shown that there is no community support to remove the site north of Shearwater (GA6) from the Green Belt. There is a mix of support and objections regarding removing the site at Whitburn Lodge (GA5) from Green Belt.

The evidence (South Tyneside Green Belt Study) on assessing impacts on the Green Belt is invalid and unreliable. Firstly, it is entirely unclear what the relation is between the Green belt assessment and the allocations.

Secondly, it is subjective, with no clear indicators given on what is considered a weak, moderate and strong performance. The assessment of factors such as openness is reduced to a narrative, as opposed to an objective assessment relating to measurable and comparable indicators, for instance distances. This was also commented on by Gateshead Council. The assessment itself does not explain how it has reached the rating of 'moderate' in for instance the sites GA5 and GA6 - it does not translate the narrative of impacts into a rating and does not mention the rating itself in the text. This overall subjectivity cannot be considered to be a justification for the choice of allocations.

The methodology also places a lower significance on the villages as urban areas compared to South Shields, by not defining the village of Whitburn as a 'large built-up area', even though it has over 5,000 residents. This is also not in line with the identification of the main urban areas in map 3 of the proposed Local plan, which includes the villages. This therefore means that any development in Whitburn would have lower impacts than a development in South Shields without good reason, as Whitburn is surrounded by Green Belt, so impacts on development here should be attributed the same weight as development in South Shields.

Furthermore, sites GA5 and GA6 are assessed together, both as an 'individual' assessment and as a cumulative assessment, which is illogical. Even though they are assessed together, they are also reported separately with the same scores (e.g. Table 5.1). These sites are not the same, and they are performing differently in terms of green belt, with GA5 as a brownfield site, and GA6 a green field with a strong green belt function and openness. GA6 has a strong function to maintain the coherence of the Green Belt, forming an open corridor between green belt to the west and the green belt to the east on the coastal strip. This justifies an individual assessment.

GA5 and GA6 cumulatively will significantly increase the sprawl of Whitburn to the north, by extending the northern boundary of Whitburn by appr. 215 metres, which is a 40% increase to the north-eastern block of current development in Whitburn (between Fern Avenue and Shearwater), which is a significant increase in sprawl.

Overall, the removal of green belt sites is unsound and policy SP3 is 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.:

The Green Belt assessment needs to be redone in an objective manner, assessing each site individually, as well as cumulative impacts, with a clear reasoning for the ultimate sites chosen to be removed from Green Belt. Site GA6 north of Shearwater should not be removed from the Green Belt, as the assessment of impacts from removal is unsound, and its allocation for housing is not justified.

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

Yes

## Policy 10: Disposal of Foul Water

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.:

### Legal compliance

Sewage collection and treatment capacity is a material planning consideration.

The role of Northumbrian Water (NWL) is to provide a system of public sewers to ensure effective drainage.

The role of the LPA is to ensure there is sufficient sewage treatment capacity before granting planning permission.

The local plan is not in compliance with the Urban Waste Water Treatment Regulations 1994.

The Whitburn sewage system discharged 821,088 tonnes of untreated sewage into the environment in 2021.

Hendon sewage works discharges illegally regularly in dry weather.

In South Tyneside there were 1350 spills from sewer overflows into the environment in 2022.

### Soundness

Data provided to the LPA demonstrates the lack of capacity of sewage treatment and presents a robust and credible evidence base which requires further research/ fact finding by the LPA

In comparison, NWL gave the LPA an uncorroborated verbal assurance that the Hendon Sewage Works has headroom for another 25,000 homes. This is hearsay.

In the Drainage and Wastewater Management Plans of NWL there is no evidence of sound sewage infrastructure delivery planning to reduce the spills of sewage in the borough or increase capacity at Hendon Sewage Works to accommodate more housing.

Therefore, the plan is not positively prepared.

### Duty to cooperate

The Whitburn Neighbourhood Forum made this representation at the Reg 18 stage:

Northumbrian Water Limited fails in its role as a sewage undertaker and is not a reliable consultee. The LPA must not rely solely on the advice provided by NWL.

NWL are under investigation by Ofwat, the EA and the OEP and cannot be regarded as a reliable consultee.

References to the Whitburn Long Sea Outfall as part of the Reg 18 stage have now been removed after representations were made by NWL.

Representations made by the WNF at Reg 18 stage were largely ignored.

This demonstrates undue bias.

### Attachments sent by email

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 Local Plan should include the following:

Planning proposals will not be supported unless it can be shown by rigorous analysis that there is sufficient capacity in the local sewerage system.

The analysis is not onerous, and data can be obtained from NWL, the Local Authority and the Environment agency as follows:

Data from the Monitoring Certification Scheme (MCERTS) of the sewage treatment works.

Local rainfall totals.

The duration and number of spills from Combined Sewer Overflows in the borough measured by Event Duration Monitor (EDM) data.

Analysis of this data will determine both capacity and compliance with the UWWTR.

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

Yes

## Policy SP22: Green and Blue Infrastructure

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.:

The green infrastructure corridors have been drawn up without following a sound methodology and evidence base.

The South Tyneside Green and Blue Infrastructure Strategy sets out its methodology for identifying the GBI corridor, based on the datasets in Appendix C, which includes the Wildlife Network. Following this approach would result in the wildlife network being part of the GBI corridor. However, the corridor included in the local plan itself excludes part of the wildlife corridor without justification, around the site that has been allocated north of Shearwater (GA6). The site currently still performs its function as wildlife corridor due to its open and green nature. There is no sound reason given to exclude this site from the GBI corridor.

The current strategic GI network does include most of the site, and so does the GI network identified in the Whitburn Neighbourhood Plan.

The Sustainability Appraisal assesses the impacts of the site not on the current GI corridor, but on the proposed one, and therefore excludes an assessment of the impacts on GI, and will prevent any mitigation from taking place if the site is developed.

No due process has been followed regarding the consultation on this revised corridor. The Whitburn Neighbourhood Forum was NOT invited to the roundtable, contrary to claims in the GBI strategy. We commented on the GI corridor online consultation to say there was no evidence to change the strategic corridor north of Shearwater. However, our comments were never acknowledged, followed up on or actioned on by the local authority.

The GBI assessment is not fit for purpose and does not justify why the site north of Shearwater has now been excluded from the corridor, which makes the local 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.:

Revise the GBI corridor to align with the wildlife corridor in the north of Whitburn. Revise the GBI strategy to ensure it follows its own methodology in a consistent manner to include the wildlife network within the GBI corridors. This is required to make sure the plan is justified and based on evidence.

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

Yes

### Your personal details

What is your name?

Name:

Steve Lavelle

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Neighbourhood Forum

Organisation:

What is your postal address?

Address:

[REDACTED]

## Reg 19 Local Plan attachments policy 10

Whitburn Neighbourhood Forum [REDACTED]

Sun 3/3/2024 4:30 PM

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

 7 attachments (6 MB)

UWWTR.pdf; Whitburn Spill data 2021.xlsx; PH\_to\_SL\_Hendon\_Draft\_23-06-2022 (1).pdf; South Tyneside Sewage Spills - Sheet1 (1).pdf; I2\_report\_wearside.pdf; I2\_report\_tyneside (1).pdf; WNF response to the 2022 Draft Local Plan housing Final.docx;

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To the local plan team,

Please find the Attachments for comments from the Whitburn neighbourhood forum on:

### **Policy 10: Disposal of Foul Water**

UWWTR

Whitburn Spill Data

PH to SL Hendon Draft

South Tyneside Sewage Spills

L2 Report Tyneside

L2 Report Wearside

WNF response to the 2022 Local Plan

Many thanks,

Phil Leaf

Whitburn neighbourhood forum

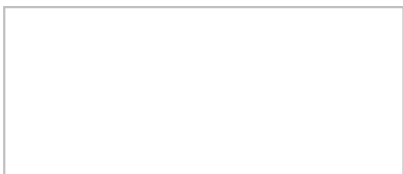
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## **Whitburn Neighbourhood Forum**

Website: [whitburnforum.co.uk](http://whitburnforum.co.uk)

Social media: [Facebook](#), [Twitter](#) and [Instagram](#)

## **Working for a better Whitburn**



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STATUTORY INSTRUMENTS

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**1994 No. 2841**

**WATER, ENGLAND AND WALES**

**The Urban Waste Water Treatment  
(England and Wales) Regulations 1994**

<i>Made</i>	- - - -	<i>4th November 1994</i>
<i>Laid before Parliament</i>		<i>9th November 1994</i>
<i>Coming into force</i>	- -	<i>30th November 1994</i>

The Secretary of State for the Environment and the Secretary of State for Wales, being Ministers designated<sup>M1</sup> for the purposes of section 2(2) of the European Communities Act 1972<sup>M2</sup> in relation to measures relating to the collection, treatment and discharge of urban waste water, and the treatment and discharge of waste water from certain industrial sectors, acting jointly in exercise of the powers conferred on them by the said section 2(2) and of all other powers enabling them in that behalf, hereby make the following Regulations:

**Modifications etc. (not altering text)**

**C1** [Regulations](#): certain functions transferred (16.2.2000) by [The National Assembly for Wales \(Transfer of Functions\) Order 2000 \(S.I. 2000/253\)](#), arts. 1(1), 2, [Sch. 1](#)

**Marginal Citations**

**M1** [S.I. 1992/1711](#).

**M2** [1972 c.68](#).

**Citation, commencement and extent**

1. These Regulations may be cited as the Urban Waste Water Treatment (England and Wales) Regulations 1994, shall come into force on 30th November 1994 and shall extend to England and Wales.

**Interpretation**

2.—(1) In these Regulations, unless the context otherwise requires—

“agglomeration” means an area where the population and/or economic activities are sufficiently concentrated for urban waste water to be collected and conducted to an urban waste water treatment plant or to a final discharge point;

[<sup>F1</sup>“the appropriate agency” means—

- (a) in relation to England, the Environment Agency;
- (b) in relation to Wales, the Natural Resources Body for Wales;]

“the Authority” means the National Rivers Authority;

“coastal waters” means the waters outside the low-water line or the outer limit of an estuary;

“collecting system” means a system of conduits which collects and conducts urban waste water;

“the Directive” means Council Directive 91/271/EEC concerning urban waste water treatment<sup>M3</sup>, [<sup>F2</sup>as last amended by Regulation (EC) No 1137/2008 of the European Parliament and of the Council] and references to other Community Directives are references to Directives other than Council Directive 91/271/EEC;

“domestic waste water” means waste water from residential settlements and services which originates predominantly from the human metabolism and from household activities;

[<sup>F1</sup>“England” includes the territorial sea adjacent to England not forming any part of Wales;]

[<sup>F3</sup>“environmental permit” has the same meaning as in the Environmental Permitting Regulations;]

[<sup>F3</sup>“Environmental Permitting Regulations” means the [<sup>F4</sup>the Environmental Permitting (England and Wales) Regulations 2016] ;]

“estuary” means the transitional area at the mouth of a river between fresh-water and coastal waters, the outer (seaward) limits of which are shown on maps kept in accordance with regulation 12;

“eutrophication” means the enrichment of water by nutrients, especially compounds of nitrogen and/or phosphorus, causing an accelerated growth of algae and higher forms of plant life to produce an undesirable disturbance to the balance of organisms present in the water and to the quality of the water concerned;

“high natural dispersion area” has the meaning given by regulation 3;

“industrial waste water” means any waste water which is discharged from premises used for carrying on any trade or industry, other than domestic waste water and run-off rain water;

“population equivalent” is a measurement of organic biodegradable load, and a population equivalent of 1 (1 p.e.) is the organic biodegradable load having a five-day biochemical oxygen demand (BOD5) of 60g of oxygen per day (the load shall be calculated on the basis of the maximum average weekly load entering the treatment plant during the year, excluding unusual situations such as those due to heavy rain);

“secondary treatment” means treatment of urban waste water by a process generally involving biological treatment with a secondary settlement or other process in which the requirements established in Table 1 in Schedule 3 are respected;

“sensitive area” has the meaning given by regulation 3;

“sludge” means residual sludge, whether treated or untreated, from urban waste water treatment plants;

“urban waste water” means domestic waste water or the mixture of domestic waste water with industrial waste water and/or run-off rain water;

[<sup>F1</sup>“Wales” has the meaning given by section 158 of the Government of Wales Act 2006.]

and other expressions used [<sup>F5</sup>in these Regulations and] in the Directive have the same meaning as in the Directive.

(2) Any reference in these Regulations to a numbered regulation or Schedule is a reference to the regulation or Schedule so numbered in these Regulations.

- F1** Words in reg. 2(1) inserted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 38** (with Sch. 7)
- F2** Words in reg. 2(1) inserted (17.9.2018) by [The Environment, Food and Rural Affairs \(Miscellaneous Amendments and Revocations\) Regulations 2018 \(S.I. 2018/942\)](#), regs. 1(2), **30(2)(a)** and words in reg. 2(1) inserted (W.) (17.12.2018) by [The Environment, Planning and Rural Affairs \(Miscellaneous Amendments\) \(Wales\) Regulations 2018 \(S.I. 2018/1216\)](#), regs. 1(3), **2(2)(a)**
- F3** Words in reg. 2 inserted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(2)** (with reg. 1(2))
- F4** Words in reg. 2 substituted (1.1.2017) by [The Environmental Permitting \(England and Wales\) Regulations 2016 \(S.I. 2016/1154\)](#), reg. 1(1), **Sch. 29 Pt. 2 para. 4** (with regs. 1(3), 77-79, Sch. 4)
- F5** Words in reg. 2(1) inserted (17.9.2018) by [The Environment, Food and Rural Affairs \(Miscellaneous Amendments and Revocations\) Regulations 2018 \(S.I. 2018/942\)](#), regs. 1(2), **30(2)(b)** and words in reg. 2(1) inserted (W.) (17.12.2018) by [The Environment, Planning and Rural Affairs \(Miscellaneous Amendments\) \(Wales\) Regulations 2018 \(S.I. 2018/1216\)](#), regs. 1(3), **2(2)(b)**

#### Marginal Citations

- M3** OJ No. L 135, 30.5.91, p. 40.

### Sensitive areas and high natural dispersion areas

3.—(1) [<sup>F6</sup>Subject to regulation 2 of the Urban Waste Water Treatment (England and Wales) (Amendment) Regulations 2003,] In these Regulations—

- (a) “sensitive area” means an area of water which the Secretary of State has identified in accordance [<sup>F7</sup>with the appropriate agency for] the purposes of this regulation;
- (b) “high natural dispersion area” means an area of water which the Secretary of State has identified in accordance [<sup>F8</sup>with the appropriate agency for] the purposes of this regulation.

(2) The Secretary of State shall review the identification of sensitive areas and high natural dispersion areas, in accordance with the relevant criteria in Schedule 1, no later than 31st December 1997 and thereafter at intervals of no more than four years.

<sup>F9</sup>(3) .....

- F6** Words in reg. 3(1) inserted (11.8.2003) by [The Urban Waste Water Treatment \(England and Wales\) \(Amendment\) Regulations 2003 \(S.I. 2003/1788\)](#), regs. 1(1), **4(2)**
- F7** Words in reg. 3(1)(a) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 39** (with Sch. 7)
- F8** Words in reg. 3(1)(b) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 39** (with Sch. 7)
- F9** Reg. 3(3) revoked (11.8.2003) by [The Urban Waste Water Treatment \(England and Wales\) \(Amendment\) Regulations 2003 \(S.I. 2003/1788\)](#), regs. 1(1), **4(3)**

### Duty to provide and maintain collecting systems and treatment plants

4.—(1) This regulation supplements the duty imposed on every sewerage undertaker by section 94 of the Water Industry Act 1991 <sup>M4</sup> (general duty to provide sewerage system) and any



contravention of the requirements of this regulation shall be treated for the purposes of that Act as a breach of that duty.

(2) Subject to paragraph (3) below, the duty imposed by subsection (1)(a) of the said section 94 shall include a duty to ensure that collecting systems which satisfy the requirements of Schedule 2 are provided—

- (a) where the urban waste water discharges into receiving waters which are a sensitive area, by 31st December 1998 for every agglomeration with a population equivalent of more than 10,000; and
- (b) without prejudice to sub-paragraph (a) above—
  - (i) by 31st December 2000 for every agglomeration with a population equivalent of more than 15,000; and
  - (ii) by 31st December 2005 for every agglomeration with a population equivalent of between 2,000 and 15,000.

(3) Paragraph (2) above shall not apply where either—

- (a) [<sup>F10</sup>the appropriate agency] has certified that the establishment of a collecting system is not justified because it would produce no environmental benefit; or
- (b) the Secretary of State has certified that the establishment of a collecting system is not justified because it would involve excessive cost,

and individual systems or other appropriate systems are [<sup>F11</sup>provided and the appropriate agency has] certified that those systems achieve the same level of environmental protection.

(4) The duty imposed by subsection (1)(b) of the said section 94 shall include a duty to ensure that urban waste water entering collecting systems is, before discharge, subject to treatment provided in accordance with regulation 5, and to ensure that—

- (a) plants built in order to comply with that regulation are designed (account being taken of seasonal variations of the load), constructed, operated and maintained to ensure sufficient performance under all normal local climatic conditions;
- (b) treated waste water and sludge arising from waste water treatment are reused whenever appropriate; and
- (c) disposal routes for treated waste water and sludge minimise the adverse effects on the environment.

**F10** Words in reg. 4 (a) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), [Sch. 4 para. 40\(2\)\(b\)](#) (with Sch. 7)

**F11** Words in reg. 4 substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), [Sch. 4 para. 40\(2\)\(a\)](#) (with Sch. 7)

#### Marginal Citations

**M4** 1991 c.56.

### Requirements as to provision of treatment

5.—(1) Subject to paragraph (5) below, treatment plants which provide secondary treatment or an equivalent treatment shall be provided—

- (a) by 31st December 2000 or, in an exceptional case, [<sup>F12</sup>a] later date (not being later than 31st December 2005) <sup>F13</sup>..., in respect of all discharges from agglomerations with a population equivalent of more than 15,000;

- (b) by 31st December 2005 in respect of all discharges from agglomerations with a population equivalent of between 10,000 and 15,000;
  - (c) by 31st December 2005 in respect of all discharges to freshwaters and estuaries from agglomerations with a population equivalent of between 2,000 and 10,000.
- (2) Subject to paragraph (3) below, treatment plants which provide more stringent treatment than that described in paragraph (1) above shall be provided by 31st December 1998 in respect of all discharges from agglomerations with a population equivalent of more than 10,000 into sensitive areas, or into the relevant catchment areas of sensitive areas where the discharges contribute to the pollution of these areas.
- (3) Paragraph (2) above shall not apply in relation to a sensitive area [<sup>F14</sup>where the appropriate agency has] certified that it is satisfied, as a result of monitoring, that the minimum percentage of reduction of the overall load entering all urban waste water treatment plants in that area, and all urban waste water treatment plants in the catchment area of that area the discharges from which contribute to the pollution of that area, is at least 75% for total phosphorus and at least 75% for total nitrogen.
- (4) Where, following a review of the identification of waters as sensitive areas or high natural dispersion areas under regulation 3, an area ceases to be identified as a high natural dispersion area or becomes identified as a sensitive area, then, as respects that area, paragraph (1) or, as the case may be, paragraph (2) above shall have effect as if the relevant date specified in that paragraph were the seventh anniversary of the change of identification or, if later, the date so specified.
- (5) Discharges of urban waste water from agglomerations with a population equivalent of between 10,000 and 150,000 (or, in an exceptional case <sup>F15</sup>..., of more than 150,000) to coastal waters which are in high natural dispersion areas, and discharges from agglomerations with a population equivalent of between 2,000 and 10,000 into estuaries which are in high natural dispersion areas, may be subjected to less stringent treatment than that described in paragraph (1) above so long as—
- (a) the discharges receive at least primary treatment in conformity with the control procedures set out in Part II of Schedule 3; and
  - (b) [<sup>F16</sup>the appropriate agency] has certified that it is satisfied that comprehensive studies have indicated that such discharges will not adversely affect the environment.
- (6) [<sup>F17</sup>The appropriate agency] shall provide the Secretary of State with such information concerning the studies mentioned in paragraph (5)(b) above as he may require <sup>F18</sup>...
- (7) Appropriate treatment of urban waste water entering collecting systems shall be provided by 31st December 2005 in respect of—
- (a) discharges to freshwaters and estuaries from agglomerations with a population equivalent of less than 2,000; and
  - (b) discharges to coastal waters from agglomerations with a population equivalent of less than 10,000.
- (8) In this regulation—
- (a) “appropriate treatment” means treatment of urban waste water by any process and/or disposal system which after discharge allows the receiving waters to meet the relevant quality objectives and the relevant provisions of [<sup>F19</sup>retained EU law];
  - (b) “primary treatment” means treatment of urban waste water by a physical and/or chemical process involving settlement of suspended solids, or other processes in which the BOD5 of the incoming waste water is reduced by at least 20% before discharge and the total suspended solids of the incoming waste water are reduced by at least 50%.

**F12** Word in [reg. 5\(1\)\(a\)](#) substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), [regs. 1\(1\), 7\(2\)\(a\)\(i\)](#); 2020 c. 1, Sch. 5 para. 1(1)

- F13** Words in reg. 5(1)(a) omitted (31.12.2020) by virtue of *The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019* (S.I. 2019/558), regs. 1(1), **7(2)(a)(ii)**; 2020 c. 1, Sch. 5 para. 1(1)
- F14** Words in reg. 5(3) substituted (1.4.2013) by *The Natural Resources Body for Wales (Functions) Order 2013* (S.I. 2013/755), art. 1(2), **Sch. 4 para. 41(2)** (with Sch. 7)
- F15** Words in reg. 5(5) omitted (31.12.2020) by virtue of *The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019* (S.I. 2019/558), regs. 1(1), **7(2)(b)**; 2020 c. 1, Sch. 5 para. 1(1)
- F16** Words in reg. 5(5)(b) substituted (1.4.2013) by *The Natural Resources Body for Wales (Functions) Order 2013* (S.I. 2013/755), art. 1(2), **Sch. 4 para. 41(3)** (with Sch. 7)
- F17** Words in reg. 5(6) substituted (1.4.2013) by *The Natural Resources Body for Wales (Functions) Order 2013* (S.I. 2013/755), art. 1(2), **Sch. 4 para. 41(4)** (with Sch. 7)
- F18** Words in reg. 5(6) omitted (31.12.2020) by virtue of *The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019* (S.I. 2019/558), regs. 1(1), **7(2)(c)**; 2020 c. 1, Sch. 5 para. 1(1)
- F19** Words in reg. 5(8)(a) substituted (31.12.2020) by *The Floods and Water (Amendment etc.) (EU Exit) Regulations 2019* (S.I. 2019/558), regs. 1(1), **7(2)(d)**; 2020 c. 1, Sch. 5 para. 1(1)

### Discharges of treated urban waste water

6.—(1) Discharges from urban waste water treatment plants described in paragraph (1) or (2) of regulation 5, or from any such plant which provides treatment in accordance with paragraph (5) of that regulation, (including any such plants which are provided other than by sewerage undertakers) shall satisfy the relevant requirements of Part I of Schedule 3.

(2) It shall be the [<sup>F20</sup>duty of the Environment Agency and of the Natural Resources Body for Wales, in exercising their] functions under [<sup>F21</sup>the Environmental Permitting Regulations], to secure—

- (a) with respect to any such discharge as is described in paragraph (1) above, that the requirements of that paragraph are satisfied;
- (b) with respect to any discharge described in paragraph (5) or (7) of regulation 5 (including any such discharge from an urban waste water treatment plant which is provided other than by a sewerage undertaker), that the requirements of the said paragraph (5) or, as the case may be, the said paragraph (7) are satisfied;
- (c) with respect to any discharge from a collecting system described in regulation 4 or an urban waste water treatment plant described in regulation 5, the limitation of pollution of receiving waters due to storm water overflows;
- (d) with respect to the discharge of sludge—
  - (i) that the discharge of sludge to surface waters is phased out by 31st December 1998; and
  - (ii) that the total amount of toxic, persistent or bioaccumulable materials in the sludge which may be discharged to surface waters pursuant to [<sup>F22</sup>environmental permits under the Environmental Permitting Regulations is controlled by such permits] and progressively reduced during the period ending on that date.

(3) [<sup>F23</sup>The Environment Agency or, as the case may be, the Natural Resources Body for Wales] shall at regular intervals review and, if necessary for the purpose of complying with this regulation, modify or revoke consents granted under the said Chapter II.

<sup>F24</sup>(4) .....

(5) All lakes and ponds shall be treated as controlled waters for the purposes of [<sup>F25</sup>the Environmental Permitting Regulations insofar as they relate] to the discharge of waste water from urban waste water treatment plants.

- F20** Words in reg. 6(2) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 42(2)** (with Sch. 7)
- F21** Words in reg. 6(2) substituted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(3)(a)** (with reg. 1(2))
- F22** Words in reg. 6(2)(d)(ii) substituted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(3)(b)** (with reg. 1(2))
- F23** Words in reg. 6(3) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 42(3)** (with Sch. 7)
- F24** Reg. 6(4) omitted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by virtue of [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(3)(c)** (with reg. 1(2))
- F25** Words in reg. 6(5) substituted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(3)(d)** (with reg. 1(2))

## Discharges of industrial waste water to collecting systems or treatment plants

7.—(1) It shall be the duty of each of the following, that is to say—

- (a) every sewerage undertaker;
- (b) the [<sup>F26</sup>Water Services Regulation Authority]; and
- (c) the Secretary of State,

in exercising their functions under Chapter III of Part IV of the Water Industry Act 1991 (trade effluent) with respect to any discharge of industrial waste water, to secure that the requirements of Schedule 4 are met in respect of that discharge.

(2) Nothing in subsection (1) or (2) of section 121 of that Act (conditions of consent) shall be construed as restricting the power of a sewerage undertaker to impose in any consent under the said Chapter III such conditions as are necessary to comply with paragraph (1) above.

(3) Nothing in any agreement entered into between a sewerage undertaker or its predecessor and the owner or occupier of premises used for carrying on any trade or industry shall be treated as a consent or authorisation for the purposes of the said Chapter III unless the terms of that agreement are such as will secure that the requirements of Schedule 4 are met in respect of any discharge to which the agreement relates.

(4) Sewerage undertakers shall review, and if necessary modify, the consents or authorisations granted or deemed to be granted under the said Chapter III at regular intervals.

(5) For the purposes of complying with paragraph (1) above, a sewerage undertaker may vary any agreement under section 129 of the Water Industry Act 1991 which provides for the discharge of industrial waste water to an urban waste water treatment plant without first entering a public sewer, and any such agreement shall not be enforceable if and to the extent that it permits any discharge of industrial waste water in respect of which the requirements of Schedule 4 are not met.

(6) Nothing in the said Chapter III shall—

- (a) restrict the power of a sewerage undertaker or the Secretary of State to vary a consent or authorisation in pursuance of the duty imposed by this regulation; or
- (b) render a sewerage undertaker or the Secretary of State liable to pay compensation as a consequence of any such variation made in pursuance of that duty.

(7) The duty imposed on sewerage undertakers by this regulation shall be enforceable under section 18 of the Water Industry Act 1991 by the [<sup>F26</sup>Water Services Regulation Authority].

**F26** Words in reg. 7(1)(7) substituted (1.4.2006) by [The Water Act 2003 \(Consequential and Supplementary Provisions\) Regulations 2005 \(S.I. 2005/2035\)](#), regs. 1(5), **15**

### Discharges of certain industrial waste water into receiving waters

**8.—**(1) This regulation applies to discharges of biodegradable industrial waste water from plants representing 4,000 p.e. or more belonging to the industrial sectors listed in Schedule 5 which does not enter urban waste water treatment plants before discharge to receiving waters.

[<sup>F27</sup>(2) The Environment Agency [<sup>F28</sup>or, as the case may be, the Natural Resources Body for Wales] must impose, in every environmental permit with respect to any discharge on or after 31st December 2000 to which this regulation applies, conditions which are appropriate to the nature of the industry concerned for the discharge of such waste water.]

<sup>F29</sup>(3) .....

(4) All lakes and ponds shall be treated as controlled waters for the purposes of the enactments mentioned in [<sup>F30</sup>paragraph (2)] above insofar as they relate to discharges to which this regulation applies.

**F27** Reg. 8(2) substituted (6.4.2010 immediately after [S.I. 2009/3381](#) comes into force) by [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(4)(a)** (with reg. 1(2))

**F28** Words in reg. 8(2) inserted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 43** (with Sch. 7)

**F29** Reg. 8(3) omitted (6.4.2010 immediately after [S.I. 2009/3381](#) comes into force) by virtue of [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(4)(b)** (with reg. 1(2))

**F30** Words in reg. 8(4) substituted (6.4.2010 immediately after [S.I. 2009/3381](#) comes into force) by [The Environmental Permitting \(England and Wales\) Regulations 2010 \(S.I. 2010/675\)](#), reg. 1(1), **Sch. 26 Pt. 2 para. 10(4)(c)** (with reg. 1(2))

### Dumping of sludge from ships

[<sup>F31</sup>**9.** In exercising its functions under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009, the appropriate licensing authority (within the meaning of section 113 of that Act) must ensure that the dumping of sludge from ships to surface waters is not permitted.]

**F31** Reg. 9 substituted (6.4.2011) by [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(2)**

### Samples and records

**10.—**(1) In this regulation—

(a) a “relevant condition” means a condition imposed for the purposes of regulation 6(2) in [<sup>F32</sup>an environmental permit] ;

[<sup>F33</sup>(b) “the operator” has the meaning given in the Environmental Permitting Regulations]

(2) Where the operator is required by a relevant condition to provide any apparatus for the purpose of measuring or recording the volume, rate of flow, nature, composition or temperature of any waste water, or for the purpose of collecting samples of waste water, any such apparatus so provided shall be presumed to register accurately unless the contrary is shown.



## (3) Any record—

- (a) produced by any such apparatus as is mentioned in paragraph (2) above; or
- (b) made by or on behalf of the operator in order to comply with a relevant condition,

shall be evidence of the matters appearing from the record and shall, in any proceedings under [<sup>F34</sup>the Environmental Permitting Regulations], be admissible in evidence against the operator.

## (4) Where—

- (a) an entry is required by a relevant condition to be made in any record as to the observance of that or any other relevant condition; and
- (b) the entry has not been made,

that fact shall be admissible as evidence that that condition or, as the case may be, that other condition has not been observed.

(5) Where, in compliance with a relevant condition, a sample of waste water is collected by apparatus installed for the purpose of collecting such samples automatically, the sample shall be treated, for the purpose of section 209 of the Water Resources Act 1991 (evidence of samples and abstractions) [<sup>F35</sup>and the Environmental Permitting Regulations], as being taken only at the time when it is removed from that apparatus.

(6) For the purposes of the said section 209 [<sup>F36</sup>and the Environmental Permitting Regulations], a sample of waste water which is taken and analysed by the operator in compliance with a relevant condition shall not be treated as being taken on behalf [<sup>F37</sup>of the appropriate agency].

- |            |                                                                                                                                                                                                                                                                        |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>F32</b> | Words in reg. 10(1)(a) substituted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by <a href="#">The Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010/675)</a> , reg. 1(1), <b>Sch. 26 Pt. 2 para. 10(5)(a)</b> (with reg. 1(2)) |
| <b>F33</b> | Reg. 10(1)(b) substituted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by <a href="#">The Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010/675)</a> , reg. 1(1), <b>Sch. 26 Pt. 2 para. 10(5)(b)</b> (with reg. 1(2))          |
| <b>F34</b> | Words in reg. 10(3) substituted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by <a href="#">The Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010/675)</a> , reg. 1(1), <b>Sch. 26 Pt. 2 para. 10(5)(c)</b> (with reg. 1(2))    |
| <b>F35</b> | Words in reg. 10(5) inserted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by <a href="#">The Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010/675)</a> , reg. 1(1), <b>Sch. 26 Pt. 2 para. 10(5)(d)</b> (with reg. 1(2))       |
| <b>F36</b> | Words in reg. 10(6) inserted (6.4.2010 immediately after S.I. 2009/3381 comes into force) by <a href="#">The Environmental Permitting (England and Wales) Regulations 2010 (S.I. 2010/675)</a> , reg. 1(1), <b>Sch. 26 Pt. 2 para. 10(5)(e)</b> (with reg. 1(2))       |
| <b>F37</b> | Words in reg. 10(6) substituted (1.4.2013) by <a href="#">The Natural Resources Body for Wales (Functions) Order 2013 (S.I. 2013/755)</a> , art. 1(2), <b>Sch. 4 para. 44</b> (with Sch. 7)                                                                            |

## Monitoring

### 11.—(1) It shall be the duty [<sup>F38</sup>of the appropriate agency]—

- (a) to monitor or procure the monitoring by a competent authority or appropriate body of discharges from urban waste water treatment plants to verify compliance with the relevant requirements of Part I of Schedule 3 in accordance with the control procedures set out in Part II of that Schedule;
- (b) to monitor or procure the monitoring by a competent authority or appropriate body of amounts and composition of sludges disposed of to surface waters <sup>F39</sup>...;

- (c) to monitor or procure the monitoring by a competent authority or appropriate body of waters subject to discharges from urban waste water treatment plants provided in accordance with regulation 5 in cases where it can be expected that the receiving environment will be significantly affected;
- (d) to carry out or procure the carrying out by a competent authority or appropriate body of monitoring and any other relevant studies to verify that discharges to which regulation 5(5) applies and the disposal of sludge to surface waters <sup>F40</sup>... do not adversely affect the environment.

<sup>F41</sup>(2) .....

(3) [<sup>F42</sup>The appropriate agency]<sup>F43</sup>... shall retain any information collected by [<sup>F44</sup>it] or by a competent authority or appropriate body in complying with paragraph (1) <sup>F45</sup>... above and shall make it available to the Secretary of State on request.

- F38** Words in reg. 11(1) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 45(2)** (with Sch. 7)
- F39** Words in reg. 11(1)(b) omitted (6.4.2011) by virtue of [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(3)(a)**
- F40** Words in reg. 11(1)(d) omitted (6.4.2011) by virtue of [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(3)(a)**
- F41** Reg. 11(2) omitted (6.4.2011) by virtue of [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(3)(b)**
- F42** Words in reg. 11(3) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 45(3)** (with Sch. 7)
- F43** Words in reg. 11(3) omitted (6.4.2011) by virtue of [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(3)(c)(i)**
- F44** Word in reg. 11(3) substituted (6.4.2011) by [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(3)(c)(ii)**
- F45** Words in reg. 11(3) omitted (6.4.2011) by virtue of [The Marine and Coastal Access Act 2009 \(Commencement No.5, Consequential and Transitional Provisions\) Order 2011 \(S.I. 2011/556\)](#), art. 1(3), **Sch. para. 1(3)(c)(iii)**

### Deposit of maps and certificates

12. [<sup>F46</sup>The appropriate agency] shall keep available at its principal office and at each of its principal regional offices, at all reasonable times, for inspection by the public free of charge—

- (a) the maps referred to in the definition of “estuary” in regulation 2(1);

<sup>F47</sup>(b) .....

- (c) particulars of certificates issued under regulation 4(3), 5(3) and 5(5)(b).

- F46** Words in reg. 12 substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 46** (with Sch. 7)
- F47** Reg. 12(b) revoked (11.8.2003) by [The Urban Waste Water Treatment \(England and Wales\) \(Amendment\) Regulations 2003 \(S.I. 2003/1788\)](#), regs. 1(1), **4(3)**

## [<sup>F48</sup> Reporting

**12A.**—(1) The appropriate authority must prepare and publish a situation report on the disposal of urban waste water and sludge.

(2) The appropriate authority must review and assess compliance with these Regulations in each agglomeration and prepare and publish a report on—

- (a) the level of that compliance;
- (b) identified reasons for non-compliance where applicable;
- (c) proposed measures to achieve compliance with these Regulations.

(3) A report under paragraph (1) and (2) must be published in such manner as the appropriate authority considers appropriate.

(4) The first reports under paragraphs (1) and (2) must be published by 31st December 2020.

(5) Subsequent reports must be published at intervals not exceeding two years.

(6) In this regulation, the “appropriate authority” means—

- (a) in relation to England, the Secretary of State;
- (b) in relation to Wales, the Welsh Ministers.]

**F48** Reg. 12A inserted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(3)**; 2020 c. 1, Sch. 5 para. 1(1)

## Information and assistance required in connection with the control of pollution

**13.** For the purposes of section 202 of the Water Resources Act 1991 (information and assistance required in connection with the control of pollution), [<sup>F49</sup>the obligations of the Secretary of State and the Welsh Ministers under regulation 12A to publish a report] shall be treated as functions of the Secretary of State [<sup>F50</sup>and the Welsh Ministers] under the water pollution provisions of that Act:

<sup>F51</sup>(a) .....

<sup>F51</sup>(b) .....

**F49** Words in reg. 13 substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(4)(a)(i)**; 2020 c. 1, Sch. 5 para. 1(1)

**F50** Words in reg. 13 inserted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(4)(a)(ii)**; 2020 c. 1, Sch. 5 para. 1(1)

**F51** Reg. 13(a)(b) omitted (31.12.2020) by virtue of [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(4)(b)**; 2020 c. 1, Sch. 5 para. 1(1)

Signed by authority of the Secretary of State

*Robert Atkins*  
Minister of State,  
Department of the Environment

*John Redwood*  
Secretary of State for Wales



## SCHEDULE 1

Regulation 3

## PART I

## CRITERIA FOR IDENTIFICATION OF SENSITIVE AREAS

A water body must be identified as a sensitive area if it falls into one of the following groups:

- (a) natural freshwater lakes, other freshwater bodies, estuaries and coastal waters which are found to be eutrophic or which in the near future may become eutrophic if protective action is not taken.

The following elements might be taken into account when considering which nutrient should be reduced by further treatment:

- (i) lakes and streams reaching lakes/reservoirs/closed bays which are found to have a poor water exchange, whereby accumulation may take place. In these areas, the removal of phosphorus should be included unless it can be demonstrated that the removal will have no effect on the level of eutrophication. Where discharges from large agglomerations are made, the removal of nitrogen may also be considered;
- (ii) estuaries, bays and other coastal waters which are found to have a poor water exchange, or which receive large quantities of nutrients. Discharges from small agglomerations are usually of minor importance in those areas, but for large agglomerations, the removal of phosphorus and/or nitrogen should be included unless it can be demonstrated that the removal will have no effect on the level of eutrophication;
- (b) surface freshwaters intended for the abstraction of drinking water which could contain more than [<sup>F52</sup>50 mg/l of nitrates in 95% of the samples] if action is not taken;
- (c) areas where further treatment than secondary or equivalent treatment is necessary to fulfil [<sup>F53</sup>retained EU law].

**F52** Words in Sch. 1 Pt. 1(b) substituted (17.9.2018) by [The Environment, Food and Rural Affairs \(Miscellaneous Amendments and Revocations\) Regulations 2018 \(S.I. 2018/942\)](#), regs. 1(2), **30(3)** and words in Sch. 1 Pt. 1(b) substituted (W.) (17.12.2018) by [The Environment, Planning and Rural Affairs \(Miscellaneous Amendments\) \(Wales\) Regulations 2018 \(S.I. 2018/1216\)](#), regs. 1(3), **2(3)**

**F53** Words in Sch. 1 Pt. 1 substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(5)**; 2020 c. 1, **Sch. 5 para. 1(1)**

**F52** Words in Sch. 1 Pt. 1(b) substituted (17.9.2018) by [The Environment, Food and Rural Affairs \(Miscellaneous Amendments and Revocations\) Regulations 2018 \(S.I. 2018/942\)](#), regs. 1(2), **30(3)** and words in Sch. 1 Pt. 1(b) substituted (W.) (17.12.2018) by [The Environment, Planning and Rural Affairs \(Miscellaneous Amendments\) \(Wales\) Regulations 2018 \(S.I. 2018/1216\)](#), regs. 1(3), **2(3)**

**F53** Words in Sch. 1 Pt. 1 substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(5)**; 2020 c. 1, **Sch. 5 para. 1(1)**

## PART II

### CRITERIA FOR IDENTIFICATION OF HIGH NATURAL DISPERSION AREAS

A marine water body or area can be identified as a high natural dispersion area if the discharge of waste water does not adversely affect the environment as a result of morphology, hydrology or specific hydraulic conditions which exist in that area.

When identifying high natural dispersion areas, the Secretary of State shall take into account the risk that the discharged load may be transferred to adjacent areas where it can cause detrimental environmental effects. The Secretary of State shall recognise the presence of sensitive areas outside England and Wales.

The following elements shall be taken into consideration when identifying high natural dispersion areas:

— open bays, estuaries and other coastal waters with a good water exchange and not subject to eutrophication or oxygen depletion or which are considered unlikely to become eutrophic or to develop oxygen depletion due to the discharge of urban waste water.

#### SCHEDULE 2

Regulation 4

##### REQUIREMENTS FOR COLLECTING SYSTEMS

1. Collecting systems shall take into account waste water treatment requirements.
2. The design, construction and maintenance of collecting systems shall be undertaken in accordance with the best technical knowledge not entailing excessive costs, notably regarding—
  - (a) volume and characteristics of urban waste water;
  - (b) prevention of leaks;
  - (c) limitation of pollution of receiving waters due to storm water overflows.

#### SCHEDULE 3

Regulations 5, 6 and 11

## PART I

### REQUIREMENTS FOR DISCHARGES FROM TREATMENT PLANTS

1. Treatment plants shall be designed or modified so that representative samples of the incoming waste water and of treated effluent can be obtained before discharge to receiving waters.
2. Discharges from urban waste water treatment plants subject to treatment in accordance with regulation 5(1) and (2) shall, subject to paragraphs 4 and 5 of Part II of this Schedule, meet the requirements shown in Table 1 below.
3. Discharges from urban waste water treatment plants to those sensitive areas which are subject to eutrophication as identified in sub-paragraph (a) of Part I of Schedule 1 shall, subject to paragraphs 4 and 5 of Part II of this Schedule, also meet the requirements in Table 2 below.

**Changes to legislation:** There are currently no known outstanding effects for the *The Urban Waste Water Treatment (England and Wales) Regulations 1994*. (See end of Document for details)

4. More stringent requirements than those shown in Table 1 and/or Table 2 shall be applied where required to ensure that the receiving waters satisfy [<sup>F54</sup>retained EU law].

**F54** Words in Sch. 3 Pt. 1 para. 4 substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019](#) (S.I. 2019/558), regs. 1(1), **7(6)**; 2020 c. 1, Sch. 5 para. 1(1)

5. The points of discharge of urban waste water shall be chosen, as far as possible, so as to minimise the effects on receiving waters.

**TABLE 1**

**REQUIREMENTS FOR DISCHARGES FROM URBAN WASTE WATER  
TREATMENT PLANTS SUBJECT TO REGULATION 5(1) AND (2)**

The values for concentration or for the percentage of reduction shall apply.

Parameters	Concentration	Minimum percentage of reduction {s001}	Reference method of measurement
Biochemical oxygen demand (BOD5 at 20°C without nitrification {s002})	25 mg/l O <sub>2</sub>	70—90	Homogenized, unfiltered, undecanted sample. Determination of dissolved oxygen before and after five-day incubation at 20° +1°C, in complete darkness. Addition of a nitrification inhibitor
Chemical oxygen demand (COD)	125 mg/l O <sub>2</sub>	75	Homogenized, unfiltered, undecanted sample Potassium dichromate

{s001} Reduction in relation to the load of the influent.

{s002} The parameter can be replaced by another parameter: total organic carbon (TOC) or total oxygen demand (TOD) if a relationship can be established between BOD5 and the substitute parameter.

Analyses concerning discharges from lagooning shall be carried out on filtered samples; however, the concentration of total suspended solids in unfiltered water samples shall not exceed 150 mg/l.

**TABLE 2**

**REQUIREMENTS FOR DISCHARGES FROM URBAN WASTE WATER TREATMENT  
PLANTS TO SENSITIVE AREAS WHICH ARE SUBJECT TO EUTROPHICATION  
AS IDENTIFIED IN SUB-PARAGRAPH (a) OF PART I OF SCHEDULE 1**

One or both parameters may be applied depending on the local situation. The values for concentration or for the percentage of reduction shall apply.

Parameters	Concentration	Minimum percentage of reduction {s003}	Reference method of measurement
Total phosphorus	2 mg/l P (10,000—100,000 p.e.) 1 mg/l P (more than 100,000 p.e.)	80	Molecular absorption spectrophotometry
Total nitrogen {s004}	15 mg/l N (10,000—100,000 p.e.) 10 mg/l N (more than 100,000 p.e.)	70—80	Molecular absorption spectrophotometry

{s003} Reduction in relation to the load of the influent.

{s004} Total nitrogen means: the sum of total Kjeldahl-nitrogen (organic N + NH<sub>3</sub>), nitrate (NO<sub>3</sub>)-nitrogen and nitrite (NO<sub>2</sub>)-nitrogen.

## PART II

### REFERENCE METHODS FOR MONITORING AND EVALUATION OF RESULTS

- (a) (a) [<sup>F55</sup>The appropriate agency] shall apply a monitoring method which corresponds at least with the level of requirements described below.
- (b) Alternative methods to those mentioned in paragraphs 2, 3 and 4 may be used provided that it can be demonstrated that equivalent results are obtained.
- (c) [<sup>F56</sup>The appropriate agency] shall provide the Secretary of State with all relevant information concerning the applied method.

**F55** Words in Sch. 3 Pt. 2 para. 1(a) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 47(2)** (with Sch. 7)

**F56** Words in Sch. 3 Pt. 2 para. 1(c) substituted (1.4.2013) by [The Natural Resources Body for Wales \(Functions\) Order 2013 \(S.I. 2013/755\)](#), art. 1(2), **Sch. 4 para. 47(2)** (with Sch. 7)

- (a) (a) Flow-proportional or time-based 24-hour samples shall be collected at the same welldefined point in the outlet and if necessary in the inlet of the treatment plant in order to monitor compliance with the requirements for discharged waste water laid down in these Regulations.
  - (b) Good international laboratory practices aiming at minimising the degradation of samples between collection and analysis shall be applied.
3. The minimum annual number of samples shall be determined according to the size of the treatment plant and be collected at regular intervals during the year:

— 2,000 to 9,999 p.e.:	12 samples during the first year; four samples in subsequent years, if it can be shown that the water during the first year complies with the provisions of these Regulations; if one sample of the four fails, 12 samples must be taken in the year that follows;
— 10,000 to 49,999 p.e.:	12 samples;

— 50,000 p.e. or over: 24 samples.

4. The treated waste water shall be assumed to conform to the relevant parameters if, for each relevant parameter considered individually, samples of the water show that it complies with the relevant parametric value in the following way:

- (a) for the parameters specified in Table 1 and sub-paragraph (b) of regulation 5(8), a maximum number of samples which are allowed to fail the requirements, expressed in concentrations and/or percentage reductions in that Table and that sub-paragraph, is specified in Table 3;
- (b) for the parameters of Table 1 expressed in concentrations, the failing samples taken under normal operating conditions must not deviate from the parametric values by more than 100%;
- (c) for those parameters specified in Table 2 the annual mean of the samples for each parameter shall conform to the relevant parametric values.

5. Extreme values for the water quality in question shall not be taken into consideration when they are the result of unusual situations such as those due to heavy rain.

**TABLE 3**

<b>Series of samples taken in any year</b>	<b>Maximum permitted number of samples which fail to conform</b>
4—7	1
8—16	2
17—28	3
29—40	4
41—53	5
54—67	6
68—81	7
82—95	8
96—110	9
111—125	10
126—140	11
141—155	12
156—171	13
172—187	14
188—203	15
204—219	16
220—235	17
236—251	18
252—268	19
269—284	20

285—300	21
301—317	22
318—334	23
335—350	24
351—365	25

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## SCHEDULE 4

Regulation 7

### INDUSTRIAL WASTE WATER

Industrial waste water entering collecting systems and urban waste water treatment plants shall be subject to such pre-treatment as is required in order to—

- protect the health of staff working in collecting systems and treatment plants;
- ensure that collecting systems, waste water treatment plants and associated equipment are not damaged;
- ensure that the operation of the waste water treatment plant and the treatment of sludge are not impeded;
- ensure that discharges from the treatment plants do not adversely affect the environment, or prevent receiving water from complying with [<sup>F57</sup>retained EU law];
- ensure that sludge can be disposed of safely in an environmentally acceptable manner.

**F57** Words in Sch. 4 substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(7)**; 2020 c. 1, Sch. 5 para. 1(1)

**F57** Words in Sch. 4 substituted (31.12.2020) by [The Floods and Water \(Amendment etc.\) \(EU Exit\) Regulations 2019 \(S.I. 2019/558\)](#), regs. 1(1), **7(7)**; 2020 c. 1, Sch. 5 para. 1(1)

## SCHEDULE 5

Regulation 8

### INDUSTRIAL SECTORS REFERRED TO IN REGULATION 8

1. Milk processing.
2. Manufacture of fruit and vegetable products.
3. Manufacture and bottling of soft drinks.
4. Potato processing.
5. Meat industry.
6. Breweries.
7. Production of alcohol and alcoholic beverages.
8. Manufacture of animal feed from plant products.

9. Manufacture of gelatine and of glue from hides, skin and bones.
10. Malt-houses.
11. Fish-processing industry.

## EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations implement, as respects England and Wales, Council Directive [91/271/EEC](#) concerning urban waste water treatment.

Regulation 4 supplements the general duty imposed on sewerage undertakers by section 94 of the Water Industry Act 1991, by requiring them to secure that “collecting systems” (this and other expressions are defined in regulation 2(1)) are provided by specified dates, and to secure that urban waste water entering collecting systems is subject to treatment provided in accordance with regulation 5. Regulation 5 requires such treatment to be provided by specified dates and, with regulation 6(1) and Part I of Schedule 3, prescribes the standard of treatment required.

The specified date and the standard of treatment are determined according to the size of the “agglomeration” from which the waste water emanates and the nature of the waters into which the treated waste water is discharged. Generally, “secondary treatment” is required, but more stringent treatment is required for waters identified as “sensitive areas” and less stringent treatment is permissible for waters identified as “high natural dispersion areas”. The areas identified as sensitive areas and high natural dispersion areas are shown on maps deposited with the National Rivers Authority (“NRA”); the Secretary of State is under a duty to review the identification of these areas at least every four years (regulation 3). Discharges from smaller agglomerations need be subjected only to “appropriate treatment”.

Regulation 6 also requires the NRA to secure, by means of its powers to grant and modify discharge consents under Chapter II of Part III of the Water Resources Act 1991, that the relevant requirements of the Regulations in relation to discharges are satisfied.

Regulation 7 imposes requirements in respect of discharges of industrial waste water to collecting systems or treatment plants. Sewerage undertakers are empowered to modify trade effluent consents and agreements for this purpose.

Regulation 8 imposes a duty on the NRA to secure that direct discharges on and after 31st December 2000 of biodegradable industrial waste water from the industrial sectors listed in Schedule 5 are subject to conditions appropriate to the nature of the industry concerned.

Regulation 9 requires the phasing out of the dumping of sludge from ships by 31st December 1998, and the progressive reduction before that date of the total amount of toxic, persistent and bioaccumulable materials in sludge so dumped.

Regulation 11 imposes a duty on the NRA to ensure that monitoring of discharges and waters to which the Regulations apply, and such other studies as are required by the Regulations, are carried out. The requirements as to monitoring of discharges are set out in Part II of Schedule 3, and regulation 10 makes provision in connection with samples and records obtained in accordance with those requirements.

Regulation 12 requires the NRA to keep certain documents available for inspection by the public, and regulation 13 enables the Secretary of State to require information to be furnished to him for the purpose of enabling him to comply with certain requirements of the Directive.

***Changes to legislation:*** *There are currently no known outstanding effects for the The Urban Waste Water Treatment (England and Wales) Regulations 1994. (See end of Document for details)*

A compliance cost assessment in respect of these Regulations may be obtained from Water Directorate, Department of the Environment, Romney House, 43 Marsham Street, London SW1P 3PY, or Environment Division, Welsh Office, Cathays Park, Cardiff CF1 3NQ.



**Changes to legislation:**

There are currently no known outstanding effects for the The Urban Waste Water Treatment (England and Wales) Regulations 1994.

## Hendon STW (rough draft!)

Hendon STW serves a population equivalent of over 210,00 and its outlet is offshore in the North Sea. In recent years, the operation of Hendon STW has been subject to close scrutiny by local campaigners, Bob Latimer and Steve Lavelle. They have already established that unreliable EDM spill data for Hendon STW was reported to the EA by Northumbrian Water in 2018/2019. Briefly, a first set of spill data for the period 1/4/2019 to 31/3/2020 provided to them by the EA showed a total duration of about 16 hours. After Steve Lavelle challenged this figure, the EA produced a second dataset (presumably originating from Northumbrian Water) for the same period corresponding to 646 hours. Here, we show that for 3 of the 4 years 2018-2021, there are major discrepancies between the EDM spill data submitted to the EA by Northumbrian Water and that obtained by Steve Lavelle.

year	hours reported	counted spills	EDM active	Northumbrian Water - comments	WASP beliefs/facts
2018	No EDM data submitted to EA for any CSO				Local campaigners obtained EDM data about 503 spilling hrs in total unable to check compliance
2019	No EDM data submitted to EA for Hendon				Local campaigners proved EDM report false about 600 spilling hours in total illegal, early spills on at least 14 days
2020	4.7/109.14 (Jan-Mar)	11/33 (Jan-Mar)			Local campaigners proved EDM report false further 300+ spilling hours (Apr-Dec) illegal, early spills on at least 10 days
2021	565.44	116	100.00%		illegal, early spills on at least 6 days

**Table 1: EDM annual summary spill data submitted to EA by Northumbrian Water for Hendon STW**

incorrect unreliable consistent withheld

On April 27th 2022, WASP submitted an EIR request to Northumbrian Water for all individual spill start/stop times for every overflow included in its EDM submissions to the EA for 2020 and 2021. Northumbrian provided the data in the form of a spreadsheet on May 4<sup>th</sup> 2022, along with the comment:

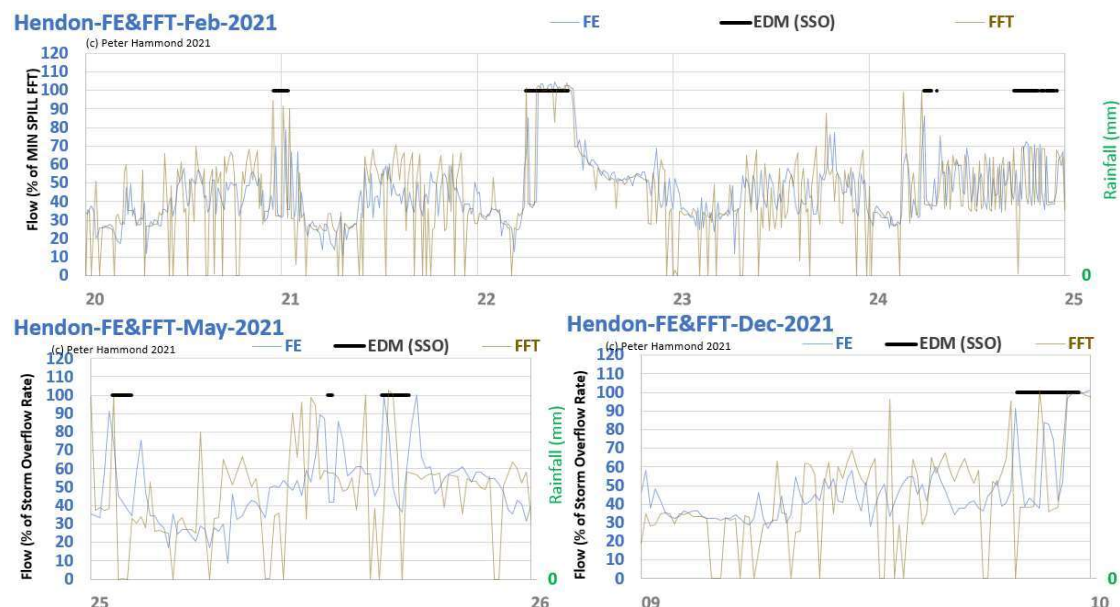
*Please note that we make no guarantees as to the accuracy of this information and it should not be relied upon for any purpose.*

For Hendon STW, Northumbrian Water provided detailed spill data for 2021 but none for 2020.

In addition, WASP has been able to access flow to treatment and final effluent flow data for 2015 to 2021 provided by Northumbrian Water to Steve Lavelle via EIR-21073.

### 2021

WASP's analysis has confirmed that the 2021 spilling hours total submitted to the EA by Northumbrian Water for Hendon STW is consistent with that derived from the detailed spill data provided to WASP. However, from the spill data provided by Northumbrian Water directly to WASP and the flow data provided to Steve Lavelle, it appears that Hendon STW failed to maintain compliant flow to full treatment on at least 6 days in 2021. In Fig. 1, the black horizontal segments denote spill intervals and their location on the vertical axis corresponds to 100% of the minimum, continued flow to treatment level (1,856 l/s) that is required for permit compliance during a spill. WASP believes illegal, early spilling occurred in 2021 on February 20<sup>th</sup>, 21<sup>st</sup>, 22<sup>nd</sup>, 24<sup>th</sup>; May 25<sup>th</sup>; and, on December 9<sup>th</sup>.



**Figure 1: WASP believes early spills occurred on at least 6 days in 2021 at Hendon STW**

## 2020

In the 2020 spill data submission by Northumbrian Water to the EA, no figure for spilling hours for Hendon STW was provided but a comment was included as follows:

*“Monitor present. Data for 2019 under review between EA and NWL. Agreed monitoring data will follow in the bespoke annual return.”*

The two data series in the figure below contain extracts for 2020 dates and lengths of spills at Hendon STW provided by the EA to Steve Lavelle on separate occasions (in an inconvenient PDF format). The left extract simply gives the date of the spill and its length in hours and minutes. The right extract gives the spill start and stop times as well as length of the spill in hours, minutes and seconds.

09/01/2020	06:21
13/01/2020	00:08
14/01/2020	00:02
09/02/2020	01:41
12/02/2020	00:10
13/02/2020	00:30
15/02/2020	00:46
22/02/2020	00:31
24/02/2020	00:08
08/03/2020	00:01
11/03/2020	00:45

**Spill dates and lengths in hrs:mins**  
(from 2019-20 report.pdf)  
**Totalling 4.7 hrs**

09/01/2020 02:10:21	09/01/2020 08:40:41	6:30:20
09/01/2020 08:43:01	09/01/2020 08:47:11	0:04:10
09/01/2020 08:51:51	09/01/2020 16:54:01	8:02:10
09/01/2020 20:43:01	09/01/2020 21:38:11	0:55:10
12/01/2020 11:49:41	12/01/2020 13:35:31	1:45:50
13/01/2020 18:21:31	13/01/2020 20:44:01	2:22:30
14/01/2020 14:54:01	14/01/2020 18:59:31	4:05:30
16/01/2020 21:58:41	16/01/2020 23:10:00	1:11:19
01/02/2020 19:57:31	01/02/2020 21:11:51	1:14:20
09/02/2020 00:34:51	09/02/2020 02:43:11	2:08:20
09/02/2020 05:06:01	09/02/2020 18:47:21	13:41:20
13/02/2020 06:20:41	13/02/2020 11:38:11	5:17:30
13/02/2020 13:18:31	13/02/2020 15:38:11	2:19:40
15/02/2020 18:08:31	16/02/2020 14:34:41	20:26:10
16/02/2020 18:32:21	16/02/2020 20:25:00	1:52:39
20/02/2020 10:47:01	20/02/2020 11:21:21	0:34:20
20/02/2020 11:40:31	20/02/2020 12:45:11	1:04:40
22/02/2020 03:31:11	22/02/2020 05:25:00	1:53:49
23/02/2020 07:58:21	23/02/2020 08:20:41	0:22:20
24/02/2020 05:58:21	24/02/2020 18:41:11	12:42:50
24/02/2020 19:04:11	24/02/2020 20:15:01	1:10:50
28/02/2020 05:29:11	28/02/2020 08:55:00	3:25:49
28/02/2020 14:27:01	28/02/2020 15:07:01	0:40:00
29/02/2020 21:20:41	29/02/2020 22:40:00	1:19:19
08/03/2020 05:05:01	08/03/2020 06:28:11	1:23:10
09/03/2020 20:02:01	09/03/2020 21:44:01	1:42:00
09/03/2020 22:32:11	09/03/2020 23:22:51	0:50:40
11/03/2020 16:44:21	11/03/2020 17:49:41	1:05:20
11/03/2020 18:53:31	11/03/2020 22:35:41	3:42:10
12/03/2020 21:41:31	12/03/2020 22:43:31	1:02:00
28/03/2020 16:04:31	28/03/2020 17:36:21	1:31:50
31/03/2020 04:18:41	31/03/2020 06:34:51	2:16:10
31/03/2020 08:40:00	31/03/2020 09:03:21	0:23:21

**Spill dates and lengths in hrs:mins:secs**  
(from Copy of Hendon Return 2019\_20\_EA Sent.pdf)  
**Totalling 109.14**

**Figure 2: two extracts of EDM spill times and lengths provided to Steve Lavelle on separate occasions**

Clearly, the extracts do not agree and it is assumed that Northumbrian Water provided incorrect data on the first occasion that was subsequently challenged and replaced. WASP has used the second extract in its analysis. An overview of final effluent (FE), flow to full treatment (FFT), settled storm overflow (SSO) and rainfall data is given in Fig. 3.

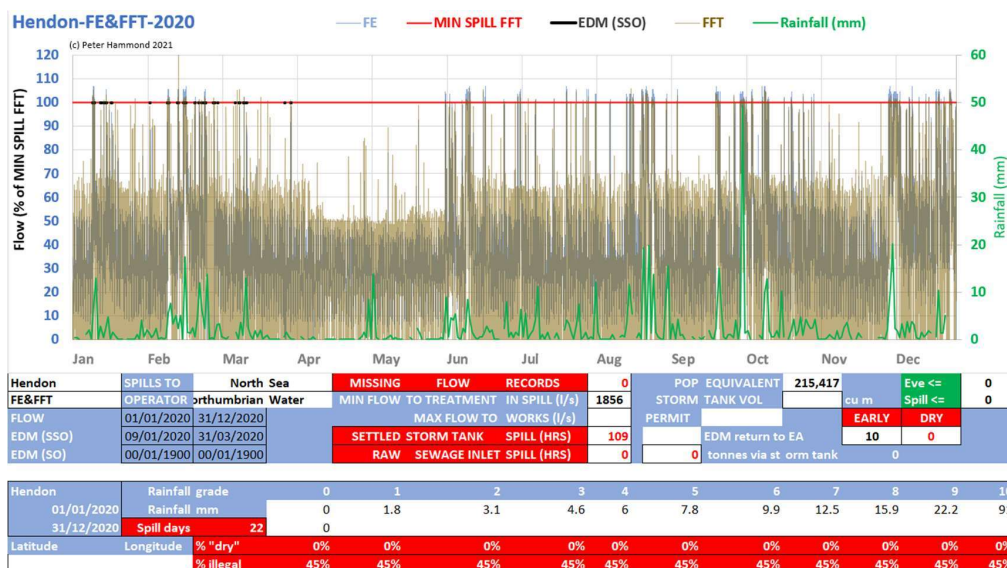


Figure 3: overview of flow, spill and rainfall data for 2020 for Northumbrian Water's Hendon STW

WASP believes there were at least 10 days when illegal, early spills occurred in the three months for which spill data was provided: January 12<sup>th</sup>, 13<sup>th</sup>, 16<sup>th</sup>; February 22<sup>nd</sup>, 28<sup>th</sup>, 29<sup>th</sup>; March 8<sup>th</sup>, 9<sup>th</sup>, 12<sup>th</sup>, 13<sup>th</sup>.



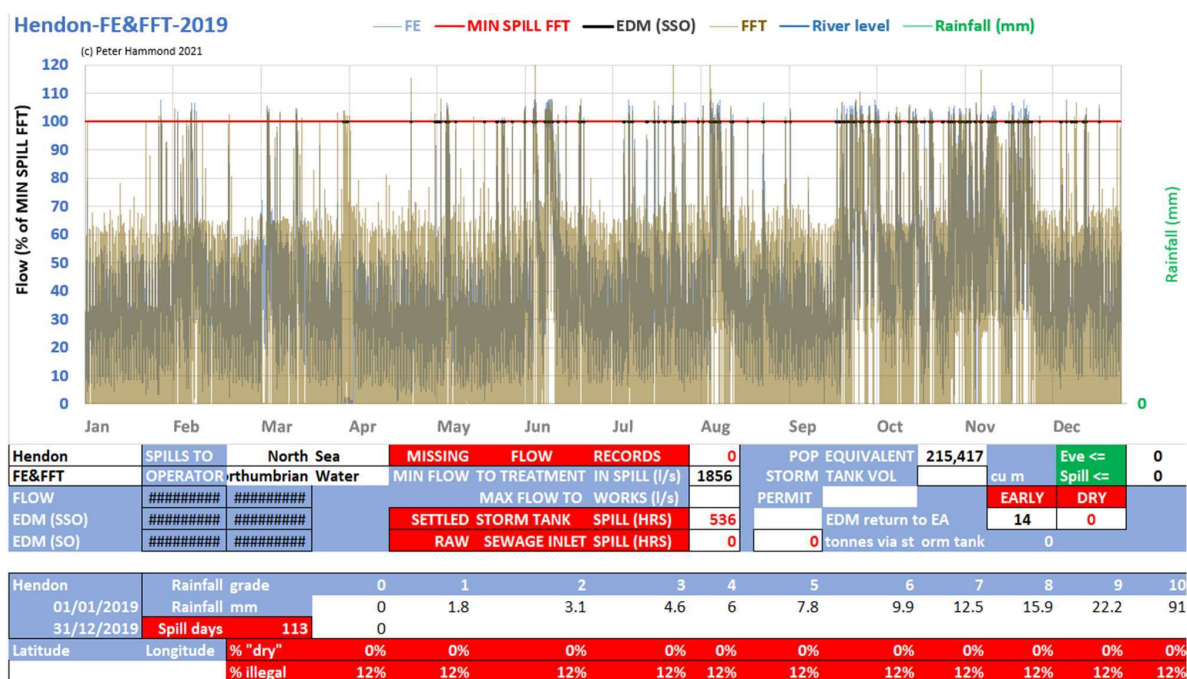
Figure 4: WASP believes there were illegal, early spills from Hendon STW on at least 10 days in 2020

## 2019

The EDM spill data provided to Steve Lavelle for Hendon STW for 2019 is a mix of spill dates and lengths for the first 3 months of the year totalling 60.38 hours (Table ?) and individual start-stop times for the remaining 9 months totalling 535.59 hours (overview Fig. 5).

Date	Spill length (hrs)	Date	Spill length (hrs)	Date	Spill length (hrs)	Date	Spill length (hrs)
01/02/2019	1.33	08/02/2019	1.55	03/03/2019	6.80	09/03/2019	0.85
02/02/2019	0.57	09/02/2019	1.07	04/03/2019	8.65	10/03/2019	1.70
05/02/2019	1.57	11/02/2019	3.50	06/03/2019	9.75	16/03/2019	10.40
07/02/2019	9.23	20/02/2019		08/03/2019	1.00	30/03/2019	0.35

**Table Spill dates and lengths for Hendon STW for 1/1/2019 to 31/3/2019**  
(Totalling 60.38 hours)



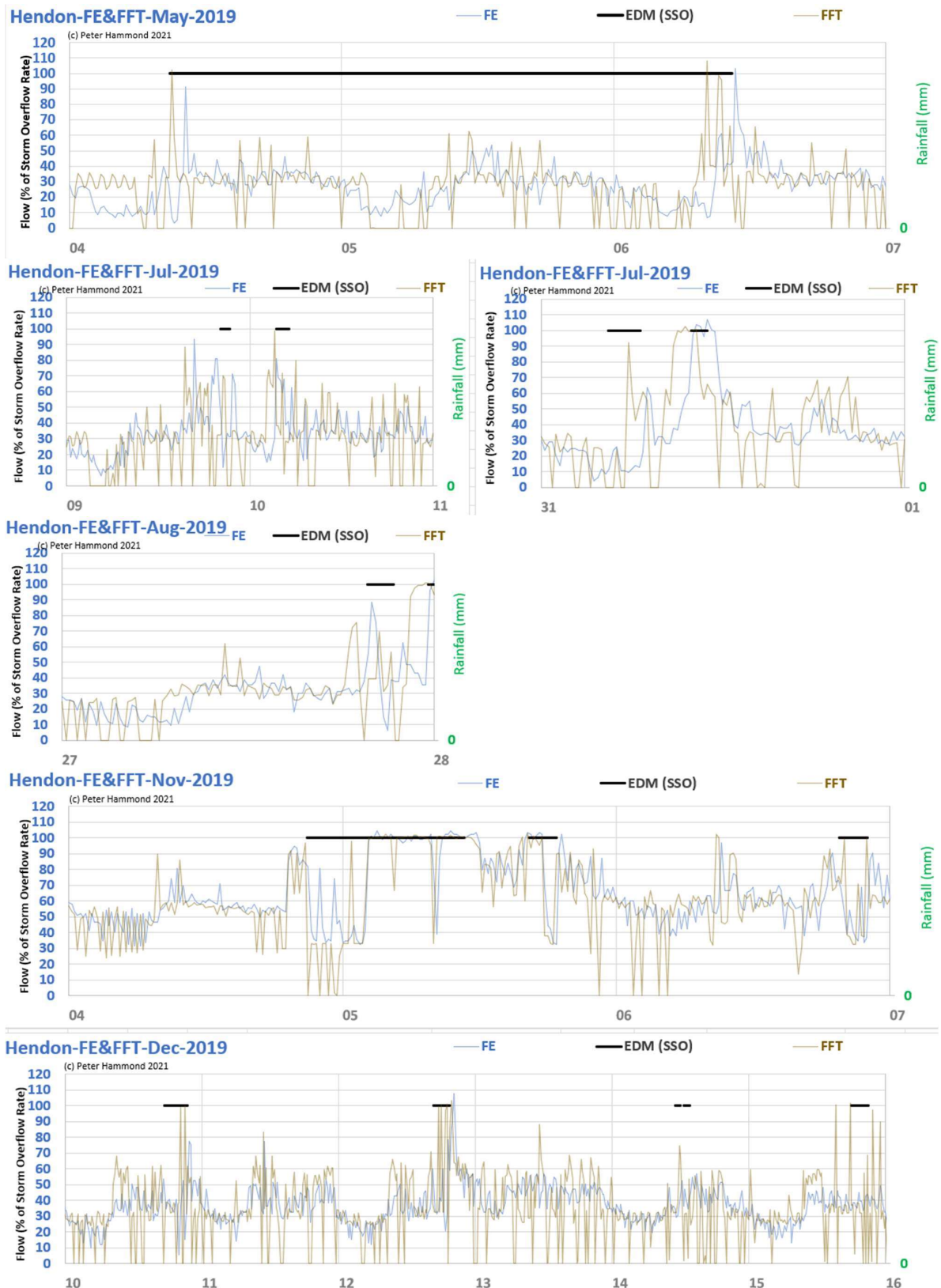
**Figure 5: annual overview of flow to treatment, final effluent flow and EDM spill data for Hendon STW**

Northumbrian Water did not submit any EDM spill data to the EA for 2019 for Hendon STW despite providing data to Steve Lavelle suggesting almost 600 spilling hours for the year. WASP believes that the sewage flow data and EDM spill data are consistent with this annual spilling total. WASP also believes that there were illegal, early spills on at least 14 days at Hendon STW in 2019 (Fig. 6).

## 2018

Northumbrian Water was the only water company in England and Wales not to submit any EDM spill data to the EA in 2018 for any overflows. The summary EDM spill data (dates and lengths of spills) provided to Steve Lavelle correspond to 101 individual spills totalling 502.92 spilling hours. Without the detailed spill start-stop times, it is not possible to determine their compliance with the EA permit.





**Figure 6: WASP believes there were illegal, early spills on at least 14 days at Hendon STW in 2019**  
May 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>; July 9<sup>th</sup>, 10<sup>th</sup>, 31<sup>st</sup>; August 27<sup>th</sup>; November 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>; December 10<sup>th</sup>, 12<sup>th</sup>, 14<sup>th</sup>, 15<sup>th</sup>

Site Name	Permit Number	2018 data		2019 data		2020 data		2021 data		2022 data	
		Spills	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)
Boldon Colliery Cso Arnold Strt Cso (Nos. 97/99)	EPRAB3290EA	0	0	3	0.75	0	0	0	0	2	0.5
Boldon Colliery Cso Brooke Avenue New Road	235/F/0613	0	0	0	0	0	0	17	80	0	0
Boldon Colliery Cso Charles Street (Nos. 95/97)	EPRAB3291RT	0	0	2	0.75	2	3	4	3	4	1
Boldon Colliery Cso Ernest Street No. 3	EPRAB3390W N	9	2	36	13.5	2	1.5	2	3	5	2.5
Boldon Colliery Cso North Road No. 1	235/1505	0	0	1	0.5	1	0.25	2	3	4	1.5
Boldon Colliery Cso South Crescent No.7	EPRCB3096R W	6	2	8	7.25	2	0.5	5	5	0	0
Brooke Avenue (No20) Sty049	EPRBB3792AU	37	46	49	72	38	54.25	44	79	35	40.25
Cemetery Road Cso Sty029	235/C/0047	22	50	30	42	19	36.5	19	66	19	81.75
Coronation Street Cso	EPRBP3720XY	0	0	45	179.02	37	230	40	260	25	86.56
Cso East Holborn West	235/1644	3	24	6	4.65	1	0.37	34	791	12	34.25
Cso East Holborn West	235/1645	0	0	0	0	0	0	0	0	0	0
Cso Junct.lang holme Avenue & Beckenham Avenue	235/1590	1	1	9	8.25	2	0.75	11	33	6	5.5
East Boldon Cso No 6	235/F/0616	39	36	48	68.5	46	57.25	26	53	31	31.75
Eden Walk CSO (STY 034)	235/1969	25	21	36	51	24	24	32	46	26	26

Site Name	Permit Number	2018 data		2019 data		2020 data		2021 data		2022 data	
		Spills	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)
Eldon Street Cso (Sty067)	235/1944	4	1	73	309	49	259.5	68	412	62	223.25
Harton Low Staithes (Mill Dam)	235/1907	2	2	3	4.5	5	5.25	3	2	4	1.25
Hebburn Cso Pinewood / Lamport St (No. 25)	235/1051	5	3	10	7	4	2	9	7	6	11
Hebburn Cso Reyrolle Works South (Rear) [D22]	235/1186	11	6	77	124	67	152.25	65	171	58	81
Hebburn Cso Royal Industrial Estate	235/1744	11	20	13	40.25	5	11.5	24	12	8	9.5
Jarrow Cso Bedesway [B10/104]	235/1276	53	191	117	1697.22	36	140.34	53	246	47	121.23
Jarrow Cso Regent Road (West Of A1) [B5/104]	235/B/0170	71	487	No 2019 data available		70	535.34	88	786	91	584.73
Marsden Cso Coast Road (A193) Redwell Lane	235/1588	17	58	18	59.16667	21	54.17	19	62	15	40.59
New Road Cso	235/1572	19	43	19	36	15	22.75	17	80	19	42.5
Prince Consort Rd Pump Station	235/1657	38	78	63	181.5	40	82	46	254	45	114.25
Rear 92/94 Charles Street Cso	EPRAB3290D W	0	0	0	0	0	0	0	0	0	0
Roman Road CSO	235/1703	28	119	55	212.75	33	132.75	43	266	31	108
Don Smith St SPS	235/1652	5	8	12	52.5	4	15.5	16	1652	7	33.75



Site Name	Permit Number	2018 data		2019 data		2020 data		2021 data		2022 data	
		Spills	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)
South Shields Cso Temple Street [B26/101	235/1943	46	136	70	192.83	51	160.25	52	235	55	122.96
Springwell Park Cso	235/1704	16	55	28	84.75	24	115.75	35	305	26	65.5
Station Road CSO	235/1702	64	458	59	321.75	46	328.5	56	579	43	216.5
Tudor Road Cso (Sty068)	235/1905	67	256	68	202.64	26	90.58	37	80	43	216
Tyne Street Pumping Station	235/1656	0	0	0	0	0	0	1	0	0	0
Tyneside Cso No 85/201	235/B/0169	36	65	84	610	39	289.73	107	885	96	605.17
Wapping Street	235/1902	32	100	49	134	25	89.5	44	311.75	33	84.25
West Boldon Cso No 4	235/F/0614	65	195	95	232.5	84	378.5	79	477	32	67.25
West Holborne South Cso	235/1945	15	59	20	48.5	12	25.25	9	33	12	34.25
West of Hedworth Lane CSO STY 035	235/C/0044	26	19	32	26.5	25	27.5	21	14	31	15.25
Whitburn Steel Ps	245/1207	41	49.5	No 2019 data available		23	67.92	31	119	13	38.25
William Street Cso	235/1746	9	9	19	14.5	6	2.75	4	3	9	3.5
Blackett Street	235/1181			No 2019 data available		18	28.5	30	95	24	47
Burdon Road Cso	235/1279			27	70.3	19	39.37	33	1279	21	59.03
Cleadon Lea Pumping Station	235/1493			No 2019 data available		No 2020 data available		no	data	no	data
Cleadon Village Pumping Station	235/1494			No 2019 data available		No 2020 data available		no	data	no	data

Site Name	Permit Number	2018 data		2019 data		2020 data		2021 data		2022 data	
		Spills	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)
Cso At Sw Corner Of Allotment Garde	235/1187			1	0.5	2	3.75	8	16	5	7.75
Don Valley Pumping Station	235/B/0171			No 2019 data available		No 2020 data available		28	143	25	93.07
East Holborn Pumping Station	235/1646			No 2019 data available		No 2020 data available		0	0	no	data
Ellison Street Cso	235/1747			No 2019 data available		No 2020 data available		no	data	no	data
Harton Low Staithes Cso	235/1908			No 2019 data available		33	160.33	40	171	26	69.95
Harton Low Staithes Pumping Station	235/1638			No 2019 data available		No 2020 data available		no	data	no	data
Heaton Gardens Pumping Station	235/1388			No 2019 data available		No 2020 data available		no	data	1	2
Hebburn Riverside Sps	235/1050			No 2019 data available		No 2020 data available		no	data	no	data
Hebburn Village Pumping Station	235/0634			No 2019 data available		No 2020 data available		no	data	no	data
Jarrow Pretreatment Works	235/2012			No 2019 data available		No 2020 data available		no	data	no	data
Jarrow Road Pumping Station	235/1405			No 2019 data available		48	606.73	71	1090	31	200.38
Littlehaven Ps Water Company	235/1129			No 2019 data available		No 2020 data available		no	data	no	data
Marine Drive Pumping Station	235/1389			No 2019 data available		0	0	2	2	2	0.47

Site Name	Permit Number	2018 data		2019 data		2020 data		2021 data		2022 data	
		Spills	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)	Counted spills using 12-24hr counting method	Total Duration (hours)
Market Dock Pumping Station	235/1639			No 2019 data available		No 2020 data available		no	data		
Mitre Place Cso	235/1940			0	0	0	0	0	0	0	0
Pilot Street Pumping Station	235/0076			No 2019 data available		15	15.59	12	13	20	54.73
Reyrolle Sewer (North) Cso	235/1185			No 2019 data available		No 2020 data available		Not	Monitored	Not	Monitored
Tyneside Cso B5/301	235/B/0168			No 2019 data available		36	133.5	27	120	75	455.59
Wagonway Road Pumping Station	235/1745			No 2019 data available		142	1951.51	155	2391	132	1401.11
Wapping Street Pumping Station	235/1642			No 2019 data available		No 2020 data available		44	312	33	84.25
West Holborn Pumping Station	235/1655			No 2019 data available		No 2020 data available		no	data	no	data
Boldon Colliery Fenwick Street Cso	EPRCB3096NZ							1	1	0	0
Totals		823	2599.5	1285	5110.831	1197	6337.21	1614	14046.75	1350	5626.82

## DRAINAGE AND WASTEWATER MANAGEMENT PLANS (DWMP)



# LEVEL 2 STRATEGIC PLANNING AREA SUMMARY – WEAR SIDE



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## OVERVIEW

The Drainage and Wastewater Management Plan (DWMP) covers seven Strategic Planning Areas (SPA). The seven areas align broadly with the river basin catchments within the region and the main urban areas.

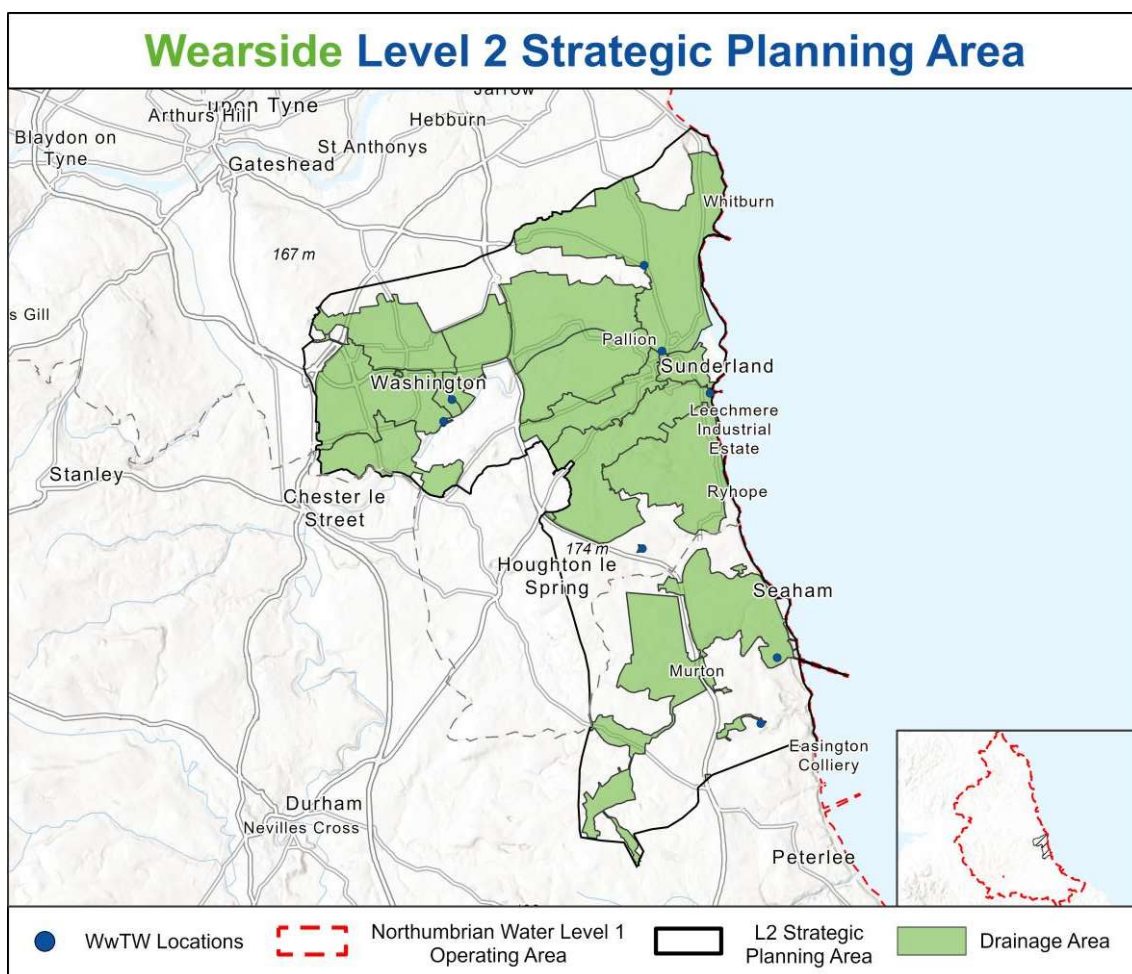
This document provides an overview of the DWMP for the **Wearside Level 2 SPA**.

Within the Wearside Level 2 SPA, there are:

- 6 Wastewater Treatment Works (WwTW)
- 6 Level 3 Tactical Planning Unit (TPU) areas
- 16 Wastewater Drainage Areas

The total estimated population of the Wearside Level 2 SPA is 301,000.

### WEARSIDE LEVEL 2 STRATEGIC PLANNING AREA



## DRAINAGE AREAS WITHIN WEARSIDE L2 SPA

The following table outlines all of the drainage areas within the Wearside Level 2 SPA. The table also outlines whether the drainage area triggered during the Risk Based Catchment Screening (RBCS) stage of the DWMP for detailed analysis as part of the Baseline Risk and Vulnerability Assessment (BRAVA) stage.

Drainage Area Reference	Drainage Area Name	WwTW Name	Triggered BRAVA?
08-D01	Seaham	Seaham WwTW	Yes
08-D02	Murton	Seaham WwTW	Yes
08-D04	Hawthorn	Hawthorn WwTW	Yes
08-D06	Seaburn & Roker	Hendon WwTW	Yes
08-D07	Hylton Castle	Hendon WwTW	Yes
08-D08	Wearmouth	Hendon WwTW	Yes
08-D09	Barnes Burn	Hendon WwTW	Yes
08-D10	Hendon Burn	Hendon WwTW	Yes
08-D11	Pallion	Hendon WwTW	Yes
08-D12	Ryhope & Silksworth	Hendon WwTW	Yes
08-D13	Nissan	Washington WwTW	Yes
08-D14	Washington North	Washington WwTW	Yes
08-D15	Washington Central	Washington WwTW	Yes
08-D16	Fatfield	Washington WwTW	Yes
08-D17	Burdon Village	Burdon Village WwTW	No
08-D18	Sheepfolds	Sheepfolds WwTW	No

## KEY STAKEHOLDERS

It is widely recognised and acknowledged that drainage systems are complex and have numerous interactions, both known and unknown. It was therefore important that the DWMP was not created solely by Northumbrian Water. While NWL have been tasked with the delivery of the DWMP, it was critical that the public and relevant stakeholders actively participated and offered support in its creation. We have worked with a range of relevant stakeholders in the production of the DWMP, including the Environment Agency (EA), Lead Local Flood Authorities, Local Planning Authorities, housing developers and environmental partners.

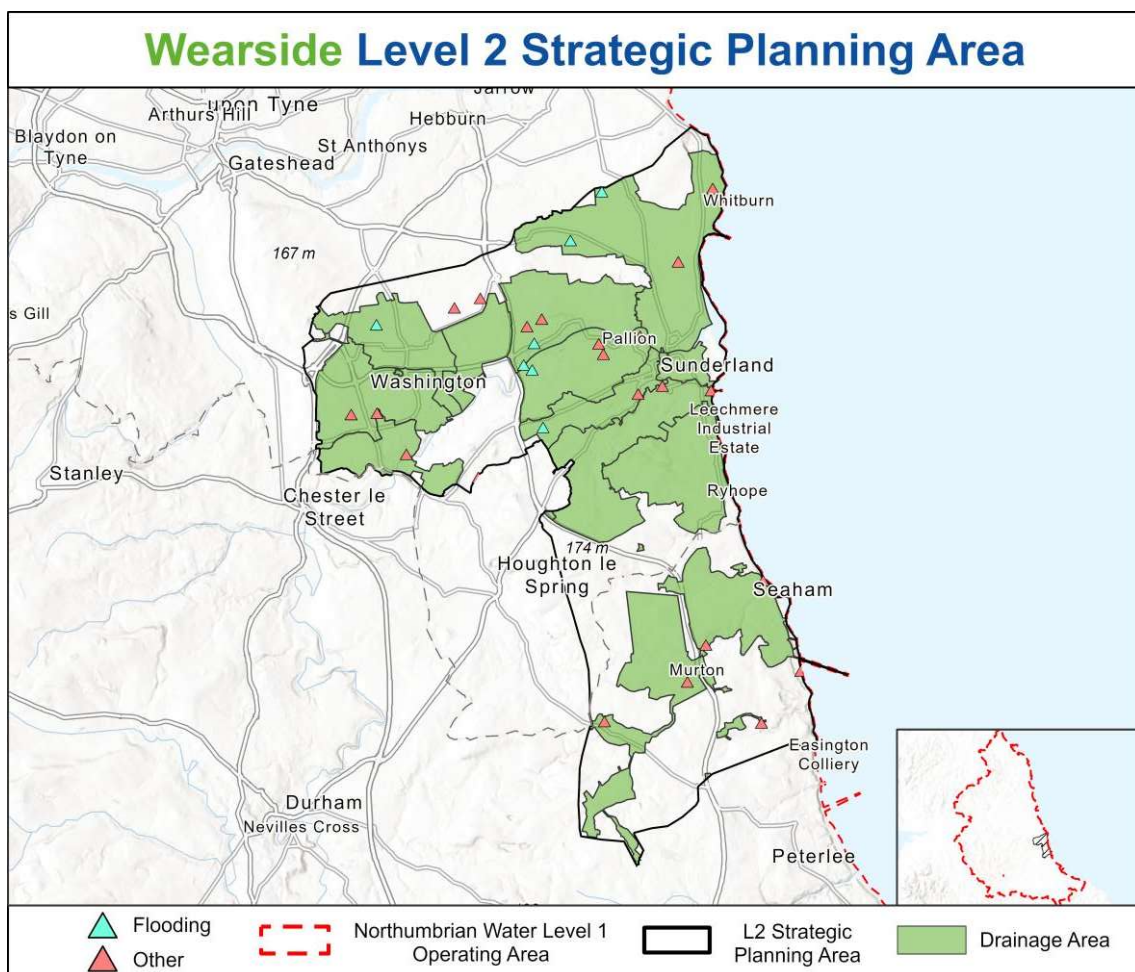
Through different partnerships and strategies, we play an active role within the region, working collaboratively with stakeholders on several projects. The DWMP builds on the strong foundation of the Northumbria Integrated Drainage Partnership (NIDP), which consists of 14 Lead Local Flood Authorities, the EA and Northumbrian Water. One of the aims of the NIDP is to identify opportunities to deliver surface water management schemes within catchments to reduce the risk and impact of flooding. Catchments are taken from the investigation stages where opportunity areas are identified,

through to the outline business case stage to determine funding sources, and ultimately through to scheme delivery. The award-winning partnership approach, which is based around collaboration to identify priority investment areas where benefits can be delivered for multiple stakeholders, provides an excellent platform for the DWMP.

To ensure that existing and future opportunities for working collaboratively with stakeholders were included in the production of the DWMP, engagement sessions were held in March 2023. During these sessions, all the geographical areas covered by the DWMP were reviewed to identify, record and map ongoing and future opportunities.

Key Stakeholders	
Environment Agency	
Local Authorities	
National Farmers Union	
Rivers Trusts	
Natural England	
Developers	
National Parks	

### Collaborative Working Opportunities





## Significant Collaborative Working Opportunities

Drainage Area Reference	Organisation	Opportunity Type
08-D05	Northumbria Integrated Drainage Partnership (NIDP)	Blackhall Colliery is an area of Nutrient Neutrality Zone. Northumbria Integrated Drainage Partnership scheme planned for 2024.
08-D06	Environment Agency	Environment Programme Pipeline Projects 2023-2028
08-D14	Northumbria Integrated Drainage Partnership (NIDP)	Washington North: Scheme planned for 2025-2026.

## CATCHMENT NEEDS

Through the Baseline Risk and Vulnerability Assessment (BRAVA) and Problem Characterisation stages of the DWMP, the requirements for investment within catchments were identified.

The following summaries provide the detail of the 'Catchment Needs' that have been identified within the Wearside Level 2 SPA.

### Storm Overflow Discharge Reduction Plan

The following table summarises the number of storm overflows within the Wearside Level 2 SPA and how many have been included in the DWMP for improvement in line with the Storm Overflow Discharge Reduction Plan (SODRP).

Storm Overflow Categorisation	Count	Storm Overflows Requiring Improvement
Inland – High Priority	14	11
Inland – Not High Priority	47	31
Bathing Water	11	5
Coastal / Estuarine (not linked to Bathing Water)	9	8
<b>Total</b>	<b>81</b>	<b>55</b>

### Storm Overflow Screening

Under the SODRP, all storm overflows are required to include 6mm screening provision on any discharges that are made.

The following table summarises the number of storm overflows within the Wearside Level 2 SPA that have been included in the DWMP for the provision of 6mm screening.

Storm Overflow Categorisation	Count	Storm Overflows Requiring Screening
Inland – High Priority	14	10
Inland – Not High Priority	47	24
Bathing Water	11	8
Coastal / Estuarine (not linked to Bathing Water)	9	2
<b>Total</b>	<b>81</b>	<b>44</b>

The full list of storm overflows within the Northumberland Level 2 SPA is included in the following table.

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
CSO AT WARKWORTH CRESCENT	08-D01	Seaham	2030 - 2035
MILL INN A SSO SEAHAM PARK	08-D01	Seaham	2030 - 2035
CSO NEW DRIVE RECREATION GROUND	08-D01	Seaham	2030 - 2035
DALTON-LE-DALE CSO	08-D01	Seaham	2030 - 2035
GLEBE ESTATE CSO	08-D01	Seaham	2040 - 2045
SEAHAM CSO NO 8	08-D01	Seaham	2040 - 2045
SHOTTON LANE CSO	08-D01	Seaham	2040 - 2045
SEAHAM SEWAGE TREATMENT WORKS	08-D01	Seaham	2040 - 2045
SEAHAM URBAN DISTRICT COUNCIL SSO SEATON CSO 1	08-D01	Seaham	No Improvement Required
DAPHNE CRESCENT CSO	08-D01	Seaham	No Improvement Required
DURHAM STREET CSO	08-D01	Seaham	No Improvement Required
SEAHAM SOUTH DOCK CSO 1302	08-D01	Seaham	No Improvement Required
FERGUSON MOTOR REPAIRS CSO 2008	08-D01	Seaham	No Improvement Required
BARWICK STREET CSO	08-D02	Murton	2030 - 2035
COOP HOUSE WOOD CSO	08-D02	Murton	2030 - 2035
DALTON RETAIL PARK CSO	08-D02	Murton	2030 - 2035
HASWELL SSO	08-D02	Murton	2040 - 2045
CONISHEAD TERRACEM SOUTH HETTON CSO	08-D02	Murton	2040 - 2045
MURTON CSO 15	08-D02	Murton	2040 - 2045
BURNIP ROAD CSO	08-D02	Murton	2040 - 2045
PESSPOOL LANE CSO	08-D02	Murton	2040 - 2045
COLDWELL BURN SSO	08-D02	Murton	No Improvement Required
Little Coop House Farm - NWL name	08-D02	Murton	No Improvement Required
MURTON COMBINED SEWER OVERFLOW	08-D02	Murton	No Improvement Required
B1285 STORAGE TANK	08-D02	Murton	No Improvement Required

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
HAWTHORNE CLOSE STORAGE TANK	08-D02	Murton	No Improvement Required
SEA VIEW STORAGE TANK	08-D02	Murton	No Improvement Required
HAWTHORN CSO	08-D04	Hawthorn	2035 - 2040
HAWTHORN STW	08-D04	Hawthorn	2035 - 2040
BROOKE AVENUE (NO20) STY049 CSO	08-D06	Seaburn & Roker	2025 - 2030
WEST BOLDON CSO (NO 4)	08-D06	Seaburn & Roker	2025 - 2030
EAST BOLDON CSO NO 6	08-D06	Seaburn & Roker	2030 - 2035
BURDON ROAD CSO	08-D06	Seaburn & Roker	2030 - 2035
HAY STREET CSO SU056	08-D06	Seaburn & Roker	2035 - 2040
ST PETERS PUMPING STATION OUTFALL N	08-D06	Seaburn & Roker	2035 - 2040
WHITBURN STEEL PS	08-D06	Seaburn & Roker	2035 - 2040
KIER HARDY WAY	08-D06	Seaburn & Roker	2035 - 2040
ROKER STORM SEWAGE OVERFLOW	08-D06	Seaburn & Roker	No Improvement Required
SEABURN SOUTH CSO	08-D06	Seaburn & Roker	No Improvement Required
WHITBURN STORM SEWAGE OVERFLOW	08-D06	Seaburn & Roker	No Improvement Required
SEABURN NORTH CSO	08-D06	Seaburn & Roker	No Improvement Required
LOW SOUTHWICK PUMPING STATION	08-D07	Hylton Castle	2045 - 2050
FERRYBOAT LANE PUMPING STATION	08-D07	Hylton Castle	2045 - 2050
NORTH HYLTON SEWAGE PUMPING STATION	08-D07	Hylton Castle	2045 - 2050
CASTLETOWN WAY SPS	08-D07	Hylton Castle	2045 - 2050
QUEEN ALEXANDRA PS	08-D07	Hylton Castle	2045 - 2050
BODLEWELL LANE CSO	08-D08	Wearmouth	2045 - 2050
GILL CEMETERY CSO (SU061) M2	08-D09	Barnes Burn	2035 - 2040
GILL CEMETERY CSO (SU061) M2	08-D09	Barnes Burn	2035 - 2040
MAINSFORTH TERRACE CSO SU63	08-D10	Hendon Burn	2035 - 2040

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
BACK LODGE TERRACE CSO	08-D10	Hendon Burn	2035 - 2040
HENDON PRELIMINARY TREATMENT WORKS	08-D10	Hendon Burn	2035 - 2040
BARLEY MOW PARK CSO	08-D10	Hendon Burn	No Improvement Required
EAST HENDON ROAD CSO	08-D10	Hendon Burn	No Improvement Required
GOLDEN LION SPS	08-D11	Pallion	2035 - 2040
POTTERY LANE PS	08-D11	Pallion	2035 - 2040
PALLION PUMPING STATION	08-D11	Pallion	2035 - 2040
PRIESTLEY CRESCENT CSO	08-D11	Pallion	2035 - 2040
DEPTFORD PUMPING STATION	08-D11	Pallion	2035 - 2040
PALLION CSO 4	08-D11	Pallion	2035 - 2040
WELLINGTON LANE PUMPING STATION	08-D11	Pallion	2035 - 2040
ST LUKES ROAD	08-D11	Pallion	No Improvement Required
GRANGETOWN CSO	08-D12	Ryhope & Silksworth	2035 - 2040
CSO SUNDERLANS GAS WORKS	08-D12	Ryhope & Silksworth	2035 - 2040
RYHOPE SSO	08-D12	Ryhope & Silksworth	2040 - 2045
CSO SALTERFEN SU47	08-D12	Ryhope & Silksworth	2040 - 2045
CSO 200M WEST OF WALTON ROAD	08-D13	Nissan	No Improvement Required
WASHINGTON CSO DON GARDENS - NWL name	08-D14	Washington North	2025 - 2030
MANOR ROAD CSO GLENDALE AVENUE	08-D14	Washington North	2025 - 2030
COACH ROAD EST CSO DONWELL PRIMARY SCHOOL	08-D14	Washington North	2025 - 2030
WASHINGTON STW CSO INLET	08-D14	Washington North	2040 - 2045
WASHINGTON STW Storm Tank	08-D14	Washington North	2040 - 2045
USWORTH HALL CSO	08-D14	Washington North	No Improvement Required
COX GREEN PUMPING STATION	08-D15	Washington Central	No Improvement Required
WASHINGTON VILLAGE CEMETRY CSO	08-D15	Washington Central	No Improvement Required

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
J F KENNEDY ESTATE CSO	08-D15	Washington Central	No Improvement Required
STONEY LANE CSO	08-D15	Washington Central	No Improvement Required
STATION ROAD CSO	08-D16	Fatfield	2035 - 2040
FATFIELD CSO 3	08-D16	Fatfield	2035 - 2040
PRINCESS ANNE PARK CSO	08-D16	Fatfield	No Improvement Required
WORMHILL TERRACE CSO	08-D16	Fatfield	No Improvement Required

## Wastewater Treatment Works Compliance

Analyses have been completed to determine the interventions that are likely to be required to ensure all wastewater treatment works (WwTW) are operating in compliance with the permits for dry weather flow (DWF) treatment and treated effluent discharge quality.

The following table summarises the number of WwTWs within the Wearside Level 2 SPA that have been included in the DWMP for DWF permit compliance and treated effluent discharge quality permit compliance (phosphorous (P), biological oxygen demand (BOD) and ammonia (Amm) indicators).

WwTW Name	Intervention(s) Required
Hawthorn WwTW	This WwTW has been identified as requiring an investigation for discharge quality compliance for Biological Oxygen Demand and Ammonia between 2025 and 2030.
Washington WwTW	This WwTW has been identified as requiring an investigation for discharge quality compliance for Phosphorous and Ammonia between 2025 and 2030.

## Long-Term Delivery Strategy for Flooding and Pollution

The National Infrastructure Commission's report 'Reducing the risk of surface water flooding'<sup>1</sup> highlighted the importance of a national approach to tackle flooding, and the costs and challenges of eliminating sewer flooding. Given this, and the greater insight we have gained from developing the DWMP, the ambition for flooding and pollution risk has been adjusted to what is considered a stretching but achievable level that would be economically beneficial to deliver.

Our Long-Term Delivery Strategy identifies a target of reducing sewer flooding by 60% from our 2025 position. To achieve this, we will plan to reduce hydraulic flood risk regionally in the period between 2030 and 2050 by a total of:

- 17,999 internal flood risk properties
- 216,074 external flood risk properties

This approach deals with the impact of climate change, growth and urban creep.

The following table summarises the level of risk within the Wearside L2 SPA against the flooding and pollution planning objectives.

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<sup>1</sup> <https://nic.org.uk/studies-reports/reducing-the-risks-of-surface-water-flooding/surface-water-flooding-final-report/>

Planning Objective	Measure	Count				
		2020	2025	2030	2045	2060
PO1 – Internal Flood Risk	Count of properties at risk of flooding internally during a 1 in 20 year return period rainfall event	1,179	1,182	1,194	1,935	2,135
PO2 – External Flood Risk	Count of properties at risk of flooding externally during a 1 in 20 year return period rainfall event	20,874	21,002	21,286	29,054	31,192
PO3 – 1 in 50 Year Population at Risk	Population at risk of flooding during a 1 in 50 year return period rainfall event	43,522	43,725	44,305	60,160	64,534
PO6 – Pollution	Count of manholes near watercourses at risk of flooding during a 1 in 5 year return period rainfall event	117	117	117	160	168

## PLANNING OBJECTIVE ASSESSMENT

### Planning Objective Risk Scoring

The DWMP planning objectives have been assessed in line with the common scoring approach followed by all water companies.

Risk scores have been calculated at drainage area level, following the approach outlined below. Further detail on how the scores have been calculated for each of the planning objectives is within the Problem Characterisation methodology.

Risk Score	Description
0	<b>Low Risk</b> – Levels of planning objective risk within the drainage area are in the bottom quartile and/or there are no assets identified as higher priority requiring interventions throughout the planning periods.
1	<b>Medium Risk</b> – Levels of planning objective risk within the drainage area are in the middle two quartiles and/or there are assets identified as lower priority requiring interventions throughout the planning periods.
2	<b>High Risk</b> – Levels of planning objective risk within the drainage area are in the top quartile and/or there are assets identified as higher priority requiring interventions throughout the planning periods.



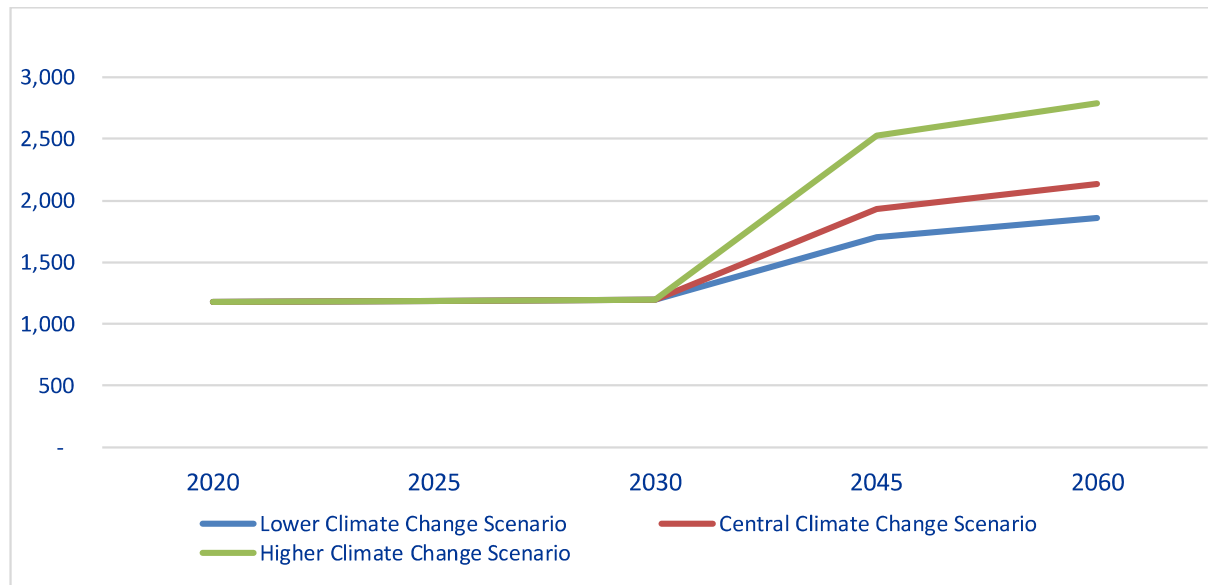
Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
08-D01	Seaham	0	1	1	1	1	1	1	1	1	2	2	2	2	2	2	1	1	1	0	0	0
08-D02	Murton	1	1	1	1	1	1	1	1	1	2	2	2	2	2	2	1	1	1	0	0	0
08-D04	Hawthorn	0	0	0	0	0	0	0	1	1	0	0	0	2	2	2	2	2	2	0	0	0
08-D06	Seaburn & Roker	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2	0	0	0	0	0	0
08-D07	Hylton Castle	1	1	1	1	1	1	1	1	1	0	0	0	1	1	1	0	0	0	0	0	0
08-D08	Wearmouth	1	1	1	0	1	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0
08-D09	Barnes Bum	0	1	1	1	1	1	1	1	1	0	0	0	1	1	1	1	1	1	0	0	0
08-D10	Hendon Bum	1	1	1	0	1	1	0	1	1	0	0	0	1	1	1	1	1	1	0	0	0
08-D11	Pallion	1	1	1	0	1	1	0	0	1	0	0	0	1	1	1	0	0	0	0	0	0
08-D12	Ryhope & Silksworth	1	1	1	1	1	1	1	1	1	0	0	0	1	1	1	0	0	0	0	0	0
08-D13	Nissan	2	2	2	2	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
08-D14	Washington North	1	1	1	1	1	1	1	1	1	0	0	0	2	2	2	0	0	0	0	0	0
08-D15	Washington Central	1	1	1	1	1	1	0	1	1	0	0	0	0	0	0	0	1	1	0	0	0
08-D16	Fatfield	1	1	1	0	1	1	0	1	1	0	0	0	1	1	1	0	0	0	0	0	0
08-D17	Burdon Village	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
08-D18	Sheepfolds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## Climate Change Sensitivity

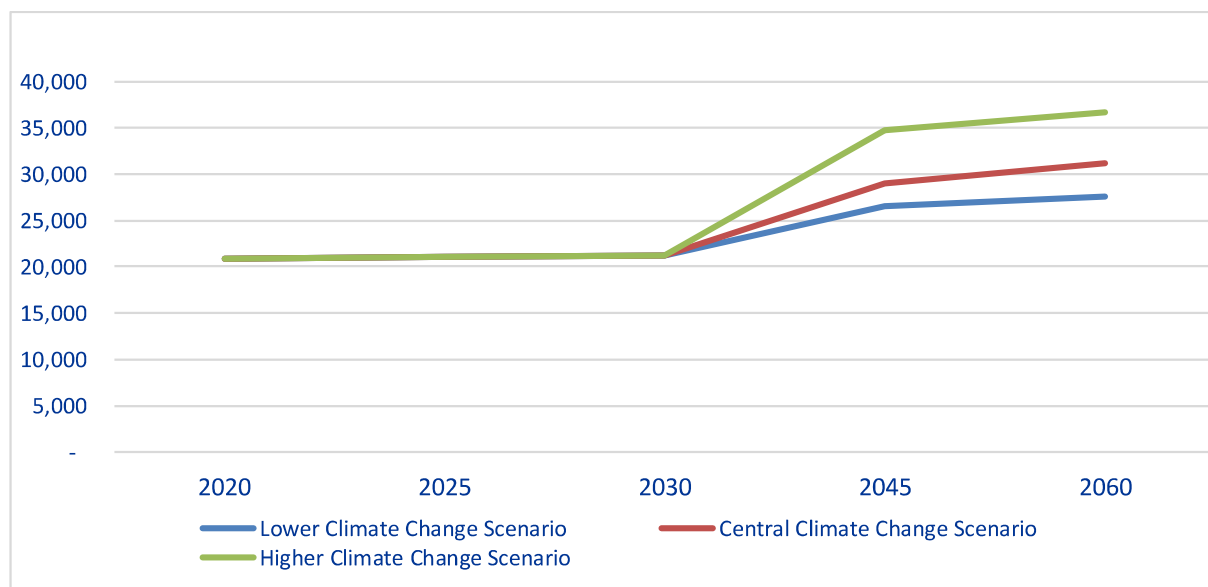
As outlined in the BRAVA methodology, two additional climate scenarios were analysed to evaluate the impact on the planning objectives of Lower Emissions and Higher Emissions climate scenarios.

The following graphics outline the impact on the planning objective risk numbers for the flooding and pollution planning objectives within the Wearside Level 2 SPA in the different climate scenarios that have been modelled.

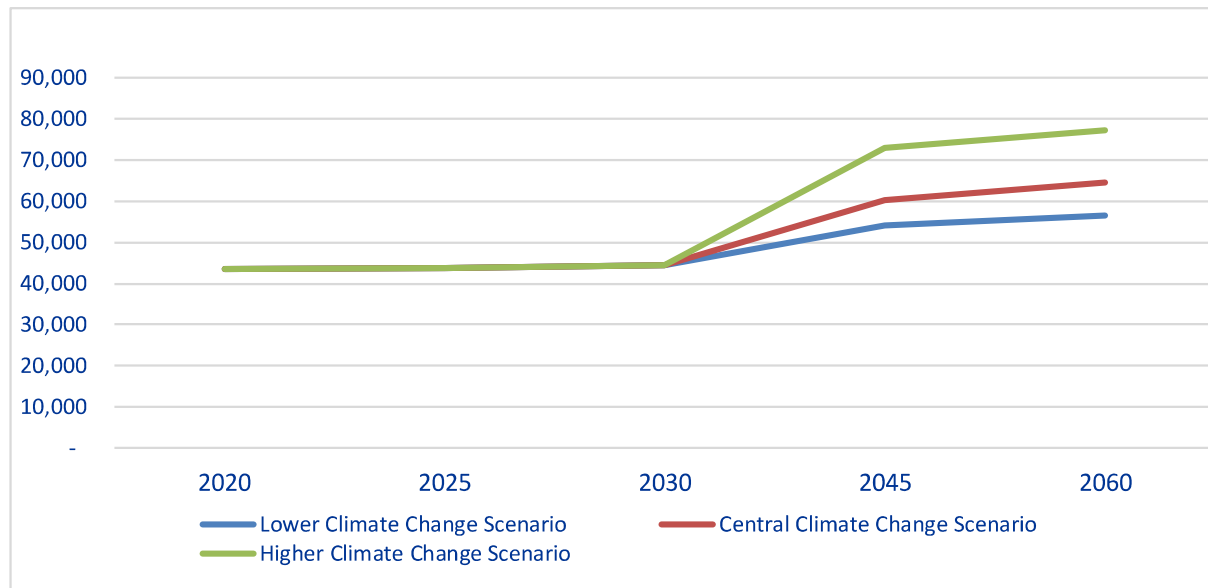
### PO1 – Internal Flood Risk – Wearside L2 SPA



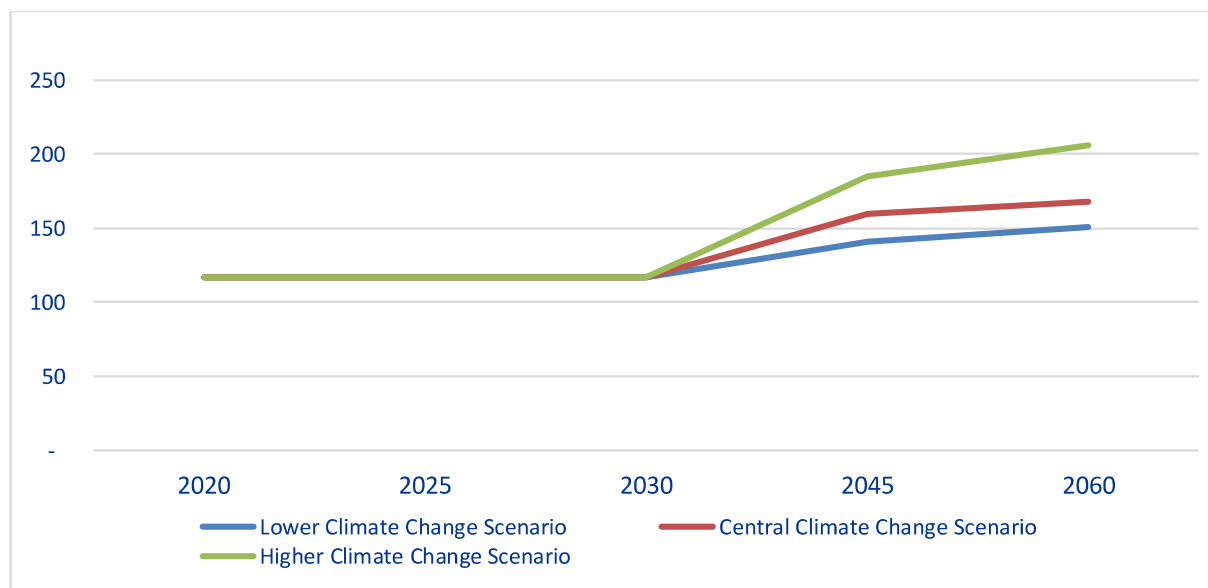
### PO2 – External Flood Risk – Wearside L2 SPA



### PO3 – 1 in 50 Year Population at Risk – Wearside L2 SPA



### PO6 – Pollution – Wearside L2 SPA



Our business plan is based on adaptive planning principles. We begin to use this more and more to think about an uncertain future. This long-term strategy is being developed alongside the long-term planning frameworks – in particular, the well-established Water Resources Management Plan process and the new Drainage and Wastewater Management Plan process.

## OPTION DEVELOPMENT

### Our Plan for the Wearside L2 SPA

#### What Are We Doing?

The DWMP has been prepared taking the Best Value options within catchments and also including sustainable options that were not identified as Best Value but did reduce the volume of below-ground storage required within a catchment.

A summary of the interventions that have been included within the DWMP within the Wearside L2 SPA are included within the following tables.

#### Storm Overflow Discharge Reduction Plan

Intervention Type	2025 to 2030	2030 to 2035	2035 to 2040	2040 to 2045	2045 to 2050
Storm Overflows addressed by Spill Frequency Reduction Schemes	5	9	22	13	6
Storm Overflows requiring Screening Provision Schemes	3	7	15	16	3

#### Wastewater Treatment Works Compliance

Intervention Type	2025 to 2030	2030 to 2035	2035 to 2040	2040 to 2045	2045 to 2050	2050 to 2055	2055 to 2060
WwTW DWF Compliance – Investigations / Schemes	-	-	-	-	-	-	-
WwTW Quality Compliance – Investigations	1 (P) 1 (BOD) 2 (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)
WwTW Quality Compliance - Schemes	- (P) 1 (BOD) 1 (Amm)	1 (P) - (BOD) 1 (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)

#### Long-Term Delivery Strategy – Flooding and Pollution

The Government's 25 Year Environment Plan (25YEP) requires us to invest to:

- Reduce nitrogen and phosphorus pollution, through catchment and nature-based solutions where possible.
- Improve drainage and environmental water quality, and reduce surface water flooding risk, through our Drainage and Wastewater Management Plan (DWMP).

Our long term delivery strategy sets out our ambition to continue to reduce sewer flooding over the next 25 years. Our plan sets out how we will match the 25YEP by reducing internal and external sewer flooding by 60% by 2050.

### How Much Does Our Plan Cost?

The following table summarises the costs that are included within the DWMP for the delivery of the identified interventions. The costs shown in the table are £million.

Intervention Type	2025 to 2030	2030 to 2035	2035 to 2040	2040 to 2045	2045 to 2050	2050 to 2055	2055 to 2060
Storm Overflow Spill Frequency Reduction Schemes	6.99	19.78	59.83	23.33	10.43	-	-
Screening Provision Schemes	1.50	3.77	7.14	4.25	0.52	-	-

### Long-Term Delivery Strategy for Flooding

It is anticipated that we will achieve our flood risk reduction targets in a number of ways. For example,

- Working in partnership with others in the Northumbria Integrated Drainage Partnership
- Working with customers and communities for the widescale disconnection of roof drainage from the combined sewer network
- Implementing source control via sustainable drainage measures (SuDS) including wetland creation
- Implementing SMART networks throughout the region
- Disconnecting highway runoff from the combined sewer network
- Working with others to implement permeable pathing and roadways schemes.

We have estimated that the cost of achieving our ambitious targets will be £1 billion between 2030 and 2050. We will seek customer support for investment to achieve these targets.

The following table summarises the level of risk within the Wear L2 SPA for the flooding planning objectives following the implementation of the Long-Term Delivery Strategy for flooding.

Planning Objective	Measure	Count				
		2020	2025	2030	2045	2060
PO1 – Internal Flood Risk	Count of properties at risk of flooding internally during a 1 in 20 year return period rainfall event	1,179	1,182	1,194	931	801

Planning Objective	Measure	Count				
		2020	2025	2030	2045	2060
PO2 – External Flood Risk	Count of properties at risk of flooding externally during a 1 in 20 year return period rainfall event	20,874	21,002	21,286	14,685	13,695

### Long-Term Delivery Strategy for Flooding

The following table summarises the level of risk within the Wear L2 SPA for the flooding planning objectives following the implementation of the Long-Term Delivery Strategy for flooding.

Planning Objective	Measure	Count				
		2020	2025	2030	2045	2060
PO1 – Internal Flood Risk	Count of properties at risk of flooding internally during a 1 in 20 year return period rainfall event	1,467	1,470	1,486	734	439
PO2 – External Flood Risk	Count of properties at risk of flooding externally during a 1 in 20 year return period rainfall event	15,028	15,070	15,170	4,455	1,956

### Planning Objective Risk Scoring

The planning objective risk scores have been evaluated with the proposed DWMP interventions delivered.

Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
08-D01	Seaham	0	0	0	1	1	1	1	1	1	2	0	0	2	0	0	1	1	1	0	0	0
08-D02	Murton	1	0	0	1	0	0	1	1	1	2	0	0	2	0	0	1	1	1	0	0	0
08-D04	Hawthorn	0	0	0	0	0	0	0	1	1	0	0	0	2	0	0	2	2	2	0	0	0
08-D06	Seaburn & Roker	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0
08-D07	Hylton Castle	1	0	0	1	0	1	1	1	1	0	0	0	1	1	0	0	0	0	0	0	0
08-D08	Wearmouth	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
08-D09	Barnes Bum	0	0	0	1	0	1	1	1	1	0	0	0	1	0	0	1	1	1	0	0	0
08-D10	Hendon Bum	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	1	1	0	0	0
08-D11	Pallion	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0
08-D12	Ryhope & Silksworth	1	0	0	1	0	0	1	1	1	0	0	0	1	0	0	0	0	0	0	0	0
08-D13	Nissan	2	0	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
08-D14	Washington North	1	0	0	1	0	0	1	1	1	0	0	0	2	0	0	0	0	0	0	0	0
08-D15	Washington Central	1	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	1	1	0	0	0
08-D16	Fatfield	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0
08-D17	Burdon Village	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
08-D18	Sheepfolds	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## CONCLUDING COMMENTS

Our DWMP forms part of our long-term delivery strategy. As we go about this, we will need to review our progress and adapt our future plans to take into account changing circumstances. These include how customer views about priorities and affordability evolve; new technologies that emerge; how supply chain capacity develops; changes in weather patterns; and customer behaviour changes.

Setting a long-term delivery strategy allows us to seek early certainty on the investment we do not expect to change, while acknowledging these factors could mean choosing different pathways in future. We will consider those choices as and when we update our DWMP and at subsequent price reviews, which take place every five years. At each point we update our DWMP, we will look further into the future to maintain a 40-year outlook on these issues.

Our PR24 business plan, covering 2025-30, will include projects to drive better, more efficient, and nature-based solutions to tackling drainage and storm overflows in the future.

## CONTACTING US

To view our DWMP, please go to our website at: [www.nwl.co.uk/dwmp](http://www.nwl.co.uk/dwmp).

To contact us:

Go to the Contact Us page at: [Contact us \(nwl.co.uk\)](http://www.nwl.co.uk/contact-us)

Or you can call our Head Office switchboard on [REDACTED]

Our phone lines are open from 8:00am to 5:00pm, Monday to Friday.

Feel free to write to us at:

Northumbrian Water Limited

Northumbria House

Abbey Road

Pity Me

Durham

DH1 5FJ



## DRAINAGE AND WASTEWATER MANAGEMENT PLANS (DWMP)



# LEVEL 2 STRATEGIC PLANNING AREA SUMMARY – TYNESIDE

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## OVERVIEW

The Drainage and Wastewater Management Plan (DWMP) covers seven Strategic Planning Areas (SPA). The seven areas align broadly with the river basin catchments within the region and the main urban areas.

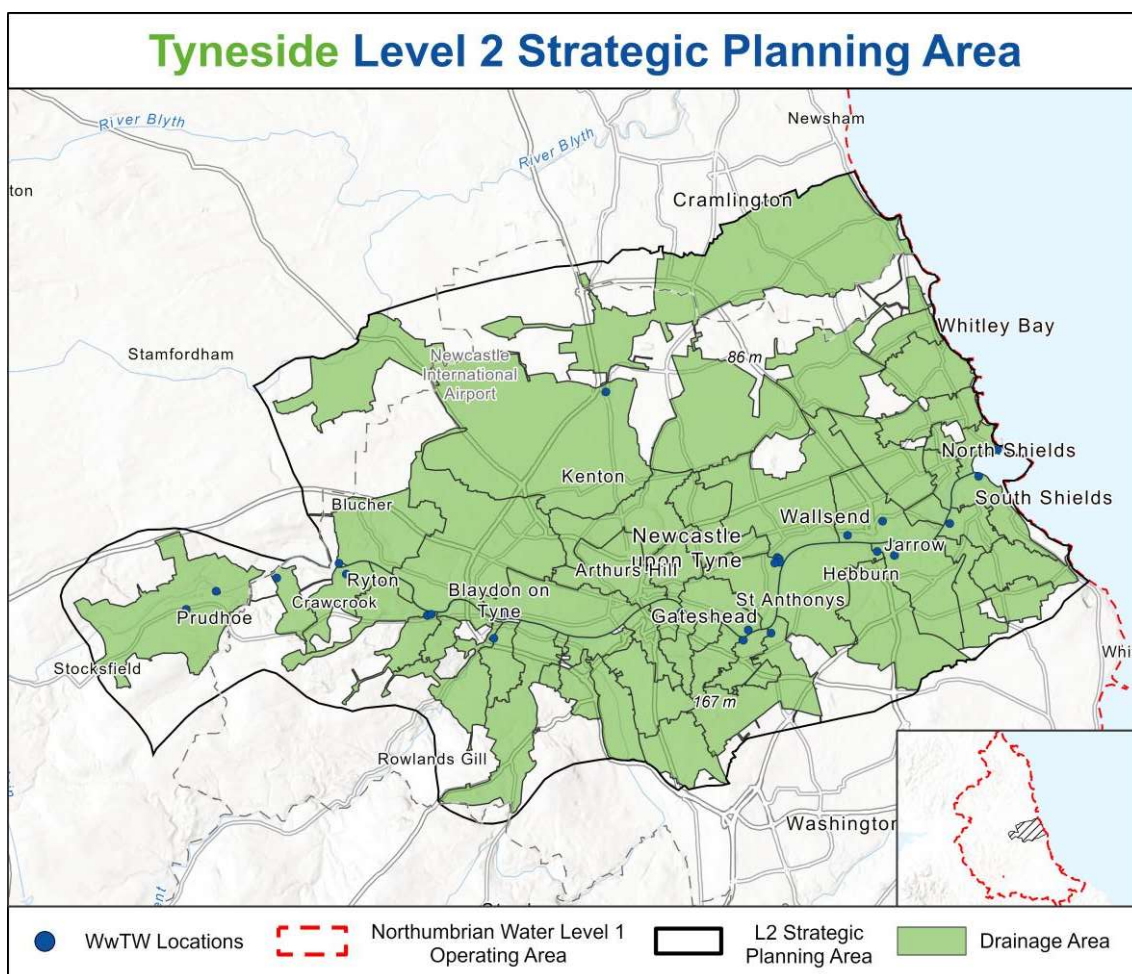
This document provides an overview of the DWMP for the **Tyneside Level 2 SPA**.

Within the Tyneside Level 2 SPA, there are:

- 3 Wastewater Treatment Works (WwTW)
- 6 Level 3 Tactical Planning Unit (TPU) areas
- 58 Wastewater Drainage Areas

The total estimated population of the Tyneside Level 2 SPA is 870,000.

### TYNESIDE LEVEL 2 STRATEGIC PLANNING AREA





## DRAINAGE AREAS WITHIN TYNESIDE L2 SPA

The following table outlines all of the drainage areas within the Tyneside Level 2 SPA. The table also outlines whether the drainage area triggered during the Risk Based Catchment Screening (RBCS) stage of the DWMP for detailed analysis as part of the Baseline Risk and Vulnerability Assessment (BRAVA) stage.

Drainage Area Reference	Drainage Area Name	WwTW Name	Triggered BRAVA?
05-D01	Seaton Valley	Howdon WwTW	Yes
05-D02	Crawcrook	Howdon WwTW	Yes
05-D03	Ryton West	Howdon WwTW	Yes
05-D04	Ryton East	Howdon WwTW	Yes
05-D05	Ryton Haugh	Howdon WwTW	Yes
05-D06	Blaydon West	Howdon WwTW	Yes
05-D07	Blaydon East	Howdon WwTW	Yes
05-D08	Blaydon Haughs	Howdon WwTW	Yes
05-D09	Derwenthaugh	Howdon WwTW	Yes
05-D10	Whickham North	Howdon WwTW	Yes
05-D11	Whickham South & Sunnyside	Howdon WwTW	Yes
05-D12	Dunston Hill	Howdon WwTW	Yes
05-D13	Dunston, Teams	Howdon WwTW	Yes
05-D14	Dunston & Lobley Hill	Howdon WwTW	Yes
05-D15	Team Valley	Howdon WwTW	Yes
05-D16	Chowdene	Howdon WwTW	Yes
05-D17	Bensham	Howdon WwTW	Yes
05-D18	Gateshead Central	Howdon WwTW	Yes
05-D19	Gateshead West	Howdon WwTW	Yes
05-D20	Gateshead Stadium, Mount Pleasant	Howdon WwTW	Yes
05-D21	Friars Goose	Howdon WwTW	Yes
05-D22	Felling & Felling Shore	Howdon WwTW	Yes
05-D23	Heworth	Howdon WwTW	Yes
05-D24	Leam Lane, Wardley, Bill Quay	Howdon WwTW	Yes
05-D25	Newburn	Howdon WwTW	Yes
05-D26	Denton Valley	Howdon WwTW	Yes
05-D27	Benwell	Howdon WwTW	Yes
05-D28	Newcastle City	Howdon WwTW	Yes
05-D29	Ponteland	Howdon WwTW	Yes
05-D30	Benton	Howdon WwTW	Yes
05-D31	Gosforth	Howdon WwTW	Yes
05-D32	Jesmond	Howdon WwTW	Yes
05-D33	Lower Ouseburn	Howdon WwTW	Yes
05-D34	Byker	Howdon WwTW	Yes

Drainage Area Reference	Drainage Area Name	WwTW Name	Triggered BRAVA?
05-D35	Walker	Howdon WwTW	Yes
05-D36	Heaton	Howdon WwTW	Yes
05-D37	Wallsend	Howdon WwTW	Yes
05-D38	Chirton	Howdon WwTW	Yes
05-D39	Brierdene	Howdon WwTW	Yes
05-D40	Whitley Bay	Howdon WwTW	Yes
05-D41	Cullercoats	Howdon WwTW	Yes
05-D42	Whitley Lodge	Howdon WwTW	Yes
05-D43	Willington Quay	Howdon WwTW	Yes
05-D44	Tynemouth	Howdon WwTW	Yes
05-D45	North Shields	Howdon WwTW	Yes
05-D46	Royal Quays	Howdon WwTW	Yes
05-D47	Westoe	Howdon WwTW	Yes
05-D48	High Shields	Howdon WwTW	Yes
05-D49	Tyne Dock, Whiteleas	Howdon WwTW	Yes
05-D50	Harton	Howdon WwTW	Yes
05-D51	Cleadon Park	Howdon WwTW	Yes
05-D52	Simonside	Howdon WwTW	Yes
05-D53	Jarrow, Hedworth	Howdon WwTW	Yes
05-D56	Hagg Bank	Hagg Bank WwTW	No
05-D54	Hebburn	Howdon WwTW	Yes
05-D59	Moore Croft, Newburn	Moore Croft, Newburn WwTW	No
05-D55	Prudhoe	Howdon WwTW	Yes
05-D58	Marquis of Granby	Howdon WwTW	Yes

## KEY STAKEHOLDERS

It is widely recognised and acknowledged that drainage systems are complex and have numerous interactions, both known and unknown. It was therefore important that the DWMP was not created solely by Northumbrian Water. While NWL have been tasked with the delivery of the DWMP, it was critical that the public and relevant stakeholders actively participated and offered support in its creation. We have worked with a range of relevant stakeholders in the production of the DWMP, including the Environment Agency (EA), Lead Local Flood Authorities, Local Planning Authorities, housing developers and environmental partners.

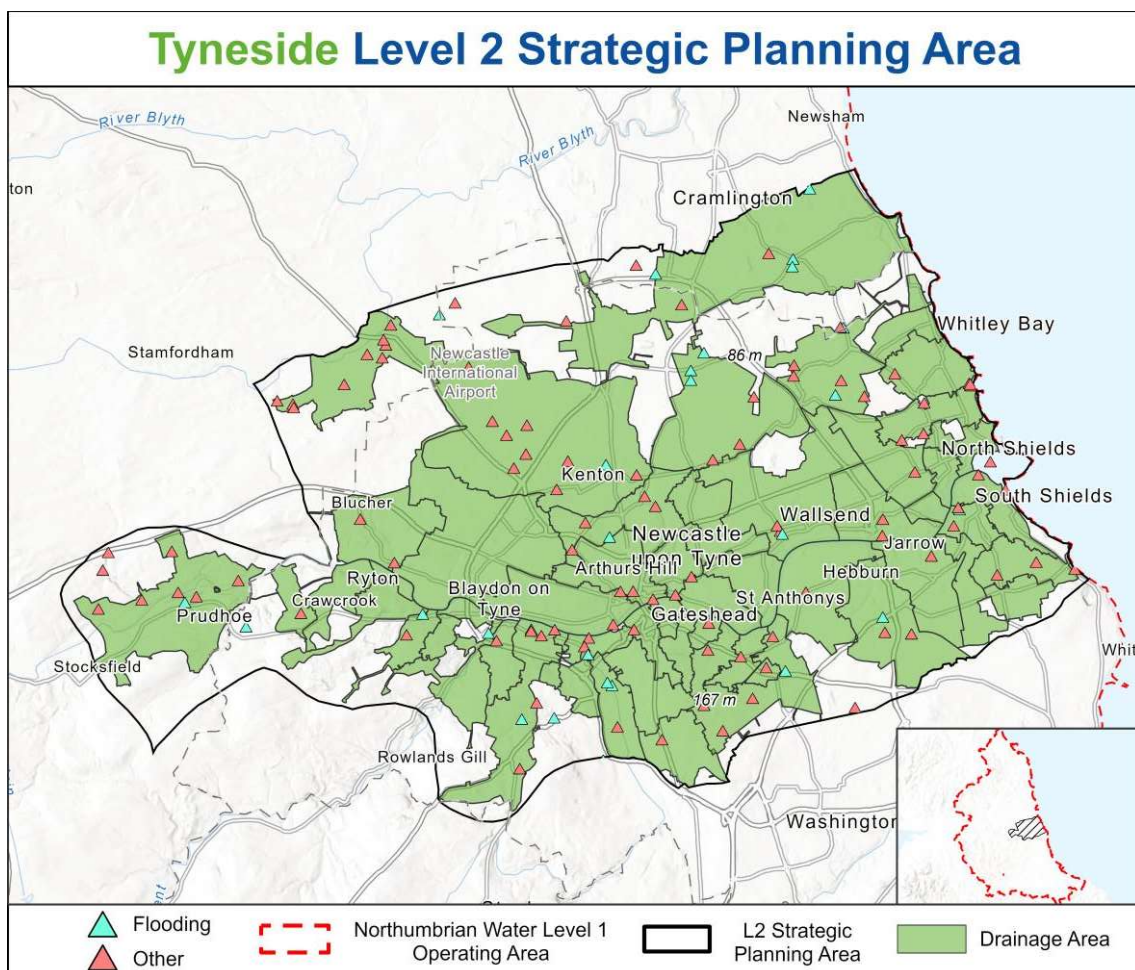
Through different partnerships and strategies, we play an active role within the region, working collaboratively with stakeholders on several projects. The DWMP builds on the strong foundation of the Northumbria Integrated Drainage Partnership (NIDP), which consists of 14 Lead Local Flood Authorities, the EA and Northumbrian Water. One of the aims of the NIDP is to identify opportunities to deliver surface water management schemes within catchments to reduce the risk and impact of

flooding. Catchments are taken from the investigation stages where opportunity areas are identified, through to the outline business case stage to determine funding sources, and ultimately through to scheme delivery. The award-winning partnership approach, which is based around collaboration to identify priority investment areas where benefits can be delivered for multiple stakeholders, provides an excellent platform for the DWMP.

To ensure that existing and future opportunities for working collaboratively with stakeholders were included in the production of the DWMP, engagement sessions were held in March 2023. During these sessions, all the geographical areas covered by the DWMP were reviewed to identify, record and map ongoing and future opportunities.

Key Stakeholders
<p>Environment Agency Local Authorities National Farmers Union Rivers Trusts Natural England Developers National Parks</p>

### Collaborative Working Opportunities



## Significant Collaborative Working Opportunities

Drainage Area Reference	Organisation	Opportunity Type
05-D24	Environment Agency	Flood and Coastal Risk Management Programme August 2021.
05-D30	Newcastle City Council	The council are planning various studies that may reduce storage interventions.
05-D30	Environment Agency	Environment Programme Pipeline Projects 2023-2028, Flood and Coastal Risk Management Programme August 2021.
05-D53	Environment Agency	Environment Programme Pipeline Projects 2023-2028, Flood and Coastal Risk Management Programme August 2021.
05-D53	South Tyneside Metropolitan Borough Council	There is potential to work with the council on green infrastructure interventions.

## CATCHMENT NEEDS

Through the Baseline Risk and Vulnerability Assessment (BRAVA) and Problem Characterisation stages of the DWMP, the requirements for investment within catchments were identified.

The following summaries provide the detail of the 'Catchment Needs' that have been identified within the Tyneside Level 2 SPA.

### Storm Overflow Discharge Reduction Plan

The following table summarises the number of storm overflows within the Tyneside Level 2 SPA and how many have been included in the DWMP for improvement in line with the Storm Overflow Discharge Reduction Plan (SODRP).

Storm Overflow Categorisation	Count	Storm Overflows Requiring Improvement
Inland – High Priority	61	31
Inland – Not High Priority	235	152
Bathing Water	14	11
Coastal / Estuarine (not linked to Bathing Water)	1	0
<b>Total</b>	<b>311</b>	<b>194</b>

### Storm Overflow Screening

Under the SODRP, all storm overflows are required to include 6mm screening provision on any discharges that are made.

The following table summarises the number of storm overflows within the Tyneside Level 2 SPA that have been included in the DWMP for the provision of 6mm screening.



Storm Overflow Categorisation	Count	Storm Overflows Requiring Screening
Inland – High Priority	61	40
Inland – Not High Priority	235	159
Bathing Water	14	11
Coastal / Estuarine (not linked to Bathing Water)	1	1
<b>Total</b>	<b>311</b>	<b>211</b>

The full list of storm overflows within the Northumberland Level 2 SPA is included in the following table.

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
NEW MARE CLOSE FARM CSO	05-D01	Seaton Valley	2030 - 2035
FIRST SCHOOL CSO NTY002	05-D01	Seaton Valley	2030 - 2035
LINKS ROAD CSO	05-D01	Seaton Valley	2030 - 2035
SEATON SLUICE PS	05-D01	Seaton Valley	2030 - 2035
SEGHILL CSO	05-D01	Seaton Valley	2045 - 2050
WESTBOURNE ESTATE SSO ASHKIRK WAY	05-D01	Seaton Valley	2045 - 2050
DINNINGTON WEST SPS	05-D01	Seaton Valley	2045 - 2050
MOUNTFORD ROAD CSO	05-D01	Seaton Valley	2045 - 2050
LYSNDON FARM CSO	05-D01	Seaton Valley	2045 - 2050
DINNINGTON EAST SPS	05-D01	Seaton Valley	2045 - 2050
NORTH GOSFORTH CSO	05-D01	Seaton Valley	2045 - 2050
HOLYWELL P.S.	05-D01	Seaton Valley	No Improvement Required
GREEN CRESCENT CSO (NTY 006)	05-D01	Seaton Valley	No Improvement Required
WANSBECK ROAD CSO (NTY 007)	05-D01	Seaton Valley	No Improvement Required
LOVE AVENUE COTTAGES CSO (NTY 009)	05-D01	Seaton Valley	No Improvement Required
ANNITSFORD BRIDGE CSO	05-D01	Seaton Valley	No Improvement Required
ANNITSFORD BRIDGE CSO FERN DRIVE	05-D01	Seaton Valley	No Improvement Required
SIMONSIDE CSO	05-D01	Seaton Valley	No Improvement Required
SIMONSIDE CSO WEST END	05-D01	Seaton Valley	No Improvement Required
HARTLEY CARAVAN PARK PS	05-D01	Seaton Valley	No Improvement Required
DUDLEY FIRST SCHOOL CSO	05-D01	Seaton Valley	No Improvement Required
DUDLEY MIDDLE SCHOOL CSO	05-D01	Seaton Valley	No Improvement Required
OWEN BRANNIGAN DRIVE CSO	05-D01	Seaton Valley	No Improvement Required
FERN DRIVE CSO	05-D01	Seaton Valley	No Improvement Required
NORTHSIDE PLACE CSO	05-D01	Seaton Valley	No Improvement Required

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
DRYSDALE CRESENT CSO	05-D01	Seaton Valley	No Improvement Required
CLARA VALE SPS	05-D02	Crawcrook	2045 - 2050
CRAWCROOK LANE CSO	05-D02	Crawcrook	No Improvement Required
STATION BANK CSO	05-D03	Ryton West	2045 - 2050
GREENSIDE CSO	05-D03	Ryton West	No Improvement Required
Holburn Lane CSO, Ryton - NWL name	05-D03	Ryton West	No Improvement Required
CSO AT CHURCH DENE	05-D03	Ryton West	No Improvement Required
BLAYDON BURN WAGONWAY CSO	05-D04	Ryton East	No Improvement Required
STELLA ROAD CSO	05-D04	Ryton East	No Improvement Required
SUMMERHILL CSO	05-D04	Ryton East	No Improvement Required
HAUGH LANE CSO	05-D04	Ryton East	No Improvement Required
ADDISON VILLAGE CSO UNIT 3	05-D04	Ryton East	No Improvement Required
CSO 28 BEWESHILL CRESCENT	05-D06	Blaydon West	2030 - 2035
BLAYDON BANK CSO	05-D06	Blaydon West	2035 - 2040
CROFTDALE ROAD CSO	05-D06	Blaydon West	2035 - 2040
COCHRANE STREET CSO	05-D06	Blaydon West	No Improvement Required
EAST FARM CSO	05-D06	Blaydon West	No Improvement Required
BLAYDON METALS NO 1 CSO	05-D08	Blaydon Haughs	2045 - 2050
BLAYDON METALS NO 2 CSO	05-D08	Blaydon Haughs	2045 - 2050
FACTORY ROAD CSO	05-D08	Blaydon Haughs	2045 - 2050
GAS LANE CSO	05-D08	Blaydon Haughs	No Improvement Required
RIVERSIDEWAY CSO	05-D09	Derwenthaugh	2045 - 2050
PARKGATE FARM CSO	05-D09	Derwenthaugh	2045 - 2050
SHIBDON ROAD CSO	05-D09	Derwenthaugh	2045 - 2050
OLD DERWENT BRIDGE CSO	05-D09	Derwenthaugh	No Improvement Required

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
JUNCTION OF HEXHAM RD &	05-D10	Whickham North	2035 - 2040
MARKET LANE CSO	05-D10	Whickham North	2035 - 2040
CLAVERING RD & RUSKIN RD	05-D10	Whickham North	No Improvement Required
JUNC OF CLAVERING RD & SWALWEL BANK	05-D10	Whickham North	No Improvement Required
MARKET LANE CSO	05-D11	Whickham South & Sunnyside	2030 - 2035
GELLESFIELD CSO	05-D11	Whickham South & Sunnyside	2030 - 2035
METROCENTRE GREEN CAR PARK PS (E7)	05-D11	Whickham South & Sunnyside	2045 - 2050
WELLINGTON ROAD CSO (E9-102)	05-D11	Whickham South & Sunnyside	2045 - 2050
NAPIER COURT CSO	05-D11	Whickham South & Sunnyside	2045 - 2050
WHICKHAM SOUTH & SUNNYSIDE CSO	05-D11	Whickham South & Sunnyside	2045 - 2050
WASHINGWELL SCHOOL CSO	05-D11	Whickham South & Sunnyside	2045 - 2050
BEECH STREET CSO	05-D11	Whickham South & Sunnyside	2045 - 2050
SOUTHFIELD ROAD CSO	05-D11	Whickham South & Sunnyside	No Improvement Required
SUNNYSIDE CSO	05-D11	Whickham South & Sunnyside	No Improvement Required
KINGSWAY/PRINCESS STREET CSO	05-D11	Whickham South & Sunnyside	No Improvement Required
MARLEY HILL SPS	05-D11	Whickham South & Sunnyside	No Improvement Required
DUNSTON FLOUR MILL (WEST) CSO	05-D12	Dunston Hill	2040 - 2045
NEWTON STREET CSO	05-D13	Dunston, Teams	2040 - 2045
STAITHES ROAD CSO	05-D13	Dunston, Teams	2040 - 2045
CORMORANT DRIVE CSO	05-D13	Dunston, Teams	2040 - 2045
CSO AT TEAM STREET	05-D13	Dunston, Teams	2040 - 2045
TEAMS CSO JOHNSON STREET E17-105	05-D13	Dunston, Teams	2040 - 2045
ROSE STREET CSO	05-D13	Dunston, Teams	2040 - 2045
RIVERSDALE ROAD CSO	05-D13	Dunston, Teams	No Improvement Required
CSO ON WHICKHAM AND GATESHEAD SEWER	05-D14	Dunston & Lobley Hill	2040 - 2045

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
BENSHAM SIDINGS CSO	05-D15	Team Valley	2040 - 2045
EASTERN AVENUE CSO	05-D15	Team Valley	2040 - 2045
THE GREEN MARKET CSO	05-D15	Team Valley	2040 - 2045
BENSHAM CSO	05-D15	Team Valley	2040 - 2045
ELMWOOD GARDENS	05-D15	Team Valley	2040 - 2045
PINEWOOD GARDENS CSO	05-D15	Team Valley	2040 - 2045
VICTORIA RD AT SANDOWN GARDENS CSO	05-D15	Team Valley	2040 - 2045
BENSHAM HOSPITAL CSO	05-D15	Team Valley	No Improvement Required
SEVENTH AVENUE CSO	05-D15	Team Valley	No Improvement Required
LOW FELL CSO	05-D15	Team Valley	No Improvement Required
BLACK LANE CSO	05-D16	Chowdene	2040 - 2045
CHOWDENE CSO	05-D16	Chowdene	2040 - 2045
WOODFORD NO 22 STORM OVERFLOW	05-D16	Chowdene	2040 - 2045
NO2 ESKDALE GARDENS CSO	05-D16	Chowdene	2040 - 2045
CSO REAR 11 ST AUSTELL GARDENS	05-D16	Chowdene	No Improvement Required
SMITHY LANE CSO	05-D16	Chowdene	No Improvement Required
HIGH WEST STREET CSO (G066)	05-D18	Gateshead Central	2045 - 2050
QUAYSIDE (HILLGATE STREET CSO)	05-D18	Gateshead Central	2045 - 2050
SWINBURNE STREET CSO	05-D18	Gateshead Central	2045 - 2050
EAST STREET WAS SWINBURN ST END CSO	05-D18	Gateshead Central	2045 - 2050
PIPEWELLGATE PUMPING STATION	05-D18	Gateshead Central	No Improvement Required
SOUTH SHORE ROAD CSO	05-D19	Gateshead West	2045 - 2050
ALBANY ROAD/SALTMEADOWS ROAD CSO	05-D19	Gateshead West	2045 - 2050
SALTMEADOWS PUMPING STATION	05-D19	Gateshead West	No Improvement Required

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
SOUTH SHORE ROAD EAST PUMPING STN	05-D20	Gateshead Stadium, Mount Pleasant	2045 - 2050
CSO AT REAR OF ORCHID CRESCENT	05-D21	Friars Goose	2035 - 2040
INTERNATIONAL PAINTS PUMPING STN.	05-D22	Felling & Felling Shore	2035 - 2040
NEST ROAD CSO	05-D22	Felling & Felling Shore	No Improvement Required
HEWORTH SHORE CSO	05-D23	Heworth	2035 - 2040
LOW HEWORTH LANE PUMPING STATION	05-D23	Heworth	2035 - 2040
JANADAB CSO	05-D23	Heworth	2035 - 2040
WOODGATE GDNS/MARCONI 2 CSO	05-D23	Heworth	No Improvement Required
CSO AT STONEYGATE LANE	05-D23	Heworth	No Improvement Required
FAIRFIELD INDUSTRIAL PARK SPS	05-D23	Heworth	No Improvement Required
4 AYCLIFFE AVENUE CSO	05-D24	Leam Lane, Wardley, Bill Quay	2025 - 2030
LANCHESTER AVENUE CSO	05-D24	Leam Lane, Wardley, Bill Quay	2030 - 2035
MANOR GARDENS CSO	05-D24	Leam Lane, Wardley, Bill Quay	2040 - 2045
CSO AT CROMWELL ROAD	05-D24	Leam Lane, Wardley, Bill Quay	2040 - 2045
WOODWYND CSO	05-D24	Leam Lane, Wardley, Bill Quay	No Improvement Required
GRASSBANKS CSO	05-D24	Leam Lane, Wardley, Bill Quay	No Improvement Required
SHERATON CSO	05-D24	Leam Lane, Wardley, Bill Quay	No Improvement Required
CSO 32 WALBOTTLE ROAD	05-D25	Newburn	2035 - 2040
MAYFIELD AVE CSO NC034	05-D25	Newburn	2035 - 2040
NEWBURN PUMPING STATION	05-D25	Newburn	2045 - 2050
BLANEY ROW PUMPING STATION	05-D25	Newburn	No Improvement Required
THE BOATHOUSE SPS	05-D25	Newburn	No Improvement Required
SCOTSWOOD ROAD/DENTON BURN PS	05-D26	Denton Valley	2045 - 2050
NEWBURN INDUSTRIAL ESTATE P STN	05-D26	Denton Valley	2045 - 2050

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
NEWBURN HAUGH/RIVERSDALE WAY P STN	05-D26	Denton Valley	2045 - 2050
TYNE VIEW CSO	05-D26	Denton Valley	2045 - 2050
BROADWAY JUNCTION NORWOOD ROAD CSO	05-D26	Denton Valley	2045 - 2050
SCOTSWOOD ROAD PUMPING STATION NO 4	05-D26	Denton Valley	2045 - 2050
DENTON ROAD CSO NC027	05-D26	Denton Valley	2045 - 2050
WOOD GROVE CSO (NC029)	05-D26	Denton Valley	2045 - 2050
BURWELL AVENUE CSO	05-D26	Denton Valley	2045 - 2050
DENTON DENE NORTH OF WEST ROAD CSO	05-D26	Denton Valley	2045 - 2050
SILVER LONNEN CSO (NC030)	05-D26	Denton Valley	2045 - 2050
DENE AVENUE CSO NC051	05-D26	Denton Valley	2045 - 2050
BROADWAY ROAD CSO	05-D26	Denton Valley	No Improvement Required
STAMFORDHAM ROAD PUMPING STATION	05-D26	Denton Valley	No Improvement Required
BURNSIDE CSO	05-D26	Denton Valley	No Improvement Required
SOUTH BENWELL ROAD CSO	05-D27	Benwell	2035 - 2040
CSO WATER STREET	05-D27	Benwell	2035 - 2040
CSO DUNN STREET	05-D27	Benwell	2035 - 2040
ESSEX CLOSE CSO	05-D27	Benwell	2035 - 2040
CSO REDHEUGH BRIDGE	05-D27	Benwell	2035 - 2040
CSO FORTH BANKS	05-D27	Benwell	2035 - 2040
TUTHILL STAIRS CSO	05-D27	Benwell	2035 - 2040
ATKINSON ROAD CSO	05-D27	Benwell	2035 - 2040
AMELIA CLOSE CSO - C49/102	05-D27	Benwell	2035 - 2040
WEST VIEW CSO	05-D27	Benwell	2035 - 2040
SCOTSWOOD ROAD PUMPING STATION NO 2	05-D27	Benwell	No Improvement Required
CLUMBER STREET CSO	05-D27	Benwell	No Improvement Required



Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
Scotswood Road CSO (C43-105) NWL name	05-D27	Benwell	No Improvement Required
SCOTSWOOD BRIDGE CSO	05-D27	Benwell	No Improvement Required
SCOTSWOOD NO1 SPS	05-D27	Benwell	No Improvement Required
MICHEL BEARINGS NORTH CSO	05-D27	Benwell	No Improvement Required
Scotswood Road (C49-104) NWL name	05-D27	Benwell	No Improvement Required
NEWCASTLE UPON TYNE CSO ST ANNES WHARF	05-D28	Newcastle City	2040 - 2045
THE SWIRLE CSO	05-D28	Newcastle City	2040 - 2045
BROAD CHARE CSO	05-D28	Newcastle City	2040 - 2045
MILK MARKET PUMPING STATION	05-D28	Newcastle City	No Improvement Required
DEAN STREET CSO	05-D28	Newcastle City	No Improvement Required
MEMORIAL HALL SSO	05-D29	Ponteland	2030 - 2035
ELAND LANE (NEW) PUMPING STATION	05-D29	Ponteland	2045 - 2050
JACKSON AVENUE CSO	05-D29	Ponteland	2045 - 2050
MOOR LANE SSO	05-D29	Ponteland	2045 - 2050
EASTERN WAY SSO	05-D29	Ponteland	2045 - 2050
CROSSFELL SEWAGE PUMPING STATION	05-D29	Ponteland	No Improvement Required
ELAND LANE (NEW) PUMPING STATION	05-D29	Ponteland	No Improvement Required
SALTERS LANE CSO	05-D30	Benton	2025 - 2030
GRASSHOLM PLACE CSO	05-D30	Benton	2030 - 2035
ACOMB CRESCENT (CATHEDRAL) CSO	05-D31	Gosforth	2030 - 2035
CSO AT THREE MILE INN	05-D31	Gosforth	No Improvement Required
FARNE AVENUE CSO	05-D31	Gosforth	No Improvement Required
TURNBERRY WAY CSO	05-D31	Gosforth	No Improvement Required
KENTON ROAD/ROCKERBY DRIVE CSO	05-D31	Gosforth	No Improvement Required
ST NICHOLAS HOSPITAL SSO	05-D31	Gosforth	No Improvement Required

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
WOOLSINGTON SEWAGE SYSTEM BULLOCKS STEADS CSO	05-D31	Gosforth	No Improvement Required
WOOLSINGTON CSO	05-D31	Gosforth	No Improvement Required
MOOR ROAD SOUTH CSO	05-D32	Jesmond	No Improvement Required
OUSEBURN WEST PS	05-D33	Lower Ouseburn	2040 - 2045
OUSEBURN EAST PS	05-D33	Lower Ouseburn	2040 - 2045
FOUNDRY LANE NO 3 CSO	05-D33	Lower Ouseburn	2040 - 2045
FOUNDRY LANE NO1 CSO	05-D33	Lower Ouseburn	2040 - 2045
LIME STREET/CUT BANK (2)	05-D33	Lower Ouseburn	2040 - 2045
BLUE BELL INN CSO	05-D33	Lower Ouseburn	2040 - 2045
QUAYSIDE/ST LAWRENCE ROAD CSO	05-D33	Lower Ouseburn	No Improvement Required
MARINER S WHARF, QUAYSIDE - NWL name	05-D33	Lower Ouseburn	No Improvement Required
OUSE BURN CSO NO 8	05-D33	Lower Ouseburn	No Improvement Required
SPILLERS PUMPING STATION	05-D34	Byker	2045 - 2050
GLASSHOUSE STREET PS	05-D34	Byker	2045 - 2050
THE OVAL PUMPING STATION	05-D34	Byker	2045 - 2050
RIVERSIDE PARK WEST CSO	05-D34	Byker	2045 - 2050
CALDBECK CL BELMONT ST ANTHONYS CSO	05-D34	Byker	2045 - 2050
CALDBECK AVE POTTERY BANK CSO	05-D34	Byker	2045 - 2050
GREENFORD ROAD C18-102	05-D34	Byker	2045 - 2050
CALDBECK AVENUE/POTTERY BANK CSO	05-D34	Byker	No Improvement Required
CSO NEPTUNE YARD NO.1 OUTFALL	05-D35	Walker	2045 - 2050
WHITE STREET STATION ROAD CSO	05-D35	Walker	2045 - 2050
WHITE STREET STATION ROAD CSO	05-D35	Walker	2045 - 2050
CSO WELBECK ROAD & BATH STREET	05-D35	Walker	2045 - 2050
WINCOMBLEE C PUMPING STATION	05-D35	Walker	2045 - 2050

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
WINCOMBLEE ROAD CSO	05-D35	Walker	2045 - 2050
WINCOMBLEE B PUMPING STATION	05-D35	Walker	2045 - 2050
NEW WELBECK ROAD PUMPING STATION	05-D35	Walker	2045 - 2050
STATION ROAD/WHITE STREET CSO	05-D35	Walker	No Improvement Required
BURN CLOSES CSO	05-D37	Wallsend	2030 - 2035
NEPTUNE YARD CSO - NWL name	05-D37	Wallsend	2045 - 2050
BENTON WAY OUTFALL NO 2 CSO	05-D37	Wallsend	2045 - 2050
STATION ROAD/SWAN HUNTERS CSO	05-D37	Wallsend	2045 - 2050
DAVY BANK PUMPING STATION	05-D37	Wallsend	2045 - 2050
HEATON CSO CORNEL RD	05-D37	Wallsend	2045 - 2050
CHURCH BANK CSO	05-D37	Wallsend	2045 - 2050
KILLINGWORTH WAGONWAY CSO	05-D37	Wallsend	2045 - 2050
POINT PLEASANT PUMPING STATION	05-D37	Wallsend	No Improvement Required
WATERVILLE ROAD CSO	05-D38	Chirton	No Improvement Required
BEEHIVE CSO	05-D39	Brierdene	2030 - 2035
BRIERDENE PUMPING STATION	05-D39	Brierdene	2030 - 2035
HOLYWELL HOUSE (CSO)	05-D39	Brierdene	2040 - 2045
TEN ACRE FARM COMBINED SEWER OVERFL	05-D39	Brierdene	2040 - 2045
MINI GOLF CSO	05-D39	Brierdene	No Improvement Required
NORTH PARADE HIGH LEVEL CSO (A52)	05-D40	Whitley Bay	2030 - 2035
BROWNS POINT CSO	05-D40	Whitley Bay	2035 - 2040
PERCY ROAD HIGH LEVEL CSO	05-D40	Whitley Bay	No Improvement Required
NORTH POINT CSO	05-D41	Cullercoats	No Improvement Required
WATTS SLOPE HIGH LEVEL CSO (A56)	05-D42	Whitley Lodge	2040 - 2045
Dukes Walk CSO	05-D42	Whitley Lodge	2040 - 2045

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
WESTERN ROAD/ROSEHILL ROAD P ST	05-D43	Willington Quay	2045 - 2050
STEPHENSON STREET PUMPING STATION	05-D43	Willington Quay	2045 - 2050
TYNE VIEW TERRACE PS	05-D43	Willington Quay	2045 - 2050
HOWDON STW CSO INLET	05-D43	Willington Quay	2045 - 2050
HOWDON STW CSO INLET South BANK	05-D43	Willington Quay	2045 - 2050
HOWDON STW CSO INLET NORTH BANK	05-D43	Willington Quay	2045 - 2050
HOWDON STW CSO Primary treated storm	05-D43	Willington Quay	2045 - 2050
PHILLIPSON STREET ROSEHILL CSO	05-D43	Willington Quay	2045 - 2050
HOWDON (ADJACENT A19 ROUNDABOUT)CSO	05-D43	Willington Quay	No Improvement Required
POTTER STREET PUMPING STATION	05-D43	Willington Quay	No Improvement Required
FISH QUAY CSO	05-D44	Tynemouth	2030 - 2035
NORTH GROVNE PUMPING STATION	05-D44	Tynemouth	2030 - 2035
SHARPNESS POINT PS	05-D44	Tynemouth	2030 - 2035
COLLINGWOOD TERRACE CSO	05-D44	Tynemouth	2030 - 2035
SWADDLES HOLE CSO	05-D44	Tynemouth	No Improvement Required
UNION QUAY CSO	05-D44	Tynemouth	No Improvement Required
NEW QUAY CSO NC058	05-D45	North Shields	2035 - 2040
BEDFORD STREET CSO NTY057	05-D45	North Shields	2035 - 2040
HOWDON ROAD CSO (NTY 040)	05-D45	North Shields	2045 - 2050
BURDON MAIN ROW CSO	05-D45	North Shields	2045 - 2050
PERCY MAIN CSO	05-D46	Royal Quays	2045 - 2050
CSO AT MANHOLE 49 HOWDEN ROAD	05-D46	Royal Quays	No Improvement Required
NEW YORK CSO	05-D46	Royal Quays	No Improvement Required
MINDRUM TERRACE CSO	05-D46	Royal Quays	No Improvement Required
PILOT STREET PUMPING STATION	05-D47	Westoe	2030 - 2035

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
WAPPING STREET CSO	05-D47	Westoe	2040 - 2045
CSO AT EAST HOLBORN WEST	05-D48	High Shields	2045 - 2050
WEST HOLBORN SOUTH CSO	05-D48	High Shields	2045 - 2050
HARTON LOW STAITHES CSO	05-D48	High Shields	2045 - 2050
TUDOR ROAD CSO	05-D48	High Shields	2045 - 2050
CORONATION ST CSO	05-D48	High Shields	2045 - 2050
MITRE PLACE CSO	05-D48	High Shields	No Improvement Required
EAST HOLBORN EAST CSO	05-D48	High Shields	No Improvement Required
HARTON LOW STAITHES (MILL DAM) CSO	05-D48	High Shields	No Improvement Required
TEMPLE STREET CSO	05-D49	Tyne Dock, Whiteleas	2040 - 2045
ELDON STREET CSO	05-D49	Tyne Dock, Whiteleas	2045 - 2050
SMITH STREET PUMPING STATION	05-D49	Tyne Dock, Whiteleas	No Improvement Required
REDWELL SEAGE PUMPING STATION	05-D50	Harton	2030 - 2035
TYNESIDE CSO B5/201	05-D52	Simonside	2030 - 2035
DON VALLEY PUMPING STATION	05-D52	Simonside	2040 - 2045
JARROW ROAD PUMPING STATION	05-D52	Simonside	2040 - 2045
CSO AT BEDESWAY	05-D52	Simonside	2040 - 2045
SOUTH SHIELDS INTERCEPTOR BS/104	05-D53	Jarrow, Hedworth	2025 - 2030
TYNESIDE CSO (NO B5/301) NEWLAND DRIVE	05-D53	Jarrow, Hedworth	2025 - 2030
SPRINGWELL PARK CSO	05-D53	Jarrow, Hedworth	2025 - 2030
WEST OF HEDWORTH LANE CSO	05-D53	Jarrow, Hedworth	2025 - 2030
NEW ROAD CSO	05-D53	Jarrow, Hedworth	2025 - 2030
EDEN WALK CSO	05-D53	Jarrow, Hedworth	2025 - 2030
CEMETERY ROAD CSO	05-D53	Jarrow, Hedworth	2030 - 2035
ROMAN ROAD CSO	05-D53	Jarrow, Hedworth	2030 - 2035

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
STATION ROAD CSO G020	05-D53	Jarrow,Hedworth	2030 - 2035
BOLDON COLLIERY FENWICK STREET CSO	05-D53	Jarrow,Hedworth	No Improvement Required
NORTH ROAD NO1	05-D53	Jarrow,Hedworth	No Improvement Required
29/30 NORTH ROAD CSO	05-D53	Jarrow,Hedworth	No Improvement Required
JARROW HEDWORTH CSO 20 ARNOLD STREET	05-D53	Jarrow,Hedworth	No Improvement Required
JARROW HEDWORTH CSO 23 CHARLES STREET	05-D53	Jarrow,Hedworth	No Improvement Required
REAR OF 92 & 94 CHARLES STREET CSO	05-D53	Jarrow,Hedworth	No Improvement Required
BOLDON COLLIERY SOUTH (N0'7) CSO	05-D53	Jarrow,Hedworth	No Improvement Required
REAR 3 ERNEST STREET CSO	05-D53	Jarrow,Hedworth	No Improvement Required
WEST BOLDON CSO NO 3	05-D53	Jarrow,Hedworth	No Improvement Required
HEATON GARDENS PUMPING STATION	05-D53	Jarrow,Hedworth	No Improvement Required
JUNCTION LANGHOLME AVENUE &	05-D53	Jarrow,Hedworth	No Improvement Required
PRINCE CONSORT ROAD PUMPING STATION	05-D54	Hebburn	2035 - 2040
WAGONWAY ROAD PUMPING STATION	05-D54	Hebburn	2035 - 2040
BLACKETT STREET JARROW	05-D54	Hebburn	2035 - 2040
REYROLLE SEWER (SOUTH) CSO	05-D54	Hebburn	2040 - 2045
MARINE DRIVE PUMPING STATION	05-D54	Hebburn	No Improvement Required
LAMPORT CSO	05-D54	Hebburn	No Improvement Required
CALEDONIAN ST / WILLIAM ST D17-103 STY056	05-D54	Hebburn	No Improvement Required
WILLIAM STREET CSO	05-D54	Hebburn	No Improvement Required
BLACKETT STREET CSO	05-D54	Hebburn	No Improvement Required
TYNE STREET SPS	05-D54	Hebburn	No Improvement Required
CSO AT SW CORNER OF ALLOTMENT GARDEN HEBBURN Riverside	05-D54	Hebburn	No Improvement Required
REYROLLE SEWER (NORTH) CSO	05-D54	Hebburn	No Improvement Required
OVINGTON CSO TD034	05-D55	Prudhoe	2035 - 2040

Storm Overflow Site Name	Drainage Area Code	Drainage Area Name	Storm Overflow Spill Frequency Reduction Scheme - Delivery Period
ANDREWS HOUSE LA HACIENDA CSO	05-D55	Prudhoe	2035 - 2040
MARY MAGDALENE NO3 CSO (TD037)	05-D55	Prudhoe	2035 - 2040
OVINGHAM PUMPING STATION CSO	05-D55	Prudhoe	2035 - 2040
ROSELEIGH CSO	05-D55	Prudhoe	2035 - 2040
WYLAM NORTH SPS CSO	05-D55	Prudhoe	2035 - 2040
SOUTH WYLAM PUMPING STATION	05-D55	Prudhoe	2035 - 2040
MID TYNE SEWERAGE SCHEME CSO	05-D55	Prudhoe	2035 - 2040
RIDING DENE CSO	05-D55	Prudhoe	2035 - 2040
PRUDHOE CSO 4	05-D55	Prudhoe	2035 - 2040
ADDERLANE SCHOOL CSO (TD035)	05-D55	Prudhoe	No Improvement Required
PRUDHOE PUMPING STATION	05-D55	Prudhoe	No Improvement Required
MID-TYNE NO,3 CSO	05-D55	Prudhoe	No Improvement Required
ELTRINGHAM CSO BEAUMONT WOOD	05-D55	Prudhoe	No Improvement Required



## Wastewater Treatment Works Compliance

Analyses have been completed to determine the interventions that are likely to be required to ensure all wastewater treatment works (WwTW) are operating in compliance with the permits for dry weather flow (DWF) treatment and treated effluent discharge quality.

The following table summarises the number of WwTWs within the Tyneside Level 2 SPA that have been included in the DWMP for DWF permit compliance and treated effluent discharge quality permit compliance (phosphorous (P), biological oxygen demand (BOD) and ammonia (Amm) indicators).

WwTW Name	Intervention(s) Required
Howdon WwTW	Howdon WwTW is being investigated/upgraded currently for dry weather flow compliance.

## Long-Term Delivery Strategy for Flooding and Pollution

The National Infrastructure Commission's report 'Reducing the risk of surface water flooding'<sup>1</sup> highlighted the importance of a national approach to tackle flooding, and the costs and challenges of eliminating sewer flooding. Given this, and the greater insight we have gained from developing the DWMP, the ambition for flooding and pollution risk has been adjusted to what is considered a stretching but achievable level that would be economically beneficial to deliver.

Our Long-Term Delivery Strategy identifies a target of reducing sewer flooding by 60% from our 2025 position. To achieve this, we will plan to reduce hydraulic flood risk regionally in the period between 2030 and 2050 by a total of:

- 17,999 internal flood risk properties
- 216,074 external flood risk properties

This approach deals with the impact of climate change, growth and urban creep.

The following table summarises the level of risk within the Tyneside L2 SPA against the flooding and pollution planning objectives.

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<sup>1</sup> <https://nic.org.uk/studies-reports/reducing-the-risks-of-surface-water-flooding/surface-water-flooding-final-report/>

Planning Objective	Measure	Count				
		2020	2025	2030	2045	2060
PO1 – Internal Flood Risk	Count of properties at risk of flooding internally during a 1 in 20 year return period rainfall event	2,919	2,997	3,260	4,821	5,272
PO2 – External Flood Risk	Count of properties at risk of flooding externally during a 1 in 20 year return period rainfall event	57,899	59,080	59,455	79,416	84,709
PO3 – 1 in 50 Year Population at Risk	Population at risk of flooding during a 1 in 50 year return period rainfall event	81,640	82,950	83,478	113,686	122,086
PO6 – Pollution	Count of manholes near watercourses at risk of flooding during a 1 in 5 year return period rainfall event	198	198	199	284	374

## PLANNING OBJECTIVE ASSESSMENT

### Planning Objective Risk Scoring

The DWMP planning objectives have been assessed in line with the common scoring approach followed by all water companies.

Risk scores have been calculated at drainage area level, following the approach outlined below. Further detail on how the scores have been calculated for each of the planning objectives is within the Problem Characterisation methodology.

Risk Score	Description
0	<b>Low Risk</b> – Levels of planning objective risk within the drainage area are in the bottom quartile and/or there are no assets identified as higher priority requiring interventions throughout the planning periods.
1	<b>Medium Risk</b> – Levels of planning objective risk within the drainage area are in the middle two quartiles and/or there are assets identified as lower priority requiring interventions throughout the planning periods.
2	<b>High Risk</b> – Levels of planning objective risk within the drainage area are in the top quartile and/or there are assets identified as higher priority requiring interventions throughout the planning periods.

Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
05-D01	Seaton Valley	0	0	0	0	1	1	0	1	1	2	2	2	2	2	2	1	1	1	2	2	2
05-D02	Crawcrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D03	Ryton West	1	1	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D04	Ryton East	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	2	2	2
05-D05	Ryton Haugh	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D06	Blaydon West	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2	0	0	0	2	2	2
05-D07	Blaydon East	0	1	1	2	2	2	1	1	1	0	0	0	0	0	0	0	0	0	2	2	2
05-D08	Blaydon Haughs	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2
05-D09	Derwenthaugh	0	1	1	1	1	2	1	1	1	0	0	0	1	1	1	1	1	1	2	2	2
05-D10	Whickham North	0	1	1	1	1	1	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2
05-D11	Whickham South & Sunnyside	1	1	1	1	1	1	0	1	1	0	0	0	2	2	2	0	0	0	2	2	2
05-D12	Dunston Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D13	Dunston, Teams	0	1	1	1	1	1	0	1	1	0	0	0	1	1	1	0	1	1	2	2	2
05-D14	Dunston & Lobley Hill	1	1	1	2	2	2	1	1	1	0	0	0	0	0	0	1	1	1	2	2	2
05-D15	Team Valley	1	2	2	1	1	1	0	0	0	0	0	0	2	2	2	0	1	1	2	2	2
05-D16	Chowdene	0	0	0	1	1	1	0	0	0	0	0	0	2	2	2	0	0	0	2	2	2
05-D17	Bensham	1	2	2	2	2	2	1	1	1	0	0	0	0	0	0	0	0	0	2	2	2
05-D18	Gateshead Central	1	1	1	1	1	1	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2
05-D19	Gateshead West	0	0	0	0	0	0	1	1	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D20	Gateshead Stadium, Mount Pleasant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D21	Friars Goose	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D22	Felling & Felling Shore	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D23	Heworth	1	1	1	1	1	1	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2

Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
05-D24	Leam Lane, Wardley, Bill Quay	1	1	1	1	1	1	0	1	1	0	0	0	2	2	2	0	0	0	2	2	2
05-D25	Newburn	1	1	1	1	1	1	1	1	1	0	0	0	1	1	1	1	1	1	2	2	2
05-D26	Denton Valley	1	1	1	0	1	1	0	0	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D27	Benwell	0	1	1	0	0	1	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2
05-D28	Newcastle City	0	0	0	0	0	0	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2
05-D29	Ponteland	0	1	1	0	0	0	0	0	0	0	0	0	2	2	2	1	1	1	2	2	2
05-D30	Benton	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2	0	0	0	2	2	2
05-D31	Gosforth	0	1	1	0	0	0	0	0	0	0	0	0	2	2	2	0	0	1	2	2	2
05-D32	Jesmond	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D33	Lower Ouseburn	0	1	1	0	0	0	0	0	0	0	0	0	2	2	2	0	0	0	2	2	2
05-D34	Byker	1	1	2	2	2	2	1	1	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D35	Walker	0	0	0	0	0	0	1	1	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D36	Heaton	0	1	1	0	0	1	1	1	1	0	0	0	0	0	0	1	1	1	2	2	2
05-D37	Wallsend	0	1	1	0	1	1	0	0	0	0	0	0	2	2	2	0	1	1	2	2	2
05-D38	Chirton	1	1	1	1	1	1	0	1	1	0	0	0	0	0	0	0	1	1	2	2	2
05-D39	Brierdene	0	0	1	1	1	1	1	1	1	2	2	2	2	2	2	0	0	0	2	2	2
05-D40	Whitley Bay	0	0	0	1	1	1	0	1	1	2	2	2	0	0	0	0	0	0	2	2	2
05-D41	Cullercoats	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	2	2	2
05-D42	Whitley Lodge	0	1	1	0	1	1	0	0	0	2	2	2	0	0	0	0	0	0	2	2	2
05-D43	Willington Quay	0	0	0	1	1	1	1	1	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D44	Tynemouth	0	1	1	1	1	2	0	0	0	2	2	2	2	2	2	0	0	0	2	2	2
05-D45	North Shields	0	0	0	0	0	0	0	1	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D46	Royal Quays	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D47	Westoe	1	1	1	0	1	1	1	1	1	2	2	2	0	0	0	0	0	0	2	2	2
05-D48	High Shields	1	2	2	2	2	2	1	1	1	0	0	0	1	1	1	0	0	0	2	2	2

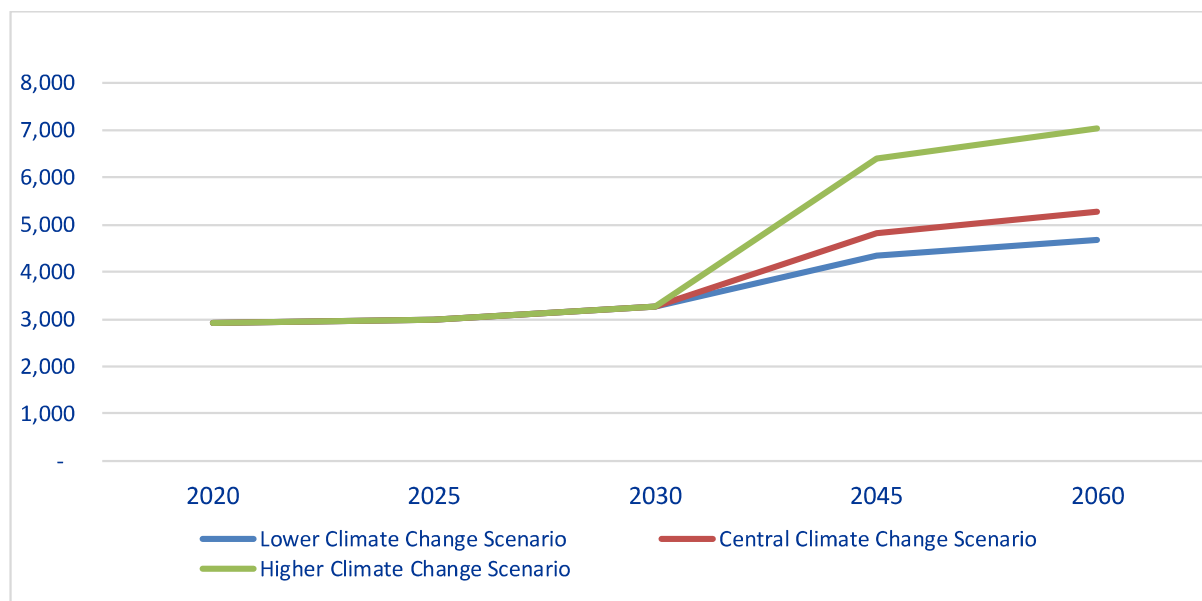
Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
05-D49	Tyne Dock,Whiteleas	0	1	1	0	0	0	0	1	1	0	0	0	1	1	1	0	0	0	2	2	2
05-D50	Harton	1	1	1	1	1	1	1	1	2	2	2	2	0	0	0	0	0	0	2	2	2
05-D51	Cleadon Park	2	2	2	2	2	2	1	2	2	0	0	0	0	0	0	0	0	0	2	2	2
05-D52	Simonside	1	1	1	0	0	0	0	0	0	0	0	0	2	2	2	0	0	0	2	2	2
05-D53	Jarrow,Hedworth	0	0	0	0	0	1	1	1	1	0	0	0	2	2	2	1	1	1	2	2	2
05-D54	Hebbum	1	1	1	0	1	1	0	0	0	0	0	0	1	1	1	0	0	0	2	2	2
05-D55	Prudhoe	1	1	1	1	2	2	1	1	1	0	0	0	2	2	2	1	1	1	2	2	2
05-D56	Hagg Bank	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
05-D58	Marquis of Granby	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	2	2
05-D59	Moore Croft, Newburn	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## Climate Change Sensitivity

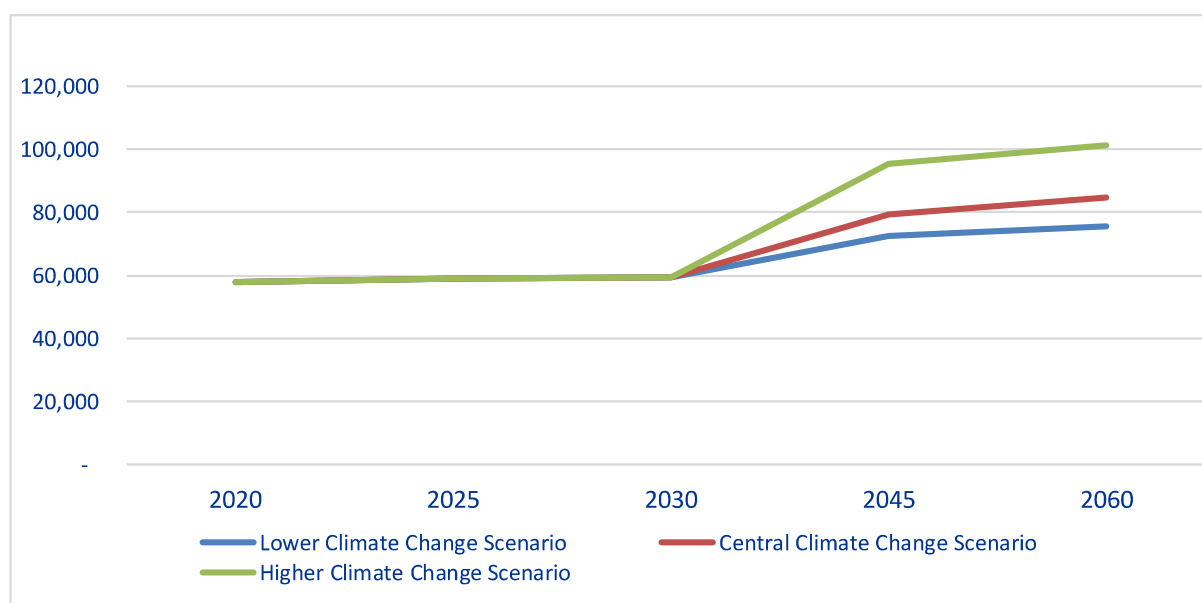
As outlined in the BRAVA methodology, two additional climate scenarios were analysed to evaluate the impact on the planning objectives of Lower Emissions and Higher Emissions climate scenarios.

The following graphics outline the impact on the planning objective risk numbers for the flooding and pollution planning objectives within the Tyneside Level 2 SPA in the different climate scenarios that have been modelled.

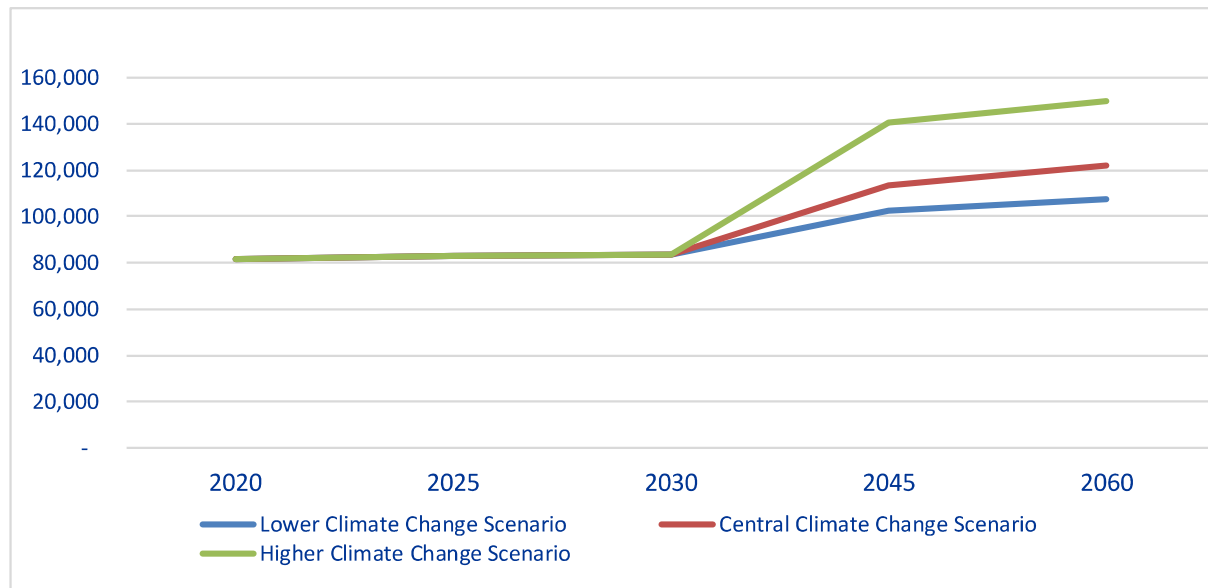
### PO1 – Internal Flood Risk – Tyneside L2 SPA



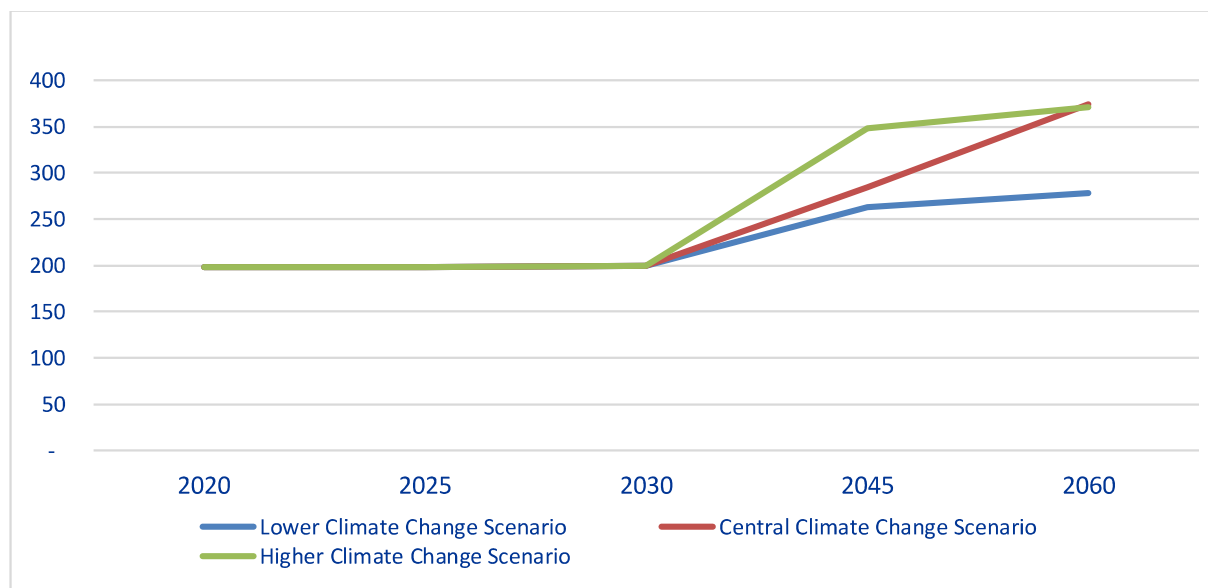
### PO2 – External Flood Risk – Tyneside L2 SPA



### PO3 – 1 in 50 Year Population at Risk – Tyneside L2 SPA



### PO6 – Pollution – Tyneside L2 SPA



Our business plan is based on adaptive planning principles. We begin to use this more and more to think about an uncertain future. This long-term strategy is being developed alongside the long-term planning frameworks – in particular, the well-established Water Resources Management Plan process and the new Drainage and Wastewater Management Plan process.



## OPTION DEVELOPMENT

### Our Plan for the Tyneside L2 SPA

#### What Are We Doing?

The DWMP has been prepared taking the Best Value options within catchments and also including sustainable options that were not identified as Best Value but did reduce the volume of below-ground storage required within a catchment.

A summary of the interventions that have been included within the DWMP within the Tyneside L2 SPA are included within the following tables.

#### Storm Overflow Discharge Reduction Plan

Intervention Type	2025 to 2030	2030 to 2035	2035 to 2040	2040 to 2045	2045 to 2050
Storm Overflows addressed by Spill Frequency Reduction Schemes	8	25	37	40	84
Storm Overflows requiring Screening Provision Schemes	5	12	81	39	74

#### Wastewater Treatment Works Compliance

Intervention Type	2025 to 2030	2030 to 2035	2035 to 2040	2040 to 2045	2045 to 2050	2050 to 2055	2055 to 2060
WwTW DWF Compliance – Investigations / Schemes	1	-	-	-	-	-	-
WwTW Quality Compliance – Investigations	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)
WwTW Quality Compliance - Schemes	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)	- (P) - (BOD) - (Amm)

#### Long-Term Delivery Strategy – Flooding and Pollution

The Government's 25 Year Environment Plan (25YEP) requires us to invest to:

- Reduce nitrogen and phosphorus pollution, through catchment and nature-based solutions where possible.
- Improve drainage and environmental water quality, and reduce surface water flooding risk, through our Drainage and Wastewater Management Plan (DWMP).

Our long term delivery strategy sets out our ambition to continue to reduce sewer flooding over the next 25 years. Our plan sets out how we will match the 25YEP by reducing internal and external sewer flooding by 60% by 2050.

### How Much Does Our Plan Cost?

The following table summarises the costs that are included within the DWMP for the delivery of the identified interventions. The costs shown in the table are £million.

Intervention Type	2025 to 2030	2030 to 2035	2035 to 2040	2040 to 2045	2045 to 2050	2050 to 2055	2055 to 2060
Storm Overflow Spill Frequency Reduction Schemes	23.65	61.46	41.26	69.17	70.77	-	-
Screening Provision Schemes	1.66	7.15	20.93	12.52	24.00	-	-

### Long-Term Delivery Strategy for Flooding

It is anticipated that we will achieve our flood risk reduction targets in a number of ways. For example,

- Working in partnership with others in the Northumbria Integrated Drainage Partnership
- Working with customers and communities for the widescale disconnection of roof drainage from the combined sewer network
- Implementing source control via sustainable drainage measures (SuDS) including wetland creation
- Implementing SMART networks throughout the region
- Disconnecting highway runoff from the combined sewer network
- Working with others to implement permeable pathing and roadways schemes.

We have estimated that the cost of achieving our ambitious targets will be £1 billion between 2030 and 2050. We will seek customer support for investment to achieve these targets.

The following table summarises the level of risk within the Wear L2 SPA for the flooding planning objectives following the implementation of the Long-Term Delivery Strategy for flooding.

Planning Objective	Measure	Count				
		2020	2025	2030	2045	2060
PO1 – Internal Flood Risk	Count of properties at risk of flooding internally during a 1 in 20 year return period rainfall event	2,919	2,997	3,260	2,439	2,107
PO2 – External Flood Risk	Count of properties at risk of flooding externally during a 1 in 20 year return period rainfall event	57,899	59,080	59,455	45,713	44,028

### Planning Objective Risk Scoring

The planning objective risk scores have been evaluated with the proposed DWMP interventions delivered.

Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
05-D01	Seaton Valley	0	0	0	0	1	1	0	1	1	2	0	0	2	1	0	1	1	1	2	0	0
05-D02	Crawcrook	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D03	Ryton West	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D04	Ryton East	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	2	0	0
05-D05	Ryton Haugh	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D06	Blaydon West	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
05-D07	Blaydon East	0	0	0	2	1	2	1	1	1	0	0	0	0	0	0	0	0	0	2	0	0
05-D08	Blaydon Haughs	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	0
05-D09	Derwenthaugh	0	0	0	1	1	1	1	1	1	0	0	0	1	1	0	1	1	1	2	0	0
05-D10	Whickham North	0	0	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0
05-D11	Whickham South & Sunnyside	1	0	0	1	0	0	0	0	0	0	0	0	2	1	0	0	0	0	2	0	0
05-D12	Dunston Hill	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D13	Dunston, Teams	0	0	0	1	1	1	0	1	1	0	0	0	1	0	0	0	1	1	2	0	0
05-D14	Dunston & Lobley Hill	1	0	1	2	1	1	1	1	1	0	0	0	0	0	0	1	1	1	2	0	0
05-D15	Team Valley	1	0	0	1	0	0	0	0	0	0	0	0	2	0	0	0	1	1	2	0	0
05-D16	Chowdene	0	0	0	1	1	1	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
05-D17	Bensham	1	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D18	Gateshead Central	1	0	0	1	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	0
05-D19	Gateshead West	0	0	0	0	0	0	1	1	1	0	0	0	1	1	0	0	0	0	2	0	0
05-D20	Gateshead Stadium, Mount Pleasant	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0

Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
05-D21	Friars Goose	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D22	Felling & Felling Shore	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D23	Heworth	1	0	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0
05-D24	Leam Lane, Wardley, Bill Quay	1	0	0	1	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
05-D25	Newbum	1	0	0	1	0	1	1	1	1	0	0	0	1	0	0	1	1	1	2	0	0
05-D26	Denton Valley	1	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	2	0	0
05-D27	Benwell	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0
05-D28	Newcastle City	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0
05-D29	Ponteland	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	1	1	1	2	0	0
05-D30	Benton	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
05-D31	Gosforth	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	1	2	0	0
05-D32	Jesmond	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D33	Lower Ouseburn	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
05-D34	Byker	1	0	0	2	1	1	1	0	0	0	0	0	1	1	0	0	0	0	2	0	0
05-D35	Walker	0	0	0	0	0	0	1	1	1	0	0	0	1	1	0	0	0	0	2	0	0
05-D36	Heaton	0	0	0	0	0	0	1	1	1	0	0	0	0	0	0	1	1	1	2	0	0
05-D37	Wallsend	0	0	0	0	0	0	0	0	0	0	0	0	2	1	0	0	1	1	2	0	0
05-D38	Chirton	1	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	1	1	2	0	0
05-D39	Brierdene	0	0	1	1	1	1	1	1	1	2	0	0	2	0	0	0	0	0	2	0	0
05-D40	Whitley Bay	0	0	0	1	1	1	0	1	1	2	0	0	0	0	0	0	0	0	2	0	0
05-D41	Cullercoats	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	2	0	0
05-D42	Whitley Lodge	0	0	0	0	1	1	0	0	0	2	0	0	0	0	0	0	0	0	2	0	0
05-D43	Willington Quay	0	0	0	1	1	1	1	1	1	0	0	0	1	1	0	0	0	0	2	0	0

Drainage Area		PO1 – Internal Flood Risk			PO2 – External Flood Risk			PO3 – 1 in 50 Year Population at Risk			PO4 – Bathing Water			PO5 – River Water			PO6 - Pollution			PO8 – WwTW DWF Compliance		
		2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060	2020	2045	2060
05-D44	Tynemouth	0	0	0	1	0	0	0	0	0	2	0	0	2	0	0	0	0	0	2	0	0
05-D45	North Shields	0	0	0	0	0	0	0	1	1	0	0	0	1	1	0	0	0	0	2	0	0
05-D46	Royal Quays	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D47	Westoe	1	0	0	0	0	0	1	1	1	2	0	0	0	0	0	0	0	0	2	0	0
05-D48	High Shields	1	0	1	2	0	0	1	1	1	0	0	0	1	1	0	0	0	0	2	0	0
05-D49	Tyne Dock,Whitel eas	0	0	0	0	0	0	0	1	1	0	0	0	1	0	0	0	0	0	2	0	0
05-D50	Harton	1	0	0	1	0	0	1	1	1	2	0	0	0	0	0	0	0	0	2	0	0
05-D51	Cleadon Park	2	0	0	2	0	0	1	1	1	0	0	0	0	0	0	0	0	0	2	0	0
05-D52	Simonside	1	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	2	0	0
05-D53	Jarrow,Hed worth	0	0	0	0	0	1	1	1	1	0	0	0	2	0	0	1	1	1	2	0	0
05-D54	Hebbum	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	2	0	0
05-D55	Prudhoe	1	0	0	1	1	1	1	1	1	0	0	0	2	0	0	1	1	1	2	0	0
05-D56	Hagg Bank	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
05-D58	Marquis of Granby	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0
05-D59	Moore Croft, Newbum	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

## CONCLUDING COMMENTS

Our DWMP forms part of our long-term delivery strategy. As we go about this, we will need to review our progress and adapt our future plans to take into account changing circumstances. These include how customer views about priorities and affordability evolve; new technologies that emerge; how supply chain capacity develops; changes in weather patterns; and customer behaviour changes.

Setting a long-term delivery strategy allows us to seek early certainty on the investment we do not expect to change, while acknowledging these factors could mean choosing different pathways in future. We will consider those choices as and when we update our DWMP and at subsequent price reviews, which take place every five years. At each point we update our DWMP, we will look further into the future to maintain a 40-year outlook on these issues.

Our PR24 business plan, covering 2025-30, will include projects to drive better, more efficient, and nature-based solutions to tackling drainage and storm overflows in the future.

## CONTACTING US

To view our DWMP, please go to our website at: [www.nwl.co.uk/dwmp](http://www.nwl.co.uk/dwmp).

To contact us:

Go to the Contact Us page at: [Contact us \(nwl.co.uk\)](http://www.nwl.co.uk/contact-us)

Or you can call our Head Office switchboard on [REDACTED]

Our phone lines are open from 8:00am to 5:00pm, Monday to Friday.

Feel free to write to us at:

Northumbrian Water Limited

Northumbria House

Abbey Road

Pity Me

Durham

DH1 5FJ



# WHITBURN NEIGHBOURHOOD FORUM



## Response to the Emerging Local Plan

**Distribution:** South Tyneside Council

**Authors:** Executive Members Whitburn Neighbourhood Forum

**Date:** 14th August 2022

# WHITBURN NEIGHBOURHOOD FORUM

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# WHITBURN NEIGHBOURHOOD FORUM

## Response to the Emerging Local Plan – Pre-Publication Draft

We, the Whitburn Neighbourhood Forum (WNF) have a number of concerns with the Emerging Local Plan – Pre-Publication Draft that was approved by the cabinet for consultation on June 15th 2022.

### 1. EXECUTIVE SUMMARY

#### 1.1. Housing Need

The draft local plan that South Tyneside Council (STC) have recently issued are using ONS figures that are eight years out of date. Thus, STC are not able to meet Conservative government's housing needs derived from the government's own standard formula on brownfield sites alone.

However, the Levelling Up and Regeneration Bill proposes significant changes to the planning system which has led to uncertainty around national planning guidance which needs to be fully understood. This is likely to include the way national housing requirements are worked out and set locally, which will dictate how local plans are drawn up.

There will also be a revised NPPF and an NPPF prospectus. A 'more sophisticated way of assessing housing need' will be included in the revised NPPF. As the former DLUHC SoS states, 'we also need to ensure that how we calculate need and how plans are adopted is much more sensible and sensitive'. Both candidates for PM have also made statements that they want to abandon centrally set housing targets and formula.

In its policy report, the government signals very clearly that it wants to protect and safeguard the Green Belt and pursue policy options to make the Green Belt even greener - which is the opposite of building on green belt. There is also a Green Belt Protection Bill currently going through Parliament that proposes to establish a national register of Green Belt land in England which will restrict the ability of local authorities to de-designate Green Belt land.

The PPG is very clear that the Standard Method is not the whole answer to deciding on a housing target within a particular local authority. The formula is only based on two inputs so cannot possibly accurately reflect the myriad of very different housing challenges that exist across the country. The Standard Method was introduced to speed up and simplify the Plan-making process but was never intended to be a panacea. Current Planning Practice Guidance states that the use of the standard method is not mandatory, and a local authority can move away from this in exceptional circumstances. The above change in political and policy direction on housing need and green belt and recent data from the census showing a decline in the number of residents, shows that this exceptional circumstance is indeed present. Many local authorities have indeed paused their work while they await more information, conscious as they are that if they delete sites from the green belt, they will be unnecessarily lost forever.

We recognise the constraints imposed on the council by current government planning policy. However, we propose that the plans are put on hold until the government make their intentions for the new planning policy framework clear, whereby they issue transitional guidance that align with their intentions, prior to new legislation coming into force.

# WHITBURN NEIGHBOURHOOD FORUM

## 1.2. **Biodiversity, Site Selection, SA and HRA**

The site selection method and the Sustainability Assessment are both unsound. The SA fails to be a comprehensive assessment of impacts on biodiversity in particular. The site selection method is obscure and arbitrary, with different methods used for different sites, which fails to provide a complete overview of impacts from allocations. If there is no comprehensive understanding of all sites, then how has the decision been made that some sites should be developed, and some should not? What is this based on? The Forum needs to see the complete evidence and the council needs to be more transparent and open to scrutiny.

The Local Plan does not meet the requirements of the NPPF, and of paras 11, 16, 22 and 174 in particular.

## 1.3. **Health Provision**

It is considered unlikely that developers will be in an informed position to produce a satisfactory Health Impact Assessment (HIA) for the 396 houses proposed for Whitburn until the present identified state of health provision inequality in the village is addressed.

We recommend that the work of the Local Clinical Commissioning group looking at health provision in Whitburn is concluded **before** the local plan is agreed. This will allow for planned improvements in health care provision to be agreed that remedies this identified deficiency in social facilities.

## 1.4. **Air Quality and Impacts on Health Outcomes**

Due to the proposal to build an extra 396 houses bringing with it a 17 % increase in traffic there is a requirement to produce an Air Quality Assessment before any developments take place in Whitburn

## 1.5. **Traffic**

We recommend, due to the increase in traffic in Whitburn over the last 60 years (with no commensurate improvement in the road infrastructure) and due to the proposed increases in levels of car ownership (that will result from the proposed increase in population in the Draft Local Plan) a comprehensive Transport Assessment (TA) and Travel Plan (TP) unique for Whitburn should be prepared before any development levels are agreed.

## 1.6. **Social and community infrastructure**

The present education provision in Whitburn is inadequate to deal with any increase in student population and South Tyneside Council should request the developer to provide the land and construct and equip a new school.

## 1.7. **Sewage**

No large housing developments can be agreed to until plans to improve the sewage treatment infrastructure are also agreed.

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## 2. STATEMENT OF COMMUNITY INVOLVEMENT

The Regulation 18 Draft Local Plan was approved by the council cabinet on 15<sup>th</sup> July 2022. A consultation period started shortly afterwards and closed on the 14<sup>th</sup> August 2022.

According to the **Statement of Community Involvement** on the council's website:

*We will keep you informed through a variety of methods including: letters and e-mails, our website [www.southtyneside.info](http://www.southtyneside.info) our 'Local Plan' newsletter, the council's 'South Tyneside' magazine and through notices in the local newspaper.*

There is a marked difference in the way that South Tyneside Council have sought the views of the local community with respect to The Draft Local Plan as compared with the Strategic Land Review. There are details of the consultation period regarding The Draft Local Plan on the Council web site and drop-in sessions have been arranged throughout the borough, managed by council staff. The South Tyneside Council did not deliver notices outlining The Draft Local Plan, inviting comments, and advertising the drop-in sessions.

At the drop-in meeting held in the Whitburn Village Hall only about 8 residents turned up and four of them were members of the Forum executive committee. Many residents were totally unaware of the plan other than advertising by the forum and were not aware of the drop-in sessions being held in the village. The council are also only accepting online comments. This rules out a lot of elderly folk who are not Internet savvy.

There was also confusion within the village between the Local Plan and the referendum for the Neighbourhood Plan. It has become apparent that some villagers voted against the Neighbourhood Plan when they thought they were voting against the Local Plan.

We, the Forum believe that the council have not demonstrated an adequate and robust communication strategy seeking the views of the local community with respect to the Draft Local Plan and more consultation is required before the Local Plan is agreed.

## 3. HOUSING

The regulation 18 draft local plan was approved by the cabinet on Wednesday June 15<sup>th</sup> less than 2 weeks before the 2011 census figures were published. This plan estimates the 2021 population of South Tyneside as 151,936 whereas the actual figure is 147,800 an overestimate of 4,136 or 2.8%.

This equates to approximately 2,000 houses. That is more than has been allocated in the plan to the green belts of Whitburn, Cleadon and East Boldon combined.

The council planners inform us that they have to use as a base the ONS 2014 population figures and abide by the governments standard method for calculating allocations.

However, the **Department for Levelling up, Housing and Communities** have stated in a response to a letter from East Boldon Forum that

# WHITBURN NEIGHBOURHOOD FORUM

*"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 and working with neighbouring authorities if it would be more appropriate for needs to be met elsewhere. It is recognised that not every community will be able to meet its housing need in full."*

The letter also states:

*"The Government is committed to protecting and enhancing the Green Belt, in line with our manifesto. Strong protections for Green Belt remain firmly in place. The Framework states, for instance, that a Green Belt boundary may be altered only in exceptional circumstances through the Local Plan process. A local authority should consider releasing land from Green Belt only if it can demonstrate that it has explored all other reasonable options."*

The fact is that there is no housing shortage in this area of the North East. If you examine the 2021 census figures the two neighbouring councils like South Tyneside have seen a decrease in population in the last 10 years.

Council	Census 2011	Census 2021	Difference	%
South Tyneside	148,127	147,800	(327)	(0.2)
Gateshead	200,200	196,100	(4,100)	(2.0)
Sunderland	275,506	274,200	(1,306)	(0.5)
Total	623,833	618,100	(5,733)	(0.9)

Reliance on outdated figures and a standard method that inflates housing needs are not exceptional circumstances to remove the green belt spaces.

Furthermore the figures in the SHLAA are contradictory, inaccurate and full of arithmetic errors. For example the figures in 5.1

A	Residual Requirement	5,457
B	Developable SHLAA sites	6,147
C	Supply Against Target (A-B)	-2,370

Table 13 Supply against target before assessing Green Belt

Here is another one from the SHMA. The total is 7 years



# WHITBURN NEIGHBOURHOOD FORUM

**Table 2.10 Dwelling completions 2014/15 to 2019/20**

Year	Completions	Demolitions / losses	Housing target	Net delivery
2014/15	456	47	365	409
2015/16	431	46	365	385
2016/17	566	103	350	463
2017/18	438	99	350	339
2018/19	402	154	350	248
2019/20	251	15	350	236
2020/21	182	2	341	180
<b>Total (past 6 years)</b>	<b>2,726</b>	<b>466</b>	<b>2,471</b>	<b>2,260</b>
<b>Annual average (past 6 years)</b>	<b>389</b>	<b>67</b>	<b>353</b>	<b>323</b>

Source: Council data

How can we trust the figures when they do not add up!

Which brings us to another quandary. According to the table 2.10 above 2,260 net dwellings were built in the last 7 years. However the 2021 census informs us that there was only an increase of 1,133 households since 2011 (a period of 10 years). We would expect there to be more households than dwellings not the other way round. The census 2021 figures records 68,300 households whereas the SHMA plan estimates there are 70,170 households and 72,081 dwellings. If the dwellings figure is accurate and assuming there is 1 household per dwelling (highly unlikely) then there are 3,781 dwellings vacant. This means that there are 5.2% of dwellings vacant compared with the national rate of 2.5%. Therefore the vacancy rate in the borough is above the 'transactional vacancy level' of 3%, which is the proportion of stock normally expected to be vacant to allow movement within the market.

## 4. CONSULTATION FOR NEIGHBOURHOOD PLAN

As part of creating the Neighbourhood Plan the Forum has been involved in a number of consultation exercises with the community.

We had a series of workshops to elicit feedback of what the villagers liked and disliked about Whitburn. The community were asked to answer 5 questions:

1. What do you like about Whitburn and want to keep?
2. What do you dislike about Whitburn and want to change or improve?
3. What does Whitburn not have that you would like it to have?
4. What do you think the neighbourhood plan should address?
5. Any other comments?

A high percentage of the comments referred to housing and green belt. The general feedback was that:

- Developers were more interested in profit margins than local demand, building large executive style housing rather than affordable housing.

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- Development should be modelled on local need, including affordable housing and accommodation more suitable for the elderly eg bungalows.
- Priority should be given to local families for social housing

The following table represents the percentage of comments relating to either greenbelt (retain) or development (must be based on need)

Question	Greenbelt	Development
What do you like about Whitburn and want to keep?	40%	
What do you dislike about Whitburn and want to change or improve?		38%
What does Whitburn not have that you would like it to have?		4%
What do you think the neighbourhood plan should address?	32%	57%
Any other comments?		22%

## Supply v Demand

The Forum employed Aecom to produce a Housing Need Assessment for Whitburn. They looked at supply v demand of types of houses

*"Another approach to benchmarking whether sales volumes indicate inflated or depressed demand across different housing types is to compare the proportion of sales of each type of housing (excluding any new builds, which would introduce supply side factors) with the proportion of the existing housing stock that falls into each category. This allows conclusions to be drawn about whether the sale of homes of each type is occurring proportional to their availability, or whether, on account of sales volumes in any given type exhibiting a greater or lesser proportion than in the housing stock, suggesting higher or lower demand for that type respectively.*

*This comparison is presented in the following table, with figures for the housing stock in South Tyneside as a whole presented alongside for reference. The table shows that whilst the percentage of sales and stock are roughly the same for detached properties and flats, fewer semi-detached properties are being sold than are represented in the existing stock. Whereas, for terraced properties, it appears that sales are much higher than the level of stock which could suggest this is where there is the highest demand relative to supply within Whitburn, versus a decreased demand for semi-detached properties. Indeed, in both cases, this conclusion is only reiterated by the existing stock within the district as a whole, which both points to there being less demand for semi-detached properties than would be expected given its availability and more demand for terraced housing given its availability."*

## Percentage of housing sales compared to stock

	SALES Whitburn	STOCK Whitburn	STOCK South Tyneside
Detached	14%	16%	8%
Semi-Detached	45%	53%	41%
Terraced	36%	25%	30%
Flats	5%	6%	21%

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*Source: Census 2001/2011, Land Registry PPD, AECOM Calculations*

This analysis supports the Forum's consultation exercises conducted for the neighbourhood plan that the current need is for affordable terraced/town houses.

## 5. GENERAL GREEN BELT/BIODIVERSITY COMMENTS

- The Local Plan is not promoting sustainable development:
  - 1) Unequal growth for Whitburn places pressure on existing facilities, with no plans to expand or build new facilities at strategic level;
  - 2) No plans to implement BNG let alone environmental net gain in policy;
  - 3) Development in Whitburn is unsustainable. Locations are more than three miles from any metro station. This will be the cause of additional carbon emissions. [Greater Cambridge's assessment](#) of growth options and carbon emissions showed that growth within villages would by far cause the highest emissions due to transport implications (figure 3 in report). Those living in Whitburn will need to use transport that will have high emissions. There are bus routes through the village, but these have emissions. Overall, the Whitburn area has a higher level of car ownership, and more people use their car for commuting than the South Tyneside average. This means that it is more likely that people will commute using their car, leading to further high emissions.
  - 5) Does not make efficient use of brownfield
- NPPF para 22 states that 'Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery'. This has not been done for the allocations in Whitburn, which are significant compared to current dwellings.
- The Local Plan goes against policy 174 of the NPPF:
  - a) It does not protect or enhance valued landscapes. Sites allocations will affect area of high landscape value, or their setting
  - b) It does not consider the economic and other benefits of best and most versatile land. Site allocations will cause the loss of BMVAL, yet there is no assessment of cumulative loss. This is pertinent because of the food security debate, and the growing awareness of this. A [recent report](#) showed that 14,500ha of the best agricultural land have been permanently lost since 2010 and it's crucial that the Local Plan considers this. The interactive does not contain all BMVAL as identified on the Magic Map and Natural England data.
  - c) It does not maintain the character of the undeveloped coast by allocating land for development in this area.

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d) It does not minimise impacts on biodiversity by not consistently assessing the loss or damage to biodiversity on the sites where allocations are proposed.

- The Local Plan proposes to delete green belt sites. The Forum objects to this for multiple reasons, including that the Local Plan has not shown the need for this and that it lacks a comprehensive assessment of impacts on the environment and climate change. In addition, in accordance with NPPF para 142, there needs to be a plan in place to improve the remaining green belt. The council should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. This should be localised, i.e. any green belt land taken out of Whitburn should lead to improvements to the remaining green belt within Whitburn.
- Policy SP22: Green Infrastructure states that Supplementary Planning Document 3: Green Infrastructure Strategy (2013) provides the foundation for the Green Infrastructure policy. Yet the map provided has been altered from what appears in SPD3. The GI network has been amended without any evidence to support this, and conveniently excludes new allocations within Whitburn Green Belt. As these sites are still unallocated and are still part of the existing GI assets, this is inappropriate. It shows that the council is biased and has made the decision to allocate these sites for development without going through due process. When the Whitburn Neighbourhood Plan was going through examinations, the inspector requested a map from the council showing the GI corridor. The council provided the same false map with altered boundaries, thereby misleading the inspector and trying to push their changes through without going through any consultation processes. Luckily the Forum realised, but the council is now trying to do the same for the Local Plan. The GI map needs to be the same as in SPD3, as stated in the Local Plan.
- Policy SP17: Climate Change. This should refer to sustainable locations for development as well. This is a crucial factor in climate change mitigation and adaptation.
- Policy 36: Protecting against the loss, damage, or deterioration of (...) irreplaceable habitats. The wording is not strong enough. NPPF footnote 7 and para 180. Irreplaceable habitats are excluded from the presumption in favour of sustainable development. Development leading to the loss of such habitats should be refused. Policy wording needs amending to reflect NPPF.
- Policy 33: Biodiversity, Geodiversity and Ecological Networks: 'i. Avoid/minimise adverse impacts upon biodiversity and geodiversity in accordance with the mitigation hierarchy'. Using a / creates ambiguity. It should be avoid and minimise - should be clear that the first step in the mitigation hierarchy is to avoid, second step is to reduce or minimise. Impacts should not be minimised if they can be completely avoided. Unless minimise is meant as mitigation? This policy wording will create confusion.
- Para 11.9: 'The requirement to provide biodiversity net gain is in addition to any mitigation measures required to address potential harm created as a result of the development.' It should be clear that BNG should also be applied AFTER the mitigation hierarchy has been applied and BNG should not be used as an excuse to not follow the mitigation hierarchy. This needs to be added in the text.
- Map 42 should display the whole coast. It is misleading to display only a small proportion of N2K sites in the borough
- 11.14 refers to interim SPD – yet this has not been mentioned before, Is this the Mitigation Strategy?

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- 11.18 Proposals for any development within 400m of the European designated sites are likely to cause additional effects– yet this is not assessed for those sites within this boundary, which in Whitburn is Land North of Shearwater (also see below)
- Wildlife network is identified on the policy map, but there is no clear link to the Local Plan. It does not mention the term 'wildlife network'. How will this network be protected? What weight does it have? Also, there is no assessment of the impacts on this network from allocating land for housing that is part of the network, including land north of Shearwater.
- Para 11.26: 'The Act sets a requirement for development to achieve a mandatory 10% net increase in biodiversity, secured for at least 30 years'. The Environment Act actually sets out at least 10% - this needs to be amended.
- Clarity is needed on the Biodiversity Supplementary Planning Document (SPD). What are timelines for making this happen and how will this work for new development applied for in the meantime?
- The Local Plan lacks a climate change assessment. South Tyneside Council has declared a climate emergency, yet this is not acknowledged nor acted upon in developing the Local Plan. There should be consideration of the effect of the loss of natural capital assets and their importance to mitigating and being resilient to climate change. There should also be an assessment of the effect of building in green belt outside the main urban area. Please see the Greater Cambridge's example of a carbon assessment regarding the sustainability of their growth options linked to above. The Plan should build in higher densities on brownfield land and not accept the standard housing method, as the use of green belt goes against the aim to fight climate change.

## 6. SUSTAINABILITY ASSESSMENT

- Has not assessed the local circumstances for using a different housing need, including green belt. Has not considered the latest demographic data and projections.
- Para 4.41 claims that Whitburn is just over 5km from Sunderland city centre as the crow flies, this is not a realistic distance. No one travels in a straight line. By road it is around 7km.
- Too high a number for the population of Whitburn. Population is 5102 (<https://www.nomisweb.co.uk/reports/localarea?compare=E35000601>)  
The population in the table includes Marsden - this is not in the village of Whitburn.
- The summary assessment of the sites contains errors and is incomplete - see below for errors per site
- It is unclear how the conclusions of the SA have been taken into account into the final site selection and the development of the Local Plan draft. Even more, the SA is incomplete and is severely lacking the consideration of crucial implications of the Local Plan on the environment.
- For the site assessments, why is there no consideration of biodiversity impacts? Only distance to designated sites is included as a factor, not the effect on biodiversity on site. It is common to include e.g. loss of habitat (priority habitat, priority species). These can be so large that it should not be allocated, e.g. linking to the wader report. How is this assessed? The impacts are known at this stage as some of the potential sites have been screened out due to biodiversity impacts, but details of this assessment and its report are missing. The Forum needs to see a complete assessment of how sites have been screened in/out.

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- It does not consider the cumulative effects of allocations on villages. It only considers the individual impacts of sites. Taken all four allocated sites in Whitburn together, there are significant impacts on many areas including biodiversity.
- P303 (Appendix F Reasons for Selecting or Rejecting Site Options) - this shows which sites have not been taken forward - there are many errors in here that show that the SA has not informed the choices at all. For example, SW06 - states significant impacts on biodiversity as reason not taken forward yet the table earlier only has amber for biodiversity.
- Promoting healthier communities objective: distance to healthcare facilities and to open space are completely different factors that contribute to health. A positive effect in one does not cancel the effect in another out.
- SA should consider proximity to metro station, not just bus - public transport is more than bus connections, whilst buses contribute to carbon emissions.
- Releasing green belt land at whitburn is not the most sustainable option. There is an existing pressure on facilities, which is not recognised in the SA. There is limited public transport (bus only) and the nearest town centre is over 5km away. Whitburn has shown to be a commuting village with not much employment opportunity within the village. Development near the town and near public transport interchanges would be more sustainable. This would also achieve higher densities and would therefore need less land to be used. SA has not considered more sustainable locations in terms of development pattern. It has only focused on green belt releases away from the most sustainable locations.
- South Tyneside has high levels of multiple deprivation, and low levels of access to green space (see <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx>). No consideration has been given of the impacts of deleting green belt on health and inequality. It goes against 'levelling up' by depleting the area's natural resources and preventing effective brownfield development and regeneration to come forward.
- SA monitoring insufficient. GI should also measure GI strategic corridor area lost or gained.
- SA objective and monitoring of Land use should include reference to BMVAL - measure area lost
- SA monitoring of biodiversity should measure the effects of the plan and not general developments on e.g. SSSI condition. It should measure area of biodiversity habitat lost as well.

## 7. SITE ALLOCATION

### 7.1. Methodology

- This is an opaque process, obscuring scrutiny. It is not clear what criteria is used to screen sites in and out.
- There is no link between the SA and the site selection report, e.g. screening out some sites due to biodiversity impacts that are included in the site allocation topic paper but not the SA. Where is the evidence behind this if known for some sites, but not all?
- Site allocations are not in line with the mitigation hierarchy - it is not evidenced how the significant impacts on biodiversity on these allocated sites are avoided firstly.
- There is no assessment of individual and cumulative impacts on best and most versatile agricultural land, and the impacts on the economic and other natural capital benefits from BMVAL.

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- The SA is where it all should get together - all assessments and impacts. It should contain a map with the sites. The lack of a map or a complete table with all the site names and locations, plus the use of three different identifiers means it is very difficult to look at overall sites. For instance, Wellands Farm site is known as GA10, SWH009 and WH17a in various documents. This is also causing errors with assessments, e.g. the HRA (see below).

## 7.2. **Site selection Topic Paper**

- Refers to SA and Green Belt review, but it is not clear how some sites have been screened out and why some have not - there is no link between the SA conclusions / significant red effects and the selection process.
- Even more, for some sites (e.g. SBC004) it considers the effects from development on habitats and species on-site. Yet this is not done for all sites, or there is no mention of the wader report. The screening method is therefore unclear and incomplete. It is an arbitrary approach to screening as for some sites certain effects are taken into account, while it is silent on these effects on other sites. This prevents a comprehensive, objective, valid and reliable assessment to take place.

## 7.3. **Site Framework**

What weight does the site framework have? Will applications be judged against the layouts in the framework? How much weight will be on the need for environmental net gain?

## 7.4. **Green Belt Review**

- Lacks a standard and objective method to assess impacts. The document is entirely based on narrative, leading to subjective, unreasoned, and biased assessment.
- Lacks cumulative effects of multiple sites taken out of green belt. Green Belt is not made up of individual small sites as assessed. It is one large area, and it should therefore be assessed as a whole. Looking at the Green Belt as a whole, taking all the sites out that have been screened in for allocation, will the remaining green belt still fulfil its purpose?
- South Tyneside's Green Belt has a unique purpose to separate the villages and the urban area of South Shields from themselves and other authorities, in a wider region that is very densely populated. This gives South Tyneside's Green Belt an important purpose in keeping the land open, in combination with the importance for green space access and enjoyment mentioned earlier. Yet no consideration of overall impacts of taking green belt land away has been given.

## 7.5. **Whitburn Lodge (GA12)**

- Errors in number of houses here. Local Plan specifies 30, while site framework states 25.
- Strongly support environmental net gain, but there needs to be more detail and guidance for developers to understand how to achieve this.
- No link to the land that is owned by the same landowner - it includes part of GA12



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## 7.6. Land North of Shearwater (GA13)

- SA assessment has errors. On P67, the table on SWH026 does not take into account the significant negative effect on best and most versatile land (land use). SA criterion is that a red negative effect is applied (p269) if greenfield land is mainly on grade 3 soils. Site is mainly 3a with the rest 3b - see magic map, post 1988 ALC layer. It also says it's classed as urban land. This is incorrect as it is greenfield. It is not currently used for food production, but it could in the future. Allocating this means that this option is completely taken away and therefore it should be considered that development would result in the permanent loss of 3a land and its potential for food production.
- Significant negative effect on GI as it's within the GI network - SA might have been based on the altered GI map and is wrong. Should be significant red effect.
- It correctly states that the site is within 400m buffer of a N2K site, but incorrectly states this will cause recreational effects only. As it is clear from the SA itself, and from the Local Plan, there are additional effects on N2K sites, such as invasive species and trampling. This should be included into the assessment.
- It is within a wildlife network and forms the links between wildlife corridors and local landscapes of high value. It is undeveloped coast, also as identified in the Whitburn Neighbourhood Plan.
- Site allocation would be against LP policy SP40 - agricultural land. Development should be avoided because there are enough suitable alternative sites on previously developed or lower quality land.
- Site allocation goes against policy 39: retaining and enhancing the open and undeveloped character of the area
- Total for this site should be 6 red significant negative effects and is within 400m of the SAC; the site should not be taken forward for development.
- Green belt review: error: there is no previously developed site to the north. It is adjacent to a garden at the north. Only contained by housing to the south.
- It has a strong purpose to restrict sprawl. It is an open site part of undeveloped coastal land (also in the Whitburn Neighbourhood Plan), and areas of high landscape value. Building on here would cause sprawl along Mill Lane - ribbon development.
- Together with lodge being developed, this causes a strong impact on how it prevents Whitburn and South Shields from merging.

## 7.7. Land North of Cleadon Lane (GA11)

- Biodiversity impacts are more than neutral - on site impacts should be assessed, and the site was not assessed for wader presence.
- Site is within the GI corridor, not on the periphery. This is because a false map was included in the Local Plan. Effects are negative. Focus on it not having public access is misleading, as GI has a multi-functional purpose, which is not limited to public use.
- Site is within the wildlife corridor. Yet has been excluded from the wildlife network map for no obvious reason apart from it being proposed for housing.

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## 7.8. Wellands Farm (GA10)

- Biodiversity impacts from developing the site have not been considered. Waders, particularly curlew use this site - this is a significant impact that is not mitigated. Housing will reduce field significantly and will disturb waders which are likely not to return there. How will this be compensated for?
- It is part of a wildlife corridor and area of high landscape value - yet no mitigation proposed. It is against policy 39 on landscapes.
- The impact on biodiversity in the SA should be red because of this. Current assessment underestimates local impacts.
- Loss of 2 ha of grade 3a land (BMVAL) - goes against policy 40
- No reasoning for the sudden increase in housing numbers.

## 8. AREAS OF HIGH LANDSCAPE VALUE

- The Forum supports designating The Coast: Area of High Landscape Value
- The Forum objects to the boundary purposely being drawn around the land north of Shearwater (SWH026) even though the character is the same as in the rest of the area - undeveloped green coast. Visually it is the same as the surrounding area and the landscape designation should wrap around the brownfield land of the lodge but include land north of Shearwater.

## 9. HABITATS REGULATIONS ASSESSMENT

- A183 Assessment of Durham Coast SAC: 'Given that there is no contemporary assessment of traffic flows or air quality that reflect growth proposed in the emerging Plan, this furthermore detailed analysis cannot take place. Consequently, at this stage in plan making, adverse effect on the integrity cannot be ruled out (in combination with other plans or projects) and further evidence is necessary to inform the next iteration of the HRA at the Regulation 19 stage.' The Forum requires more information on how this assessment will take place.
- Water quality: no mention of the evidence that is existing of sewage overflow (see other section of comments). This is an issue that could have a likely effect and in line with the precautionary principle it should be assessed, or evidence shown it can be screened out at this stage.
- "Dog fouling is a widely recognised issue" and on trampling: "need for steps for example at Whitburn Bents and Whitburn Steel to address trampling pressure". The statement that dog fouling and trampling is an issue in Whitburn is not followed through. Site allocations within Whitburn are very close to protected sites, and therefore will increase these pressures, yet no further assessment or mitigation is included.
- Screening of sites contains errors, e.g. GA9 is not within 400m of protected sites (in Cleadon not near N2K sites). Whitburn sites not included as being within 400m while they should be (e.g. see SA), for example GA13 (land north of Shearwater).
- The 400m is only mentioned in relation to identifying sites within this buffer, but there is no further assessment of impacts in the HRA. The SA and Local Plan do mention this buffer. The HRA needs to include evidence on additional impacts. Sites within the 400m buffer should not be developed due to the impacts that cannot be mitigated. This includes Land north of Shearwater. For example, note the 400m exclusion zone for residential development at Thames

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Basin Heath, which showed stronger recreational pressure, fly tipping and vandalism risk that could not be mitigated.

## 10. LOCAL SHOPPING CENTRE

The Forum objects to map 40 of the Whitburn Local Centre. Both the name and the area should match POLICY WNP11: WHITBURN VILLAGE CENTRE as included in the Whitburn Neighbourhood Plan.

## 11. HEALTH PROVISION

### LOCAL PLAN POLICY

#### POLICY 1: PROMOTING HEALTHY COMMUNITIES

To improve and promote strong, vibrant, and healthy communities which encourage positive health related behaviours, reduce health inequalities, and support good physical and mental health and wellbeing, the Council, and its Partners, including the NHS, will:

- Support health care provision and improvements
- Ensure new developments contribute to improving health and reducing health inequalities by requiring a Health Impact Assessment (HIA) to be submitted for:
  - Residential schemes for 100 or more dwellings or bedspaces
  - Other developments where the proposal is likely to have a significant impact on health and wellbeing.

### NATIONAL PLANNING POLICY FRAMEWORK

To ensure faster delivery of other public service infrastructure such as further education colleges, hospitals and criminal justice accommodation, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues **before** applications are submitted.

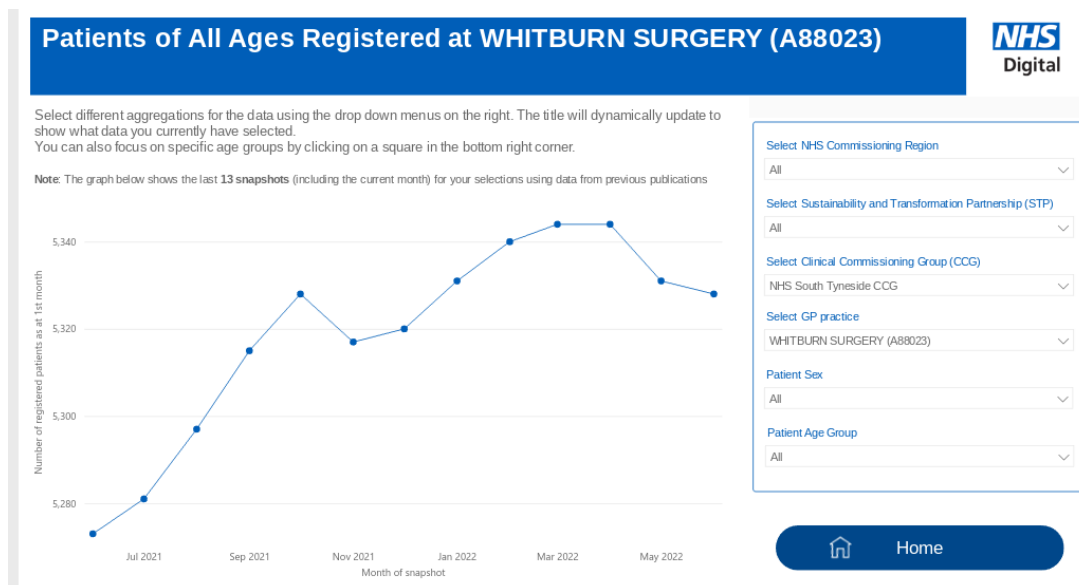
### CURRENT LACK OF HEALTH PROVISION IN WHITBURN

- There is currently a shortage of health provision in Whitburn Village in comparison with neighbouring areas of South Tyneside.
- In South Tyneside the average GP has 2008 patients per each GP#
- In North Tyneside this figure is 1491 patients per GP#
- Currently in Whitburn there is only one GP and the surgery has a patient list of 5328.\*
- At Central Surgery there are 13 GPs with a patient list of 19333 patients or 1487 patients per doctor
- At Marsden Road health centre there are 16GPs with 14,000 patients or 875 patients per doctor

#ONS Geography, NHS Digital, NHS England & Improvement.

\*NHS - Business Services Authority

# WHITBURN NEIGHBOURHOOD FORUM

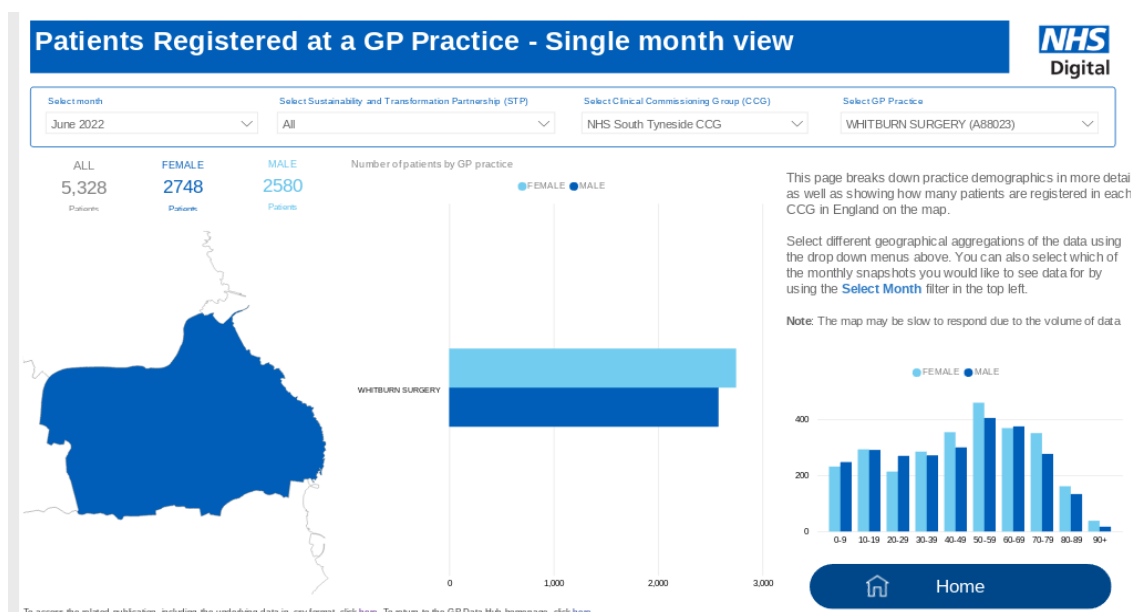


If the Local Plan is approved an extra 396 houses in Whitburn will bring another potential 950 patients to Whitburn

## Where will these new patients register at a GP?

### AGEING POPULATION

The total number of patients registered at Whitburn Surgery over the age of 50 years is 2,579 which represents 48% of the total. Note from the graph below that the majority of patients are in the 50-59 age group. Over the next 10 years this "bulge" will move to the 60-69 age group with more medical care required for age related diseases.



# WHITBURN NEIGHBOURHOOD FORUM

## RECOMMENDATIONS - POLICY 1: PROMOTING HEALTHY COMMUNITIES

It is considered unlikely that developers will be in an informed position to produce a satisfactory Health Impact Assessment (HIA) for the 396 houses proposed for Whitburn until the present identified state of health provision inequality in the village is addressed.

We recommend that the work of the Local Clinical Commissioning group looking at health provision in Whitburn is concluded **before** the local plan is agreed. This will allow for planned improvements in health care provision to be agreed that remedies this identified deficiency in social facilities.

## 12. AIR QUALITY AND IMPACTS ON HEALTH OUTCOMES

### LOCAL PLAN POLICY – AIR QUALITY POLICY

- Development should contribute to the improvement of air quality
- Where significant air quality impacts are likely to be generated by the development, an appropriate air quality assessment will be required. Development that would result in exposure to air pollution that exceeds national air quality objectives will only be approved where satisfactory mitigation measures can be implemented.

### NATIONAL PLANNING POLICY FRAMEWORK

As per the National Planning Policy Framework paragraph 186 and paragraph 181, National Planning Practice Guidance – Air quality chapter and as per the Validation of Planning Applications in Tyneside – 2019.<sup>1</sup>

Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

Where a development would lead to a minimum 5% increase in traffic within an Air Quality Management Area (AQMA), Clean Air Zone (CAZ) or 10% elsewhere.

Where relevant, development that may result in a detrimental effect on air quality in the Borough will need to be supported by an air quality assessment that demonstrates appropriate mitigation or promotes sustainable options such as electric charging points. Development proposals must consider the cumulative impacts from other permitted developments on air quality. The Validation Checklist outlines what an Air Quality Assessment must include.

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<sup>1</sup> [https://www.southtyneside.gov.uk/media/9861/Validation-of-Planning-Applications-in-Tyneside-2019-version-1-February-2019-/pdf/Validation\\_of\\_Planning\\_Applications\\_in\\_Tyneside\\_\(Feb.\\_2019\).pdf](https://www.southtyneside.gov.uk/media/9861/Validation-of-Planning-Applications-in-Tyneside-2019-version-1-February-2019-/pdf/Validation_of_Planning_Applications_in_Tyneside_(Feb._2019).pdf)

# WHITBURN NEIGHBOURHOOD FORUM

## SOUTH TYNESIDE RESIDENTS LIFE EXPECTANCY - LOWER THAN THE NATIONAL AVERAGE

Residents of South Tyneside Council generally have a lower life expectancy than the national average according to Public Health data reports<sup>2</sup>:

	Male	Female
South Tyneside	77.0 years	81.8 years
National Average	79.8 years	83.4 years

There is evidence to suggest that long term exposure to poor air quality increases the risk of premature mortality from cardiovascular and respiratory diseases. The latest research also links poor air quality as a factor in the onset of dementia. The premature mortality rates for cardiovascular, respiratory diseases and cancer are given below. It is important to note that other lifestyle factors such as smoking, etc. do influence these figures.

Premature (under 75 years) mortality rates from all cardiovascular disease of 90.3 per 100,000 as compared to 70.4 per 100,000 for England; of this 36.7 per 100,000 were considered preventable.

Premature (under 75 years) mortality rates from respiratory disease of 54.3 per 100,000 as compared to 34.2 per 100,000 for England; of this 38.9 per 100,000 were preventable.

Premature (under 75 years) mortality rates from cancer of 155.5 per 100,000 as compared to 129.2 per 100,000 for England; of this 76.0 per 100,000 were preventable.

## AIR QUALITY MONITORING IN WHITBURN

South Tyneside Council claim to monitor Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>) and (PM<sub>2.5</sub>) using continuous monitoring stations and non-continuous diffusion tubes; to ensure that there are no exceedances of national air quality and EU limit and target values.

Nitrogen Dioxide (NO<sub>2</sub>) levels are measured in East Street, Whitburn near the Jolly Sailor PH by a diffusion tube that is left out for set periods of time, monthly or time specified if longer than a month. Diffusion tubes do not give real time data, but they do provide an indication of whether further investigation into air quality is required in an area. The concentration may be higher during peak traffic flows. The figures provided are the raw data concentrations for the period of time that the diffusion tubes are left at the location. (All measurements are in µg/m<sup>3</sup>). The national annual average objective level for NO<sub>2</sub> is 40 µg/m<sup>3</sup> per cubic metre.

### DT1

2016 30.0	2017 25.9	2018 24.3	2019 24.9	2020 20.9
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There is no measurement of Particulate Matter (PM<sub>10</sub>) and (PM<sub>2.5</sub>) taking place in Whitburn

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<sup>2</sup> 2021 Air Quality Annual Status Report (ASR)

# WHITBURN NEIGHBOURHOOD FORUM

## POSITION OF EAST STREET, WHITBURN DIFFUSION TUBE.

There are concerns regarding the position of the diffusion tube. Defra guidance advises that diffusion tubes should be placed at breathing height. This tube is placed at a height of 2.3m. It is on the pavement on the other side of the road to traffic queueing at traffic lights, avoiding the fumes from stationary traffic. It is situated to the South of Eastfields and thus avoids the traffic congestion that occurs in the centre of Whitburn Village.

X OS Grid Ref (Easting) 440,822

Y OS Grid Ref (Northing) 561,822





# WHITBURN NEIGHBOURHOOD FORUM

## Air pollution report for Whitburn

### Pollutant one: PM2.5

At this address, the annual average of PM2.5 is 6.76mcg/m3. The World Health Organization limit is 10mcg/m3.

However, there is no healthy limit of PM2.5. These particles, which are less than 2.5 micrometers in diameter, can cause asthma, respiratory inflammation and jeopardize lung functions.

### Pollutant two: PM10

The reading for PM10 at this address is 11.79mcg/m3. The W.H.O. limit is 20mcg/m3.

There is no healthy limit of PM10.

Exposure to PM10 affects lung development in children.

### Pollutant three: NO2

The reading for NO2 at this address is 21.87mcg/m3. The W.H.O. limit is 40mcg/m3.

However, exposure (for a year or more) to 30mcg leads to a 5.5% increased risk of disease related mortality.

## RECOMMENDATIONS - LOCAL PLAN POLICY - AIR QUALITY POLICY

The diffusion tube at Whitburn (and those elsewhere in the borough) is badly sited as it avoids the heaviest traffic fumes and is set at a height that is not commensurate with breathing height. The results produced cannot be relied upon to reflect the air pollution that exists in the Village. There is no measurement of Particulate Matter (PM10) and (PM2.5) taking place in Whitburn. **The measuring system is not fit for purpose.**

Due to the proposal to build an extra 396 houses bringing with it a 17 % increase in traffic there is a requirement to produce an Air Quality Assessment before any developments take place in Whitburn under the following provisions:

- Where there would be an increase of 50 parking spaces within an AQMA or 100 spaces elsewhere.
- Development in excess of 100 dwellings or 10,000 square metres floorspace (or an equivalent combination)
- Where a development would lead to a minimum 5% increase in traffic within an Air Quality Management Area (AQMA), Clean Air Zone (CAZ) or 10% elsewhere.

# WHITBURN NEIGHBOURHOOD FORUM

## LOCAL PLAN POLICY RE TRAFFIC AND CLIMATE CHANGE

### Policy SP17: Climate Change

To meet the challenge of mitigating and adapting to the effects of climate change, a comprehensive approach to delivering sustainable development and reducing carbon emissions is required. This will be achieved by:

Facilitating a modal shift in transport by maximising the ability to make trips by public transport, sustainable and active modes of transport.

## NATIONAL PLANNING POLICY FRAMEWORK

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed.
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated.
- c) opportunities to promote walking, cycling and public transport use are identified and pursued.
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed, and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking, and other transport considerations are integral to the design of schemes and contribute to making high quality places.

## VEHICULAR TRAFFIC IN WHITBURN

Since 1949 motor vehicle traffic in the UK has increased more than ten-fold from 28.9 to 328.1 billion vehicle miles, largely driven by steady growth in car traffic.

Cleadon Lane, Moor Lane, Lizard Lane and the A183 are the principal routes in and out of Whitburn and these remain largely unchanged since the end of World War 2. These routes have had to endure the ten-fold increase in motor vehicle traffic including the HGVs that thunder through the village from the quarry and the constant stream of traffic that travels through the centre of Whitburn daily from Sunderland to South Shields and back.

## CAR OWNERSHIP IN WHITBURN

Presently in the North-East there are 1.1 cars per household.<sup>3</sup>

We currently have 2545 households in Whitburn equating to 2799 cars. An extra 397 homes would give us an extra 436 cars equating to 3235 cars travelling in and out of Whitburn. This represents a further self-

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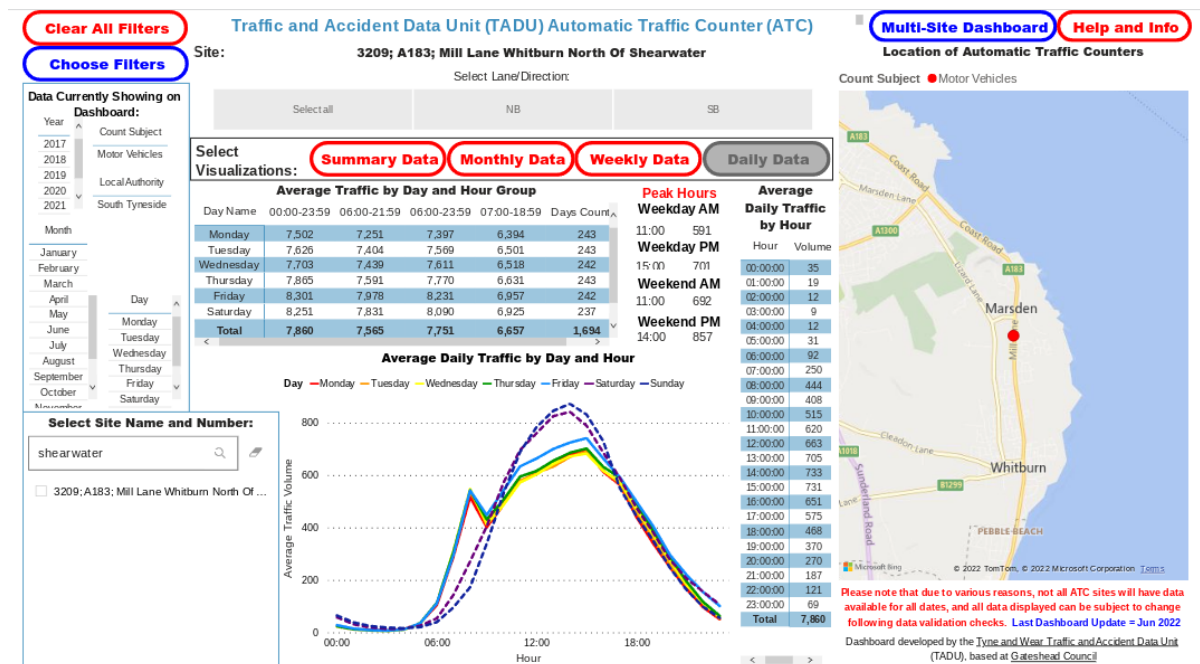
<sup>3</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/619902](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/619902)

# WHITBURN NEIGHBOURHOOD FORUM

generated 17% increase in domestic traffic on roads that were built in the mid twentieth century. This will increase noise, congestion, and air pollution with an increased risk of road traffic collisions.

Whitburn has an automatic traffic counter at Mill Lane in the north of the village<sup>4</sup>. This shows that the daily average is 7,860 motor vehicles travelling through the village. There are clear peaks, for instance on an average week day there is a peak at 15:00hrs (690 motor vehicles). The largest peak is on a Sunday, with 872 vehicles at 14:00hrs (11% of the total number of vehicles). Congestion / traffic queues are observed regularly during these peak times by residents.

The daily Traffic Data is shown below

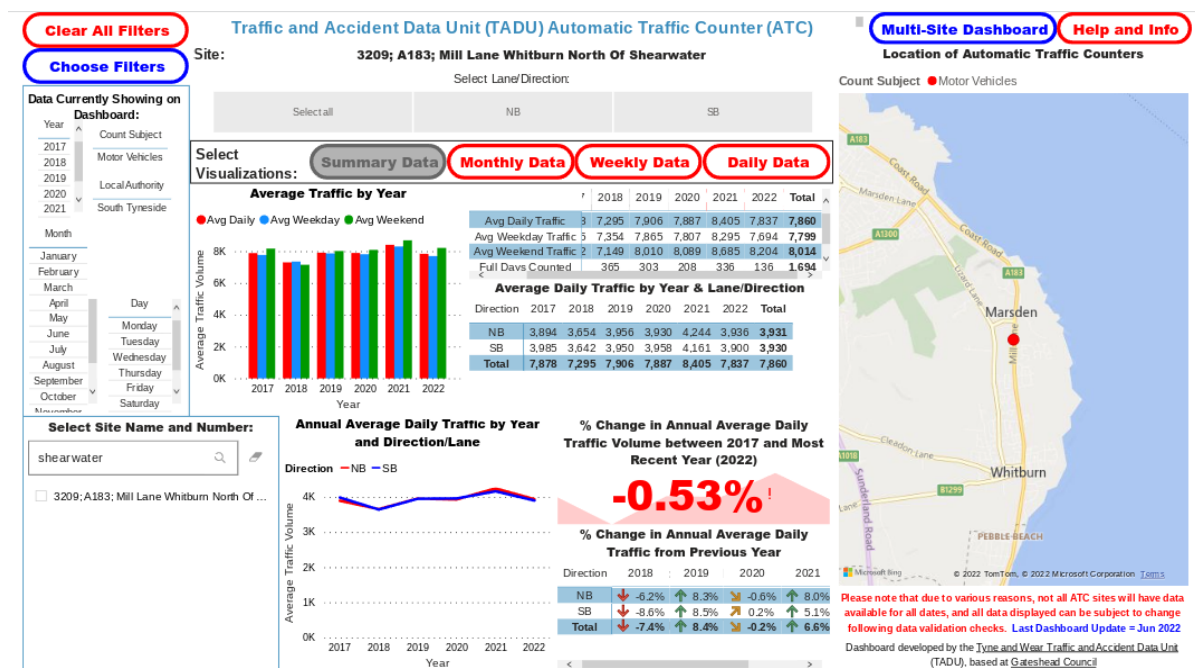


Weekly Data

4

<https://app.powerbi.com/view?r=eyJrIjojOTliZTJmNDgtOWM4Yj00ZjhhLWE3YzEtYjNhMDNiYmVjZmRkIiwidCI6IjA5ZmJiOTc5LTQzMTEtNGQyMS05Y2I2LWU1ODgxMTE2OWNkOCJ9>

# WHITBURN NEIGHBOURHOOD FORUM



## RECOMMENDATIONS - LOCAL PLAN POLICY RE TRAFFIC AND CLIMATE CHANGE

### Transport Assessments / Statements, and Travel Plans <sup>5</sup>

The plan to build 396 homes in a village with no local employment facilities, no direct link to the Metro system and no nearby large retail facilities will produce a commuting community that will add to traffic volumes and thus increase vehicle fumes adding to climate change.

There needs to be an assessment of how the extra vehicles will impact on the local area and how a modal shift in transport by maximising the ability to make trips by public transport, sustainable and active modes of transport can be achieved.

For new development, changes of use and alterations to existing buildings, the transportation and accessibility outcomes of development needs to be set out as part of a planning application. This information is used to assess the suitability of the development and to ensure it is in accordance with policy and other related guidance.

Where a development is likely to have significant transportation implications, a Transport Assessment (TA) and Travel Plan (TP) should be prepared. In some instances, The TA may be downgraded to a Transport Statement (TS). These documents are used to determine whether the impact of the development is acceptable, in highways and transportation terms.

For a development of dwelling houses above 80 units a TA and a TP are required. For between 50 and 80 units a TS and TP are required.

We recommend, due to the increase in traffic in Whitburn over the last 60 years (with no commensurate improvement in the road infrastructure) and due to the proposed increases in levels of car ownership

<sup>5</sup> [https://www.southtyneside.gov.uk/media/9861/Validation-of-Planning-Applications-in-Tyneside-2019-version-1-February-2019-.pdf/Validation of Planning Applications in Tyneside \(Feb. 2019\).pdf](https://www.southtyneside.gov.uk/media/9861/Validation-of-Planning-Applications-in-Tyneside-2019-version-1-February-2019-.pdf/Validation%20of%20Planning%20Applications%20in%20Tyneside%20(Feb.%202019).pdf)

# WHITBURN NEIGHBOURHOOD FORUM

(that will result from the proposed increase in population in the Draft Local Plan) a comprehensive Transport Assessment (TA) and Travel Plan (TP) unique for Whitburn should be prepared before any development levels are agreed.

## 13. **EDUCATION PROVISION IN WHITBURN.**<sup>6</sup>

### LOCAL PLAN POLICY 51: SOCIAL AND COMMUNITY INFRASTRUCTURE

To ensure that social and community infrastructure, including education, meets the Borough's evidenced needs, development proposals will be required to:

- Set land aside for the provision of social and community infrastructure, where there **IS** an identified need or, where appropriate, provide an equivalent financial contribution
- Where a need for additional school places is identified because of pressure on places from development, either individually or because of multiple developments within an area, requests for S106 contributions will be made.
- If the scale of a development means that demand for school places cannot be met through the expansion of existing schools or academies a S106 contribution may be sought to include land needed to develop a new school in addition to the associated capital costs of establishing the school. Alternatively, the Council may request the developer to provide the land and construct and equip a new school.

### NATIONAL PLANNING POLICY FRAMEWORK

It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive, and collaborative approach to meeting this requirement, and to development that will widen choice in education.

They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
- b) work with school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.

### CURRENT EDUCATIONAL PROVISION IN WHITBURN

There are three schools in Whitburn providing primary and secondary education.

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<sup>6</sup> <https://www.southtyneside.gov.uk/article/36365/Primary-infant-and-junior-school-admissions>

# WHITBURN NEIGHBOURHOOD FORUM

Recent intake figures are as follows:

	Whitburn Primary	Marsden Primary	Whitburn Academy
Intake/year.	30	30	205
Applications	53	48	464
Places taken.	25	26	206

These figures demonstrate that the current schools provision in Whitburn will not be able to cope with a 22% increase in population as proposed in the Draft Local Plan.

## RECOMMENDATIONS - POLICY 51: SOCIAL AND COMMUNITY INFRASTRUCTURE

The present education provision in Whitburn is inadequate to deal with any increase in student population and South Tyneside Council should request the developer to provide the land and construct and equip a new school.

A suggestion is to build such a new school on the 'Charley Hurley' site and transfer the school population from Whitburn Primary to the new , larger school. This would free up the land that Whitburn Primary presently occupies for development.

## 14. MEETING THE CHALLENGE OF CLIMATE CHANGE, FLOODING, AND COASTAL CHANGE

The Local Plan devotes a lot of information about how they intend to deal with wastewater with specific reference to roles and responsibilities.

### Roles and Responsibilities

#### 7.32 Local Planning Authority (LPA)

As part of the planning application process the LPA consults with the Lead Local Flood Authority and Northumbrian Water (the water and sewerage undertaker for South Tyneside Council) on a range of development proposals that require a connection to the sewerage network.

#### 7.33 Lead Local Flood Authority (LLFA)

Under the Flood and Water Management Act 2010, LLFAs are required to undertake a statutory consultee role providing technical advice on surface water and ground water flooding to LPAs on major developments (10 dwellings or more).

# WHITBURN NEIGHBOURHOOD FORUM

## 7.34 Northumbrian Water Ltd (NWL)

Northumbrian Water's role as water and sewerage undertaker, in the planning and development process is to:

- Provide a system of public sewers to ensure effective drainage
- Manage the adoption of sewers serving new development sites, including sustainable storm water storage systems
- Engage with the LPA when introducing new or revised long term special planning policies that ensure there will be sufficient capacity within their systems to meet anticipated flows from future developments
- Manage the Whitburn Long Sea Outfall, ensuring discharges during wet weather maintains water quality in accordance with the Bathing Water Directive and remains in compliance with the discharge permit at this location.

## 7.35 Environment Agency (EA) -

The EA are a statutory consultee providing advice to the LPA for planning applications within 20m of a main river. They regulate Northumbrian Water Limited's discharge at the Whitburn Long Sea Outfall against a permit to discharge, which contains conditions that must be complied with to ensure there is no breach of environmental laws. The EA also has responsibility for assessing the quality of designated bathing waters under the Bathing Water Directive and monitors the performance of the Whitburn scheme, following the requirement of The European Court of Justice. This data is reported back to the European Commission via Defra.

Disposal of Foul Water Policy 10:

Disposal of Foul Water

1. Development shall utilise the following drainage hierarchy:
  - i. Connection to a public sewer
  - ii. Package sewage treatment plant, which can be offered to the Sewerage Undertaker for adoption
  - iii. Septic tank
2. Development involving the use of non-main methods of drainage (including septic tanks/cesspits) will not be permitted in areas where public sewerage exists
3. Development of new or extensions/ improvements to existing wastewater, sludge, or sewage treatment works, will be supported unless the adverse impact of the development significantly outweighs the need for greater capacity
4. Where the development involves the disposal of trade effluent, a foul Water Management Plan/ drainage assessment will be required to demonstrate how the disposal of foul water is undertaken following the disposal hierarchy. This shall include a trade effluent consent if connected to the sewerage



# WHITBURN NEIGHBOURHOOD FORUM

system. Trade effluent is any liquid produced by the operations of any trade or industry including car washes.

7.36 The LPA must be satisfied that there is sufficient capacity within the existing sewer network before granting planning permission to a development that will impact on that capacity. However, it is the responsibility of NWL to ensure that there is sufficient capacity. NWL is a statutory consultee for planning applications. In assessing whether there is sufficient capacity, the LPA relies on the professional advice provided by NWL.

7.37 The Environment Agency is the regulator for licensing abstractions, pollution control and the quality of the water environment, whilst NWL is responsible for water services and sewerage. The Council has been working closely with the Environment Agency and NWL and will continue to collaborate with these agencies and other infrastructure providers to inform future decision making.

## NATIONAL PLANNING POLICY FRAMEWORK

The Local Plan is a strategic document

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

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- 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.

## REBUTTAL OF ASSERTIONS MADE IN THE LOCAL PLAN

**It is the duty of the Local Planning Authority to ensure there is sufficient wastewater collection and treatment capacity. Northumbrian Water Limited does not make planning decisions, that is the role of the LPA.**

**Northumbrian Water's role in the planning and development process is as a statutory consultee. They will be shown to be unreliable as a consultee.**

**The EA are a statutory consultee and regulate Northumbrian Water Limited's discharge at the Whitburn Long Sea Outfall against a permit to discharge. They will be shown to have failed in their duty to regulate.**

**We will provide evidence that demonstrates there is, at this time, insufficient wastewater collection and treatment capacity to deal with the present population of the borough and increasing the population will lead to an increase in sewage pollution.**

# WHITBURN NEIGHBOURHOOD FORUM

South Tyneside Council have also previously been supplied with a legal opinion which challenges the assertion that the **LPA has to rely on the professional advice provided by NWL (embedded below)**



Legal Opinion  
Sewage.docx

## **I would draw your attention to the following paragraphs:**

From a legal perspective I would note that any evidence submitted to the LPA that contradicts Northumberland Water's assertions regarding sewerage capacity is likely to be a material consideration that cannot be disregarded by the LPA for the purposes of deciding whether to grant planning permission (although the weight to be given to that evidence is of course a matter of the LPA's planning judgment). I also note that wastewater treatment capacity in general is clearly a material planning matter.

I would also add that the fact that the European Commission takes the view that the UK has not complied with Case C- 301/10 in respect of Whitburn is also a material planning consideration, which the LPA is not entitled to ignore in its consideration of proposed new developments that will impact on the local sewerage network.

## **NORTHUMBRIAN WATER LIMITED AS A CONSULTEE TO THE LOCAL PLAN**

Northumbrian Water, as a consultee to planning applications in the borough, have a history of consistently asserting that they have the wastewater treatment capacity to cope with the extra wastewater flows any new development will create. They do not provide any data or evidence that corroborates such a claim. They increase their profits by charging for new connections to their sewer network and have a resultant increase in profits from the water and sewerage rates they charge new customers. Their decisions and the advice they give to the LPA are based only on increasing their profits. They are an unreliable consultee.

On July 15th 2022 Forbes reported that New York-listed investment giant KKR has reached a deal to invest £867 million (\$1 billion) for a minority stake in Northumbrian Water Group, which is jointly owned by several listed companies within CK Group, the business empire of Hong Kong billionaire Li Ka-shing.

Li Ka-shing is one of many who have been identified as using the English water companies as a lucrative form of growing even wealthier, as the NAO highlights

*Major investors have gained access to an annual harvest of guaranteed money and assets to borrow against* (**National Audit Office Report 2018**)

No wonder multinationals see this company (NWL) as a cash cow, guaranteed to generate profits from the water rates paid by captive customers whilst the companies are allowed to break environmental laws with impunity.

As an example, in response to the recent Cleadon Lane Industrial site application for 196 new homes (reference ST/1109/21/FUL) the response from NWL to the application simply says

*The Sewage Treatment Works to which this development finally discharges to is able to accept the additional flows.*

# WHITBURN NEIGHBOURHOOD FORUM

They provide no data to substantiate this assertion. They stand to make around £98,000 in new connection charges from this proposed development and around £80,000 a year in perpetuity from the charges they make to these new customers. They can achieve this without investing in their infrastructure as the wastewater they do not have the capacity to treat they simply discharge into the local marine environment.

NWL also does not comment on whether the additional flows will cause issues with the sewage collection system and the storm interceptor tunnel at Whitburn and if the Whitburn sewage discharge permit can accommodate these extra flows. The extra 196 homes will create an extra 60 tonnes of sewage a day, that is 60,000 litres a day.

NWL can accept the flows because they are able to dump the flows by discharging them untreated out to sea. They do not state that they 'treat' the flows.

In the normal course of events i.e. when it rains, the Whitburn long sea outfall (LSO) is the primary source of untreated sewage discharges for Whitburn, Cleadon and East Boldon and is used to pump untreated sewage out to sea from the Whitburn 'stormwater' interceptor tunnel.

The Whitburn LSO is governed by permit 245/1207 and is reported to have discharged 31 times for 119 hours in 2021.

The LSO is unique in that volumes of the discharge are also measured and in 2021 the 31 reported 'spills' resulted in a record 821,088.00 tonnes of untreated sewage being discharged into the environment

All the combined flows of sewage from this development (ST/1109/21/FUL) go directly to the Whitburn sewage system via the nominated connection at manhole 2802 at the junction of Cleadon Lane / Whitburn Road.

NWL, in 2017, built a holding tank behind Morrisons at Seaburn to hold back increasing flows from the East Boldon / Cleadon area due to insufficiencies in sewage treatment and collection capacity. This holding tank has overflowed on occasion and the extra volumes from this proposed development, especially at the wake-up hours of the day, will add to the pressure on a system that is not coping now.

There is evidence to suggest that NWL have made another illegal connection from this storage tank to the storm interceptor tunnel. The primary function of the tunnel is to store stormwater. The connection introduces flows of foul sewage to the tunnel. This connection is not identified as one of the overflows in the conditions of the Whitburn discharge permit and so is illegal.

I would also draw your attention to the routine return on a daily basis of high volumes of untreated sewage from the Whitburn storm interceptor tunnel to the foul sewage system

- The early 2021 daily return flows of raw foul sewage show over 500 tonnes of undiluted raw sewage is regularly pumped from the Whitburn interceptor tunnel on dry days back to the foul sewer system.

This shows the Whitburn interceptor tunnel is being used on a daily basis to collect and store foul sewage as though it is part of the foul sewer network - this was never the intended purpose of the tunnel and, I understand, breaches the planning consent for the Whitburn Long Sea Outfall pumping station which I understand only allows for the discharge of stormwater to sea. If the planning application was for

# WHITBURN NEIGHBOURHOOD FORUM

discharge of stormwater, then a change of use application to allow discharge of foul sewage is required.

The daily return flows of raw foul sewage from the Whitburn interceptor tunnel to the foul sewer system in dry weather show that either:

1) One or more of the CSOs connected to the tunnel is discharging undiluted raw foul sewage on a daily basis, in violation of the existing permit; or

2) There have been one or more illegal connections made from the foul sewage system to the tunnel since it was first built (apart from the illegal connection which has been identified and which is subject to a CAR) which NWL has failed to disclose to the regulator, also in violation of the permit.

In using the tunnel as a foul sewage retention tank during dry weather NWL shows a total disregard of the permit which only allows discharges into the tunnel as a result of heavy rainfall or snowmelt. They cannot be regarded as a reliable consultee.

It must also be noted that the Whitburn system is currently subject to a Compliance Assessment Report after NWL constructed an illegal connection to the sewage system in 2015. Since the illegal connection was made an extra 100,000 tonnes of untreated sewage has been discharged at Whitburn on average each year culminating in a record 820,000 tonnes of untreated sewage being discharged into the protected marine areas in 2021. The sewage collection and treatment system at Whitburn is not fit for purpose.

Northumbrian Water limited failed to report to the Environment Agency that they had constructed this illegal connection in 2015. They are not a reliable consultee.

On 18 November 2021, the Environment Agency and Ofwat announced major investigations into potential widespread non-compliance by water and sewerage companies at sewage treatment works (STW). More than 2200 sewage treatment works (STWs) spanning all water and sewerage companies in England will be scrutinised by EA experts. One of the STWs under investigation has been identified as the Hendon STW which is supposed to treat the sewage from a large part of South Tyneside. This is a criminal investigation and as such must be conducted in accordance with criminal rules and procedures.

OFWAT said on Wednesday 9th March 2022 it had started enforcement cases against Northumbrian Water Limited. The inquiry came after evidence that the scale of illegal discharges of raw sewage could be 10 times higher than disclosed by the firm.

NWL are also suspected to be in breach of Section 94, Water Industry Act 1991 which stipulates that It shall be the duty of every sewerage undertaker

a) to provide, improve and extend such a system of public sewers (whether inside its area or elsewhere) and so to cleanse and maintain those sewers as to ensure that that area is and continues to be effectually drained.

# WHITBURN NEIGHBOURHOOD FORUM

Discharging untreated sewage into our waterways cannot be said to be a proper way of ensuring that our area is and continues to be effectually drained.

NWL are routinely breaching the discharge permits at Hendon and Whitburn. This is in contravention of Environmental Protection law which in England And Wales is enforced through the Environmental Permitting (England and Wales) Regulations 2010

Sec 12 of the Environmental Permitting (England and Wales) Regulations 2010 sets out the requirement for an environmental permit

(1) A person must not, except under and to the extent authorised by an environmental permit—

(a) operate a regulated facility; or

(b) cause or knowingly permit a water discharge activity or groundwater activity.

The ocean is suffering, residents are paying for services they do not receive and NWL are making millions in profits that are paid to shareholders each year rather than investing in the infrastructure required to serve a growing population.

Northumbrian Water Limited fails in its role as a sewage undertaker and is not a reliable consultee. The LPA must not rely solely on the advice provided by NWL.

## THE ROLE OF THE EA

The Environment Agency is the regulator for licensing abstractions, pollution control and the quality of the water environment.

They have failed in their duty to regulate sewage discharge permits at Whitburn and cannot be relied upon to advise the LPA on wastewater treatment and pollution control

### **The following information in the Local Plan is misleading**

*The EA also has responsibility for assessing the quality of designated bathing waters under the Bathing Water Directive and monitors the performance of the Whitburn scheme, following the requirement of The European Court of Justice. This data is reported back to the European Commission via Defra.*

The requirement of the European Court of Justice was that the Whitburn system was brought into compliance with the Urban Wastewater Treatment Directive, not the Bathing Water Directive. The data regarding the performance of the Whitburn scheme was last reported back to the European Commission in October 2020, The European Commission looked at the data and decided that the Whitburn system, despite remedial work, was still not in compliance with the Urban Wastewater

# WHITBURN NEIGHBOURHOOD FORUM

Treatment Directive. This is also a material planning consideration, which the LPA is not entitled to ignore in its consideration of proposed new developments that will impact on the local sewerage network.

The EA accepts NWLs assertion that 500 tonnes of foul sewage entering the storm interceptor tunnel each day is groundwater ingress. This cannot be so, especially when there is no rain. The tunnel was not built of bricks like the Victorian parts of our sewage system. It was built in modern times, using modern materials consisting of sections of prefabricated concrete. There is something seriously amiss if the EA claims that sections of these prefabricated concrete structures have failed and allow groundwater to pour into the tunnel at a rate of 500 tonnes a day on dry days. The construction company should be sued.

We also advise that you pay no heed to the claims that bathing water results generated by the EA are excellent. The bathing water testing system has been shown to be a sham as the EA in our area only takes bathing water samples on dry days, thus avoiding pollution incidents. The EA are taking the local authorities for fools and risking harm to public health by operating a bathing water testing regime that is not fit for purpose.

The EA failed to regulate the Whitburn discharge permit as it was not aware of the illegal connection made in 2015 for over 6 years.

In 2021 a report was made to the EA that NWL had made an illegal connection to the sewage system at Whitburn in 2015. The EA initially discounted these concerns and did not uphold the complaint. The complaint was escalated before appropriate action was taken and a Compliance Assessment Report was issued against NWL for making the illegal connection.

The EA gave NWL a warning. NWL then challenged the CAR which was withdrawn and the warning rescinded,

Legal advice was obtained, and a legal Pre Action-Protocol letter was sent to the EA. The CAR was then reinstated but NWL have so far not complied. The EA is not consistent in their use of their regulatory powers.

Similarly, the discharge figures provided by NWL to the EA for Hendon Sewage Treatment Works were challenged. These concerns were discounted by the EA and the complaint was once more escalated.

NWL were required to revisit their discharge figures and incredibly increased them by 4,000%.

A set of figures for Whitburn long sea outfall discharges were supplied by the EA and were discovered to be inaccurate by 10%. These figures were eventually corrected by the EA but not before they had sent them to the National Audit Office.

These examples of the EAs failings demonstrate that the EA cannot be relied upon to advise the LPA on wastewater treatment and pollution control they have failed to regulate Northumbrian Water Limited's discharge at the Whitburn Long Sea Outfall against a permit to discharge, which contains conditions that must be complied with to ensure there is no breach of environmental laws.

THE PERFORMANCE OF THE WHITBURN SEWAGE SYSTEM AND LONG SEA OUTFALL

# WHITBURN NEIGHBOURHOOD FORUM

The Whitburn sewage system has a history of noncompliance with environmental law on wastewater treatment going back over 25 years:

## Summary of data on spill events and volumes at Whitburn

Year	Frequency of 'spills' at Whitburn			Total volume spilled to sea(m3)	Rainfall (mm)
	Pump operations	12 Hour Rule *	24 Hour Rule *		
1997	208			295,200	271.5
1998	487			717,570	750.7
1999	285			709,290	624
2000	117			367,290	426
2001	310			561,240	
2002	67	26	22	359,640	663.2
2003	56	23	20	387,450	692.6
2004	110	37	24	530,100	693.8
2005	96	27	21	542,070	693.8
2006	51	23	20	248,130	521.2
2007	75	25	23	478,620	529.4
2008	108	42	37	744,660	742
2009	93	34	27	762,300	609.8
2010	73	39	31	548,37	711
2011	11	9	9	163,620	503
2012	83	43	32	703.62	888
2016	61		19	624,600	
2017	50		19	569,221	
2018	43		17	376,593	553
2019	75		26	760,993	749.8
2020	65		23	460,399	610.6
2021	122		31	821,088	661

In 2020 the UK authorities submitted figures to the EC for discharges from the Long Sea Outfall at Whitburn that indicated that 14,9557.50 tonnes of untreated wastewater were discharged into the North Sea in the first 6 months of 2020. This was a relatively light total volume of discharges considering the history of discharging at Whitburn.

The UK Environment Agency states that:

*discharge from the Whitburn LSO can only be triggered by high amounts or intense rainfall or from snowmelt. Whitburn LSO will only operate once rainfall has exceeded the capacity of the sewers and*



# WHITBURN NEIGHBOURHOOD FORUM

*then exceed the operating capacity of the interceptor tunnel. It requires enormous volumes of rainfall to trigger the discharge.*

This statement is roughly in line with the view of the European Court of Justice who in 2012 found that failure to treat urban wastewater cannot be accepted under usual climatic and seasonal conditions, as otherwise Directive 91/271 would be rendered meaningless.

The EA have supplied the 15-minute interval rainfall figures for the area (From the weather station at Fulwell) that feeds into the Whitburn Wastewater collection system for the first 6 months of 2020.

These were plotted against the periods of rain and the discharge figures for the Long Sea Outfall at Whitburn.

Date	Hours of Rainfall	Rainfall total mm	Average Rainfall per Hour	Volume discharge m3	Volume m3 per 1 mm rain
09/01/2020	12.75	14.8	1.16	17850	
09/02/2020	16	18	1.12	22869	
13/02/2020	10.5	10.6	1	10650	
15/02/2020	19.75	19.4	0.98	55993.5	
24/02/2020	6	11.4	1.9	22209	
12/06/2020	17.5	18.2	1.04	19986	
	82.5	92.4	1.2	149557.5	1618

The UK Met office use the following parameters to describe rainfall

Slight = less than 0.5 mm/hr

Moderate = 0.5 to 4 mm/hr

Heavy = more than 4 mm/hr

Rain fell during the first 6 months of 2020 (leading up to and during discharge operations) for a total of 82.5 hours.

The maximum hourly rainfall fell on 15/02/20 between 17.45 and 18.45 when 5mm of rain fell. (Heavy rainfall).

15/02/2020 17:45:00 1.2mm

15/02/2020 18:00:00 1.8 mm

15/02/2020 18:15:00 0.4 mm

15/02/2020 18:30:00 1.6 mm

This is the only hour of the 82.5 hours when the rain could be classed as heavy.

The average rainfall during these 82.5 hours was 1.20 mm per hour. (Moderate rainfall)

# WHITBURN NEIGHBOURHOOD FORUM

For every 1 mm of rain that fell, 1,618 tonnes of untreated wastewater were discharged into the North Sea

No data is provided by the authorities to substantiate their claims that sewage discharges are heavily diluted. Once they reach the sea/ ocean they will become heavily diluted but by that time the damage is done.

As the rainfall causing the discharges is, at most, mainly moderate, then the discharges cannot be heavily diluted. The flows that continue to be treated at the STW during the same period that discharges are taking place from combined sewer overflows are generally the same level of dilution as the discharges. If the authorities were confident that the flows in the sewer system (which, during rainfall, form a homogenous sewage soup) were as highly diluted as they claim, then why do they continue to treat the flows that arrive at the treatment works at that same time?

There were no storms taking place during these discharges, only normal, moderate rainfall.

This can hardly be said to be in line with the UWWTD. The system cannot cope with moderate rainfall.

As has been proved with the illegal connection, added flows from the proposed level of development in the Local Plan will increase the volumes of untreated sewage discharges at Whitburn, which was declared non-compliant with the Urban Wastewater Treatment Directive in 2012 and remains in breach of the Urban Wastewater Treatment Regulations (UWWTR) today.

The objective pursued by UWWTR goes beyond the mere protection of aquatic ecosystems and seeks to conserve man, fauna, flora, soil, water, air and landscapes from any significant adverse effects of the accelerated growth of algae and higher forms of plant life that results from discharges of urban wastewater.

The purpose of the Urban Wastewater Treatment Regulations is to ensure a high level of environmental protection. It would be absurd to accept that untreated wastewater may be discharged into the environment as a matter of course, in the absence of exceptional circumstances, simply because a collecting system or a treatment plant has been designed with insufficient capacity.

## THE PERFORMANCE OF THE HENDON SEWAGE TREATMENT WORKS

Of equal concern, during 2021, Hendon Sewage Treatment Works (STW) is reported to have 'spilled' 116 times, amounting to 565 hours. This is the STW for Cleadon, Whitburn and East Boldon and is spilling when there is little or no rain.

Although the volumes are not measured, this STW is discharging millions of tonnes of untreated sewage each year. It must also be noted that Hendon STW also has 2 x Quay Wall overflows (which have no event duration monitors fitted) which will also add to the volumes of untreated sewage discharges. The 'spills' from these overflows are not measured at all.

There exists limited data on the capacity of the Hendon Sewage Treatment works. From the data that does exist it can be shown that light rainfall causes the Hendon Sewage Treatment works to overflow and routinely discharge untreated wastewater directly into the North Sea via the 310 m overflow pipe.

# WHITBURN NEIGHBOURHOOD FORUM

Between 7th May and 2nd October 2003 measurements of the volumes of discharges from the 310 m overflow pipe were recorded using a flow monitor. These measurements have been compared with rainfall for the period and the following summary prepared.

The total volume of untreated wastewater discharged into the North Sea during the monitoring period (149 days) was 418,184.9 tonnes. Discharges happened on 39 separate days.

During the 149 days that flows were measured rainfall was recorded as falling on 66 days. The total volume of rainfall was a moderate 234.8 mm and there were 28 days of the 66 days of rainfall when rainfall for the whole day was recorded at less than 1 mm. Rainfall over 1 mm per day was therefore recorded as falling on 38 days.

More recently the performance of the Hendon STW has been subject to scrutiny by Professor Peter Hammond (He is a mathematician with current visiting research posts at the UK Centre for Ecology & Hydrology (2018-20) and Dept. of Human Genetics, Leuven University, Belgium (2017-21). He has previously been called upon to give evidence regarding sewage pollution at the Environmental Audit Committee at the Houses of Parliament

Professor Hammond has prepared a report that shows that the Hendon Sewage Treatment works is operated by NWL in contravention of the discharge permit as he has identified 30+ illegal early spills.

It is obvious that the Hendon STW is operating at capacity during dry weather and cannot cope when it rains. The added flows from this proposed development in the Local Plan are also likely to end up discharged untreated into the sea.

## THE PERFORMANCE OF THE HOWDON SEWAGE TREATMENT WORKS

The Howdon STW deals with the flows from the rest of South Tyneside. Sewage is pumped to this STW via pipes that run through the Tyne Tunnel.

In 2021 the following discharge figures were reported for Howdon

Howdon STW CSO – 162 times amounting to 2087 hours.

Howdon STW North Bank CSO – 86 times amounting to 882 hours.

Howdon STW South Bank CSO – 136 times amounting to 1427 hours.

It is amazing how Northumbrian Water are able to charge people for treating wastewater and then casually dump it untreated into the environment.

## PUBLIC OPINION AS A MATERIAL PLANNING CONSIDERATION

Public opinion, if justified, is also a material planning consideration. I draw your attention to the petition to Stop Sewage Pollution at Whitburn which has gathered over 1,130 local signatures. <https://bit.ly/3QgVAD4>

## PROTECTING WATER QUALITY -POLICY

The quantity and quality of surface and groundwater bodies shall be protected and where possible enhanced.

# WHITBURN NEIGHBOURHOOD FORUM

Development will not be permitted where it would have an adverse impact on water dependent Sites of Special Scientific Interest (SSSIs) and European sites.

The reason why it is important in South Tyneside that there is sufficient wastewater collection and treatment capacity is because we are fortunate to have the following protected sites as part of our coastline:

Ramsar sites, Northumbria Coast Special protection Area and the Durham Coast Special Area of Conservation

THE NATIONAL PLANNING POLICY FRAMEWORK affords a greater level of protection to these habitats:

The following should be given the same protection as habitats sites:

- a) potential Special Protection Areas and possible Special Areas of Conservation;
- b) listed or proposed Ramsar sites; and
- c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

## EVIDENCE OF SEWAGE POLLUTION IN THE BOROUGH

South Tyneside has at least 63 Combined Sewer Overflows (CSOs), operated by NWL, that routinely discharge untreated sewage into the River Don, the River Tyne and the North Sea. In 2020 the number of 'spills' from these amounted to 1197 and they discharged for 6,337.2 hours in total. You must bear in mind that not all CSOs are monitored and some of the data supplied by NWL has been proved to be inaccurate previously so the totals may be higher.

The figures provided by NWL to the Environment Agency (EA) for discharges from the Hendon STW for 2019 to 2020 were challenged. The hours of discharge that were supplied in the annual report by NWL to the EA for 2019 to 2020 were 15 hours and 52 minutes. The EA went back to NWL who revisited their figures. The figure has now been amended to 646 hours, a 4,000% increase.

In 2021 the South Tyneside CSOs 'spilled' 1614 times for 14,046.75 hours, a 120% increase. This is all the more remarkable as rainfall data supplied by the EA shows average rainfall in 2020 to be 610 mm which increased by a modest 11 % to 661 mm in 2021. The fact is the sewage infrastructure cannot cope now due to the lack of investment.

The CSOs are regulated by environmental permits regulated by the Environment Agency which allow discharges to take place during heavy rainfall or snowmelt. The CSOs in the South Tyneside area are discharging in light to moderate rainfall,

# WHITBURN NEIGHBOURHOOD FORUM

All of this sewage flows into the River Don and River Tyne eventually flowing to the Ramsar sites, Northumbria Coast Special protection Area and the Durham Coast Special Area of Conservation

SEWAGE POLLUTION IN SOUTH TYNESIDE FROM NWL ASSETS

Embedded below is a table of the spills per year



SEWAGE  
POLLUTION IN SOUT

PUBLIC HEALTH IS A MATERIAL PLANNING CONSIDERATION.

EFFECTS OF SEWAGE POLLUTION

In this age of declaring ocean emergencies, It is important to recognise that sewage pollution harms the marine environment due to a myriad of causes including the fact it contains high levels of microplastics, Sewage also includes all the drugs and bugs that we have, including chemotherapeutic drugs and all the chemicals from cleaning products. This all forms a soup which encourages genetic mutation in the bugs which helps them resist the effects of the antimicrobials we have now. The prediction is that in 10 years' time as many as 50 million people will die every year from conditions that we now control but should they gain resistance from the drugs we've got then we are going to be in trouble.

SUMMARY

It is evident from the sewage pollution figures and the ongoing investigations into the performance of Northumbrian Water Limited that tis company cannot be trusted to protect the environment.

Self-regulation and self-reporting by NWL is not working. This company has been shown to allow numerous 'spills' from their assets in both dry weather and in light to moderate rainfall. This behaviour is not permitted as spills are only supposed to take place in exceptional circumstances such as heavy rain or snowmelt.

The Environment Agency are under resourced and admit they are unable to regulate sewage discharge permits in our area.

The risk of harm to our marine environment is significant and this should be recognised in the draft Local Plan.

No large housing developments can be agreed to until plans to improve the sewage treatment infrastructure are also agreed.

## Local plan attachment to comments on policy SP7

Whitburn Neighbourhood Forum

Sun 3/3/2024 8:11 PM

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

 1 attachments (166 KB)

Response to Local Plan 2024 JPL.docx;

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To the local plan team,

Please find attached a document to support the representation made on policy SP7 by the Whitburn Neighbourhood Forum.

Many thanks,

Phil Leaf

Whitburn Neighbourhood Forum

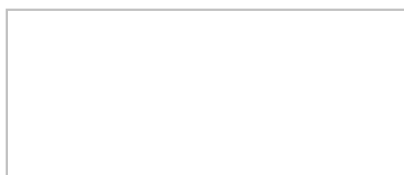
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**Whitburn Neighbourhood Forum**

Website: [whitburnforum.co.uk](http://whitburnforum.co.uk)

Social media: [Facebook](#), [Twitter](#) and [Instagram](#)

**Working for a better Whitburn**

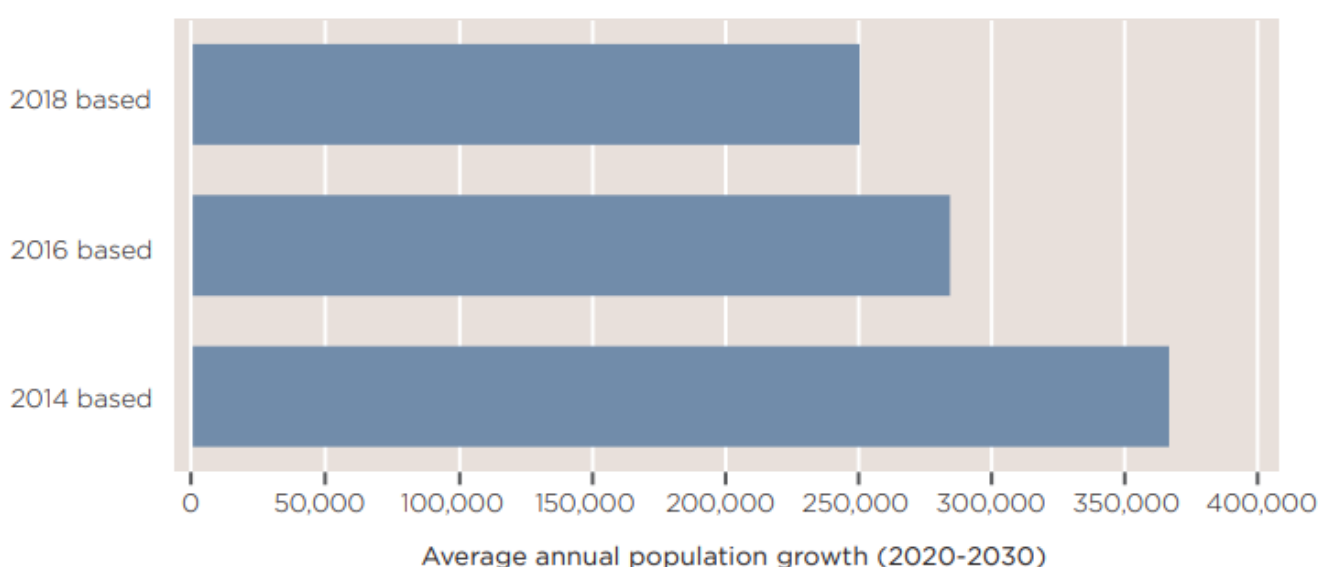


## Policy SP7 Housing Supply and Delivery – Soundness (No)

The Regulation 19 local plan that South Tyneside Council (STC) have recently issued are using the standard method to calculate housing need. The standard method says that you must use the 2014 ONS figures as a base (which are now 10 years out of date).

Below is a graph from the ONS itself showing a marked decrease in population growth. The annual population growth based on their own figures has decreased by 33% between 2014 and 2018. This is due to the long-term completed family size being revised down across Great Britain by 0.05 children per woman since the 2014-based projections to 1.85 in England & Wales. Added to the natural change numbers is a small reduction in the expectation for net international migration, down from 170,000 people per year to 150,000. This downward trend has been backed up by the results of the 2021 census.

**Figure 1** Population Projection Changes, England



Source ONS

The PPG is very clear that the Standard Method is not the whole answer to deciding on a housing target within a particular local authority. The formula is only based on two inputs so cannot possibly accurately reflect the myriad of very different housing challenges that exist across the country. The Standard Method was introduced to speed up and simplify the Plan-making process but was never intended to be a panacea.

The NPPF (para 61) states that:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – ***unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.***

We the WNF believe that the following exceptional circumstances should be taken into consideration:

- **Demographic characteristics of an area:** For example, if an area has a high proportion of elderly residents, it may be necessary to take this into account when assessing housing need. **South Tyneside has 20.8% of the population over 65 years of age compared to the national average of 18.6%**



- **Economic factors:** For example, if an area has a high level of unemployment, it may be necessary to consider the impact of this on housing need. **See Figure 1 below. The North-East has the highest level of unemployment in England.**
- **Infrastructure constraints:** For example, if an area has insufficient sewage capacity it may be necessary to consider the impact of this on housing need. **See response to Policy no 10**

Have the council included an assessment of whether these exceptional circumstances apply?  
**Figure 1**

**Table 1: Summary of latest headline estimates, and quarterly changes, for regions of the UK, seasonally adjusted, Oct to Dec 2023 [Notes 4, 5, and 6]**

	Employment rate (%) aged 16 to 64 years [Note 1]	Change on July to September 2023	Unemployment rate (%) aged 16 years and over [Note 2]	Change on July to September 2023	Inactivity rate (%) aged 16 to 64 years [Note 3]	Change on July to September 2023
<b>UK</b>	75.0	0.2	3.8	-0.2	21.9	0.0
<b>Great Britain</b>	75.1	0.1	3.9	-0.3	21.8	0.1
<b>England</b>	75.4	0.2	3.8	-0.3	21.5	0.1
<b>North East</b>	71.6	0.3	4.3	-0.3	25.4	0.1
<b>North West</b>	73.4	0.6	4.3	-1.1	23.2	0.3
<b>Yorkshire and The Humber</b>	74.4	0.6	3.4	0.3	22.9	-0.9
<b>East Midlands</b>	73.7	-0.6	5.1	0.3	22.3	0.4
<b>West Midlands</b>	74.4	-0.4	3.8	0.1	22.5	0.2
<b>East</b>	76.3	-0.1	3.4	-0.3	20.8	0.3
<b>London</b>	76.1	3.1	3.8	-1.3	20.8	-2.2
<b>South East</b>	78.0	-1.1	3.8	0.3	18.8	0.9
<b>South West</b>	76.7	-1.9	2.8	-0.4	21.0	2.4

The 2021 Census figures for no of households in South Tyneside is 68,285 and the population is 147,800

3917	E08000023	South Tyneside	-8	Does not apply	0
3918	E08000023	South Tyneside	1	One-person household: Aged 66 years and over	10484
3919	E08000023	South Tyneside	2	One-person household: Other	14066
3920	E08000023	South Tyneside	3	Single family household: All aged 66 years and over	5980
3921	E08000023	South Tyneside	4	Single family household: Married or civil partnership couple: No children	6876
3922	E08000023	South Tyneside	5	Single family household: Married or civil partnership couple: Dependent children	7191
3923	E08000023	South Tyneside	6	Single family household: Married or civil partnership couple: All children non-dependent	4035
3924	E08000023	South Tyneside	7	Single family household: Cohabiting couple family: No children	3648
3925	E08000023	South Tyneside	8	Single family household: Cohabiting couple family: With dependent children	3331
3926	E08000023	South Tyneside	9	Single family household: Cohabiting couple family: All children non-dependent	615
3927	E08000023	South Tyneside	10	Single family household: Lone parent family: With dependent children	6370
3928	E08000023	South Tyneside	11	Single family household: Lone parent family: All children non-dependent	3290
3929	E08000023	South Tyneside	12	Single family household: Other single family household: Other family composition	358
3930	E08000023	South Tyneside	13	Other household types: With dependent children	935
3931	E08000023	South Tyneside	14	Other household types: Other, including all full-time students and all aged 66 years and over	1106

The SHMA on which housing delivery is used by the council is 71,074 households for 2023 and a population of 151,426. If we allow for the budgeted build of 309 houses per annum for 2022 and 2023 there is an overestimate of 2,177 households. The council want to release green belt and build 1,108 houses. The figures on which the council are basing housing delivery is not sound. There are exceptional circumstances to not apply the standard method in South Tyneside.

**Table 4.1 Household change under 2014-based household projections**

<b>Projection</b>	<b>2023 Households</b>	<b>2033 Households</b>	<b>2023-33 household change</b>	<b>Annual change</b>
DCLG 2014-based	71,074	73,990	2,916	292

## Whitburn return 2021

Date On	Time On	Date Off	Time Off	Duration	No.of Events	Volume m3	Volume m3 per event
01-Jan-21	3:06	01-Jan-21	4:32	1:25:54	1	7731.00	26871.00
01-Jan-21	3:13	01-Jan-21	4:18	1:04:10		5775.00	
01-Jan-21	9:11	01-Jan-21	11:07	1:56:22		10473.00	
01-Jan-21	13:34	01-Jan-21	14:07	0:32:08		2892.00	
02-Jan-21	17:16	02-Jan-21	18:45	1:28:52	2	7998.00	14395.50
02-Jan-21	21:35	02-Jan-21	22:14	0:38:40		3480.00	
03-Jan-21	0:31	03-Jan-21	1:03	0:32:25		2917.50	
03-Jan-21	5:44	03-Jan-21	6:22	0:38:24	3	3456.00	17920.50
03-Jan-21	8:24	03-Jan-21	9:19	0:54:31		4906.50	
03-Jan-21	10:46	03-Jan-21	11:22	0:36:09		3253.50	
03-Jan-21	15:00	03-Jan-21	15:34	0:34:54		3141.00	
03-Jan-21	19:44	03-Jan-21	20:19	0:35:09		3163.50	
06-Jan-21	16:35	06-Jan-21	17:46	1:11:37	4	6445.50	10953.00
06-Jan-21	16:42	06-Jan-21	17:32	0:50:05		4507.50	
08-Jan-21	0:38	08-Jan-21	2:38	1:59:54	5	10791.00	23757.00
08-Jan-21	0:46	08-Jan-21	2:08	1:22:04		7386.00	
08-Jan-21	3:33	08-Jan-21	4:35	1:02:00		5580.00	
08-Jan-21	5:24	08-Jan-21	6:57	1:33:03	6	8374.50	18361.50
08-Jan-21	8:12	08-Jan-21	8:53	0:40:54		3681.00	
08-Jan-21	10:44	08-Jan-21	11:24	0:39:37		3565.50	
08-Jan-21	15:21	08-Jan-21	15:52	0:30:27		2740.50	
14-Jan-21	5:16	14-Jan-21	6:57	1:40:28	7	9042.00	38803.50
14-Jan-21	5:20	14-Jan-21	6:41	1:20:17		7225.50	
14-Jan-21	8:00	14-Jan-21	9:05	1:05:05		5857.50	
14-Jan-21	9:44	14-Jan-21	10:48	1:03:41		5731.50	
14-Jan-21	11:32	14-Jan-21	12:49	1:16:44		6906.00	
14-Jan-21	13:51	14-Jan-21	14:36	0:44:54		4041.00	
14-Jan-21	16:31	14-Jan-21	17:17	0:45:40	8	4110.00	7015.50
14-Jan-21	19:41	14-Jan-21	20:14	0:32:17		2905.50	
19-Jan-21	15:07	19-Jan-21	21:12	6:05:30	9	32895.00	59830.50
19-Jan-21	15:15	19-Jan-21	16:40	1:25:19		7678.50	
19-Jan-21	19:03	19-Jan-21	20:50	1:46:51		9616.50	
19-Jan-21	22:16	19-Jan-21	23:21	1:05:54		5931.00	
20-Jan-21	0:20	20-Jan-21	1:01	0:41:13		3709.50	
20-Jan-21	3:08	20-Jan-21	3:41	0:32:10	10	2895.00	82660.50
20-Jan-21	8:48	20-Jan-21	9:30	0:42:15		3802.50	
20-Jan-21	11:29	20-Jan-21	12:06	0:37:05		3337.50	
20-Jan-21	13:55	20-Jan-21	17:39	3:43:52		20148.00	
20-Jan-21	14:37	20-Jan-21	16:44	2:07:28		11472.00	
20-Jan-21	18:22	20-Jan-21	20:44	2:21:24		12726.00	
20-Jan-21	21:26	21-Jan-21	1:09	3:42:59		20068.50	
20-Jan-21	23:03	21-Jan-21	0:34	1:31:14		8211.00	
21-Jan-21	1:38	21-Jan-21	5:37	3:58:56	11	21504.00	42049.50
21-Jan-21	6:17	21-Jan-21	7:17	0:59:52		5388.00	
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31-Dec-21	7:00	31-Dec-21	7:34	00:34:03		3064.50	
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# Response ID ANON-RUCU-JV1H-R

Submitted to Sustainability Appraisal 2024  
Submitted on 2024-03-03 16:21:18

## Have your say

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

Section of the SA:

SA main report: Chapter 2 on the methodology and the sustainability objectives  
SA appendix

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

Comments:

The Sustainability Appraisal is not fit for purpose:

Sustainability objectives:

SO2 on biodiversity has too narrow a set of indicators for site assessments and should include wildlife corridors and general biodiversity impacts, linking it to the wader surveys conducted.

SO4 on land use should include an indicator for site allocations the presence of Best and Most Versatile Agricultural Land, seeing that the rapid decline in this has been identified on P 27 as a key sustainability issue.

Sustainable transport (SO7) only considers public transport and not active travel. Note that the National Planning Policy Framework's definition of sustainable transport modes includes walking and cycling. Note that it is a government objective to increase trips made on foot or by bicycle. The assessment can therefore mark a site as wholly sustainable while in reality it is too far from local services such as shops on foot and by bicycle.

There is no negative impact possible for objective SO8 on town centres. In practice this means that sites may not be promoting a sustainable pattern of growth due to a large distance to facilities, and this would not be picked up in the SA.

Individual site assessment (appendix):

Land north of Shearwater (SWH026): assessment contains errors and is unsound:

SO2 on biodiversity: the evidence report 'Wader Survey' shows that this site (classed as field 3 in the survey) is used by a significant number of wader birds (20 per hectares, the highest numbers of all surveyed fields), especially at night. This site plays a crucial role to support wader birds due to its proximity to the coast and the lack of access for dogs that could disturb the birds. Other sites identified as peak sites in the survey have been rejected for allocation due to this (e.g. see site selection paper), but the SA and site allocation papers are completely silent on this impact for this site.

The SO2 objective does not consider that this land is in a wildlife corridor (also see below on SO5).

SO4 on efficient land use: this should be a significant negative impact, because of the loss of Best and Most Versatile Agricultural land, which is flagged as a key issue in South Tyneside (P 27 key sustainability issues: rapidly declining reduction in agricultural land). It is in agricultural use as horse grazing, and even though there are no crops grown at the moment, it could be reinstated. However, building housing on here would result in permanent loss of BMVAL and this score should be significantly negative. Please see submitted image by email showing the classification as BMVAL on this site, taken from the Magic Map (magic.gov.uk).

In addition, it is not urban land (as stated in the SA), but it has agricultural use as it is a green field, and the majority of the field is used for horse grazing, with non-significant additional feeding taking place during times of snowfall. There are no structures on most of the field. Also see statement from the local authority that the site is greenfield on page 50 of the main report. The loss of greenfield and agricultural land is significant.

SO5 on green infrastructure: the SA claims the site is not within the Green and Blue Infrastructure Corridor, however, this regulation 19 plan proposes to change the GI corridor, which has not been adopted yet. The site is within the wildlife network and should therefore be classed as GBI (see our comments made on policy SP22 of the local plan). Therefore, the SA should consider the current GI boundaries, meaning that the site is within the GI corridor and effects will be negative.

SO8 on town centres: the impacts should be negative, due to the error in distance to the nearest town centre. Para 4.51 of the main report states that Whitburn is 5km from Sunderland town centre, however, it is 4-5 miles. In addition, key facilities such as shops are more than 800 metres away (a reasonable walking distance), and overall due to the significant distances to facilities, the site should score negatively in relation to town centres.

### 3 What is your name?

Name:

Phil Leaf

### 4 What is your email address?

Email:

[Redacted]

5 Who are you responding as?

Neighbourhood Forum

Organisation:

6 What is your postal address?

Address:

[Redacted]



## Regulation 19 Local Plan: Sustainability Appraisal attachments

Whitburn Neighbourhood Forum [REDACTED]

Sun 3/3/2024 4:38 PM

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

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To the local plan team,

See below image as an attachment to the Sustainability Appraisal representation made by the Whitburn Neighbourhood Forum. It's an image from the [Magic.gov.uk](https://www.magic.gov.uk) map showing the presence of Best and Most Versatile Agricultural Land on the site north of Shearwater.

Many thanks,  
Phil Leaf  
Whitburn Neighbourhood Forum

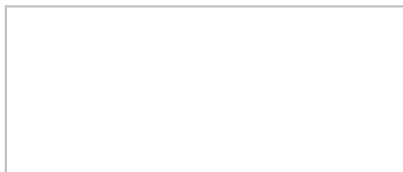
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**Whitburn Neighbourhood Forum**

Website: [whitburnforum.co.uk](http://whitburnforum.co.uk)

Social media: [Facebook](#), [Twitter](#) and [Instagram](#)

**Working for a better Whitburn**



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**From:** Whitburn Neighbourhood Forum [REDACTED]  
**Sent:** 03 March 2024 16:38  
**To:** Local Plan  
**Subject:** Regulation 19 Local Plan: Sustainability Appraisal attachments

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To the local plan team,

See below image as an attachment to the Sustainability Appraisal representation made by the Whitburn Neighbourhood Forum. It's is an image from the [Magic.gov.uk](https://www.magic.gov.uk) map showing the presence of Best and Most Versatile Agricultural Land on the site north of Shearwater.



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## Table of Contents



### Landscape



### Geology and Soils



### Landscape Classifications



National Character Areas (England)



National Historic Landscape  
Characterisation (250m Grid) (England)



National Historic Landscape  
Characterisation (500m Grid) (England)



Built Up Areas 2011 (England and  
Wales)



Agricultural Land Classification -



Many thanks,

Phil Leaf  
Whitburn Neighbourhood Forum

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## Whitburn Neighbourhood Forum

Website: [whitburnforum.co.uk](http://whitburnforum.co.uk)

Social media: [Facebook](#), [Twitter](#) and [Instagram](#)

## Working for a better Whitburn



## Response ID BHLF-RUCU-JV26-7

Submitted to Sustainability Appraisal 2024  
Submitted on 2024-04-25 13:32:12

### Have your say

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

Section of the SA:

Impacts on green infrastructure

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

Comments:

The green infrastructure corridors have been drawn up without following a sound methodology and evidence base.

The South Tyneside Green and Blue Infrastructure Strategy sets out its methodology for identifying the GBI corridor, based on the datasets in Appendix C, which includes the Wildlife Network. Following this approach would result in the wildlife network being part of the GBI corridor. However, the corridor included in the local plan itself excludes part of the wildlife corridor without justification, around the site that has been allocated north of Shearwater (GA6). The site currently still performs its function as wildlife corridor due to its open and green nature. There is no sound reason given to exclude this site from the GBI corridor.

The current strategic GI network does include most of the site, and so does the GI network identified in the Whitburn Neighbourhood Plan.

The Sustainability Appraisal assesses the impacts of the site not on the current GI corridor, but on the proposed one, and therefore excludes an assessment of the impacts on GI, and will prevent any mitigation from taking place if the site is developed.

No due process has been followed regarding the consultation on this revised corridor. The Whitburn Neighbourhood Forum was NOT invited to the roundtable, contrary to claims in the GBI strategy. We commented on the GI corridor online consultation to say there was no evidence to change the strategic corridor north of Shearwater. However, our comments were never acknowledged, followed up on or actioned on by the local authority.

The GBI assessment is not fit for purpose and does not justify why the site north of Shearwater has now been excluded from the corridor, which makes the local plan unsound.

#### 3 What is your name?

Name:

Steve Lavelle

#### 4 What is your email address?

Email:

[REDACTED]

#### 5 Who are you responding as?

Neighbourhood Forum

Organisation:

Whitburn Neighbourhood forum

#### 6 What is your postal address?

Address:

[REDACTED]

## Response ID ANON-TJBH-TD7K-2

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 20:47:59

### 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:

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.:

The basis for the calculation of the number of new homes proposed is not sound. 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.

The 2023 South Tyneside Strategic Housing Market Assessment provides the following estimates for the number of households in the Borough in 2023:

- 2014 based - 71,074

- 2018 based - 70,762

The number of households in the Borough at the 2021 Census was 68,300.

These household estimates which are out of line with the Census figure are then projected forward to 2033 to provide the housing requirement figure of 309 dwellings per year and a total of 5,253.

The proposed allocation of a housing site within the Green Belt in the EBNP area (GA2 – Land at North Farm) arises solely because of the use of these household projections.

The Government has consulted on the status of the standard method for calculating the housing requirement. This has resulted in an updated National Planning Policy Framework (NPPF) published on 19 December 2023. In Paragraphs 60 and 61 of the new NPPF there is greater flexibility for local authorities in assessing housing needs. Under paragraph 61, the revised NPPF states that the standard method for calculating housing need, to establish the number of homes required, is now considered as “an advisory starting point”. Under the previous NPPF, the standard method was not classified in this way and there was no similar explanatory text.

As a result of these changes, local authorities have greater flexibility to plan for fewer or higher number of homes than the standard method indicates, and where there are specific local circumstances that justify an alternative approach to assessing housing need, which is now explicitly supported.

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.:

Notwithstanding the transitional arrangements being applied that this Local Plan should be examined under the September 2023 NPPF, based on the guidance in the December 2023 NPPF, there is a clear case for a much lower housing requirement figure based on local circumstances and Green Belt constraint.

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

No

### 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:

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.:

SP3.2 States that “The Plan will...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”

This policy has not been positively prepared to deliver sustainable development in the East Boldon Neighbourhood Plan area. The proposed development of 263 houses at GA2, Land at North Farm, along with 202 houses already approved at Cleadon Lane and 9 at the Former Mayflower Glass site, will result in a 26% increase in the number of houses in East Boldon. The impact of this on the “distinctive character of the village”, local services and infrastructure is unsustainable.

SP3.4 States: “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 policy is not justified, uses out of date evidence and the exceptional circumstances case to amend the Green Belt boundary has not been made. The issue was considered by the Independent Examiner for the East Boldon Neighbourhood Plan, who considered that it was appropriate to retain the Green Belt around the village in order to meet housing need in the plan area.

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

Remove from the Plan entirely or significantly reduce the number of houses proposed for GA2 Land at North Farm under policy SP7. This would reduce the impact of new housing development on local services and infrastructure and maintain the integrity of the existing green belt.

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

No

### 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:

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.:

This proposal is in conflict with the adopted East Boldon Neighbourhood Plan as it is outside the settlement boundary approved in the plan. The site is within the Green Belt and its removal can only be agreed if the Council can prove exceptional circumstances and can demonstrate that all other reasonable options have been met.

Furthermore, the number of houses proposed for the village of East Boldon that will result from the development of this site is not sustainable, and the mitigation proposed for the site within the draft local plan has not been shown to be deliverable or adequate to address its loss.

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.:

Remove or significantly reduce the 263 houses proposed for site GA2 – Land at North Farm. This will resolve the conflict with the Neighbourhood Plan and reduce the impact of new development on local infrastructure.

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

No

### 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:

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.:

SP16 point 2 states:

“Making provision for the provision of at least 263 new homes within the designated East Boldon Neighbourhood Forum Area;” to contribute to the overall housing requirement of 5253 net additional dwellings (309 per year) and maintain a rolling five-year land supply.

The Regulation 19 Local Plan does not acknowledge an additional 202 houses proposed for Cleadon Lane, a site that was included in the Regulation 18 draft Plan, which although not yet given final approval will probably still proceed. Along the development of 9 dwellings recently approved at the former Mayflower Glass site, and the Land at North Farm (GA2/163 dwellings included in the Reg 19 plan), 470 houses could now come forward within the East Boldon, an increase of 26%.

Strategic policy SP3 (2), states “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.”

The impact of 470 new dwellings on the physical and social infrastructure of East Boldon is unsustainable and does not "respect the distinctive character of the village".

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.:

Remove or significantly reduce the provision of 263 homes proposed for the North Farm site (GA2).

This will reduce or eliminate the impact on local physical and social infrastructure and help maintain the character of East Boldon.

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

No.

## Policy 50: Social and Community Infrastructure

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.:

Policy 50 does not contain sufficient detail about how appropriate social, environmental, and physical infrastructure will be provided to cater for the impact of new development on local communities.

There is a thematic approach cutting across all the Plan policies which highlights “policies seeking to improve health and wellbeing for residents.” (Page 12 Chapter 6: Promoting Healthy Communities).

Policy 50, Social and Community Infrastructure (page 150), addresses these issues but without providing any specific detail about how appropriate infrastructure should be provided to cater for proposed new dwellings in the Plan. In particular, the 26% increase in households in East Boldon will have a significant impact on the health and wellbeing of the residents, both current and proposed. Schools, medical facilities and road networks are already under severe pressure. In the absence of detail about how this will be provided, Policy 50 is 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.:

Policy 50 should be amended to provide more detail about how the delivery of appropriate social, environmental and physical infrastructure will be achieved to mitigate the impact of new development on local communities where new housing development is proposed.

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

No

## Your personal details

What is your name?



Name:

Dave Hutchinson

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 2024-03-03 21:26:38

### 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.:

Proposed Housing

Reference - Local Plan paragraph 5.26 – 5.27

The basis for Fellgate development hinges on the development and completion of the International Advance Manufacturing Park according to their web site documentation only 3 buildings have been developed and are in use covering 623,000 sqft out of a potential 4 million sqft availability of covering 245 Acres. At this point there are many plots not allocated nor are there signs of significant building works; as stated in document LSH 2 Employment Area Assessment. Phase 1 "Some infrastructure completed. Phase 2 "Requires Infrastructure"

As South Tyneside are a partner in this venture it can only be assumed that the building of home on the land south of Fellgate may attract business to Fellgate area. As this cannot be proven as there is no evidence of (IAMP) being achievable within the timescales of South Tyneside's Local Plan.

As the IAMP, is within Sunderland local authority area, no evidence can be found on any direct public transport from Fellgate to IAMP.

Until this is assessed and documented, it has to be assumed that anyone living in these homes and who work at IAMP would use their own transport. This would more likely be a car.

If this is the case then the above assumption is not recorded in the evidence provide in Local Plan Policy 51 Traffic Assessment.

On page 48 and 49, in column Policy SP8: Fellgate Sustainable Growth Area, item 5 it talks about the things that the Development of this new sustainable community shall deliver.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan to retain the Green Belt.

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

No

### Your personal details

What is your name?

Name:

Kathryn Pino

What is your email address?

Email address:

[REDACTED]

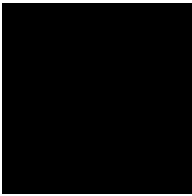
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



# Response ID ANON-TJBH-TD7T-B

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:38:53

## 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.:

Paragraph: 4.35 (Page 37)

Policy: South Tyneside Publication Local Plan

SP8 Fellgate Sustainable Growth Area

Paragraph SP8 Fellgate Sustainable Growth Area Page 5

Policy SP8 Fellgate Sustainable Growth Area

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Policy SP8: Fellgate Sustainable Growth Area

1. Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green belt as shown on the Policies Map and Inset Map 9. The allocation will deliver approximately 1200 homes and supporting infrastructure and community facilities.

Local Plan Paragraph 4.34 (page 37) the Plan has identified land south of Fellgate as a Sustainable Urban Extension. The site will be allocated for approximately 1200 new dwellings. The South Tyneside Green Belt Study (2023) has determined the most appropriate boundary to accommodate a new sustainable community and explores opportunities for mitigation and compensatory improvements.

Local Plan Paragraph 4.35 (page 37) states "Land South of Fellgate offers a unique opportunity to deliver a new sustainable community. It will be well designed and provide an attractive and desirable place."

Although South Tyneside Council have been considering this plan for a number of years, for example in 2021 a study of White Mare Pool was carried out, A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY the residents of Fellgate were only formally informed of this proposal in January 2024 and given 6 weeks to respond to what is a very lengthy and complex proposal.

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping report (January 2024) page 5 'Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green Belt'

The Green Belt needs to be removed to enable this development to take place. This does not take into account the residents of Fellgate and the negative and undesirable impact leading to impaired quality of life that the removal of the Green could and is likely to have. The residents of Fellgate have not been considered in the plan.

The removal of the Green Belt, to the south of Fellgate As stated in 'South Tyneside Green Belt Study 2023, Purpose 3 – Function recognises that the parcel of land is 'part of the countryside' if the plan goes ahead the landscape will be replaced with the development of a 1200 housing development. Although Paragraph 4.34 states that the Green Belt Study explores opportunities for mitigation and compensatory improvements. The only reason there is need for this is because the plan is taking away the Green Belt and all the benefits of it. In no way will any of the mitigation and compensatory measures, make up for the loss of the Green Belt. Conclusion: There is absolutely no mitigation and compensatory measure that could compensate to justify the removal of the Green Belt.

In the 'Strategic Land Review – Fellgate and Hedworth – 2016' The Site Appraisal Conclusion was stated as. 'There are likely adverse impacts upon the green belt landscape, biodiversity ground conditions and infrastructure provision. However, some parts of the site, particularly along Durham Drive are required for flood attenuation schemes and are strictly not suitable for development. The emerging International Advanced Manufacturing Park Area Action Plan document should also be considered further as it will reduce the size of the Green Belt in this area'.

This document states the unsuitability of the Green Belt land that there would be 'High Impact – significant mitigation required' in Infrastructure and Services, Landscape and Townscape, Biodiversity and Green Belt Separation.

There have been NO changes to the Greenbelt and surrounding areas since the 'Strategic Land Review – Fellgate and Hedworth – 2016' when it was deemed that removal would have a high impact therefore 'unsuitable for development'. 7 years later in the 'South Tyneside Green Belt Study, 2023' states that the impact would be 'moderate' and now this same land is suitable for development, even taking into account the 'mitigation' measures included, this in no way compensates for the loss of the Green Belt.

There are many potential sites for development that have not been included in the plan. There are at least 46 brownfield sites in South Tyneside that could be used for development. There are also many sites that are or will become available for example when manufacturing sites close and land becomes available. Explored thoroughly these could provide the land needed for housing development so our Green Belt can be protected.

For these reasons The Local Plan is not legally compliant or sound

In the Plan it states that number of new homes that South Tyneside are required to build to meet Government targets. The plan goes on to state where

and how many houses are to be built on specific sites including 1200 houses on the Greenbelt South of Fellgate. This does not consider a statement made on 19 December 2023 by Michael Gove Secretary of State for Levelling Up, Housing and Communities, and Minister for Intergovernmental Relations. In his statement Michael Gove stated that: 'Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.' This means that there are no requirements for South Tyneside to use Green belt land to meet targets. For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan to retain the Green Belt.

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

No

### Your personal details

What is your name?

Name:  
Kathryn Pino

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-TD7U-C

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:20:09

## 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.:

### Infrastructure – traffic

In the Local Plan paragraph 5.28 on page 51 we read ‘the Local Centre is to be located to coincide with sustainable transport routes accessibility to the existing Fellgate estate and the green infrastructure network’ the detail of this is in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report – page 6. Paragraph 5- iii - v

5-v in this document states ‘ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout. There would inevitably be increased traffic which would increase congestion, parking is currently difficult enough without additional cars in the area.

In the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report January 2024 it states on page 6 paragraph 5 iv. Deliver Vehicle access routes to the site from a) Mill Lane roundabout and b) Durham Drive

Having read the A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY. It does not appear to reflect the actual circumstance of these roads on a day to day basis.

The A194 is the main route to link South Shields with the motor-way and nearby towns and cities including Sunderland and Newcastle. This is an extremely busy road, particularly at peak times when traffic can build up quickly and Mill Lane roundabout becomes congested and struggles to cope with existing traffic. Introducing another junction on to the roundabout with the cars from the proposed 1200 houses will add significantly to the problem. In addition there are 127 houses being built west of the A184 (adjacent to Luke's Lane), if the proposed 1200 houses go ahead this will bring an unsustainable level of growth which will have a significant detrimental impact

Durham Drive carries all of the traffic around Fellgate, it is not wide enough for the traffic currently using it, for example a bus and car going in opposite directions cannot pass without one of them stopping. So it is not tenable to have an access route, from any development on the Greenbelt, on to Durham Drive. There are only 2 routes from Durham Drive, either on to the A194, and as this is a dual carriageway, all traffic exiting this way joins the roundabout at Mill Lane, therefore joining any traffic from the new development or, on to Fellgate Avenue and adding pressure to the traffic lights at Hedworth lane. At busy times, if the A194 is busy Fellgate becomes gridlocked with the cars of current residents and those who are trying to avoid traffic jams, and it is impossible to leave Fellgate estate. At these times it is almost impossible for emergency vehicles to access or leave the estate.

Fellgate is a quiet estate where children can play safely outdoors however taking into account an increase of pedestrians walking through Fellgate to access the Metro or other public transport, this may be no longer possible.

Fellgate Metro station is on the Newcastle to Sunderland line. The Metro at peak times is often very busy and does not cope with the number of passengers, so any increase in passengers would be untenable. The Metro takes people out of South Tyneside so any benefit to the economy of South Tyneside will be minimal.

Although public transport links are mentioned in the Local Plan there does not appear to have been any studies as to how these will be implemented, as Durham Drive is not wide enough for a bus and car to pass easily there would be no scope for increasing buses to go along Durham Drive.

The air-pollution from increased traffic and public transport would negatively impact those in the surrounding areas including the residents of Fellgate.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan to retain the Green Belt.

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

No

## Your personal details

What is your name?

Name:

Kathryn Pino

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-TD7X-F

Submitted to South Tyneside Publication Draft Local Plan 2023-2040  
Submitted on 2024-03-03 21:30:20

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.:

Flooding  
On page 7 of the Policy SP8: Fellgate Sustainable Growth Area, ix it talks about the urban drainage systems.

Historically Fellgate area has been prone to flooding, work was undertaken to install sustainable urban drainage systems (SuDS). This £21million project-built systems to alleviate future flooding, in part this has been successful, although parts of Durham Drive still have localised flood from heavy rain.  
Current flood defenses may be overwhelmed by the added pressures of housing development. This could and is likely to intensify the flood risk for the existing Fellgate community.  
The proposals to incorporate new, appropriately designed SuDS state that "Any surface water should discharge into Monkton Burn and Calf Close Burn". Whilst the evidence provides a view that these systems will be successful, however there is little clarity that Monkton Burn and Calf Close Burn will cope with the water discharge from 1,2000 homes  
No evidence can be found on the impact on the biodiversity, the wildlife, the Great Crested Newt Pond, and Wildlife corridor which traverse these burns. Whilst no figures can be found that would estimate the amount of water entering these burns it can be assumed that there will be a significant is a risk of surface water flooding from these burns, if not in the immediate area, but further downstream where that land is near sea level  
This in its self will have a negative effect towards the climate change objectives.  
For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan to retain the Green Belt.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:  
  
No

Your personal details

What is your name?

Name:  
Kathryn Pino

What is your email address?

Email address:  
[REDACTED]

Who are you responding as?

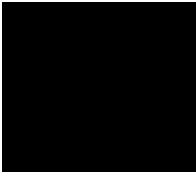
Resident or Member of the General Public

Organisation:

What is your postal address?



Address:



# Response ID ANON-TJBH-TD75-C

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:09:30

## Policy SP8: Fellgate Sustainable Growth Area

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

Support or Object - Legally Compliant:

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 object to the Local Plan.

The Local Plan is not legally compliant or sound for the following reasons:

Environmental impact

In the Local Plan, paragraph 5.34, we read that 2 other wildlife sites, Calf Close Burn and Lakeside Inn are recognised as wildlife sites and where possible improvements will be sought for these sites through appropriate mitigation and compensation. The current Green Belt is a natural habitat and the plan states that it is a 'wildlife corridor' to many wildlife and states 'The release of the Greenbelt would change the landscape take away the open space to the south of Fellgate.

The Green Belt is currently farmland and is recognised in the South Tyneside Green Belt Study page 105 as being 'part of the countryside' as such it has an existing working farm on the land. This is prime arable farming land currently used to grow grain. The land is used to house livery stable which services the local community. The Farmer will be given notice to leave therefore, as well as losing a valuable contribution to the eco system and the food chain, this person is losing his livelihood. The Green Belt including the farm are home to many species of wildlife.

In the 'Strategic Land Review - 2016' South Tyneside Council deemed the Greenbelt land to the South of Fellgate as not suitable for development, however in 2023 South Tyneside Council now deem the land is suitable for development! What has changed? Certainly not the land or activities that happen on it.

The 2016 report states that the site is a Green Belt, is a habitat creation zone, is a wildlife Corridor and a local wildlife site - this has NOT CHANGED.

The council now seem to be content with the loss of greenbelt and the damage to wildlife in the area, these include farmland birds (barn owls, wood pigeons, collared doves, kestrel, yellow hammer and red kites). Other wildlife such as foxes, rabbits, voles, squirrels are on the land. Whilst South Tyneside Council assure us that they will have 'mitigations' in place, they cannot guarantee that this wildlife will 'comply' and, taking into account the planned IAMP nearby development which is also removing natural habitats, there is further concern that by removing this Green Belt land we will be contributing to the demise of the wildlife population.

Furthermore, the development will add to air and noise pollution and eventually light pollution once a development is completed.

The 2016 study recommends that the linear links between sites of habitat value should be created and promoted, the area is of open aspect and views should be retained.

It is considered that developing the site would have a HIGH impact on the landscape. The Local Plan does not consider this to be of any importance and will need significant mitigation would be required to change this recommendation.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan to retain the Green Belt.

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

No

## Your personal details

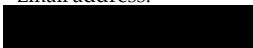
What is your name?

Name:

Kathryn Pino

What is your email address?

Email address:



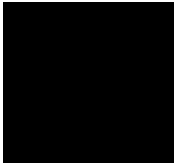
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



Response ID ANON-TJBH-TD7J-1

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:09:40

## 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 Local Plan is not legally compliant or sound for the following reasons:

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In the Local Plan, paragraph 5.34, we read that 2 other wildlife sites, Calf Close Burn and Lakeside Inn are recognised as wildlife sites and where possible improvements will be sought for these sites through appropriate mitigation and compensation. The current Green Belt is a natural habitat and the plan states that 'it is a 'wildlife corridor' to many wildlife and though the plan states 'The release of the Greenbelt would change the landscape take away the open space to the south of Fellgate. The Green Belt is currently farmland and is recognised in the South Tyneside Green Belt Study page 105 as being 'part of the countryside' as such it has an existing working farm on the land. This is prime arable farming land currently used to grow grain. The land is used to house livery stable which services the local community. The Farmer will be given notice to leave therefore as well as losing a valuable contribution to the eco system and the food chain, this person is losing his livelihood. The Green Belt including the farm are home to many species of wildlife.

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The 2016 report states that the site is a Green Belt, is a habitat creation zone, is a wildlife Corridor and a local wildlife site - this has NOT CHANGED.

The council now seem to be content with the loss of greenbelt and the damage to wildlife in the area, these include farmland birds (barn owls, wood pigeons, collared doves, kestrel, yellow hammer and red kites). Other wildlife such as foxes, rabbits, voles, squirrels are on the land. Whilst South Tyneside Council assure us that they will have 'mitigations' in place, they cannot guarantee that this wildlife will 'comply' and, taking into account the planned IAMP nearby development which is also removing natural habitats, there is further concern that by removing this Green Belt land we will be contributing to the demise of the wildlife population.

Furthermore, the development will add to air and noise pollution and eventually light pollution once a development is completed.

The 2016 study recommends that the linear links between sites of habitat value should be created and promoted, the area is of open aspect and views should be retained.

It is considered that developing the site would have a HIGH impact on the landscape. The Local Plan does not consider this to be of any importance and will need significant mitigation would be required to change this recommendation.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan to retain the Green Belt

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

no

## Your personal details

What is your name?

Name:

Mrs Angela Pino

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-TD7Q-8

Submitted to South Tyneside Publication Draft Local Plan 2023-2040  
Submitted on 2024-03-03 21:32:46

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.:

Flooding  
I object to the Local Plan.  
On page 7 of the Policy SP8: Fellgate Sustainable Growth Area, ix, it talks about the urban drainage systems.

Historically Fellgate are has been prone to flooding, work was undertaken to install sustainable urban drainage systems (SuDS). This £21million project-built systems to alleviate future flooding, in part this has been successful, although parts of Durham Drive still have localised flood from heavy rain.  
Current flood defences may be overwhelmed by the added pressures of housing development. This could and is likely to intensify the flood risk for the existing Fellgate community.  
The proposals to incorporate new, appropriately designed SuDS state that "Any surface water should discharge into Monkton Burn and Calf Close Burn". Whilst the evidence provides a view that these systems will be successful, however there is little clarity that Monkton Burn and Calf Close Burn will cope with the water discharge from 1,2000 homes  
No evidence can be found on the impact on the biodiversity, the wildlife, the Great Crested Newt Pond, and Wildlife corridor which traverse these burns. Whilst no figures can be found that would estimate the amount of water entering these burns it can be assumed that there will be a significant is a risk of surface water flooding from these burns, if not in the immediate area, but further downstream where that land is near sea level  
This in its self will have a negative effect towards the climate change objectives.  
For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan and retain the Green Belt

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?:  
  
no

Your personal details

What is your name?

Name:  
Mrs Angela Pino

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-TD7W-E

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:27:57

### 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.:

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Proposed Housing

Reference - Local Plan paragraph 5.26 – 5.27

The basis for Fellgate development hinges on the development and completion of the International Advance Manufacturing Park according to their web site documentation only 3 buildings have been developed and are in use covering 623,000 sqft out of a potential 4 million sqft availability of covering 245 Acres. At this point there are many plots not allocated nor are there signs of significant building works; as stated in

document LSH 2 Employment Area Assessment. Phase 1 "Some infrastructure completed. Phase 2 "Requires Infrastructure"

As South Tyneside are a partner in this venture one can only assume that the building of home on the land south of Fellgate may attract business to Fellgate area. As this cannot be proven as there is no evidence of (IAMP) being achievable within the timescales of South Tyneside's Local Plan.

As the IAMP, is within Sunderland local authority area, no evidence can be found on any direct public transport from Fellgate to IAMP.

Until this is assessed and documented, it has to be assumed that anyone living in these homes and who work at IAMP would use their own transport. This would more likely be a car.

If this is the case then the above assumption is not recorded in the evidence provide in Local Plan Policy 51 Traffic Assessment.

On page 48 and 49, in column Policy SP8: Fellgate Sustainable Growth Area, item 5 it talks about the things that the Development of this new sustainable community shall deliver.

For these reasons The Local Plan is not legally compliant or sound

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.:

remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan and retain the Green Belt

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

no

### Your personal details

What is your name?

Name:

Mrs Angela Pino

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

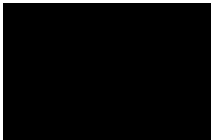
Resident or Member of the General Public

Organisation:



What is your postal address?

Address:



Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:41:10

## Policy SP8: Fellgate Sustainable Growth Area

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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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I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Policy SP8: Fellgate Sustainable Growth Area

1. Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green belt as shown on the Policies Map and Inset Map 9. The allocation will deliver approximately 1200 homes and supporting infrastructure and community facilities.

Local Plan Paragraph 4.34 (page 37) the Plan has identified land south of Fellgate as a Sustainable Urban Extension. The site will be allocated for approximately 1200 new dwellings. The South Tyneside Green Belt Study (2023) has determined the most appropriate boundary to accommodate a new sustainable community and explores opportunities for mitigation and compensatory improvements.

Local Plan Paragraph 4.35 (page 37) states 'Land South of Fellgate offers a unique opportunity to deliver a new sustainable community. It will be well designed and provide an attractive and desirable place.'

Although South Tyneside Council have been considering this plan for a number of years, for example in 2021 a study of White Mare Pool was carried out, A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY the residents of Fellgate were only formally informed of this proposal in January 2024 and given 6 weeks to respond to what is a very lengthy and complex proposal.

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping report (January 2024) page 5 'Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green Belt'

The Green Belt needs to be removed to enable this development to take place. This does not take into account the residents of Fellgate and the negative and undesirable impact leading to impaired quality of life that the removal of the Green could and is likely to have. The residents of Fellgate have not been considered in the plan.

The removal of the Green Belt, to the south of Fellgate As stated in 'South Tyneside Green Belt Study 2023, Purpose 3 – Function recognises that the parcel of land is 'part of the countryside' if the plan goes ahead the landscape will be replaced with the development of a 1200 housing development. Although Paragraph 4.34 states that the Green Belt Study explores opportunities for mitigation and compensatory improvements. The only reason there is need for this is because the plan is taking away the Green Belt and all the benefits of it. In no way will any of the mitigation and compensatory measures, make up for the loss of the Green Belt. Conclusion: There is absolutely no mitigation and compensatory measure that could compensate to justify the removal of the Green Belt.

In the 'Strategic Land Review – Fellgate and Hedworth – 2016' The Site Appraisal Conclusion was stated as. 'There are likely adverse impacts upon the green belt landscape, biodiversity ground conditions and infrastructure provision. However, some parts of the site, particularly along Durham Drive are required for flood attenuation schemes and are strictly not suitable for development. The emerging International Advanced Manufacturing Park Area Action Plan document should also be considered further as it will reduce the size of the Green Belt in this area'.

This document states the unsuitability of the Green Belt land that there would be 'High Impact – significant mitigation required' in Infrastructure and Services, Landscape and Townscape, Biodiversity and Green Belt Separation.

There have been NO changes to the Greenbelt and surrounding areas since the 'Strategic Land Review – Fellgate and Hedworth – 2016' when it was deemed that removal would have a high impact therefore 'unsuitable for development' to 7 years later in the 'South Tyneside Green Belt Study , 2023'

that the impact would be 'moderate' and now this same land is suitable for development, even taking into account the 'mitigation' measures included, this in no way compensates for the loss of the Green Belt.

There are many potential sites for development that have not been included in the plan. There are at least 46 brownfield sites in South Tyneside that could be used for development. There are also many sites that are or will become available for example when manufacturing sites close and land becomes available. Explored thoroughly these could provide the land needed for housing development so our Green Belt can be protected.

For these reasons The Local Plan is not legally compliant or sound

In the Plan it states that number of new homes that South Tyneside are required to build to meet Government targets. The plan goes on to state where and how many houses are to be built on specific sites including 1200 houses on the Greenbelt South of Fellgate. This does not consider a statement made on 19 December 2023 by Michael Gove Secretary of State for Levelling Up, Housing and Communities, and Minister for Intergovernmental Relations.

In his statement Michael Gove stated that: 'Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.' This means that there are no requirements for South Tyneside to use Green belt land to meet targets.

For these reasons The Local Plan is not legally compliant or sound

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.:

remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan so that the Green Belt is retained

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

no

### Your personal details

What is your name?

Name:

Mrs Angela Pino

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-TD74-B


Submitted to South Tyneside Publication Draft Local Plan 2023-2040  
Submitted on 2024-03-03 21:43:46

Your personal details

What is your name?

Name:  
Mrs Angela Pino

What is your email address?

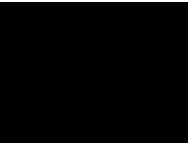
Email address:  


Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:  


Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:20:19

## Policy SP8: Fellgate Sustainable Growth Area

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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 object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Infrastructure – traffic

In the Local Plan paragraph 5.28 on page 51 we read ‘the Local Centre is to be located to coincide with sustainable transport routes accessibility to the existing Fellgate estate and the green infrastructure network’ the detail of this is in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report – page 6. Paragraph 5- iii - v

5-v in this document states ‘ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

There would inevitably be increased traffic which would increase congestion, parking is currently difficult enough without additional cars in the area.

In the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report January 2024 it states on page 6 paragraph 5 iv. Deliver Vehicle access routes to the site from a) Mill Lane roundabout and b) Durham Drive

Having read the A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY. It does not appear to reflect the actual circumstance of these roads on a day to day basis.

The A194 is the main route to link South Shields with the motor-way and nearby towns and Cities including Sunderland and Newcastle. This is an extremely busy road, particularly at peak times when traffic can build up quickly and Mill Lane roundabout becomes congested and struggles to cope with existing traffic. Introducing another junction on to the roundabout with the cars from the proposed 1200 houses will add significantly to the problem. In addition, there are 127 houses being built west of the A184 (adjacent to Luke's Lane), if the proposed 1200 houses go ahead this will bring an unsustainable level of growth which will have a significant detrimental impact

Durham Drive carries all of the traffic round Fellgate, it is not wide enough for the traffic currently using it, for example a bus and car going in opposite directions cannot pass without one of them stopping. So it is not tenable to have an access route, from any development on the Greenbelt, on to Durham Drive. There are only 2 routes from Durham Drive, either on to the A194, and as this is a dual carriageway, all traffic exiting this way joins the roundabout at Mill Lane, therefore joining any traffic from the new development or, on to Fellgate Avenue and adding pressure to the traffic lights at Hedworth lane. At busy times, if the A194 is busy Fellgate becomes gridlocked with cars of current residents and those who drive through Fellgate (Durham Drive) to avoid traffic jams. At these times it is almost impossible for emergency vehicles to access the estate or drive along the A194. When the roads are gridlocked, it is impossible to drive off Fellgate estate.

Fellgate is a quiet estate where children can play safely outdoors however taking into account an increase of pedestrians walking through Fellgate to access the Metro or other public transport, this may be no longer possible.

Fellgate Metro station is on the Newcastle to Sunderland line. The Metro at peak times is often very busy and does not cope with the number of passengers, so any increase in passengers would be untenable. The Metro takes people out of South Tyneside so any benefit to the economy of South Tyneside will be minimal.

Although public transport links are mentioned in the Local Plan there does not appear to have been any studies as to how these will be implemented, as Durham Drive is not wide enough for a bus and car to pass easily there would be no scope for increasing buses to go along Durham Drive.

The air-pollution from increased traffic and public transport would negatively impact those in the surrounding areas including the residents of Fellgate. For these reasons The Local Plan is not legally compliant or sound

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.:

remove SP8 Fellgate Sustainable Growth Area from South Tyneside Local Plan and retain the Green Belt

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

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Your personal details

What is your name?

Name:

Mrs Angela Pino

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 Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report  
Submitted on 2024-03-03 21:45:27

## Have your say

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

Comments:

Policy Local Plan - SP8 Fellgate Sustainable Growth Area Scoping report

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Paragraph SP8 Fellgate Sustainable Growth Area Page 5

Policy SP8 Fellgate Sustainable Growth Area

I object to the Local Plan.

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Policy SP8: Fellgate Sustainable Growth Area

1. Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green belt as shown on the Policies Map and Inset Map 9. The allocation will deliver approximately 1200 homes and supporting infrastructure and community facilities.

Local Plan Paragraph 4.34 (page 37) the Plan has identified land south of Fellgate as a Sustainable Urban Extension. The site will be allocated for approximately 1200 new dwellings. The South Tyneside Green Belt Study (2023) has determined the most appropriate boundary to accommodate a new sustainable community and explores opportunities for mitigation and compensatory improvements.

Local Plan Paragraph 4.35 (page 37) states "Land South of Fellgate offers a unique opportunity to deliver a new sustainable community. It will be well designed and provide an attractive and desirable place."

Although South Tyneside Council have been considering this plan for a number of years, for example in 2021 a study of White Mare Pool was carried out, A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY the residents of Fellgate were only formally informed of this proposal in January 2024 and given 6 weeks to respond to what is a very lengthy and complex proposal.

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The Green Belt needs to be removed to enable this development to take place. This does not take into account the residents of Fellgate and the negative and undesirable impact leading to impaired quality of life that the removal of the Green could and is likely to have. The residents of Fellgate have not been considered in the plan.

The removal of the Green Belt, to the south of Fellgate As stated in 'South Tyneside Green Belt Study 2023, Purpose 3 – Function recognises that the parcel of land is 'part of the countryside' if the plan goes ahead the landscape will be replaced with the development of a 1200 housing development. Although Paragraph 4.34 states that the Green Belt Study explores opportunities for mitigation and compensatory improvements. The only reason there is need for this is because the plan is taking away the Green Belt and all the benefits of it. In no way will any of the mitigation and compensatory measures, make up for the loss of the Green Belt. Conclusion: There is absolutely no mitigation and compensatory measure that could compensate to justify the removal of the Green Belt.

In the 'Strategic Land Review – Fellgate and Hedworth – 2016' The Site Appraisal Conclusion was stated as. 'There are likely adverse impacts upon the green belt landscape, biodiversity ground conditions and infrastructure provision. However, some parts of the site, particularly along Durham Drive are required for flood attenuation schemes and are strictly not suitable for development. The emerging International Advanced Manufacturing Park Area Action Plan document should also be considered further as it will reduce the size of the Green Belt in this area'.

This document states the unsuitability of the Green Belt land that there would be 'High Impact – significant mitigation required' in Infrastructure and Services, Landscape and Townscape, Biodiversity and Green Belt Separation.

There have been NO changes to the Greenbelt and surrounding areas since the 'Strategic Land Review – Fellgate and Hedworth – 2016' when it was deemed that removal would have a high impact therefore 'unsuitable for development' to 7 years later in the 'South Tyneside Green Belt Study , 2023' that the impact would be 'moderate' and now this same land is suitable for development, even taking into account the 'mitigation' measures included, this in no way compensates for the loss of the Green Belt.

There are many potential sites for development that have not been included in the plan. There are at least 46 brownfield sites in South Tyneside that could be used for development. There are also many sites that are or will become available for example when manufacturing sites close and land becomes available. Explored thoroughly these could provide the land needed for housing development so our Green Belt can be protected.

For these reasons The Local Plan is not legally compliant or sound

In the Plan it states that number of new homes that South Tyneside are required to build to meet Government targets. The plan goes on to state where and how many houses are to be built on specific sites including 1200 houses on the Greenbelt South of Fellgate. This does not consider a statement made on 19 December 2023 by Michael Gove Secretary of State for Levelling Up, Housing and Communities, and Minister for Intergovernmental Relations.

In his statement Michael Gove stated that: 'Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.' This means that there are no requirements for South Tyneside to use Green belt land to meet targets.

For these reasons The Local Plan is not legally compliant or sound

## Environmental impact

In the Local Plan, paragraph 5.34, we read that 2 other wildlife sites, Calf Close Burn and Lakeside Inn are recognised as wildlife sites and where possible improvements will be sought for these sites through appropriate mitigation and compensation. The current Green Belt is a natural habitat and the plan states that 'it is a 'wildlife corridor' to many wildlife and though the plan states 'The release of the Greenbelt would change the landscape take away the

open space to the south of Fellgate. The Green Belt is currently farmland and is recognised in the South Tyneside Green Belt Study page 105 as being 'part of the countryside' as such it has an existing working farm on the land. This is prime arable farming land currently used to grow grain. The land is used to house livery stable which services the local community. The Farmer will be given notice to leave therefore as well as losing a valuable contribution to the eco system and the food chain, this person is losing his livelihood. The Green Belt including the farm are home to many species of wildlife. In the 'Strategic Land Review - 2016' South Tyneside Council deemed the Greenbelt land to the South of Fellgate as not suitable for development, however in 2023 South Tyneside Council now deem the land is suitable for development! What has changed, certainly not the land or activities that happen on it. The 2016 report states that the site is a Green Belt, is a habitat creation zone, is a wildlife Corridor and a local wildlife site – this has NOT CHANGED. The council now seem to be content with the loss of greenbelt and the damage to wildlife in the area, these include farmland birds (barn owls, wood pigeons, collared doves, kestrel, yellow hammer and red kites). Other wildlife such as foxes, rabbits, voles, squirrels are on the land. Whilst South Tyneside Council assure us that they will have 'mitigations' in place, they cannot guarantee that this wildlife will 'comply' and, taking into account the planned IAMP nearby development which is also removing natural habitats, there is further concern that by removing this Green Belt land we will be contributing to the demise of the wildlife population. Furthermore, the development will add to air and noise pollution and eventually light pollution once a development is completed.

The 2016 study recommends that the linear links between sites of habitat value should be created and promoted, the area is of open aspect and views should be retained.

It is considered that developing the site would have a HIGH impact on the landscape. The Local Plan does not consider this to be of any importance and will need significant mitigation would be required to change this recommendation.

For these reasons The Local Plan is not legally compliant or sound

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

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In the Local Plan paragraph 5.28 on page 51 we read 'the Local Centre is to be located to coincide with sustainable transport routes accessibility to the existing Fellgate estate and the green infrastructure network' the detail of this is in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report – page 6. Paragraph 5- iii - v

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Durham Drive carries all of the traffic round Fellgate, it is not wide enough for the traffic currently using it, for example a bus and car going in opposite directions cannot pass without one of them stopping. So it is not tenable to have an access route, from any development on the Greenbelt, on to Durham Drive. There are only 2 routes from Durham Drive, either on to the A194, and as this is a dual carriageway, all traffic exiting this way joins the roundabout at Mill Lane, therefore joining any traffic from the new development or, on to Fellgate Avenue and adding pressure to the traffic lights at Hedworth lane. At busy times, if the A194 is busy Fellgate becomes gridlocked with cars of current residents and those who drive through Fellgate (Durham Drive) to avoid traffic jams. At these times it is almost impossible for emergency vehicles to access the estate or drive along the A194. When the roads are gridlocked, it is impossible to drive off Fellgate estate.

Fellgate is a quiet estate where children can play safely outdoors however taking into account an increase of pedestrians walking through Fellgate to access the Metro or other public transport, this may be no longer possible.

Fellgate Metro station is on the Newcastle to Sunderland line. The Metro at peak times is often very busy and does not cope with the number of passengers, so any increase in passengers would be untenable. The Metro takes people out of South Tyneside so any benefit to the economy of South Tyneside will be minimal.

Although public transport links are mentioned in the Local Plan there does not appear to have been any studies as to how these will be implemented, as Durham Drive is not wide enough for a bus and car to pass easily there would be no scope for increasing buses to go along Durham Drive.

The air-pollution from increased traffic and public transport would negatively impact those in the surrounding areas including the residents of Fellgate.

For these reasons The Local Plan is not legally compliant or sound

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Proposed Housing

Reference - Local Plan paragraph 5.26 – 5.27

The basis for Fellgate development hinges on the development and completion of the International Advance Manufacturing Park according to their web site documentation only 3 buildings have been developed and are in use covering 623,000 sqft out of a potential 4 million sqft availability of covering 245 Acres. At this point there are many plots not allocated nor are there signs of significant building works; as stated in

document LSH 2 Employment Area Assessment. Phase 1 "Some infrastructure completed. Phase 2 "Requires Infrastructure"

As South Tyneside are a partner in this venture one can only assume that the building of home on the land south of Fellgate may attract business to Fellgate area. As this cannot be proven as there is no evidence of (IAMP) being achievable within the timescales of South Tyneside's Local Plan.

As the IAMP, is within Sunderland local authority area, no evidence can be found on any direct public transport from Fellgate to IAMP.

Until this is assessed and documented, it has to be assumed that anyone living in these homes and who work at IAMP would use their own transport. This



would more likely be a car.

If this is the case then the above assumption is not recorded in the evidence provide in Local Plan Policy 51 Traffic Assessment.

On page 48 and 49, in column Policy SP8: Fellgate Sustainable Growth Area, item 5 it talks about the things that the Development of this new sustainable community shall deliver.

For these reasons The Local Plan is not legally compliant or sound

Flooding

I object to the Local Plan.

On page 7 of the Policy SP8: Fellgate Sustainable Growth Area, ix, it talks about the urban drainage systems.

Historically Fellgate are has been prone to flooding, work was undertaken to install sustainable urban drainage systems (SuDS). This £21million project-built systems to alleviate future flooding, in part this has been successful, although parts of Durham Drive still have localised flood from heavy rain.

Current flood defences may be overwhelmed by the added pressures of housing development. This could and is likely to intensify the flood risk for the existing Fellgate community.

The proposals to incorporate new, appropriately designed SuDS state that "Any surface water should discharge into Monkton Burn and Calf Close Burn". Whilst the evidence provides a view that these systems will be successful, however there is little clarity that Monkton Burn and Calf Close Burn will cope with the water discharge from 1,2000 homes

No evidence can be found on the impact on the biodiversity, the wildlife, the Great Crested Newt Pond, and Wildlife corridor which traverse these burns. Whilst no figures can be found that would estimate the amount of water entering these burns it can be assumed that there will be a significant is a risk of surface water flooding from these burns, if not in the immediate area, but further downstream where that land is near sea level

This in its self will have a negative effect towards the climate change objectives.

For these reasons The Local Plan is not legally compliant or sound

2 What is your name?

Name:

Mrs Angela Pino

3 What is your email address?

Email:

[REDACTED]

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report  
Submitted on 2024-03-03 21:44:58

## Have your say

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

Comments:

Policy Local Plan - SP8 Fellgate Sustainable Growth Area Scoping report

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Paragraph SP8 Fellgate Sustainable Growth Area Page 5

Policy SP8 Fellgate Sustainable Growth Area

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Policy SP8: Fellgate Sustainable Growth Area

1. Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green belt as shown on the Policies Map and Inset Map 9. The allocation will deliver approximately 1200 homes and supporting infrastructure and community facilities.

Local Plan Paragraph 4.34 (page 37) the Plan has identified land south of Fellgate as a Sustainable Urban Extension. The site will be allocated for approximately 1200 new dwellings. The South Tyneside Green Belt Study (2023) has determined the most appropriate boundary to accommodate a new sustainable community and explores opportunities for mitigation and compensatory improvements.

Local Plan Paragraph 4.35 (page 37) states "Land South of Fellgate offers a unique opportunity to deliver a new sustainable community. It will be well designed and provide an attractive and desirable place."

Although South Tyneside Council have been considering this plan for a number of years, for example in 2021 a study of White Mare Pool was carried out, A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY the residents of Fellgate were only formally informed of this proposal in January 2024 and given 6 weeks to respond to what is a very lengthy and complex proposal.

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping report (January 2024) page 5 'Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green Belt'

The Green Belt needs to be removed to enable this development to take place. This does not take into account the residents of Fellgate and the negative and undesirable impact leading to impaired quality of life that the removal of the Green could and is likely to have. The residents of Fellgate have not been considered in the plan.

The removal of the Green Belt, to the south of Fellgate As stated in 'South Tyneside Green Belt Study 2023, Purpose 3 – Function recognises that the parcel of land is 'part of the countryside' if the plan goes ahead the landscape will be replaced with the development of a 1200 housing development. Although Paragraph 4.34 states that the Green Belt Study explores opportunities for mitigation and compensatory improvements. The only reason there is need for this is because the plan is taking away the Green Belt and all the benefits of it. In no way will any of the mitigation and compensatory measures, make up for the loss of the Green Belt. Conclusion: There is absolutely no mitigation and compensatory measure that could compensate to justify the removal of the Green Belt.

In the 'Strategic Land Review – Fellgate and Hedworth – 2016' The Site Appraisal Conclusion was stated as. 'There are likely adverse impacts upon the green belt landscape, biodiversity ground conditions and infrastructure provision. However, some parts of the site, particularly along Durham Drive are required for flood attenuation schemes and are strictly not suitable for development. The emerging International Advanced Manufacturing Park Area Action Plan document should also be considered further as it will reduce the size of the Green Belt in this area'.

This document states the unsuitability of the Green Belt land that there would be 'High Impact – significant mitigation required' in Infrastructure and Services, Landscape and Townscape, Biodiversity and Green Belt Separation.

There have been NO changes to the Greenbelt and surrounding areas since the 'Strategic Land Review – Fellgate and Hedworth – 2016' when it was deemed that removal would have a high impact therefore 'unsuitable for development' to 7 years later in the 'South Tyneside Green Belt Study , 2023' that the impact would be 'moderate' and now this same land is suitable for development, even taking into account the 'mitigation' measures included, this in no way compensates for the loss of the Green Belt.

There are many potential sites for development that have not been included in the plan. There are at least 46 brownfield sites in South Tyneside that could be used for development. There are also many sites that are or will become available for example when manufacturing sites close and land becomes available. Explored thoroughly these could provide the land needed for housing development so our Green Belt can be protected.

For these reasons The Local Plan is not legally compliant or sound

In the Plan it states that number of new homes that South Tyneside are required to build to meet Government targets. The plan goes on to state where and how many houses are to be built on specific sites including 1200 houses on the Greenbelt South of Fellgate. This does not consider a statement made on 19 December 2023 by Michael Gove Secretary of State for Levelling Up, Housing and Communities, and Minister for Intergovernmental Relations.

In his statement Michael Gove stated that: 'Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.' This means that there are no requirements for South Tyneside to use Green belt land to meet targets.

For these reasons The Local Plan is not legally compliant or sound

### Environmental impact

In the Local Plan, paragraph 5.34, we read that 2 other wildlife sites, Calf Close Burn and Lakeside Inn are recognised as wildlife sites and where possible improvements will be sought for these sites through appropriate mitigation and compensation. The current Green Belt is a natural habitat and the plan states that 'it is a 'wildlife corridor' to many wildlife and though the plan states 'The release of the Greenbelt would change the landscape take away the

open space to the south of Fellgate. The Green Belt is currently farmland and is recognised in the South Tyneside Green Belt Study page 105 as being 'part of the countryside' as such it has an existing working farm on the land. This is prime arable farming land currently used to grow grain. The land is used to house livery stable which services the local community. The Farmer will be given notice to leave therefore as well as losing a valuable contribution to the eco system and the food chain, this person is losing his livelihood. The Green Belt including the farm are home to many species of wildlife. In the 'Strategic Land Review - 2016' South Tyneside Council deemed the Greenbelt land to the South of Fellgate as not suitable for development, however in 2023 South Tyneside Council now deem the land is suitable for development! What has changed, certainly not the land or activities that happen on it. The 2016 report states that the site is a Green Belt, is a habitat creation zone, is a wildlife Corridor and a local wildlife site – this has NOT CHANGED. The council now seem to be content with the loss of greenbelt and the damage to wildlife in the area, these include farmland birds (barn owls, wood pigeons, collared doves, kestrel, yellow hammer and red kites). Other wildlife such as foxes, rabbits, voles, squirrels are on the land. Whilst South Tyneside Council assure us that they will have 'mitigations' in place, they cannot guarantee that this wildlife will 'comply' and, taking into account the planned IAMP nearby development which is also removing natural habitats, there is further concern that by removing this Green Belt land we will be contributing to the demise of the wildlife population. Furthermore, the development will add to air and noise pollution and eventually light pollution once a development is completed.

The 2016 study recommends that the linear links between sites of habitat value should be created and promoted, the area is of open aspect and views should be retained.

It is considered that developing the site would have a HIGH impact on the landscape. The Local Plan does not consider this to be of any importance and will need significant mitigation would be required to change this recommendation.

For these reasons The Local Plan is not legally compliant or sound

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Infrastructure – traffic

In the Local Plan paragraph 5.28 on page 51 we read 'the Local Centre is to be located to coincide with sustainable transport routes accessibility to the existing Fellgate estate and the green infrastructure network' the detail of this is in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report – page 6. Paragraph 5- iii - v

5-v in this document states 'ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

There would inevitably be increased traffic which would increase congestion, parking is currently difficult enough without additional cars in the area.

In the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report January 2024 it states on page 6 paragraph 5 iv. Deliver Vehicle access routes to the site from a) Mill Lane roundabout and b) Durham Drive

Having read the A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY. It does not appear to reflect the actual circumstance of these roads on a day to day basis.

The A194 is the main route to link South Shields with the motor-way and nearby towns and Cities including Sunderland and Newcastle. This is an extremely busy road, particularly at peak times when traffic can build up quickly and Mill Lane roundabout becomes congested and struggles to cope with existing traffic. Introducing another junction on to the roundabout with the cars from the proposed 1200 houses will add significantly to the problem. In addition, there are 127 houses being built west of the A184 (adjacent to Luke's Lane), if the proposed 1200 houses go ahead this will bring an unsustainable level of growth which will have a significant detrimental impact

Durham Drive carries all of the traffic round Fellgate, it is not wide enough for the traffic currently using it, for example a bus and car going in opposite directions cannot pass without one of them stopping. So it is not tenable to have an access route, from any development on the Greenbelt, on to Durham Drive. There are only 2 routes from Durham Drive, either on to the A194, and as this is a dual carriageway, all traffic exiting this way joins the roundabout at Mill Lane, therefore joining any traffic from the new development or, on to Fellgate Avenue and adding pressure to the traffic lights at Hedworth lane. At busy times, if the A194 is busy Fellgate becomes gridlocked with cars of current residents and those who drive through Fellgate (Durham Drive) to avoid traffic jams. At these times it is almost impossible for emergency vehicles to access the estate or drive along the A194. When the roads are gridlocked, it is impossible to drive off Fellgate estate.

Fellgate is a quiet estate where children can play safely outdoors however taking into account an increase of pedestrians walking through Fellgate to access the Metro or other public transport, this may be no longer possible.

Fellgate Metro station is on the Newcastle to Sunderland line. The Metro at peak times is often very busy and does not cope with the number of passengers, so any increase in passengers would be untenable. The Metro takes people out of South Tyneside so any benefit to the economy of South Tyneside will be minimal.

Although public transport links are mentioned in the Local Plan there does not appear to have been any studies as to how these will be implemented, as Durham Drive is not wide enough for a bus and car to pass easily there would be no scope for increasing buses to go along Durham Drive.

The air-pollution from increased traffic and public transport would negatively impact those in the surrounding areas including the residents of Fellgate.

For these reasons The Local Plan is not legally compliant or sound

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Proposed Housing

Reference - Local Plan paragraph 5.26 – 5.27

The basis for Fellgate development hinges on the development and completion of the International Advance Manufacturing Park according to their web site documentation only 3 buildings have been developed and are in use covering 623,000 sqft out of a potential 4 million sqft availability of covering 245 Acres. At this point there are many plots not allocated nor are there signs of significant building works; as stated in

document LSH 2 Employment Area Assessment. Phase 1 "Some infrastructure completed. Phase 2 "Requires Infrastructure"

As South Tyneside are a partner in this venture one can only assume that the building of home on the land south of Fellgate may attract business to Fellgate area. As this cannot be proven as there is no evidence of (IAMP) being achievable within the timescales of South Tyneside's Local Plan.

As the IAMP, is within Sunderland local authority area, no evidence can be found on any direct public transport from Fellgate to IAMP.

Until this is assessed and documented, it has to be assumed that anyone living in these homes and who work at IAMP would use their own transport. This

would more likely be a car.

If this is the case then the above assumption is not recorded in the evidence provide in Local Plan Policy 51 Traffic Assessment.

On page 48 and 49, in column Policy SP8: Fellgate Sustainable Growth Area, item 5 it talks about the things that the Development of this new sustainable community shall deliver.

For these reasons The Local Plan is not legally compliant or sound

Flooding

I object to the Local Plan.

On page 7 of the Policy SP8: Fellgate Sustainable Growth Area, ix, it talks about the urban drainage systems.

Historically Fellgate are has been prone to flooding, work was undertaken to install sustainable urban drainage systems (SuDS). This £21million project-built systems to alleviate future flooding, in part this has been successful, although parts of Durham Drive still have localised flood from heavy rain.

Current flood defences may be overwhelmed by the added pressures of housing development. This could and is likely to intensify the flood risk for the existing Fellgate community.

The proposals to incorporate new, appropriately designed SuDS state that "Any surface water should discharge into Monkton Burn and Calf Close Burn". Whilst the evidence provides a view that these systems will be successful, however there is little clarity that Monkton Burn and Calf Close Burn will cope with the water discharge from 1,2000 homes

No evidence can be found on the impact on the biodiversity, the wildlife, the Great Crested Newt Pond, and Wildlife corridor which traverse these burns. Whilst no figures can be found that would estimate the amount of water entering these burns it can be assumed that there will be a significant is a risk of surface water flooding from these burns, if not in the immediate area, but further downstream where that land is near sea level

This in its self will have a negative effect towards the climate change objectives.

For these reasons The Local Plan is not legally compliant or sound

2 What is your name?

Name:

Mrs Angela Pino

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?

[REDACTED]

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This in its self will have a negative effect towards the climate change objectives.

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Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

[REDACTED]

## Response ID ANON-TJBH-TD7C-T

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:15:01

## Chapter 1: Introduction

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

Support or Object - Legally Compliant:

Support or Object - Sound:

Support or Object - Complies with the Duty to Cooperate:

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

## Policy 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.:

Buckley Burnett is broadly supportive of the principle of Policy SP2, albeit we do object to part 2 of the policy which establishes the housing need over the plan period. We do not consider that part of the policy to be positively prepared and capable of supporting other elements of Policy SP2, specifically the aspirations of jobs growth over the plan period. As such, the policy as a whole is not sound.

We understand the housing requirement figure has reduced from 5,778 (equating to 321 dwellings per annum) dwellings at Regulation 18 stage to 5,253 (309 dwellings per annum) within this current consultation document. It is also noted that the Plan period has been amended (from 2021 to 2039 to 2023 to 2040), thus reducing the length of the plan period from 18 to 17 years, resulting in a further reduction in the overall number of homes required through the effective loss of 1 years' worth of housing.

Paragraphs 2.6 – 2.8 of the Plan clearly articulate the difficulties faced by South Tyneside, in particular a declining working age population and an increasing population of over 65, placing greater pressure on the local economy and delivery of services. For the Plan to achieve all of its objectives, it is essential that the Plan secures an appropriate amount of housing delivery to attract a working age population to support the targeted employment growth. In the Regulation 19 Local Plan, these objectives are not aligned and cannot be considered sound.

In order to determine the minimum number of homes required, a Local Housing Needs Assessment (LHNA) has been undertaken using the Standard Method (SM). This process has led to the proposed 309 dwellings per annum figure. The Plan notes that national policy explains this figure should be seen as a minimum starting point, from which a case can be made to increase the requirement to address other requirements (ie economic and employment growth).

In this case, the Plan is proposing to provide the absolute minimum housing delivery, without any attempt to align housing growth with the wider plan aspirations.

The PPG (ID: 2a-010-20201216) provides clear guidance for the authority to increase its housing requirement in these circumstances.

We note the SHMA makes reference to the North East Local Enterprise Partnership's (NELEP) Strategic Economic Plan which identifies that it is targeting 25,000 new jobs for South Tyneside by 2031. The Council's own plan seeks to drive the economy and generate more jobs. A key pillar of this strategy is

the International Advanced Manufacturing Park (IAMP) which the plan notes at paragraph 2.41 is “identified in the LEA as providing a major opportunity to increase the number of high-quality jobs in South Tyneside and this is already happening: investment was announced in 2021 by Envision AESC for a Gigafactory to provide batteries for electric vehicles”. To put this into further context, paragraph 9.10 of the plan states that “there are 30,000 jobs regionally in the advanced automotive sector and there is the potential to increase this significantly” (our emphasis).

We note that the 2023 SHMA now identifies a total affordable housing requirement of 361 net additions per annum (52 more than the total annual target cited in the Plan; or 884 additional dwellings over the plan period; or nearly 17% of the plan target). Whilst we accept it is not possible to require this amount of affordable housing to be delivered through allocated sites without making them unviable, it is further clear evidence that the plan simply does not plan to provide sufficient housing. However it is measured, the need for affordable housing is ultimately a matter of supply and demand. The more housing there is available, the less the market will continue to overheat and push prices up, further increasing the affordability gap.

Furthermore, allocating a greater number of sites in the first place will also deliver more affordable housing as a proportion of those developments. In this case, it is a conscious decision of the Council not to allocate sufficient land to deliver affordable homes for existing households in need. We conclude the Plan fails to consider the balance between the Council’s employment needs and aspirations, affordable housing need and the overall housing requirement. As such, before the Plan progresses to submission, the Council must seek to align the jobs growth aspirations with the proposed housing delivery. This should be achieved by increasing the housing requirement.

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.:

Before the Plan progresses to submission, the Council must seek to align the jobs growth aspirations with the proposed housing delivery. This should be achieved by increasing the housing requirement.

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

Yes

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.:

In principle, the draft policy is well intended but does require further clarification for it to be considered positively prepared, and sound. We welcome the recognition in point 4 of the policy text that, in order to meet the identified needs and facilitate sustainable growth, amendments to the Green Belt boundary are necessary. However, as discussed under Policy SP7, we do not consider sufficient land is released from the Green Belt.

Point 1 of the Policy confirms growth will be focused in the “Main Urban Area, including South Shields, Hebburn and Jarrow”. Point 2 goes on to reference “the Boldons” amongst other areas. Map 3 of the draft plan defines the ‘Main Urban Area’. The plan resolution is very poor and it is difficult to define the exact boundaries, but it appears to confirm the ‘Main Urban Area’ includes the areas referenced in Point 3 of the Policy. This is unnecessarily confusing and lacks clarity.

Assuming all these areas do fall within the Main Urban Area, it is not necessary to list the individual settlements. Further clarification is required before the Policy can be considered sound. On the issue of the need to release land from the Green Belt to meet identified needs, we support this approach, although we consider the Plan does not release sufficient land to support its other policy objectives. Indeed, it is significant to note that the 2022 Housing Delivery Test (HDT) results have been published. The below table summarises housing delivery over the last three years in South Tyneside.

Years	Housing Requirement	Housing Delivered	Balance	for Year
2019-20	320	236	-84	
2020-21	227	182	-45	
2021-22	321	207	-114	
Totals	868	625	-243	
Source: Housing Delivery Test 2022 Results (published December 2023)				

Based on the above, the trend of under delivery is one that continues, and is significantly below the draft plan target. This provides further justification for the need to release land from the Green Belt to meet needs.

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.:

In order for the Plan to be considered sound, clarifications must be made to the policy wording and associated figures. The Policy must also make a greater allowance for land to be released from the Green Belt, aligned with our comments on other policies.

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

Yes

#### 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

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.:

We have previously (at Regulation 18 stage) provided commentary on certain allocated sites with a view to highlighting potential constraints. Where those sites remain allocated, our previous comments stand.

Policy SP4 sets out 25 allocations which, when taken together, have an indicative capacity of 849 dwellings (approximately 16% of the total Plan requirement, or 24% of the allocated sites).

We provide an overall summary on the number of site allocations at the end of Policy SP8, although the overriding concern is that the Council is failing to deliver anywhere near the required homes to meet its own plan requirement of 5,253 homes. This is before considering whether or not 5,253 homes is sufficient to deliver the wider Plan objectives in the first place.

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.:

More sites must be allocated for the Plan to be able to meet its plan wide objectives, specifically around economic growth. Specifically, this should include Buckley Burnett's land at Hylton Lane, Boldon (SHLAA Ref: SBC111).

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

Yes

#### 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.:

As detailed in our response to Policy SP3 (Spatial Strategy for sustainable development), we support the Council's strategy of facilitating sustainable growth through the amendment of Green Belt boundaries. However, we consider the Council is not proposing to release sufficient land to support either its minimum requirement for housing delivery over the plan period, or sufficient to support the wider economic objectives.



The Council's Green Belt Review 2023 considers land promoted by Buckley Burnett at Hylton Lane, Boldon (site reference SBC111). The site falls within the wider Green Belt parcel, reference BO-S4, which extends to approximately 110ha. The vast majority of the land parcel subject to the assessment bears no relationship to site reference SBC111 and it is unclear how a reasonable and reasoned judgement can be made on a small piece of land (representing less than 2% of the total Green Belt parcel) can be made.

The parcel description contained within the Green Belt Study (2023) further supports this opinion. For example, the Study notes:

"The parcel would only be released in combination with the other parcels that lie in between this parcel and the urban edge of The Boldons to the north."

This is only relevant to the eastern half of the parcel where parcels BO-S5 and BO-S6 lie between it and the urban edge. The area around site SBC111 has no relevance to this part of the description.

In drawing this conclusion, we note the Council has previously concluded release of site SBC111 does not cause unacceptable harm to the Green Belt and included it as a proposed allocation. There is no clear evidence to rationalise this change in position and how the site actually relates to a significantly larger land parcel assessment within the Green Belt Review. On this basis it is clear the evidence underpinning these policies of the Plan is not justified and the policy is not positively prepared. As such, it is not sound in its current drafting.

SHLAA (2023)

Despite being submitted at several rounds of call for sites, being assessed in previous editions of the SHLAA and appearing in the published Site Selection Paper, site reference SBC111 does not appear in the latest SHLAA. The site should be assessed in future SHLAA publications.

As evidenced in previous representations, the site is available now with a willing landowner. There is also market interest in the site. Deliverability of the site has previously been demonstrated through site assessment and preparation of a Vision Document. With a positive Local Plan position, the site could be delivered early in the Plan period, assisting with the shortage in housing delivery and helping to close the gap between the number of allocated sites and the minimum housing requirement over the plan period.

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.:

More housing allocations must be included within the submission version of the Plan. Specifically Buckley Burnett's land at Hylton Lane, Boldon (SHLAA Ref: SBC111).

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

Yes

## 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.:

Policy SP8 allocates land at Fellgate to deliver in the order of 1,200 homes. This is equivalent to 23% (almost a quarter) of the total housing requirement for the Plan and 34% (over a third) of the allocated housing numbers over that period. It is clear the Plan is entirely reliant on the successful and timely delivery of this site.

Whilst large developments such as this offer a range of benefits and can deliver large numbers of homes alongside significant infrastructure and services, experience across the region shows they can take much longer than anticipated to get from allocation to delivery, particularly where there are multiple land ownerships and requirements for them to be comprehensively master planned. This does not mean that those sites should not be allocated, but authorities must build sufficient contingency into their plans to allow for some delays.

Examples of this include the following:

- Murton, North Tyneside (c. 3,000 homes) – allocated 2017. Delivery commenced 2023
- Killingworth, North Tyneside (c. 2,000 homes) – allocated 2017. Delivery due to commence 2024
- Sniperley, County Durham (c. 1,700 homes) – allocated 2020. Delivery subject to determination of recovered appeal. Completions unlikely before 2025.

It is not clear from any of the published information when the Council anticipates delivery to commence at Fellgate. However, it is not unreasonable to assume it will be several years following adoption of the Plan. There are a number of implications from this:

1 The Plan is overly reliant on other sites delivering in the early years to maintain a 5-year housing land supply. This means other sites are all clustered into the early years of the Plan with very little delivery in the rest of the Borough in the later years, or the Council is unable to maintain a 5-year housing land supply in the early years (as it currently cannot), continues to fail the Housing Delivery Test and is subject to the presumption in favour of sustainable development; or

2 Fellgate continues to deliver beyond the end of the Plan period which does not seem to be allowed for with the capacity of the proposed housing allocations and the ability of the Council to deliver its minimum housing requirement for the plan period.

Whilst we do not specifically object to the principle of Fellgate, there are significant concerns that it is not able to provide the delivery expected by the Council and the Plan does not secure a rolling 5-year housing land supply over the plan period. The Plan as drafted is too reliant upon a single large allocation. If delivery of that allocation falters, even by the smallest of margins, the Plan will not deliver on the minimum housing requirement for the plan period.

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 is overly reliant on the delivery of Fellgate (representing over a third of the allocated housing sites) to achieve its objectives. More sites must be allocated to ensure the plan does not fail with any delay to the Fellgate site. Also noting our position that the amount of allocations (and housing target) is not sufficient to deliver the wider plan aspirations.

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

Yes

## 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.:

Policy SP16 explains the different sources of housing supply to achieve the minimum plan period requirement of the 5,253 net additional dwellings. Having reviewed the sources of supply and the over reliance on a small number of allocated sites, it is immediately clear that the Plan is operating within extremely fine margins, meaning the smallest change in delivery could undermine the whole Plan.

The proposed housing allocations, amounting to some 3,498 dwellings, amount to only 67% of the minimum housing requirement for the plan period. The remainder is made up of existing commitments, neighbourhood forum areas and windfall sites.

Parts 2 and 3 of Policy SP16 designate a housing requirement for the neighbourhood forum areas of East Boldon and Whitburn Village (263 dwellings and 71 dwellings respectively). There is no evidence to demonstrate where these homes could be delivered within the Neighbourhood Forum areas and neither of the adopted Neighbourhood Plans for these areas allocates land to deliver these homes. This places significant doubt on the deliverability of 334 homes (equivalent to over 6% of the plan requirement).

On windfall delivery, we agree there should not be an allowance made for the first 6 years of the plan. Whilst this is the case, it's not clear how the Council has arrived at a windfall allowance of 37 dwellings per annum from year 6 onwards. Whilst this is the case, some allowance for windfall is not unreasonable. Greater clarity should be provided on the Council's evidence to support the stated figure, which amounts to almost 8.5% of the total housing requirement.

We note a 10% lapse rate has been made for existing commitments, although no allowance is made for none delivery of allocated sites or for those sites to deliver beyond the plan period. This is an unrealistic expectation and cannot be justified.

Taking account of the alternative sources of supply, Table 2 under Policy SP16 considers allocated sites need to account for 3,443 dwellings to achieve the overall plan requirement. In this case, the allocated sites amount to 3,498 dwellings, resulting in a theoretical over supply of 55 dwellings.

This theoretical over supply provides no meaningful flexibility in supply or for any sites to slip at all. The 55 units amount to less than 20% of a single

year's supply and 1% of the total plan requirement. The plan is working in margins so fine that even a slip in delivery in year 1 could undermine the whole plan – this does not seem unrealistic given the evidence of historic delivery and the Housing Delivery Test results. This is not positively prepared or justified and cannot be considered sound.

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 only way to make this sound is to increase the amount of site allocations. Even with an increase in allocations, as noted earlier, we do not consider the actual requirement figure of 5,253 is reasonably aligned with other policies of the plan relating to economic growth. The only reasonable conclusion on this is that the plan is planning to fail from day 1.

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

Yes

## Policy 18: Affordable Housing

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.:

We note that the 2023 SHMA now identifies a total affordable housing requirement of 361 net additions per annum. Whilst we accept it is not possible to require this amount of affordable housing to be delivered through allocated sites without making them unviable, it is further clear evidence that the plan simply does not plan to provide sufficient housing. However it is measured, the need for affordable housing is ultimately a matter of supply and demand. The more housing there is available, the less the market will continue to overheat and push prices up, further increasing the affordability gap.

Furthermore, allocating a greater number of sites in the first place will also deliver more affordable housing as a proportion of those developments. In this case, it is a conscious decision of the Council not to allocate sufficient land to deliver affordable homes for existing households in need.

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 must increase its housing requirement and range of housing allocations to be able to make this and other policies sound.

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

Yes

## Your personal details

What is your name?

Name:

Andrew Burnett (Buckley Burnett)

What is your email address?

██████████  
████████████████████

Who are you responding as?

Landowner

Organisation:

What is your postal address?

Address:



Response ID ANON-TJBH-TD7P-7

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:42:25

#### 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

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.:

Boldon area.....

I do not feel consideration has been given to the practicalities of serving the people who will live in the new homes. Our schools are full, teachers are working to maximum capacity and increases in classes or class sizes would disadvantage our children's education.

It is difficult enough to get a GP appointment further people added to the lists would adversely affect service provided and overstretch our already hard working medical professionals.

Traffic is already heavy around the area and further traffic threatens the safety and efficient travel.

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.:

Although the plan looks very professional and a huge amount of work has gone into producing it, it appears that the simple practicalities of use of services etc has not been considered fully.

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

no

#### Policy 41: Green Belt

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

Boldon area

Greenbelt is being built on regardless of the consequences to the area. When considering the benefits to the area of development, a wider approach needs to be adopted to consider the environment, benefits to our children's and our own wellbeing and mental health by having open space we can all appreciate.

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.:

Original pledges and promises for conservation of greenbelt need to be reviewed and honoured.

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

no

## Policy 59: Delivering Infrastructure

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 infrastructure in East Boldon is insufficient to support additional housing.

Boker Lane for example is already busy leading to two of the main roads in Boldon. I question the safety and flow of traffic, congestion and pollution factors.

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.:

Realistically look at the practical human aspects of this and not as an exercise on paper.....this number of houses will increase cars on road, pollution, traffic issues.

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

no

## Your personal details

What is your name?

Name:

Brenda Horton

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:

The Manager

What is your postal address?

Address:

[REDACTED]

## Response ID ANON-TJBH-TD7F-W

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 21:56:49

### 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.:

STC have put many obstacles in place during this entire process. Missing Links, incorrect input codes meaning Reg 19 was unavailable for the entirety of the Consultation process, refusal to provide paper copies in accessible format, Equality Act 2010 being broken. I have stuck by it and completed this as best I can. It may not be in legal terms but i hope to have made my point. Please don't be fooled by them

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.:

Reject their proposal

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

Yes Please

### 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.:

Policy SP8 in my opinion does not neither Legally Compliant or Sound. The development is to be built on a Green Belt Corridor which currently is home to a working farm and 52 horses grazing and is an asset to our Community. It is a habitat to numerous types of wildlife which will not be able to be relocated.

Another concern is Traffic from the development with access onto Mill Lane roundabout A194 and Durham Drive. In their Local Plan Strategic Allocation Point 5 v it states:

- 5 v. Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool Roundabout.

STC CANNOT LEGALLY OR SOUNDLY STATE THAT THEY CAN MITIGATE FOR THIS PROBLEM

MILL LANE: In their Local Plan Traffic Assessment 2023 they make no mention of the traffic onto Mill Lane roundabout via the A194 (Pages 6 + 9) The report also does not take into account recent house builds and second guess that:

- 2.2.2 National data is available which demonstrates that levels of traffic are increasing, however in South Tyneside they are considered to remain lower or comparable with pre-COVID levels i.e. forecasted traffic growth has not occurred. TRAFFIC LEVELS HAVE INCREASED AND THE AREA IS CONGESTED DAILY.

DURHAM DRIVE: This is a residential ring road around Fellgate with residents parking on one side. It has 3 local Schools in the vicinity and the proposed development will have a serious detrimental effect on the Mental Health and Wellbeing of all the residents as well as their safety and Air Quality. In addition:

• The Junction of Fellgate Avenue / Hedworth Lane has never been considered by STC in their reports. This regularly tails back from the A19 junctions to the Single lane Bridge creating total Gridlock on one of the main access routes to Fellgate

• The second access route to the A194 is regularly gridlocked from the Mill Lane Roundabout.

STC will state that they already have infrastructure in place at Tests Roundabout A19 and Lindisfarne Roundabout A19/A194. This has not mitigated the problem. They will also state that they will create a 'new arm' onto the Mill Lane roundabout from the proposed development to Whitemare Pool. THIS WILL NOT MITIGATE THE PROBLEM .

STC are trying to hide the fact that there are currently major traffic problems around the Mill Lane/ Durham Drive Area. 1200 homes will not help and WILL SERIOUSLY HARM THE CURRENT FELLGATE COMMUNITY FOR MANY, MANY YEARS . PLEASE DON'T BE FOOLED BY THEM.

Fellgate also has a severe problem with Flooding.

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.:

STC in the Local Plan state that 5 iv. Deliver vehicular access roads to the site, from: a) Mill Lane roundabout on the A194; b) Durham Drive.

v. Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic road network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool Roundabout.

STC CANNOT STATE THAT THEY ARE ABLE TO DO THIS PARTICULARLY AROUND THE DURHAM DRIVE RESIDENTIAL ROAD WHICH WILL CREATE SEVERE TRAFFIC CONGESTION , HAVE A SERIOUS AFFECT ON THE MENTAL HEALTH ,WELLBEING AND SAFETY OF THE CURRENT COMMUNITY AND CREATE PROBLEMS WITH AIR POLLUTION, LIGHT POLLUTION FOR MANY YEARS TO COME. PLEASE DO NOT GRANT PLANNING PERMISSION WITHOUT LOOKING INTO THIS VERY CLOSELY.

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

Yes please

## Policy 1: Promoting Healthy Communities

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

STC state that they will create Health Communities. There is already a Healthy Community on Fellgate with a Farm which is cherished by them along with the Green Belt it stands on. This will be destroyed by the proposed new development with the current community being subjected to years of construction and inconvenience which will have a serious detrimental on their Mental health and Wellbeing. Congestion. Air Pollution, Light Pollution will become everyday occurrences should this development be given the go-ahead. WE DON'T DESERVE 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.:

STC have created many problems for residents trying to give their responses to Reg 19. These have included:-

-Missing Links which suddenly re-appear

-STC Hubs not having any access to the Reg 19 forms for the entirety of the Consultation period

- Incorrect advice given in relation to the 'have your say' link

- Paper copies of the Reg 19 feedback forms being unavailable even when requested

- Format not accessible to residents with Learning disabilities.

YOU WILL HAVE RESPONSE FROM STC RESIDENTS WHICH HIGHLIGHT THIS. STC HAVE DECEIVED THEIR RESIDENTS AND THEIR LOCAL PLAN SHOULD BE REJECTED.

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

YES PLEASE

## Your personal details

What is your name?



Name:

Doreen Green

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:

Previous customer

What is your postal address?

Address:

[REDACTED]

## Response ID ANON-5JMM-6ZHB-K

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report  
Submitted on 2024-03-03 21:49:50

### Have your say

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

Comments:

Policy Local Plan - SP8 Fellgate Sustainable Growth Area Scoping report

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Paragraph SP8 Fellgate Sustainable Growth Area Page 5

Policy SP8 Fellgate Sustainable Growth Area

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Policy SP8: Fellgate Sustainable Growth Area

1. Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green belt as shown on the Policies Map and Inset Map 9. The allocation will deliver approximately 1200 homes and supporting infrastructure and community facilities.

Local Plan Paragraph 4.34 (page 37) the Plan has identified land south of Fellgate as a Sustainable Urban Extension. The site will be allocated for approximately 1200 new dwellings. The South Tyneside Green Belt Study (2023) has determined the most appropriate boundary to accommodate a new sustainable community and explores opportunities for mitigation and compensatory improvements.

Local Plan Paragraph 4.35 (page 37) states "Land South of Fellgate offers a unique opportunity to deliver a new sustainable community. It will be well designed and provide an attractive and desirable place."

Although South Tyneside Council have been considering this plan for a number of years, for example in 2021 a study of White Mare Pool was carried out, A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY the residents of Fellgate were only formally informed of this proposal in January 2024 and given 6 weeks to respond to what is a very lengthy and complex proposal.

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping report (January 2024) page 5 'Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green Belt'

The Green Belt needs to be removed to enable this development to take place. This does not take into account the residents of Fellgate and the negative and undesirable impact leading to impaired quality of life that the removal of the Green could and is likely to have. The residents of Fellgate have not been considered in the plan.

The removal of the Green Belt, to the south of Fellgate As stated in 'South Tyneside Green Belt Study 2023, Purpose 3 – Function recognises that the parcel of land is 'part of the countryside' if the plan goes ahead the landscape will be replaced with the development of a 1200 housing development. Although Paragraph 4.34 states that the Green Belt Study explores opportunities for mitigation and compensatory improvements. The only reason there is need for this is because the plan is taking away the Green Belt and all the benefits of it. In no way will any of the mitigation and compensatory measures, make up for the loss of the Green Belt. Conclusion: There is absolutely no mitigation and compensatory measure that could compensate to justify the removal of the Green Belt.

In the 'Strategic Land Review – Fellgate and Hedworth – 2016' The Site Appraisal Conclusion was stated as. 'There are likely adverse impacts upon the green belt landscape, biodiversity ground conditions and infrastructure provision. However, some parts of the site, particularly along Durham Drive are required for flood attenuation schemes and are strictly not suitable for development. The emerging International Advanced Manufacturing Park Area Action Plan document should also be considered further as it will reduce the size of the Green Belt in this area'.

This document states the unsuitability of the Green Belt land that there would be 'High Impact – significant mitigation required' in Infrastructure and Services, Landscape and Townscape, Biodiversity and Green Belt Separation.

There have been NO changes to the Greenbelt and surrounding areas since the 'Strategic Land Review – Fellgate and Hedworth – 2016' when it was deemed that removal would have a high impact therefore 'unsuitable for development' to 7 years later in the 'South Tyneside Green Belt Study , 2023' that the impact would be 'moderate' and now this same land is suitable for development, even taking into account the 'mitigation' measures included, this in no way compensates for the loss of the Green Belt.

There are many potential sites for development that have not been included in the plan. There are at least 46 brownfield sites in South Tyneside that could be used for development. There are also many sites that are or will become available for example when manufacturing sites close and land becomes available. Explored thoroughly these could provide the land needed for housing development so our Green Belt can be protected.

For these reasons The Local Plan is not legally compliant or sound

In the Plan it states that number of new homes that South Tyneside are required to build to meet Government targets. The plan goes on to state where and how many houses are to be built on specific sites including 1200 houses on the Greenbelt South of Fellgate. This does not consider a statement made on 19 December 2023 by Michael Gove Secretary of State for Levelling Up, Housing and Communities, and Minister for Intergovernmental Relations.

In his statement Michael Gove stated that: 'Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.' This means that there are no requirements for South Tyneside to use Green belt land to meet targets.

For these reasons The Local Plan is not legally compliant or sound

#### Environmental impact

In the Local Plan, paragraph 5.34, we read that 2 other wildlife sites, Calf Close Burn and Lakeside Inn are recognised as wildlife sites and where possible improvements will be sought for these sites through appropriate mitigation and compensation. The current Green Belt is a natural habitat and the plan states that 'it is a 'wildlife corridor' to many wildlife and though the plan states 'The release of the Greenbelt would change the landscape take away the

open space to the south of Fellgate. The Green Belt is currently farmland and is recognised in the South Tyneside Green Belt Study page 105 as being 'part of the countryside' as such it has an existing working farm on the land. This is prime arable farming land currently used to grow grain. The land is used to house livery stable which services the local community. The Farmer will be given notice to leave therefore as well as losing a valuable contribution to the eco system and the food chain, this person is losing his livelihood. The Green Belt including the farm are home to many species of wildlife. In the 'Strategic Land Review - 2016' South Tyneside Council deemed the Greenbelt land to the South of Fellgate as not suitable for development, however in 2023 South Tyneside Council now deem the land is suitable for development! What has changed, certainly not the land or activities that happen on it. The 2016 report states that the site is a Green Belt, is a habitat creation zone, is a wildlife Corridor and a local wildlife site – this has NOT CHANGED. The council now seem to be content with the loss of greenbelt and the damage to wildlife in the area, these include farmland birds (barn owls, wood pigeons, collared doves, kestrel, yellow hammer and red kites). Other wildlife such as foxes, rabbits, voles, squirrels are on the land. Whilst South Tyneside Council assure us that they will have 'mitigations' in place, they cannot guarantee that this wildlife will 'comply' and, taking into account the planned IAMP nearby development which is also removing natural habitats, there is further concern that by removing this Green Belt land we will be contributing to the demise of the wildlife population. Furthermore, the development will add to air and noise pollution and eventually light pollution once a development is completed.

The 2016 study recommends that the linear links between sites of habitat value should be created and promoted, the area is of open aspect and views should be retained.

It is considered that developing the site would have a HIGH impact on the landscape. The Local Plan does not consider this to be of any importance and will need significant mitigation would be required to change this recommendation.

For these reasons The Local Plan is not legally compliant or sound

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Infrastructure – traffic

In the Local Plan paragraph 5.28 on page 51 we read 'the Local Centre is to be located to coincide with sustainable transport routes accessibility to the existing Fellgate estate and the green infrastructure network' the detail of this is in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report – page 6. Paragraph 5- iii - v

5-v in this document states 'ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

There would inevitably be increased traffic which would increase congestion, parking is currently difficult enough without additional cars in the area.

In the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report January 2024 it states on page 6 paragraph 5 iv. Deliver Vehicle access routes to the site from a) Mill Lane roundabout and b) Durham Drive

Having read the A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY. It does not appear to reflect the actual circumstance of these roads on a day to day basis.

The A194 is the main route to link South Shields with the motor-way and nearby towns and Cities including Sunderland and Newcastle. This is an extremely busy road, particularly at peak times when traffic can build up quickly and Mill Lane roundabout becomes congested and struggles to cope with existing traffic. Introducing another junction on to the roundabout with the cars from the proposed 1200 houses will add significantly to the problem. In addition, there are 127 houses being built west of the A184 (adjacent to Luke's Lane), if the proposed 1200 houses go ahead this will bring an unsustainable level of growth which will have a significant detrimental impact

Durham Drive carries all of the traffic round Fellgate, it is not wide enough for the traffic currently using it, for example a bus and car going in opposite directions cannot pass without one of them stopping. So it is not tenable to have an access route, from any development on the Greenbelt, on to Durham Drive. There are only 2 routes from Durham Drive, either on to the A194, and as this is a dual carriageway, all traffic exiting this way joins the roundabout at Mill Lane, therefore joining any traffic from the new development or, on to Fellgate Avenue and adding pressure to the traffic lights at Hedworth lane. At busy times, if the A194 is busy Fellgate becomes gridlocked with cars of current residents and those who drive through Fellgate (Durham Drive) to avoid traffic jams. At these times it is almost impossible for emergency vehicles to access the estate or drive along the A194. When the roads are gridlocked, it is impossible to drive off Fellgate estate.

Fellgate is a quiet estate where children can play safely outdoors however taking into account an increase of pedestrians walking through Fellgate to access the Metro or other public transport, this may be no longer possible.

Fellgate Metro station is on the Newcastle to Sunderland line. The Metro at peak times is often very busy and does not cope with the number of passengers, so any increase in passengers would be untenable. The Metro takes people out of South Tyneside so any benefit to the economy of South Tyneside will be minimal.

Although public transport links are mentioned in the Local Plan there does not appear to have been any studies as to how these will be implemented, as Durham Drive is not wide enough for a bus and car to pass easily there would be no scope for increasing buses to go along Durham Drive.

The air-pollution from increased traffic and public transport would negatively impact those in the surrounding areas including the residents of Fellgate.

For these reasons The Local Plan is not legally compliant or sound

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Proposed Housing

Reference - Local Plan paragraph 5.26 – 5.27

The basis for Fellgate development hinges on the development and completion of the International Advance Manufacturing Park according to their web site documentation only 3 buildings have been developed and are in use covering 623,000 sqft out of a potential 4 million sqft availability of covering 245 Acres. At this point there are many plots not allocated nor are there signs of significant building works; as stated in

document LSH 2 Employment Area Assessment. Phase 1 "Some infrastructure completed. Phase 2 "Requires Infrastructure"

As South Tyneside are a partner in this venture one can only assume that the building of home on the land south of Fellgate may attract business to Fellgate area. As this cannot be proven as there is no evidence of (IAMP) being achievable within the timescales of South Tyneside's Local Plan.

As the IAMP, is within Sunderland local authority area, no evidence can be found on any direct public transport from Fellgate to IAMP.

Until this is assessed and documented, it has to be assumed that anyone living in these homes and who work at IAMP would use their own transport. This

would more likely be a car.

If this is the case then the above assumption is not recorded in the evidence provide in Local Plan Policy 51 Traffic Assessment.

On page 48 and 49, in column Policy SP8: Fellgate Sustainable Growth Area, item 5 it talks about the things that the Development of this new sustainable community shall deliver.

For these reasons The Local Plan is not legally compliant or sound

Flooding

I object to the Local Plan.

On page 7 of the Policy SP8: Fellgate Sustainable Growth Area, ix, it talks about the urban drainage systems.

Historically Fellgate are has been prone to flooding, work was undertaken to install sustainable urban drainage systems (SuDS). This £21million project-built systems to alleviate future flooding, in part this has been successful, although parts of Durham Drive still have localised flood from heavy rain.

Current flood defences may be overwhelmed by the added pressures of housing development. This could and is likely to intensify the flood risk for the existing Fellgate community.

The proposals to incorporate new, appropriately designed SuDS state that "Any surface water should discharge into Monkton Burn and Calf Close Burn". Whilst the evidence provides a view that these systems will be successful, however there is little clarity that Monkton Burn and Calf Close Burn will cope with the water discharge from 1,2000 homes

No evidence can be found on the impact on the biodiversity, the wildlife, the Great Crested Newt Pond, and Wildlife corridor which traverse these burns. Whilst no figures can be found that would estimate the amount of water entering these burns it can be assumed that there will be a significant is a risk of surface water flooding from these burns, if not in the immediate area, but further downstream where that land is near sea level

This in its self will have a negative effect towards the climate change objectives.

For these reasons The Local Plan is not legally compliant or sound

2 What is your name?

Name:

Julie Price

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-TDYD-W

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 22:12:03

### 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.:

I object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Proposed Housing

Reference - Local Plan paragraph 5.26 – 5.27

The basis for Fellgate development hinges on the development and completion of the International Advance Manufacturing Park according to their web site documentation only 3 buildings have been developed and are in use covering 623,000 sqft out of a potential 4 million sqft availability of covering 245 Acres. At this point there are many plots not allocated nor are there signs of significant building works; as stated in

document LSH 2 Employment Area Assessment. Phase 1 "Some infrastructure completed. Phase 2 "Requires Infrastructure"

As South Tyneside are a partner in this venture one can only assume that the building of home on the land south of Fellgate may attract business to Fellgate area. As this cannot be proven as there is no evidence of (IAMP) being achievable within the timescales of South Tyneside's Local Plan.

As the IAMP, is within Sunderland local authority area, no evidence can be found on any direct public transport from Fellgate to IAMP.

Until this is assessed and documented, it has to be assumed that anyone living in these homes and who work at IAMP would use their own transport. This would more likely be a car.

If this is the case then the above assumption is not recorded in the evidence provide in Local Plan Policy 51 Traffic Assessment.

On page 48 and 49, in column Policy SP8: Fellgate Sustainable Growth Area, item 5 it talks about the things that the Development of this new sustainable community shall deliver.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove SP8 from the local plan

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

no

### Policy 7: Flood Risk and Water Management

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 object to the Local Plan.

On page 7 of the Policy SP8: Fellgate Sustainable Growth Area, ix, it talks about the urban drainage systems.

Historically Fellgate has been prone to flooding, work was undertaken to install sustainable urban drainage systems (SuDS). This £21million project-built systems to alleviate future flooding, in part this has been successful, although parts of Durham Drive still have localised flood from heavy rain.

Current flood defences may be overwhelmed by the added pressures of housing development. This could and is likely to intensify the flood risk for the existing Fellgate community.

The proposals to incorporate new, appropriately designed SuDS state that "Any surface water should discharge into Monkton Burn and Calf Close Burn". Whilst the evidence provides a view that these systems will be successful, however there is little clarity that Monkton Burn and Calf Close Burn will cope with the water discharge from 1,200 homes

No evidence can be found on the impact on the biodiversity, the wildlife, the Great Crested Newt Pond, and Wildlife corridor which traverse these burns.

Whilst no figures can be found that would estimate the amount of water entering these burns it can be assumed that there will be a significant risk of surface water flooding from these burns, if not in the immediate area, but further downstream where that land is near sea level

This in its self will have a negative effect towards the climate change objectives.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove the proposed development of the area to the south of Fellgate from the local plan

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

no

## Policy SP21: Natural Environment

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.:

### Environmental impact

In the Local Plan, paragraph 5.34, we read that 2 other wildlife sites, Calf Close Burn and Lakeside Inn are recognised as wildlife sites and where possible improvements will be sought for these sites through appropriate mitigation and compensation. The current Green Belt is a natural habitat and the plan states that 'it is a 'wildlife corridor' to many wildlife and though the plan states 'The release of the Greenbelt would change the landscape take away the open space to the south of Fellgate. The Green Belt is currently farmland and is recognised in the South Tyneside Green Belt Study page 105 as being 'part of the countryside' as such it has an existing working farm on the land. This is prime arable farming land currently used to grow grain. The land is used to house livery stable which services the local community. The Farmer will be given notice to leave therefore as well as losing a valuable contribution to the eco system and the food chain, this person is losing his livelihood. The Green Belt including the farm are home to many species of wildlife.

In the 'Strategic Land Review - 2016' South Tyneside Council deemed the Greenbelt land to the South of Fellgate as not suitable for development, however in 2023 South Tyneside Council now deem the land is suitable for development! What has changed, certainly not the land or activities that happen on it.

The 2016 report states that the site is a Green Belt, is a habitat creation zone, is a wildlife Corridor and a local wildlife site – this has NOT CHANGED.

The council now seem to be content with the loss of greenbelt and the damage to wildlife in the area, these include farmland birds (barn owls, wood pigeons, collared doves, kestrel, yellow hammer and red kites). Other wildlife such as foxes, rabbits, voles, squirrels are on the land. Whilst South Tyneside Council assure us that they will have 'mitigations' in place, they cannot guarantee that this wildlife will 'comply' and, taking into account the planned IAMP nearby development which is also removing natural habitats, there is further concern that by removing this Green Belt land we will be contributing to the demise of the wildlife population.

Furthermore, the development will add to air and noise pollution and eventually light pollution once a development is completed.

The 2016 study recommends that the linear links between sites of habitat value should be created and promoted, the area is of open aspect and views should be retained.

It is considered that developing the site would have a HIGH impact on the landscape. The Local Plan does not consider this to be of any importance and will need significant mitigation would be required to change this recommendation.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove the proposed development of the land to the south of Fellgate to protect the natural environment and not destroy the wildlife

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

no

## Policy SP25: Infrastructure

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 object to the Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Infrastructure – traffic

In the Local Plan paragraph 5.28 on page 51 we read ‘the Local Centre is to be located to coincide with sustainable transport routes accessibility to the existing Fellgate estate and the green infrastructure network’ the detail of this is in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report – page 6. Paragraph 5- iii - v

5-v in this document states ‘ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider strategic network in terms of capacity and congestion, including mitigating the impact of the development at White Mare Pool roundabout.

There would inevitably be increased traffic which would increase congestion, parking is currently difficult enough without additional cars in the area.

In the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report January 2024 it states on page 6 paragraph 5 iv. Deliver Vehicle access routes to the site from a) Mill Lane roundabout and b) Durham Drive

Having read the A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY. It does not appear to reflect the actual circumstance of these roads on a day to day basis.

The A194 is the main route to link South Shields with the motor-way and nearby towns and Cities including Sunderland and Newcastle. This is an extremely busy road, particularly at peak times when traffic can build up quickly and Mill Lane roundabout becomes congested and struggles to cope with existing traffic. Introducing another junction on to the roundabout with the cars from the proposed 1200 houses will add significantly to the problem. In addition, there are 127 houses being built west of the A184 (adjacent to Luke's Lane), if the proposed 1200 houses go ahead this will bring an unsustainable level of growth which will have a significant detrimental impact

Durham Drive carries all of the traffic round Fellgate, it is not wide enough for the traffic currently using it, for example a bus and car going in opposite directions cannot pass without one of them stopping. So it is not tenable to have an access route, from any development on the Greenbelt, on to Durham Drive. There are only 2 routes from Durham Drive, either on to the A194, and as this is a dual carriageway, all traffic exiting this way joins the roundabout at Mill Lane, therefore joining any traffic from the new development or, on to Fellgate Avenue and adding pressure to the traffic lights at Hedworth lane. At busy times, if the A194 is busy Fellgate becomes gridlocked with cars of current residents and those who drive through Fellgate (Durham Drive) to avoid traffic jams. At these times it is almost impossible for emergency vehicles to access the estate or drive along the A194. When the roads are gridlocked, it is impossible to drive off Fellgate estate.

Fellgate is a quiet estate where children can play safely outdoors however taking into account an increase of pedestrians walking through Fellgate to access the Metro or other public transport, this may be no longer possible.

Fellgate Metro station is on the Newcastle to Sunderland line. The Metro at peak times is often very busy and does not cope with the number of passengers, so any increase in passengers would be untenable. The Metro takes people out of South Tyneside so any benefit to the economy of South Tyneside will be minimal.

Although public transport links are mentioned in the Local Plan there does not appear to have been any studies as to how these will be implemented, as Durham Drive is not wide enough for a bus and car to pass easily there would be no scope for increasing buses to go along Durham Drive.

The air-pollution from increased traffic and public transport would negatively impact those in the surrounding areas including the residents of Fellgate.

For these reasons The Local Plan is not legally compliant or sound

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.:

Remove the proposed development of the land to the south of Fellgate due to the infrastructure

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

no

### Your personal details

What is your name?

Name:

Julie Price

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 2024-03-03 22:00:01

## 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:

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 Local Plan.

The Local Plan is not legally compliant or sound of the Local Plan for the following reasons:

Policy SP8: Fellgate Sustainable Growth Area

1. Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green belt as shown on the Policies Map and Inset Map 9. The allocation will deliver approximately 1200 homes and supporting infrastructure and community facilities.

Local Plan Paragraph 4.34 (page 37) the Plan has identified land south of Fellgate as a Sustainable Urban Extension. The site will be allocated for approximately 1200 new dwellings. The South Tyneside Green Belt Study (2023) has determined the most appropriate boundary to accommodate a new sustainable community and explores opportunities for mitigation and compensatory improvements.

Local Plan Paragraph 4.35 (page 37) states 'Land South of Fellgate offers a unique opportunity to deliver a new sustainable community. It will be well designed and provide an attractive and desirable place.'

Although South Tyneside Council have been considering this plan for a number of years, for example in 2021 a study of White Mare Pool was carried out, A194/A184 White Mare Pool – Emerging Pressures 22/12/2021 Reference number GB01T21D46 / GB01T21B22 (AC.21.03 ) WHITE MARE POOL JUNCTION STUDY the residents of Fellgate were only formally informed of this proposal in January 2024 and given 6 weeks to respond to what is a very lengthy and complex proposal.

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping report (January 2024) page 5 'Land south of Fellgate is allocated as a sustainable urban extension and will be removed from the Green Belt'

The Green Belt needs to be removed to enable this development to take place. This does not take into account the residents of Fellgate and the negative and undesirable impact leading to impaired quality of life that the removal of the Green could and is likely to have. The residents of Fellgate have not been considered in the plan.

The removal of the Green Belt, to the south of Fellgate As stated in 'South Tyneside Green Belt Study 2023, Purpose 3 – Function recognises that the parcel of land is 'part of the countryside' if the plan goes ahead the landscape will be replaced with the development of a 1200 housing development. Although Paragraph 4.34 states that the Green Belt Study explores opportunities for mitigation and compensatory improvements. The only reason there is need for this is because the plan is taking away the Green Belt and all the benefits of it. In no way will any of the mitigation and compensatory measures, make up for the loss of the Green Belt. Conclusion: There is absolutely no mitigation and compensatory measure that could compensate to justify the removal of the Green Belt.

In the 'Strategic Land Review – Fellgate and Hedworth – 2016' The Site Appraisal Conclusion was stated as. 'There are likely adverse impacts upon the green belt landscape, biodiversity ground conditions and infrastructure provision. However, some parts of the site, particularly along Durham Drive are required for flood attenuation schemes and are strictly not suitable for development. The emerging International Advanced Manufacturing Park Area Action Plan document should also be considered further as it will reduce the size of the Green Belt in this area'.

This document states the unsuitability of the Green Belt land that there would be 'High Impact – significant mitigation required' in Infrastructure and Services, Landscape and Townscape, Biodiversity and Green Belt Separation.

There have been NO changes to the Greenbelt and surrounding areas since the 'Strategic Land Review – Fellgate and Hedworth – 2016' when it was deemed that removal would have a high impact therefore 'unsuitable for development' to 7 years later in the 'South Tyneside Green Belt Study , 2023'

that the impact would be 'moderate' and now this same land is suitable for development, even taking into account the 'mitigation' measures included, this in no way compensates for the loss of the Green Belt.

There are many potential sites for development that have not been included in the plan. There are at least 46 brownfield sites in South Tyneside that could be used for development. There are also many sites that are or will become available for example when manufacturing sites close and land becomes available. Explored thoroughly these could provide the land needed for housing development so our Green Belt can be protected.

For these reasons The Local Plan is not legally compliant or sound

In the Plan it states that number of new homes that South Tyneside are required to build to meet Government targets. The plan goes on to state where and how many houses are to be built on specific sites including 1200 houses on the Greenbelt South of Fellgate. This does not consider a statement made on 19 December 2023 by Michael Gove Secretary of State for Levelling Up, Housing and Communities, and Minister for Intergovernmental Relations.

In his statement Michael Gove stated that: 'Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.' This means that there are no requirements for South Tyneside to use Green belt land to meet targets.

For these reasons The Local Plan is not legally compliant or sound

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.:

Withdraw SP8 Fellgate sustainable growth from South Tyneside local plan in order to sustain the greenbelt

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

no

### Your personal details

What is your name?

Name:  
Julie Price

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 Fellgate UNsustainable plan

Mon 1/29/2024 12:22 PM

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

 4 attachments (4 MB)

Fellgate 02 A194 floods 2012.jpg; Fellgate 03 A194 floods 2012.jpg; Fellgate 01 A194 floods 2012 June jpeg.jpg; Fellgate A194 floods 2012.jpg;

\*\*\* **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](mailto:email.quarantine@southtyneside.gov.uk), **clearly stating your concerns in the email** \*\*\*

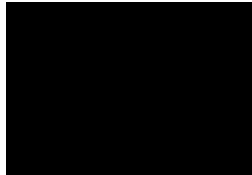
Here are attached some photos to be added to my submission of comments about the plan for new housing at Fellgate.

Photos of the flooding of July 2012 event;-

'Thunder Thursday' brought extensive flooding to Fellgate where rivers of water flowed through the whole of the estate causing tens of thousands of pounds worth of damage for residents. Traffic was held up for hours.

Climatologists are now confidently predicting that changing climate will give much more regular sudden and heavy downpours which will be just like this one, showing the aftermath of the storm, in my photos. Present flood prevention, that cost millions of pounds, won't be able to cope with the increase of surface water that will come from the proposed new estate.

John Bage









← Fellgate Estate









South Shields A166  
Tunnel (A166)   
Jarrow B1516  
Baldon Colliery



## Objections to Fellgate Green Belt being built on.

Mon 1/29/2024 12:39 PM

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

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

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report

Page 1 of 3

Closes 3 Mar 2024

Have your say

My view is that this is already a 'done deal' by a council attempting to steal Green Belt land so that they can get more money for their already failed financial position.

It had already been attempted in November 2006 to build a business park on this Green Belt, and that idea was kicked out when the Church Commissioners, who own a significant amount of the said Green Belt, decided that it would not be beneficial for the existing residents. The council have very short memories!

Doubling the number of houses on Fellgate by adding another 1200 is definitely not to the good of the existing residents who already suffer considerably from air pollution, due to the extremely busy dual carriageways that encompass the existing estate to the north (A184), to the west (A194) and the A19 just a few miles away.

Doubling the number of houses on Fellgate by up to 1200 more will significantly increase air pollution from vehicles (many homes now have two cars and sometimes three). There will be even more delivery vehicles, such as Amazon, who will add to this air pollution. Electric vehicles will not help much because many are hybrids (like mine) which use a petrol engine on cold start up, so please don't use the 'clean' electric car argument.

Traffic leaving the Fellgate Estate onto the main exit on the A194 will be made even worse than it is now. Trying to join two lanes of vehicles doing 50 mph plus is very risky. I was rear ended a few years ago by a driver looking up towards the oncoming traffic and not paying attention to the vehicle in front of him.

Now to the flooding that we have experienced previously. All the surface water from the Green Belt fields that isn't absorbed when we have a torrential downpour makes its way westwards straight across the existing Fellgate Estate with disastrous consequences. No way can this surplus water ever be taken care of by the existing two burns as stated in the document.



In 2012 fast flowing rivers of surface water flooded out many houses on the existing Fellgate Estate with dire consequences for the owners. The A194 was badly flooded below the metro bridge and thousands of vehicles were brought to a stop for hours, as nothing could be done until the water subsided, as the nearby burn was absolutely overwhelmed. The result was a council effort to alleviate the cause of the flooding at a cost of millions of pounds. Even then flooding still occurred at a later time, so it is doubtful whether the measures taken will be sufficient to stop any more flooding when we get the many more intensive downpours that are coming our way due to climate change, which climatologists are certain will happen soon rather than later.

The increase in population density in the Fellgate area will have detrimental physical and mental effects on the wellbeing of existing residents. We already have, in recent years, seen the building of a large business park opposite the Lakeside Inn, and just now the building of dozens of new houses on the soggy field nearby is also taking place. Not to mention the thousands of new houses that have been added to the nearby Hebburn and Jarrow areas.

With the increased traffic in the Fellgate area generating lots more air pollution, noise pollution and congestion the situation cannot possibly be called 'sustainable.' The government is under pressure to prevent all of these issues, and likewise it is the responsibility of the local council also.

It is also worth noting that the last part of the Government guideline document states that the council should be adding Green Belt areas around new housing, NOT removing it.

Here is an extract from the last attempt to steal the Fellgate Green Belt; -

02 NOVEMBER 2006

#### CHURCH TIMES

'After a five-week public hearing, however, inspectors opposed the re-zoning proposals. A church spokesman said that the scheme was now "highly unlikely" to go ahead.

From Irene Bage,



# Response ID ANON-5JMM-6ZZM-G

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report  
Submitted on 2024-01-29 12:05:07

## Have your say

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

Comments:

My view is that this is already a 'done deal' by a council attempting to steal Green Belt land so that they can get more money for their already failed financial position.

It had already been attempted in November 2006 to build a business park on this Green Belt, and that idea was kicked out when the Church Commissioners, who own a significant amount of the said Green Belt, decided that it would not be beneficial for the existing residents. The council have very short memories!

Doubling the number of houses by adding another 1200 on Fellgate is definitely not to the good of the existing residents who already suffer considerably from air pollution, due to the extremely busy dual carriageways that encompass the existing estate to the north (A184), to the west (A194) and the A19 just a few miles away.

Doubling the number of houses on Fellgate by up to 1200 more will significantly increase air pollution from vehicles (many homes now have two cars and sometimes three). There will be even more delivery vehicles, such as Amazon, who will add to this air pollution. Electric vehicles will not help much because many are hybrids (like mine) which use a petrol engine on cold start up, so please don't use the 'clean' electric car argument.

Traffic leaving the Fellgate Estate onto the main exit on the A194 will be made even worse than it is now. Trying to join two lanes of vehicles doing 50 mph plus is very risky. I was rear ended a few years ago by a driver looking up towards the oncoming traffic and not paying attention to the vehicle in front of him.

Now to the flooding that we have experienced previously. All the surface water from the Green Belt fields that isn't absorbed when we have a torrential downpour makes its way westwards straight across the existing Fellgate Estate with disastrous consequences. No way can this surplus water ever be taken care of by the existing two burns as stated in the document.

In 2012 fast flowing rivers of surface water flooded out many houses on the existing Fellgate Estate with dire consequences for the owners. The A194 was badly flooded below the metro bridge and thousands of vehicles were brought to a stop for hours, as nothing could be done until the water subsided, as the nearby burn was absolutely overwhelmed. The result was a council effort to alleviate the cause of the flooding at a cost of millions of pounds. Even then flooding still occurred at a later time, so it is doubtful whether the measures taken will be sufficient to stop any more flooding when we get the many more intensive downpours that are coming our way due to climate change, which climatologists are certain will happen soon rather than later.

The increase in population density in the Fellgate area will have detrimental physical and mental effects on the wellbeing of existing residents. We already have, in recent years, seen the building of a large business park opposite the Lakeside Inn, and just now the building of dozens of new houses on the soggy field nearby is also taking place. Not to mention the thousands of new houses that have been added to the nearby Hebburn and Jarrow areas.

With the increased traffic in the Fellgate area generating lots more air pollution, noise pollution and congestion the situation cannot possibly be called 'sustainable.' The government is under pressure to prevent all of these issues, and likewise it is the responsibility of the local council also.

It is also worth noting that the last part of the Government guideline document states that the council should be adding Green Belt areas around new housing, NOT removing it.

Here is an extract from the last attempt to steal the Fellgate Green Belt:-

02 NOVEMBER 2006

CHURCH TIMES

'After a five-week public hearing, however, inspectors opposed the re-zoning proposals. A church spokesman said that the scheme was now "highly unlikely" to go ahead.'

### 2 What is your name?

Name:

JOHN BAGE

### 3 What is your email address?

Email:

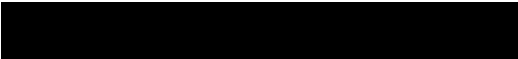
### 4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:



Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report  
Submitted on 2024-02-29 16:26:36

Have your say

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

Comments:

It has been badly put together, without any thought for the residents to be able to read, digest and comment on it in good time. It is not 'fit for purpose' and those responsible for it should hang their heads in shame. They have not helped the people who pay their wages, and it could even be said that this might have been deliberate on their part so as to 'push' through the erasure of the last Green Belt/Farming Land nearby, and the building of hundreds of houses for their own benefit (money). Some years ago when a Business Park was being attempted on the same Green Belt, the then owners, the 'Church of England' realized how bad this would be for the existing residents and dutifully, and sensibly, changed their minds. Obviously they are no longer part owners of this land, and the only one's who had a social conscience.

2 What is your name?

Name:  
JOHN BAGE

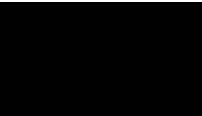
3 What is your email address?

Email:  


4 What is your organisation?

Resident of member of the general public  
  
Organisation:

5 What is your postal address?

Address:  


Fwd: Objections to Fellgate Green Belt being built on.

Mon 1/29/2024 12:47 PM

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

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

Sent from my iPad

Begin forwarded message:

**From:** bage john [REDACTED]  
**Date:** 29 January 2024 at 12:43:16 GMT  
**To:** "irene.bage" [REDACTED]  
**Subject:** Fwd: Objections to Fellgate Green Belt being built on.

----- Original Message -----

From: bage john [REDACTED]  
To: "local.plan@southtyneside.gov.uk" <local.plan@southtyneside.gov.uk>  
Date: 29/01/2024 12:39 GMT  
Subject: Objections to Fellgate Green Belt being built on.

Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report

Page 1 of 3

Closes 3 Mar 2024

Have your say

My view is that this is already a 'done deal' by a council attempting to steal Green Belt land so that they can get more money for their already failed financial position.

It had already been attempted in November 2006 to build a business park on this Green Belt, and that idea was kicked out when the Church Commissioners, who own a significant amount of the said Green Belt, decided that it would not be beneficial for the existing residents. The council have very short memories!

Doubling the number of houses on Fellgate by adding another 1200 is definitely not to the good of the existing residents who already suffer considerably from air pollution, due to the extremely busy dual carriageways that encompass the existing estate to the north (A184), to the west (A194) and the A19 just a few miles away.

Doubling the number of houses on Fellgate by up to 1200 more will significantly increase air pollution from vehicles (many homes now have two cars and sometimes three). There will be even more delivery vehicles, such as Amazon, who will add to this air pollution. Electric vehicles will not help much because many are hybrids (like mine) which use a petrol engine on cold start up, so please don't use the 'clean' electric car argument.

Traffic leaving the Fellgate Estate onto the main exit on the A194 will be made even worse than it is now. Trying to join two lanes of vehicles doing 50 mph plus is very risky. I was rear ended a few years ago by a driver looking up towards the oncoming traffic and not paying attention to the vehicle in front of him.

Now to the flooding that we have experienced previously. All the surface water from the Green Belt fields that isn't absorbed when we have a torrential downpour makes its way westwards straight across the existing Fellgate Estate with disastrous consequences. No way can this surplus water ever be taken care of by the existing two burns as stated in the document.

In 2012 fast flowing rivers of surface water flooded out many houses on the existing Fellgate Estate with dire consequences for the owners. The A194 was badly flooded below the metro bridge and thousands of vehicles were brought to a stop for hours, as nothing could be done until the water subsided, as the nearby burn was absolutely overwhelmed. The result was a council effort to alleviate the cause of the flooding at a cost of millions of pounds. Even then flooding still occurred at a later time, so it is doubtful whether the measures taken will be sufficient to stop any more flooding when we get the many more intensive downpours that are coming our way due to climate change, which climatologists are certain will happen soon rather than later.

The increase in population density in the Fellgate area will have detrimental physical and mental effects on the wellbeing of existing residents. We already have, in recent years, seen the building of a large business park opposite the Lakeside Inn, and just now the building of dozens of new houses on the soggy field nearby is also taking place. Not to mention the thousands of new houses that have been added to the nearby Hebburn and Jarrow areas.

With the increased traffic in the Fellgate area generating lots more air pollution, noise pollution and congestion the situation cannot possibly be called 'sustainable.' The government is under pressure to prevent all of these issues, and likewise it is the responsibility of the local council also.



It is also worth noting that the last part of the Government guideline document states that the council should be adding Green Belt areas around new housing, NOT removing it.

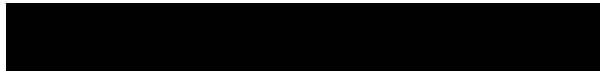
Here is an extract from the last attempt to steal the Fellgate Green Belt; -

02 NOVEMBER 2006

CHURCH TIMES

'After a five-week public hearing, however, inspectors opposed the re-zoning proposals. A church spokesman said that the scheme was now "highly unlikely" to go ahead.

From Irene Bage,





# 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](https://haveyoursay.southtyneside.gov.uk)

If you are having difficulty submitting representations, please contact [local.plan@southtyneside.gov.uk](mailto:local.plan@southtyneside.gov.uk) or call 0191 424 7692

## Part A: Your Details

	Personal Details*	Agent's Details (if applicable)
Title	Mrs	
First Name	Julie	
Last Name	Richardson	
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	
Client (if relevant)	

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

Paragraph	3.2
Policy	Spatial Strategy for Sustainable Development
Policies Map	

### Section 2: Legal Compliance & Duty to Cooperate

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

### Section 3: Details of Representation

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 policy has not been adequately prepared in order to deliver sustainable development within the East Boldon Neighbourhood Plan area.

The proposal to add some 474 homes to East Boldon area will result in unsustainable growth levels with a most detrimental impact upon the local infrastructure. The distinctive character of the village is in jeopardy.

The proposal for development site at North Farm, Boker Lane, appears to be a reversal of East Boldon Neighbourhood Plan agreed at referendum in 2021. This plan appears totally ineffective in terms of sustainable development.

#### 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.*

Plan needs to be revisited and evidence sought in relation to objective assessment results for infrastructure and sustainable development.

Proof needs to be provided stating that plan is consistent with National Planning Policy Framework for sustainable development.

*(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.*

## Response ID ANON-TJBH-TD5F-U

Submitted to South Tyneside Publication Draft Local Plan 2023-2040

Submitted on 2024-03-03 22:19:24

### 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:

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 following statements are set out in the spatial vision and strategic objectives. How do these statements fit with the plans to develop the greenbelt south of Fellgate???:

Healthy and well - Residents will enjoy good mental wellbeing and physical health throughout their lives. They will have the best start in life and be able to live and age well.

How does the above apply to CURRENT residents of Fellgate?

"countryside and important biodiversity and geodiversity designations will continue to be protected"

"To support sustainable development whilst protecting the borough's most valuable landscapes and maintaining the openness and permanence of the Green Belt"

How can the removing of protected GREENBELT land to be built on before Brownfield (AS THE GOVERNMENT HAS URGED!!!)

"including a choice of schools and nurseries"

The plan to develop Fellgate's greenbelt mentions nothing of SECONDARY schools OR NURSERIES!!!! where is the plan for these. We have primary schools a plenty but are lacking in both secondary schools and nurseries.

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.:

Reconsider Brownfield before encroaching onto GREENBELT!!!

if this plan is to go ahead there needs to be serious consideration given to the provision of secondary schools and nurseries for the area.

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

I would be happy to take part

### 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:



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.:

the NEED for housing is based on out of date Data therefore this is NOT SOUND. Removal of greenbelt is not justified.

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.:

Re-address the need for housing in the CURRENT CLIMATE.  
BUILD ON BROWNFIELD!!!

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.:

In March 2016 the 'south tyneside strategic land review - fellgate and hedworth' was published. in this document it states that the land south of fellgate " IS NOT CONSIDERED SUITABLE FOR DEVELOPMENT" - WHAT HAS CHANGED??? it states that the site contains protected low fen species - great crested newt pond and that development of the site would have a HIGH IMPACT on wildlife corridor and local wildlife site. How do you intend to make improvements to 'biodiversity' when the current plan as I understand it fragments wildlife corridor , isolating the pond and goes against Lawton Principle (bigger, better, more joined up') This is not a sound, or credible plan. Established ecosystems do not appear overnight. The building site alone alongside a wildlife corridor will disrupt the wildlife for many years and may not recover. The planting of 'woodland' will take years and years to establish. The wildlife will not wait. It will die!

The number of new homes proposed to be needed is not sound or credible. The statistics used to calculate this proposal I believe are out of date and inflated.

Building an additional 1200 homes on the proposed site in addition to the 127 homes currently being built west of the A194 will create an unsustainable level of growth. It will have a huge negative impact on our local infrastructure and road networks. Has there been consultation with local emergency services as to the impact of this for access to the fellgate estate (and surrounding areas) and the safety of our current and proposed new residents to the area? As i understand it no such consultation has taken place. Therefore i believe this is not sound or credible AND endangers the public. The suggestion that there would only be an estimated '100 extra trips' in relation to vehicles is laughable and i believe hugely underestimated. Who will finance the SIGNIFICANT infrastructure changes that would need to be addressed to make this plan credible?

The document states that the position of Fellgate metro station would be KEY in creating public transport links for the new development. yet the current metro station could not support an Influx of additional passengers. Particularly at peak times when there is no physical space either in the metro cars or on the platform itself. The metro is currently extremely overcrowded before reaching Fellgate Metro station during the commute to work. Has there been a survey of the feasibility of additional passengers during peak times? As a person who currently uses this service it is already UNSAFE with the current volume!!! Therefore i believe this proposal to be NOT SOUND or credible.

Where is the plans for a new SECONDARY SCHOOL or NURSERY? Our current secondary schools in the 'area' could not cope with the influx of a whole 'new primary school'. and we are quite lacking in nurseries, particularly now with the new funding expansion on the horizon for ALL children.

I believe that the development goes against the proposed 'policy 1: promoting healthy communities' for the residents of fellgate, by removing the greenbelt the residents of fellgate are being robbed of "Good quality open space" which contributes to our overall physical and mental wellbeing, "New developments can generate potential risks to human health through increasing exposure to

air pollution, noise pollution or contaminated land. These issues should be adequately addressed and assessed in accordance with the relevant policies in this Plan. "

How does the current proposal address this for the current residents of Fellgate?

How does building on GREENBELT FARMLAND fit into policy 40? This Proposal will lose FARMLAND used for FOOD PRODUCTION.

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.:

DO NOT STRIP FELLGATE OF ITS GREENBELT!!!! Build on CURRENT Brownfield Areas! Continue to use proposed site for FOOD PRODUCTION!

Re-address statistics based on CURRENT figures.

Re-address and Project a more ACCURATE assessment of the strain on road networks and public transport (Metro) that this kind of development will bring.

Specific thought must go in to preserving EXISTING wildlife species and providing a suitable and 'more joined up' habitat so that biodiversity can flourish.

DO NOT ISOLATE THE POND AREA!!!!

Collect data on CURRENT species which rely on the site!

Ensure this promised new wildlife habitat is ESTABLISHED and part of a more long term plan before any building work takes place.

Re-address the need for educational settings. Where is the plan for nursery and secondary aged children?

PROTECT the physical and mental wellbeing of current residents.

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

I would be happy to partake.

## Policy 1: Promoting Healthy Communities

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

The SP8 plans in relation to Fellgate seem to go against this policy for 'promoting healthy communities'. It IGNORES current residents as an existing community, whose health and wellbeing should be considered. The current proposal will have a significant impact on our residents.

"Air pollution is associated with several adverse health impacts and particularly affects vulnerable groups such as children, older people and those with heart and lung conditions."

Building what is effectively a town next to Fellgate will have a significant impact on the air quality of the local area and have a detrimental effect on the 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.:

Build on EXISTING Brownfield areas. Do NOT strip Fellgate of its greenbelt.

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:

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 40: Agricultural Land

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.:

How does the proposed development on land south of Fellgate comply with this policy????? The proposed plan to build on GREENBELT FARMLAND is NOT SOUND.

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.:

Preserve the land for food production.

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:

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.:

In March 2016 the 'south tyneside strategic land review - fellgate and hedworth' was published. in this document it states that the land south of fellgate " IS NOT CONSIDERED SUITABLE FOR DEVELOPMENT" - WHAT HAS CHANGED??? it states that the site contains protected low fen species - great crested newt pond and that development of the site would have a HIGH IMPACT on wildlife corridor and local wildlife site. How do you intend to make improvements to 'biodiversity' when the current plan as I understand it fragments wildlife corridor , isolating the pond and goes against Lawton Principle (bigger, better, more joined up') This is not a sound, or credible plan. Established ecosystems do not appear overnight. The building site alone alongside a wildlife corridor will disrupt the wildlife for many years and may not recover. The planting of 'woodland' will take years and years to establish. The wildlife will not wait. It will die!

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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.:

BUILD ON BROWNFIELD. DO NOT ENCROUCH ON GREENBELT!!!!

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:

Georgina Scott

What is your email address?

Email address:

[REDACTED]

Who are you responding as?

Resident or Member of the General Public

Organisation:

Fellgate resident

What is your postal address?

Address:

[REDACTED]