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# LP1994 - Karen Hunter

#### Response ID ANON-TJBH-TDYM-6

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 23:17:34

Policy SP8: Fellgate Sustainable Growth Area

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

Support or Object - Legally Compliant:

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

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.:

Why was this site in 2016 deemed to be unsuitable for large scale development, but now in 2024 it is - Simple question really but the most important. What has changed to bring about this change in strategy. Whilst surrounding areas have retained their green belt status, Fellgate has seen a large proportion of theirs potentially removed.

Comments on scoping document:

- 5.i Provision of mixed house types etc. is not a guarantee, they can be negotiated away in return for capital investment elsewhere. This is frequently the case especially with larger developments. Metro services are currently over capacity in peak time with no additional availability on the network.
- 5.ii Provision of local services are dependent upon need. Current figures indicate the population of the Borough is declining, therefore the requirement for another Primary School is questionable at best. Shortages of GPs and future moves to a more remote service provision rule out requirement for Health Services. Large supermarkets and out of town retail outlets now replace local shops. All of these changes mentioned remove the need for a settlement type build.

5.iii, i,v,v In addition to the proposed 1200 new homes built, there are 127 houses currently being built west of the A194 and a new Tri-Station built on land near the Lukes Lane Estate, all of which will feed onto Mill Lane Roundabout. This level of growth will have a severe impact on all surrounding traffic infrastructure. It is frequently observed that when traffic is impeded on the A194 for even a short time it has negative consequences on traffic feeding into the Tyne Tunnel and A19 as it backs up to the Lindisfarne roundabout. The surrounding urban roads also become crowded and dangerous to pedestrians as motorists attempt alternative routes. The Traffic Assessment Report 2023 acknowledged lack of clarity around working /shopping patterns. This is now becoming clear with an increase in workers returning to the workplace and increased use of internet shopping. Both leading to an increase in traffic.

The plan to open a road onto Durham Drive, which is currently a 20 mph parameter road around an estate which contains schools, a special needs teaching facility, a community centre and is used for cycling, running, horse riding to name a few is not feasible. It introduces significant danger to the current residents, a lot of whom have young children. It will be used by motorists as a feeder road to the A19 significantly increasing the amount of traffic and speed of travel, which will also feed into the heavily pedestrianised Fellgate Avenue. The impact of such a plan has not been investigated therefore it can not be sound.

5.vi The current Green Belt contains a working farm producing grain, which if allowed to continue will help us achieve self sustainability in the future. This is becoming more and more important as the world political landscape changes. The farm also provides a service to the existing community as a livery stable which currently houses 52 horses. There are also beautiful walks, surrounded by hedgerows teaming with birdlife.

Frequently residents are visited by bats and birds of prey. There are foxes and hares in the fields and the we have swans and the occasional heron in our ponds. To decimate all of this and offer protection for the scraps left is both unsound and unethical.

viii Net gain delivery is not gained by offering to plant trees whilst concreting over large volumes of working arable land and decimating wildlife habitat.

ix Fellgate has been flooded on numerous occasions and whilst flood defences put in place have mitigated the risk to a degree we continue to see it on parts of the estate. The defences put in place did not take into account new builds of this size so the issue remains. This was a highly contentious issue at the consultation meeting as the panel did not appear to know about the flooding at all. To suggest that surface water would feed into the Monkton and Calf Close Burn is exceptionally naive, as one good day of heavy rain results in it breaking its banks and flooding further down on to farmland at Mill dene Town Farm. Therefore these current events prove this is not sound.

#### Conclusion:

This plan if allowed to go ahead will have a massive impact on residents health and well being in Fellgate and Hedworth. This will remove the feeling of safety of the estate by introducing large volumes of traffic and increasing air pollution. The estate will be become enclosed by houses on one side and the A194 on the other. To build a new estate at the detriment of the existing one is not a sound or good plan.

Again i ask what has changed to put the residents and farmer in this position?

The traffic is not the same it is worse
The wildlife still thrives here
The landscape and its boundaries have remained the same

So what has changed !!

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

Your personal details

What is your name?

Name:

Karen Hunter

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:

# LP1995 - Swifts Local Network: Swifts & planning Group

#### Response ID ANON-TJBH-TD76-D

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 13:29:25

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:

Yes

Support or Object - Sound:

Nc

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.:

We support Policy SP21: Natural Environment (page 116) to protect and enhance the natural environment, but at present it is not currently sound as it's not effective or compliant with national policy due to a lack of consideration of urban wildlife that falls outside the remit of Biodiversity Net Gain.

In more detail, swift bricks are specifically highlighted as valuable to wildlife in NPPG Natural Environment 2019 paragraph 023, along with bat boxes and hedgehog highways.

As swift bricks, bat boxes and hedgehog highways have no value in the DEFRA Biodiversity Net Gain metric, they do need their own policy.

Swift bricks are a universal nest brick for small bird species, including red-listed species such as swifts and house sparrows, so are relevant for all developments (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments\_FINAL.pdf ), and they are a permanent zero-maintenance aesthetically integrated nest brick.

Best-practice guidance is provided for example by BS 42021:2022, and CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/).

Many other Local Authorities are including detailed swift brick requirements in Local Plans, such as Wiltshire Local Plan Regulation 19 stage which requires an enhanced number of 2 swift bricks per dwelling, so this enhanced level of provision should be considered (policy 88: Biodiversity in the built environment, page 246: "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19).

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.:

Please add additional paragraphs to Policy NP21 (page 116), to respond to NPPG Natural Environment 2019 paragraph 023 as follows:

Swift bricks, bat boxes and hedgehog highways should be installed in all new developments including extensions.

Swift bricks should be installed in accordance with best-practice guidance such as BS 42021 or CIEEM which requires at least one swift brick per home on average for each development. Photographic evidence of suitable installation should be provided. Swift bricks are a universal nest brick for small bird species.

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

Yes, if required to provide further information.

Your personal details

What is your name?

Name:

Mr Michael Priaulx

What is your email address?

Email address:

Who are you responding as?

Other Organisation (please specify)

Organisation:

Swifts Local Network: Swifts & Planning Group

What is your postal address?

Address:

#### Response ID ANON-TJBH-TDYG-Z

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 23:21:43

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:

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.:

Resubmitting comment to correct my typo in policy reference, apologies for the initial error:

We support Policy SP21: Natural Environment (page 116) to protect and enhance the natural environment, but at present it is not currently sound as it's not effective or compliant with national policy due to a lack of consideration of urban wildlife that falls outside the remit of Biodiversity Net Gain.

In more detail, swift bricks are specifically highlighted as valuable to wildlife in NPPG Natural Environment 2019 paragraph 023, along with bat boxes and hedgehog highways.

As swift bricks, bat boxes and hedgehog highways have no value in the DEFRA Biodiversity Net Gain metric, they do need their own policy.

Swift bricks are a universal nest brick for small bird species, including red-listed species such as swifts and house sparrows, so are relevant for all developments (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments\_FINAL.pdf), and they are a permanent zero-maintenance aesthetically integrated nest brick.

Best-practice guidance is provided for example by BS 42021:2022, and CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/).

Many other Local Authorities are including detailed swift brick requirements in Local Plans, such as Wiltshire Local Plan Regulation 19 stage which requires an enhanced number of 2 swift bricks per dwelling, so this enhanced level of provision should be considered (policy 88: Biodiversity in the built environment, page 246: "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g., swift bricks) at a minimum of two per dwelling;" https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19).

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.:

Resubmitting comment to correct my typo in policy reference, apologies for the initial error:

Please add additional paragraphs to Policy SP21 (page 116), to respond to NPPG Natural Environment 2019 paragraph 023 as follows:

Swift bricks, bat boxes and hedgehog highways should be installed in all new developments including extensions.

Swift bricks should be installed in accordance with best-practice guidance such as BS 42021 or CIEEM which requires at least one swift brick per home on average for each development. Photographic evidence of suitable installation should be provided. Swift bricks are a universal nest brick for small bird species.

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

Yes, if further information is required.

Your personal details

What is your name?

Name

Mr Michael Priaulx

What is your email address?

Email address:

are you responding as? Other

Organisation (please specify)

Organisation:

Swifts Local Network: Swifts & Planning Group

What is your postal address?

Address:

#### LP1996 - Kirstin Richardson

#### Response ID ANON-TJBH-TDY6-F

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 23:48:13

#### Chapter 3: Spatial Vision and Strategic Objectives

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

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

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 refer to East Boldon Neighbourhood Forum's comments and modifications as I fully endorse their submission.

I believe Objective 5 and policy SP2 have not been met with regard to the needs of older people. The housing need survey and consultation for the neighbourhood plan proved that we need housing for older people to downsize to in our 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.:

Consider bespoke retirement developments within all new developments.

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

EBNF will participate.

Policy SP2: Strategy for Sustainable Development to meet identified needs

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

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

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 refer to the objections and points raised by East Boldon Forum as their response is comprehensive and I fully endorse their submission.

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

Out of date statistics have been uses to calculate the number of homes needed and this results in an overestimate.

A large development of around 200 dwellings at Cleadon Lane, East Boldon, has been left out of the Draft Local Plan creating a misrepresentation of the impact of other developments in the villages on local infrastructure.

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.:

East Boldon Forum have set out a number of suggested modifications and I fully endorse these.

The latest population statistics and projections should be used.

Infrastructures for the Boldons and Cleadon should be based on all of the developments that are planned, including the Cleadon Lane development.

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

East Boldon Forum will represent my views at the oral part of the examination.

#### Policy SP3: Spatial Strategy for Sustainable Development

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

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

Nο

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 fully endorse the comments from East Boldon Neighbourhood Forum on these issues.

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

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.:

Include all housing developments from Town End Farm through the Boldons, Cleadon and Whitburn and provide detailed traffic, parking and schools development plans for these as a whole. Do not treat developments as though they are in isolation.

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

EBBF will participate on my behalf.

#### Policy SP7: Urban and Village Sustainable Growth Areas

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

Support or Object - Legally Compliant:

Yes

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

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 refer to the comments made by East Boldon Neighbourhood Forum on this issue; I fully endorse their objections and recommendations. I object to GA2 - Land at North Farm This proposal is not justified and is not effective in delivering sustainable development.

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

Significantly reduce the number of dwellings on this site.

Incorporate active travel routes through it, creating linked cycle and bridle ways from West to SouthEast areas of the borough.

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

EBNF will make representation at the oral part.

#### 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:

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 refer to the East Boldon Neighbourhood Forum's response the this plan. I fully endorse their comments and modifications.

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

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

Plan should include some attempt to mitigate the impact all of the developments in the villages and demonstrate a commitment to providing viable infrastructure.

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

EBNF will participate and I fully endorse their views.

#### 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:

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.:

Policy 47 as currently drafted does not specifically provide for:

- 1. The use of Neighbourhood Plan Design guides to inform local development proposals.
- 2. New development proposals to include a requirement for tree lined streets.
- 3. The use of nationally Described Space Standards in new development proposals.
- 4. Creation of places that are safe, inclusive and accessible and which promote health and well-being.

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.:

Commit to the design code agreed in the Neighbourhood Plan.

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

EBNF will participate

#### Your personal details

Name:
Kirstin Richardson
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:

What is your name?

# LP1997 - T P Duffy

#### Response ID ANON-TJBH-TDY1-A

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 23:49:50

#### 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:

Nic

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

Nο

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

#### Chapter 2: Context

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

Support or Object - Legally Compliant:

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 attach a number of representations in connection with site generally referred to as GA4

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.:

A site comprising Field 14, 15 & 60 would provide for a better site in respect of meeting ALL the needs of the local plan.

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

Yes please

## Chapter 3: Spatial Vision and Strategic Objectives

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

Support or Object - Legally Compliant:

No.

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

#### Policy SP1: Presumption in favour of Sustainable Development

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

Nic

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.:

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

#### Policy SP3: Spatial Strategy for Sustainable Development

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

#### Policy 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.:

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

#### Policy SP5: Former Brinkburn Comprehensive School

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

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

#### Policy SP6: Land at former Chuter Ede Education Centre

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

Support or Object - Legally Compliant: No

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

Νo

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

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

#### Policy 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:

Nο

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

No

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

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

#### Policy 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.:

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

Policy SP9: Strategic Vision for South Shields Town Centre Regeneration

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

Support or Object - Legally Compliant:

No

Support or Object - Sound:

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 SP10: South Shields Riverside Regeneration Area

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

Support or Object - Legally Compliant:

Support or Object - Sound:

Support or Object - Complies with the Duty to Cooperate:

No

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

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

# Policy SP11: South Shields Town Centre College Regeneration Site

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

Support or Object - Legally Compliant:

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.:

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

#### Policy SP12: Fowler Street Improvement Area

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

Support or Object - Legally Compliant:

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 SP13: Foreshore Improvement Area

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

Support or Object - Legally Compliant:

Support or Object - Sound:

Nο

Support or Object - Complies with the Duty to Cooperate:

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

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

#### Policy SP14: Wardley Colliery

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

Support or Object - Legally Compliant:

Support or Object - Sound:

Νo

Support or Object - Complies with the Duty to Cooperate:

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

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

Your personal details

What is your name?

Name:

Mr T P Duffy

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:

#### LP1998 - Brian Hunter

#### Response ID ANON-TJBH-TDYH-I

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 23:50:07

Policy SP8: Fellgate Sustainable Growth Area

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

Support or Object - Legally Compliant:

Support or Object - Sound:

No

Support or Object - Complies with the Duty to Cooperate:

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

5i Will there actually be 25% affordable housing? Or will this be offset? I find it difficult to understand what constitutes affordable housing

5ii Another school, healthcare plus shops will only increase traffic

5iii This will not reduce dominance of car traffic. Its very difficult to get people to walk or cycle especially if the own a car and need to get to work and drop of kids. Many households have 2 or 3 cars

Access to the remaining greenbelt to me only indicates the loss of farming and farmer

5iv Vehicular access to the A194 and Durham Drive can only mean more congestion at peak times

5vi I don't believe the new greenbelt boundary would be "defensible" as the current one of greater value and loss isn't.

As for improving biodiversity i can't recall seeing a report or survey of the biodiversity that is presently on the greenbelt farmland

5viii Sounds impressive but don't know what it means

5ix Discharging surface water into the Burns sounds like a good idea, but I have seen the burn filling up to impressive levels in the past and that is before the building of 1200 houses on the land that currently soaks up the rain water

I was unable to "Have your Say" via computers at ST Libraries over the consultation period as it would not load the page. Once reported on Thursday 29th Feb it was explained to me that there was missing code in the programming however this was not rectified as of the 3rd March (Closing Date).

I have found the whole experience stressful and complicated and I have already lost the submission once for reasons unknown to me.

With regards to this plan, I cannot understand that in 2016 South Fellgate was rejected as unsuitable yet now in 2024 it is suitable - What has changed?

I do not support any building on the greenbelt/farmland. We constantly hear about climate change due to increased urbanisation and our carbon footprint due to importing food from other countries. How is this helping mitigate this?

KEEP OUR GREENBELT AND FARMING !!!!!

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

Your personal details

What is your name?

Name:

Brian Hunter

What is your email address?

Email address:

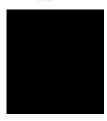
Who are you responding as?

Resident or Member of the General Public

Organisation:

What is your postal address?

Address:



# LP1999 - Lynne Nelson

#### Response ID ANON-TJBH-TDYS-C

Submitted to South Tyneside Publication Draft Local Plan 2023-2040 Submitted on 2024-03-03 23:56:47

Policy SP5: Former Brinkburn Comprehensive School

Do you consider that the element of the Local Plan you a	re responding to meets the statutory tes	sts of Legal Compliance,	Soundness or Duty to
Cooperate?			

Support or Object - Legally Compliant:
No

Support or Object - Sound:
No

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

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Community Centre is key to the local community, particularly the swimming pool.

Plus football pitches are in use. Sports England should have some say as the green fikeds site and playing g fields are key to the local community.

Should not be used for housing development

Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test(s) you have identified where this relates to soundness. (Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.:

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

Your personal details

What is your name?

Name: Lynne Nelson

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:

#### LP2000- Ian Ord

# Subject - objection to local plan and supplementary proposed planning documents9

Sun 3/3/2024 11:12 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: <a href="mailto:email.quarantine@southtyneside.gov.uk">email.quarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*

The plan is not legally compliant or sound due to the following -

- 1. Lack of accessible information website has faulty links, cannot be accessed from south Tyneside hubs, no hard copies available, missing documents.
- 2. Repeated requests for extensions refused despite all of the access issues.
- 3. In the 2016 plan the Fellgate greenbelt was deemed not suitable for development what has changed?
- 4. Impacts on local habitats including farm birds which have migrated from other developed areas, flora and fauna, lack of robust environmental survey.
- 5. Impacts on sustainable public transport which is already unable to cope with demand.
- 6. Impact on health of existing residents as a result of increased traffic and emissions, exacerbated by removal of greenbelt which reduces existing impacts.
- 7. Impact on local road infrastructure which is unable to cope with existing demand frequent gridlocks across proposed access routes to new estate.
- 8. Consideration of access routes for emergency services through gridlocked roads, especially with the proposed new tri-station in Hebburn.
- 9. Impact on secondary school provision across Jarrow and Hebburn with schools at capacity and no plans for additional secondary school places.
- 10. Lack of GP access plans show proposed GP surgery but current surgeries are over capacity with insufficient GPs available to support them.

Ian Ord

#### LP2001 - Mrs Jackson

#### Response ID BHLF-5JMM-6ZHQ-2

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report Submitted on 2024-04-09 12:52:17

Have your say

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

#### Comments:

"Firstly, I have no clear idea as to why this is being consider, my main concern begin with my child, I wasn't able to sent my child to the local school. For clarity, I love less than 500 metres from Cleadon infants school, my son didn't get a place due to a simple reason of no space, over subscribed! Still there is no space for my child to attend a local school. Therefore I need to travel on the metro or car to get my child to a school for his education. To add to this, the number of cars on the road means this can actually take up to an hour on a bad day. Sometimes I can't actually get onto the metro either due to the number of people already on.

We are able to sit down even if we do. Since my child has been due to the lack of capacity he has to spend unnecessary time travelling further. Which feels completely unfair considering we have a perfectly good school 10 minute walk from our front door.

Therefore my objections begin here;

- -schools already over subscribed, lack of primary school places locally
- volume of traffic already at capacity

The road and garden floods regularly - flood risk Already having issues with drainage and therefore - sewerage issues

Lack of services already affect the area, extra strain will push this further into chaos

The obvious factor here;

- loss of habitat wildlife suffers
- loss of green belt
- if the village loses identity by the merge of South Tyneside with Sunderland then that in itself affects the any unique character, history or value. The fact is, the reputation is already feeling strained with the lack of services, including public transport. Meaning the 1018 is busier and exiting moor lane can take far longer than it ever has. And traffic noise is increasing. Alongside the fact of the past several years flooding is becoming far worse with the increase in rainfall. It's feels disastrous to consider."

2	What	is you	r name?
2	What	is you	r name:

Name:

Mrs jackson

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

# **Fellgate Greenbelt**

Sun 3/3/2024 4:14 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.guarantine@southtyneside.gov.uk, clearly stating your concerns in the email \*\*\*

My name is Russell Bennett and I live at

The Council's proposal to remove the Greenbelt from Fellgate is not legally compliant nor sound, for a number of reasons.

The increase in traffic will result in more pollution and poor air quality. This will affect all residents in the local area. There are already traffic issues and congestion in the area. 1200 new homes and even more cars will mean emergency services cannot gain quick access to Fellgate and Hedworth. Huge disruption will be created at Mill Lane roundabout again and towards Whitemare Pool.

Wildlife and habitat allowed to develop over hundreds of years will vanish. The Greenbelt is a crucial nature corridor following the development of land to the North of Nissan. This destruction of the Greenbelt will be another contribution to global warming. Every bit of farmland needs to be saved and used to produce food for an increasing population.

The Council decided in 2016 that the Greenbelt must be saved and land to the south of Fellgate was protected. That decision must stand. What has changed since then for the Council to backtrack?

South Tyneside has a declining population, there is no sound reason to build 1200 homes on Greenbelt land. There are other suitable brownfield areas in the Borough that must be used first.

#### LP2004 - Mr & Mrs A Wheatman

#### **Rhiannon Laverick**

From:

**Sent:** 03 March 2024 15:03

To: Local Plan
Subject: developments

Categories: Deborah Lamb

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

href="mailto:email.quarantine@southtyneside.gov.uk">email.quarantine@southtyneside.gov.uk,</a>&nbsp;<strong >clearly stating your concerns in the email</strong>&nbsp;\*\*\*</div> Good afternoon to you.My wife and i think that the proposal of all these extra houses that could be built is simply a bad idea, that has not been looked into thoroughly.The consequences of these builds would just get rid of all our green belts that are left at the moment.If the building plans go ahead it would mean more congestion around the Metro and surrounding areas that are already causing a lot of local residents problems.More houses mean more traffic, then more access would be needed for emergency services etc.Then the schools ,Doctors would be overloaded, they are already struggling to accommodate the residents now.It is surprising how much wild life we have around our area ,which is great to see.that would be lost.So please think again about getting rid of what is left of our green belts.

Kind regards Mr & Mrs A, Wheatman,

# LP2005 - Cllr Rachael Milne

# Reguation 19, SP8 Fellgate, Habitat reg comments

# Cllr Rachael Milne

Sun 3/3/2024 9:44 PM

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

Cc:Cllr Shirley Ford <cllr.shirley.ford@southtyneside.gov.uk>;Cllr David Herbert <Cllr.David.Herbert@southtyneside.gov.uk>;Cllr David Francis <cllr.David.Francis@southtyneside.gov.uk>;Rachael Milne

1 attachments (41 KB)

Local Plan Regulation 19.docx;

Good evening,

Please accept attached document objecting and commenting on Regulation 19 of the Local Plan, Fellgate sustainable Growth Area (SP8) and the Habitat Regulation consultation.

**Kind Regards** 

# Cllr Rachael Milne

Green Party Councillor for Biddick and All Saints

Mobile: Email:

South Tyneside Council, South Shields, Town Hall and Civic Offices, Westoe Road, NE33 2RL <a href="https://www.southtyneside.gov.uk">www.southtyneside.gov.uk</a>

# Response to South Tyneside Local Plan Review Submission Consultation (Regulation 19)

<u>Please accept this email as my response to Regulation 19 stage of the draft \*Local Plan AND</u> my \*objection to SP8 Fellgate sustainable Growth Area combined AND \*Habitat Regulations

South Tyneside Local Plan is not legally compliant and not sound:

**Policy SP23** does not meet Strategic **Objective 14**: *'To support sustainable development whilst protecting the Boroughs most valuable landscapes and maintaining the openness and permanence of the Green Belt.'* 

Wardley Colliery does not meet exceptional circumstances to remove it from the Green Belt. Neither does Fellgate SP8.

The National Planning Policy Framework (NPPF) seeks to preserve Greenbelt and Local Wildlife Sites.

SP14: '5.68 The Wardley Colliery Local Wildlife Site is the largest open mosaic habitat on previously developed land in South Tyneside and is the most valuable example of its type in the borough. The NPPF is clear on the desirability of conserving and enhancing nature conservation.'

The plan is not sound due to the Green Belt deletion. In 2023 South Tyneside Green Belt Study was published and exceptional circumstances were not met regarding the sites: policy SP7, SP8 and SP14.

There are suitable Brown Field sites within the Borough that could be built on for residential housing. This removes the argument for Exceptional Circumstances. Old industrial sites such as Rohm and Haas for example. Which would also link in better for active travel and public transport too.

We have already lost a huge area of Green Belt locally recently due to the IAMP. Which does not appear to be referred to in the Local Plan.

South Tyneside Councils own response regarding Green Belt removal in 2016 stated Fellgate (SP8) was not suitable to build on due to a catalogue of issues.

The Local Plan states:

'It seeks to deliver this growth in a sustainable and inclusive way, protecting those assets which give South Tyneside its identity and special character, whilst enhancing our natural environment and recognising the current and future pressures of a changing climate.'

• 'A mechanism for seeking the reduction of carbon emissions and creating a resilient and enhanced natural environment.'

Please read Appendix 1. The Local Plan does not stand up to scrutiny regards carbon emission reduction. Neighbouring Councils have raised this issue.

Neighbourhood plans do not have the planning weight of the Local Plan and as such the Local Plan must have stricter planning criteria. For example, changing the wording regarding retention of mature trees and mature hedgerows from 'Should' retain mature trees to 'Must' retain mature trees. This was raised at Regulation 18 stage but ignored.

# Whitburn Neighbourhood Plan

The Whitburn Neighbourhood Plan was 'made' in September 2022. The Plan's vision is to ensure Whitburn village will continue as a sustainable and well-supported, thriving community. It will conserve and enhance its unique character as a coastal village set within a rural environment with a rich heritage and natural environment. It will be forward looking and resilient to the effects of climate change.

# The relationship between the Local Plan and Neighbourhood Plans

Once 'made' Neighbourhood Plans become part of the statutory development plan. Planning applications which fall within the neighbourhood plan area must have regard to the neighbourhood plan policies unless material considerations indicate otherwise.'

#### Chuter Ede SP6 states:

'Proposals must be supported by a site-specific transport assessment, with particular focus on Benton Road, Galsworthy Road, Boldon Lane, New Road and the Boldon Level Crossing along with the importance of active travel links and public transport connections.'

This suggests the traffic data will push the Tilesheds Flyover through (Tilesheds road over rail bridge that was due to be built in 2022 but was paused following public campaign and petition) leading to huge added traffic to the area which will become a rat run and the environmental impacts of mature tree loss (Great North Forest trees planted by the local community in 1990), the destruction of a

Site of Special Scientific Interest, A great crested newt pond will be negatively impacted and a vital wildlife corridor destroyed.

All in contravention of Climate Change targets. Including Net Zero hopes and the NPPF. **Policy 2** Air Pollution Policy means SP6 – Chuter Ede should be removed from the Local Plan.

#### South Tyneside Council Local Plan fails to meet their Duty to Cooperate:

Appendix 1. Shows the traffic concerns raised by Gateshead Council regarding extra
pressure on the roads surrounding SP8 – Fellgate sustainable Growth Area and
Wardley Colliery. Traffic Data is suspect and timeframes to carry out road
improvements to meet demand is sometime in the future after the planned SP8
development is completed. This is not acceptable.

This is likely to lead to increased air pollution (Policy 2) which is avoidable. South Tyneside Council have done the bare minimum regarding the Duty to cooperate. No hard evidence was included within the local plan to show what the adjoining councils were claiming was true when refusing to take any housing allocations from South Tyneside. This would be helpful. The neighbouring authorities have reportedly added more houses and have approval for more houses that required via their Local Plans and there is scope as such for South Tyneside Council to reduce our need for new houses in our Draft Local Plan. This could save the Greenbelt in South Tyneside. Yet reportedly when STC officers contacted those Councils they were told they weren't interested in working together. I find this hard to believe. Can the inspector investigate this information?

Thousands of extra houses in South Tyneside will mean extra Council Tax and extra jobs for builders, trades etc. This could be seen as a motivation to keep new house numbers high here.

# **Procedural Challenges**

# Consultation

Effective Consultation: There was poor engagement due to very limited amount of consultation events and fewer location the events were held. Most Wards had no engagement via events or information from Ward Councillors or STC Officers. *Kendall v Rochford DC (2014) EWHC 3866. Held: LPA reliance on website only consultation not effective enough (93)-(94).* 

Serious legal issues have been raised regarding the timing of the consultation: Timing- 6 weeks (extended to 7 weeks after Green Party put in request). This was not long enough.

No one is able to accurately view locations of the sites given the exceptionally poor graphics on the map supplied on both the hard copy and online copy of the map locations. This hinders accurate feedback, engagement and any real consultation given how this hinders any real democracy for residents, Councillors, businesses etc. \*I have a video as evidence.

Lack of democracy: Procedural failings.

- 1. All public libraries within South Tyneside reportedly would not allow public access to the local plan and response forms following incorrect codes being put into the system and this was only resolved days before the consultation ended on March the 3<sup>rd</sup>.
- 2. Hard copies of the public response forms to Regulation 19 were not available from the Town Hall or Council Buildings upon residents' requests throughout the consultation in contravention of the Disability act 2010. I have spoken to residents with disabilities and Mental Health issues that have been unable to access information and easily object.

Wide powers of High Court 3.113 (7)-(7B): can quash whole or part of relevant plan document or direct action concerning preparation, publication or adaptation.

3. More public engagement is/was needed. Most Wards had no knowledge of events or events weren't accessible due to the locations being far away. There should have been events put on in every ward. This did not happen.

'SEE Woodfield + JJ Gallagher LTD V Cherwell DC (2016) 1 WLR S126 Lindblom LJ (29)-(33) on the breadth and flexibility of the powers.

My objections to regulation 19 include:

- Substantiative
- Procedural
- Preclusive provision s.113 planning and compulsory purchase Act 2004.
- Follows CPR PDS4E Like other statutory Challenges.
- Public Law Grounds.
- ✓ Reasonable alternatives- The proposed 71 homes for the only green space in the Biddick Hall and All Saints Ward (Chuter Ede) could be removed in its entirety given recently approved South Tyneside College site application by Avant Homes for 260 homes had exceeded the 163 proposed for the site in the Draft Local Plan. Not building on this Community Green space at Chuter Ede would also be inline with National Planning Policy, STC Promoting Healthy Communities (page 62-67 of Local Plan and Policy 1), Policy SP15 Climate Change and Policy 2 Air Pollution given the

future traffic data feeding into figures to build the Tilesheds Flyover and the environmental destruction that will cause by way of huge mature trees loss (Great North Forest), destruction of SSSI site, annihilation of a designated Wildlife Corridor, Great Crested Newt pond and habitat would be negatively impacted and the loss of horses fields.

- ✓ Rohm and Hass and adjoining land along river.
- ✓ Boldon Lane (Old Clinic NHS)

# Safeguarding provisions for future assessment.

Cumulative effects.

Timing of Objections: SP8 consultation is running alongside Regulation 19 of the Local Plan. This is confusing and putting extra time and work pressure on residents and interested parties who wish to comment or object.

The Soundness of Plan is difficult to challenge as it is not a task for the Court and not statutorily defined. Making resident feedback difficult to quantify, however, given the Climate challenges we face the Local Plan does not offer any solid solutions. Instead adding to the Climate Crisis.

Use: **Policy 36** regarding Trees gives no way to protect our towns mature trees. Its just empty words that clearly means little too many developers or decision makers. We need hard rules in place to save mature trees and mature hedgerows which this policy does not do.

**Policy 36** in inconsistent with **Policy SP15** regarding Climate Change. The Planning Policy Guidance puts emphasis on tackling Climate Change and the NPPF saes must be both a planning making and decision making principle. To be found sound Local Plans will need to reflect this in line with the Climate Change Act 2008.

Failure to take policy into account (See Chuter Ede SP6)

Failure to understand/address evidence (Water Sewage Issues raised by STEP and Whitburn Neighbourhood Forum) Sewage Pollution is a factor in Climate Change so policy SP25, Policy 10 and Policy 11 are linked together with Policy SP15

S19 (1A) PCPA requires LPs include 'policies designed to secure that the development and use of land in the Local Planning authority's area contribute to the mitigation of, and adaptation to, Climate Change. Sites allocated within Regulation 19 of STC Local Plan are in contravention of the Climate Change policy. These include **Brinkburn (SP5)**, **Chuter Ede (SP6)** and **Fellgate (SP8)** along with **all Green belt sites**. The increase vehicle uses to surrounding roads on these sites will have a huge impact on air quality too.

Future challenges on sustainability grounds e.g. poor public transport, remote site allocations: The Green belt sites allocated have very poor public transport services. South Tyneside Council has declared a Climate and Ecological Emergency and has Carbon reduction targets in place. Building over 1200 houses on Greenbelt with no or limited public transport without a clear plan in place for increasing accessible public transport the Carbon Reduction targets will pointless. Roads will be under added pressure, air quality will plummet, global warming will increase when all councils are aiming to limit the impact, they are having on not only the local area but our planet. Climate Earth letter to Councils preparing Local Plans threatening legal action if strategies do not include 'evidence-based carbon reduction targets.'

Climate Challenges should be at the heart of sites allocated for development. Instead, sites are included which are not suitable due to huge negative environmental impacts, foreseeable future negative impacts.

The Plan is not consistent with The National Planning Policy Framework.

Given the information supplied here I do not consider Regulation 19 of the Draft Local Plan Sound and not Legally Compliant.

# Appendix 1.

Duty to Cooperate Meetings See Appendix 4: Schedule of meetings Key issue and outcomes Need for Green Belt Release Issue: Whether Gateshead Council are able to accommodate some of South Tyneside's objectively assessed housing and employment land needs without Green Belt release. Outcome: Once it became clear that South Tyneside Council would be unable to meet its objectively assessed housing needs in full without Green Belt release, the Council wrote a letter in 2018 to all neighbouring authorities including Gateshead Council to ascertain whether they would be able to accommodate this growth within their own area without the need to release their own Green Belt. Gateshead Council formally responded to advise that they would not be able to accommodate any of South Tyneside's housing need without Green Belt incursion. In May 2022 STC wrote again to Gateshead requesting that Gateshead formally confirm that it is still not in a position to meet any of South Tyneside's housing needs and also asked Gateshead to state whether Gateshead is able to meet any of South Tyneside's economic development needs. The GMBC response stated 'I can confirm that we continue to be unable to help meet South Tyneside's housing land needs ... we are also not in a position to assist in meeting South Tyneside's employment land needs' (see Appendix 1). Working together in the future: The two authorities will continue to liaise regarding Green Belt approaches and on any issues Sustainable Transport and highway capacity Issue: Impact on encouraging sustainable travel and on highway capacity of the proposed development allocations, particularly the Fellgate Sustainable Growth Area development. Outcome: At the Reg 18 stage, Gateshead Council made a representation stating 'We would wish to see what, if any, assessment of the potential impact of these proposals on the local highway network has been undertaken – particularly on junctions at Heworth and Whitemare Pool and on routes into Gateshead. We would also like to discuss

what efforts are being made to encourage active and public transport to/from these locations, in order to minimize car-born trips to these locations reducing that impact on the highway network and widening access to the opportunities provided.' The representation also stated, 'A particular focus for Gateshead will be the Whitemare Pool Junction (A194M / A194 / A184).' 14 Both the Delivering Sustainable Transport policy and the Fellgate Sustainable Growth Area policy in the South Tyneside Draft Local Plan support public transport and active travel provision and the South Tyneside Council Local Cycling and Walking Infrastructure Delivery Plan has been endorsed by Cabinet. STC has also met with Nexus (the Tyne and Wear Passenger Transport Executive) with the objective of ensuring that public transport accessibility is embedded into the proposed Fellgate Sustainable Growth Area from the outset. Working together in the future: Officers from South Tyneside Council and Gateshead Council had a Teams meeting on 14.12.2023 to discuss the issues raised by Gateshead in their representation. There was discussion around the proposed South Tyneside Local Plan housing allocations, particularly the Fellgate Sustainable Growth Area, and cross-boundary traffic generation implications for Gateshead. South Tyneside Council has strong partnership working with National Highways and strategic modelling had been undertaken for White Mare Pool. It was agreed that this modelling could be shared with Gateshead and to schedule a further meeting to discuss collaborative working between Gateshead and STC regarding the wider strategic highways implications of the proposed allocations in the South Tyneside Draft Local Plan. Sustainable Transport Issue: Mitigating the impact on the local highway network of the proposed allocation of Wardley Colliery for general economic development in the South Tyneside Draft Local Plan. Outcome: Officers from Gateshead and STC met on 14.12.2023 to discuss the issues raised by Gateshead in their representation made at the Regulation 18 stage of the South Tyneside Draft Local Plan. The representation stated, 'There may be other planning issues relating to this proposed allocation in relation to Green Belt, Transport and Ecology'. The proposed Wardley Colliery allocation is on the boundary with Gateshead and close to Follingsby Park Industrial Estate. At the meeting, Gateshead clarified that their primary concern was in relation to transport and specifically to understand if improvements are proposed to the local transport infrastructure to mitigate the impact of the proposed development. Working together in the future. It was agreed to schedule a further liaison meeting and that this meeting would be focused specifically on transport issues including any improvements to the local highway network required as a result of the proposed allocation of land at Wardley Colliery for general economic development.

**Habitat Regulations**: Critical to this is the huge push to protect Farmland Birds. IAMP pushed protected and Farmland Birds on to the Fellgate (SP8) site. 'Adverse effect on unfettered land'.

Defra -3A,3B regarding agricultural land is important to objecting the Fellate development (SP8) as preservation of land we can grow crops on, and currently this is a successful working farm and has been for 4 or 5 generations of the same family, that grow crops.

The area is a large area that floods regularly and has started to flood more since the IAMP development due to underground streams and the lay of the land. Local residents are gravely concerned their nearby homes currently next to the site will flood in the future following 1200 homes being built.

Three traffic surveys have been undertaken for SP8 – Fellgate. At least 1 survey has been queried as completely inaccurate due to timing of the survey reportedly being during one lockdown.

I would like to request to speak at the next stage with the planning inspector please.

Objections written by and on behalf of

Councillor Rachael Milne

Green Party Councillor Biddick and All Saints Ward



# **Rhiannon Laverick**

Richard Cowen

From:	
Sent:	03 March 2024 23:30
То:	Local Plan
Subject:	South Tyneside Local Plan
Attachments:	Policy 6 solar.pdf; Policy 25 Leisure and tourism.pdf; Policy 6 wind.pdf; Policy 11 water quality.pdf; Policy 33 Biodiversity etc.pdf; Policy SP7 general.docx; Policy SP7 general.pdf; Policy SP7 Point GA3.pdf; Policy SP7 Point GA4.pdf; Policy SP7 Point GA5.pdf; Policy SP7 Point GA6.pdf; Policy SP8.pdf
Categories:	Rachel Cooper
password details if requent is safe. If you a	nessage has originated from outside the Council. Do not provide any login or quested. Do not click on any links or attachments unless you are sure that the are unsure about this email or its content forward it to: <a href="mailto:uthtyneside.gov.uk">uthtyneside.gov.uk</a> , clearly stating your concerns in the email ***
Dear Sir	
	Representations to certain proposed Policies in the South Tyneside Local Plan. Pared on behalf of CPRE Durham.
Please note I am also	
responses.	a member of Durham Bird Club and have used this to formulate some of my

# Regulation 19 Local Plan Consultation Representation Form

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- Part B Your representation(s).
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# **Part A: Your Details**

	Personal Details*	Agent's Details (if applicable)
Title	Mr	
First Name	Richard	
Last Name	Cowen	
Job Title (where relevant)		
Organisation (where relevant)	CPRE, the countryside charity, D	
Address		
Postcode		
Telephone		
Email		

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

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	Paragraph 7.28
Policy	Policy 6 - solar energy
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.

We note that, as stated in paragraph 7.28, there is no provision made for solar development in Policy 6.

A number of applications have now been made for solar arrays in the North East of England that are up to and including 49.9 MW and indeed an application has now been made for a Nationally Significant Infrastructure Project, the Byers Gill Solar array to the north of Darlington.

We represent that the Council should provide some guidance on what may or may not be acceptable in respect of applications for solar arrays in the borough, given the limited amount of land that may be available for this matter. In particular, we represent that consideration should be given to roof top applications and whether these should be encouraged, thus saving greenfield (and in particular Green Belt) areas for other uses.

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. <i>Please be as precise as possible</i> .
Policy 6 should give guidance on what may, or may not, be acceptable for solar array applications. In particular, it should encourage roof top solar as opposed to solar on green fields.
(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.

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:
To answer any issues that may arise

## **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	

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First Name	Richard	
Last Name	Cowen	
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Organisation (where relevant)	CPRE, the countryside charity, D	
Address		
Postcode		
Telephone		
Email		

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

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	
Policy	Policy 6 - wind energy
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

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We are concerned that this Policy, as worded, is capable of leading to inappropriate applications for wind turbines within the areas identified as being potentially suitable.

We note that the Wind Energy Study of 2022 does not identify any area as being suitable for large wind turbines and only one area to be retained as suitable for turbines up to medium height. All the other areas are identified as being suitable only for micro or small turbines.

All potential areas in South Tyneside are close to residential areas. Given national criteria for assessing noise issues, we represent that larger turbines are not suitable in such locations. There are also issues relating to shadow flicker which are likely to prove to be unacceptable for larger turbines in these locations.

We would perhaps accept turbines in these areas that are micro or small. However, the Policy itself is not worded in a way that reflects this. While we note paragraph 7.30 in the Text which refers to the 2021 (not 2022) study, this of course is not part of the Policy.

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.
We represent that the Policy should make it clear that only turbines identified in the 2022 Wind
Development Study are appropriate in South Tyneside. No large turbines are appropriate
anywhere in the borough
El Company de la
-
(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.

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)				
the oral part of the examination: (Frease serect one ariswer 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:
To answer any issues that may arise

## **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			

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Last Name	Cowen	
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# Please fill in a separate form for each representation

Name or organisation	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	
Policy	Policy 11 - protecting water quality
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**

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While we support the general thrust of this policy, we are concerned that it does not refer to overloading existing sewerage systems.

This has recently become a major consideration nationally and has been the subject of much criticism relating to discharges into our water courses. The Times in particular has been campaigning on this topic.

This is not an issue that should be ignored or sidestepped and we represent that the Policy should take account of it

compliant and sound, in respect of any legal compliance or sound identified at 3 above. (Please note that non-compliance with the of modification at examination). You will need to say why each median legally compliant or sound. It will be helpful if you are able to revised wording of any policy or text. Please be as precise as possible.	dness matters you have duty to co-operate is incapable odification will make the Local o put forward your suggested
Policy 11 should have a further paragraph to reflect the above	
	(Continue on a separate sheet if necessary)

Please set out the modification(s) you consider necessary to make the Local Plan legally

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.

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 No			

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#### Section 6:

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o answer any issues that may arise		

# **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			

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

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	
Policy	Policy 25 - Leisure and tourism
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**

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We note point 3 of this Policy and its reference to "natural and built assets".

The foreshore in South Tyneside is extremely important for migrating and nesting birds. While this may fall within the definition of "natural assets", we represent that the Policy should strive to protect biodiversity and make this clear. This may also make the Policy fully consistent with Policy 33, especially in relation to priority species.

We also represent that this Policy should make a cross reference to Policy 34 relating to Appropriate Assessments.

Please set out the modification(s) you consider necessary to make the Local compliant and sound, in respect of any legal compliance or soundness mattidentified at 3 above. (Please note that non-compliance with the duty to co-of modification at examination). You will need to say why each modification Plan legally compliant or sound. It will be helpful if you are able to put forwarevised wording of any policy or text. <i>Please be as precise as possible</i> .	ters you have -operate is incapable will make the Local
Policy 25 point 3 should include biodiversity and a reference to Policy 34	
(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.

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.

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To answer any issues that may arise	

# **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		

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Title	Mr	
First Name	Richard	
Last Name	Cowen	
Job Title (where relevant)		
Organisation (where relevant)	CPRE, the countryside charity, D	
Address		15
Postcode		
Telephone		
Email		

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

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	
Policy	Policy 33 - Biodiversity etc
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**

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Generally, we support this Policy, especially the reference to "Priority Species".

However, we are concerned about Point 2. Development which is "likely to adversely affect priority species and habitats and/or geodiversity" should in our opinion be refused except in exceptional circumstances.

As a member of Durham Bird Club, I am very concerned about this part of the Policy. If a species (priority or otherwise) uses a particular area, there is usually a reason for this and it may well be very difficult to replicate that site, at least in a way that will attract that species to the new area.

This part of the Policy is far too lax and we represent that it needs to be tightened up considerably

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 incapak	
of modification at examination). You will need to say why each modification will make the Loc	
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.	1
Policy 33 point 2 should make it clear that such proposals will be refused permission unless exceptional circumstances indicate otherwise	
exceptional circumstances malcate otherwise	
(Continue on a separate sheet if necess	ary)

**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.

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Yes	✓	No	

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#### Section 6:

f you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
To answer any issues that may arise	
α.	
	xee.

## **Section 7: Being Kept Informed**

Would you like to be ke (Please select one answe		ress of the Local Plan thro	ugh to adoption?
Yes	✓	No	

# Regulation 19 Local Plan Consultation Representation Form

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

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	Personal Details*	Agent's Details (if applicable)
Title	Mr	
First Name	Richard	
Last Name	Cowen	
Job Title (where relevant)		
Organisation (where relevant)	CPRE, the countryside charity, D	
Address		
Postcode		
Telephone		
Email		

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

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	
Policy	SP7
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.

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See attached	

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. As it is, we represent that the case for the deletion of these sites from the Green Belt has not been fully made out. Given the importance of the Green Belt to CPRE, the countryside charity, we represent that the case for the deletion of all these sites needs to be further clarified, given the history of population decline in South Tyneside, before Exceptional Circumstances can be made out.

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.

(Continue on a separate sheet if necessary)

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	

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o answer any issues that may arise

# **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

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Tare A. Four Details				
	Personal Details*	Agent's Details (if applicable)		
Title	Mr			
First Name	Richard			
Last Name	Cowen			
Job Title (where relevant)				
Organisation (where relevant)	CPRE, the countryside charity, D			
Address				
Postcode				
Telephone				
Email				

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

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham
Client (if relevant)	

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

Paragraph	
Policy	SP7 point GA3 Land N of Townend Farm
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.

Our stance relating to Policy SP7 and deleting these areas from the Green Belt has been given. However, in relation to this site, we arefurther concerned about the principle of this particular deletion from the Green Belt. While the site does fall within the borough of South Tyneside, it is divorced from the built part of South Tyneside. It is more an extension of Sunderland.

As far as we are aware, Sunderland has not asked South Tyneside to take any of its housing. We question whether a site in this location will serve any shortfall South Tyneside may have. We are concerned that this is an unnecessary intrusion into the Green Belt

Please set out the modification(s) you consider necessary to make compliant and sound, in respect of any legal compliance or sound identified at 3 above. (Please note that non-compliance with the of modification at examination). You will need to say why each me Plan legally compliant or sound. It will be helpful if you are able to revised wording of any policy or text. Please be as precise as possible.	dness matters you have duty to co-operate is incapable odification will make the Local o put forward your suggested
We represent that the need for this deletion from the Green Belt s taken out of the Plan	
taken out of the Fian	
	(Continue on a separate sheet if necessary)

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Yes ✓ No				

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# **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			

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Email		

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# Please fill in a separate form for each representation

Name or organisation	CPRE Durham
Client (if relevant)	

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

Paragraph	
Policy	SP7 point GA4 Land at West Hall Farm
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.			
*			

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. <i>Please be as precise as possible</i> .
If it is proposed to alter or improve a junction, the Policy should make it a requirement to do so
In addition, if Site Surveys reveal species that should be protected, the Policy should require this.
We represent however that this needs to be spelt out in the Policy.
(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.

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				

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#### Section 6:

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To address any questions that may arise

# **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					

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Postcode		
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# Please fill in a separate form for each representation

Name or organisation	CPRE Durham
Client (if relevant)	

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

Paragraph	
Policy	SP7 point GA5 Whitburn Lodge
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.

Our stance relating to Policy SP7 and deleting these areas from the Green Belt has been given. However, if that is not accepted at least in relation to this site, we make the following reprentations in relation to this particular deletion.

While we support the criteria listed in relation to this part of the Policy in principle, we understand that the situation has changed as the developer has felled mature trees. This appears to be contrary to the second bullet point in the part of Policy SP7 and we represent in the strongest possible terms that the developer should not be rewarded for this action.

While we note the provisions of Policy 34 relating to Appropriate Assessment and accept that the Plan has to be read as a whole, we are concerned that there is no cross-reference to that in this Policy, especially bearing in mind the proximity of this site to the coast.

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. This matter clearly now needs to be reviewed. We represent that the number of houses should not be increased as a result of any extra space that comes from this action and the developer should be required to replace the trees that have been removed and maintain them, replacing any that fail. Given the proximity of this site to the European sites at the Coast, we represent that there should be some cross reference to the need for an Appropriate Assessment as given in Policy 34

**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.

(Continue on a separate sheet if necessary)

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					

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## Section 6:

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o address any questions that may arise	

# **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				

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Last Name	Cowen	
Job Title (where relevant)		
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Address		
Postcode		
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Email		

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# **Part B**

# Please fill in a separate form for each representation

Name or organisation	CPRE Durham
Client (if relevant)	

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

Paragraph	
Policy	SP7 point GA6 Land at North of Shearwater
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.

Our stance relating to Policy SP7 and deleting these areas from the Green Belt has been given. However, if that is not accepted at least in relation to this site, we make the following reprentations in relation to this particular deletion.

We note that this site adjoins GA5 and links it to the existing development at Shearwater. As with GA5, we represent that there should be a cross reference to Policy 34 and Appropriate Assessment in this case.

There is one of the conditions listed in relation to this site that we represent needs to be clarified

- Support at least one season's additional non-breeding monitoring data for wading birds for fields within 500m of the site, including nocturnal survey with appropriate equipment

We have raised this in relation to GA4, land at West Hall Farm. This site is so close to important sites at the coast and we represent that it is necessary to address what is done with any additional data and whether species may need to be considered for further action bearing in mind Section 3 of the Environment Act 2021 and Policy 33 of this Plan.

# **Section 4: Proposed Modifications**

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.
The Policy should detail what should be done if further surveys reveal important new information.
We represent however that this needs to be spelt out in the Policy.
(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.

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# **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? ( <i>Please select one answer with a tick</i> )					
the oral part of the exal	the oral part of the examination: (I lease select one answer with a tick)				
Yes ✓ No					

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# Section 6:

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:			
address any questions that may arise			

# **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				

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#### Part A: Your Details

	Personal Details*	Agent's Details (if applicable)
Title	Mr	
First Name	Richard	
Last Name	Cowen	
Job Title (where relevant)		
Organisation (where relevant)	CPRE, the countryside charity, D	
Address		
Postcode		
Telephone		
Email		

<sup>\*</sup> 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	CPRE Durham Branch
Client (if relevant)	

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

Paragraph	
Policy	SP8
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.

See attached. While prepared for Policy SP7, we represent that the same issues apply to Policy SP8

# **Section 4: Proposed Modifications**

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. As it is, we represent that the case for the deletion of these sites from the Green Belt has not been fully made out. Given the importance of the Green Belt to CPRE, the countryside charity, we represent that the case for the deletion of all these sites needs to be further clarified, given the history of population decline in South tyneside, before Exceptional Circumstances can be made out. (Continue on a separate sheet if necessary)

Please set out the modification(s) you consider necessary to make the Local Plan legally

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.

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# **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				

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### Section 6:

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# **Section 7: Being Kept Informed**

Would you like to be ke (Please select one answe		ress of the Local Plan thro	ough to adoption?
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.

#### Considerations in relation to Policies SP7 and SP8

CPRE, the countryside charity, originally known as the Council for the Preservation of Rural England, was instrumental in encouraging the establishment of Green Belt in the 1940s and 50s. The charity remains committed to protecting the Green Belt to this day and the Durham Branch, which covers South Tyneside, seeks to do this.

We note that this Regulation 19 draft of the Plan is to be guided by the principles set in the July 2021 version of the NPPF, as amended in September 2023, rather than the December 2023 version. The significant difference between the two versions, in relation to this issue, is that under paragraph 140 of the 2021 version, there appears to be requirement to review Green Belt boundaries where the housing need is established whereas, under paragraph 145 of the 2023 version there is no such requirement.

We accept that the council has used the Standard Method to calculate the objectively assessed housing need for the borough. Although some of this number is to be supplied from land not within the Green Belt, it is stated that the need cannot be fully met unless land is released from the Green Belt. Apart from the Sustainable Growth Area at Fellgate and an employment site at Wardley Colliery, all the proposed sites to be deleted from the Green Belt are contained within Policy SP7.

We represent that it is also relevant to consider the recent deletion from the Green Belt to take account of the International Advanced Manufacturing Park. While we did not oppose that deletion, that taken with these proposed deletions perhaps demonstrates a significant diminution of the Green Belt that shows a worrying trend.

We note the provisions of the South Tyneside Green Belt Study of 2023 and the Green Belt Exceptional Circumstances paper of 2024. From these, which take into account criteria listed in the Calverton judgment mentioned in both these documents, we deduce

- 1) There is insufficient Brownfield land within the Borough to meet the objectively assessed need
- 2) However, there is evidence from Census information that the population has declined consistently over the years
- 3) The Study assesses the harm to the Green Belt that may be caused by deleting each site, both individually and cumulatively. It also refers to compensation in the remaining parts of the Green Belt in respect of any site deleted.
- 4) The Exceptional Circumstances paper does not itself address issues relating to harm to the Green Belt does conclude that, because of the lack of suitable sites not in the Green Belt, Exceptional Circumstances have been made out for the deletion of these sites.

In view of this, we do not challenge the findings of the Study as far as it goes. However, there is one issues that we represent that it does not cover that can in turn affect whether Exceptional Circumstances have been made out.

The essence of the Calverton judgment is based on the judgment of the court of Appeal judgment in St Albans City Council v Hunston Properties Ltd [2013] EWCA Civ 1610. At paragraph 32, Sir David Keene said

"Where this inspector went wrong was to use a quantified figure for the five year housing requirement which departed from the approach in the Framework, especially paragraph 47.

On the figures before her, she was obliged (in the absence of a local plan figure) to find that there was a shortfall in housing land supply. However, decision-makers in her position, faced with their difficult task, have to determine whether very special circumstances have been shown which outweigh the contribution of the site in question to the purposes of the Green Belt. The ultimate decision may well turn on a number of factors, as I have indicated, including the scale of the shortfall but also the context in which that shortfall is to be seen, a context which may include the extent of important planning constraints in the district as a whole. There may be nothing special, and certainly nothing "very special" about a shortfall in a district which has very little undeveloped land outside the Green Belt. But ultimately that is a matter of planning judgment for the decision-maker."

Although this case dealt with Very Special as opposed to Exceptional Circumstances, this was not considered to be an issue in Calverton (paragraph 39). So the mere fact that there is s shortfall does not of itself amount to Very Special (or Exceptional) Circumstances and the scale of the shortfall, its context and the importance of the planning constraints are relevant issues according to this judgment.

We accept that South Tyneside is tightly constrained by the Green Belt to the west and the south. Clearly it is also constrained to the north and the east by the River Tyne and the North Sea. However, we represent that the Green Belt around South Tyneside is relatively narrow and serves the important role of separating the built parts of South Tyneside from Sunderland to the south and, to some extent, Gateshead to the west. But this appears to be just the sort of scenario that existed in the Hunston case and we represent that this issue, namely whether in such a case, the shortfall in itself does represent a "Very Special", or "Exceptional" Circumstance, is an important consideration that should be addressed. Bearing in mind that there has already been a significant deletion from the Green Belt at the IAMP, this perhaps increases the need for this to be considered.

# LP2007 - Dan Parr

# Traffic survey info regarding proposed new estate and surrounding area

Jon Daniel Parr
Fri 3/1/2024 4:15 PM
To:Local Plan <a href="mailto:Local.Plan@southtyneside.gov.uk">Local.Plan@southtyneside.gov.uk</a>

1 attachments (7 KB)

Traffic Survey that impacts Fellgate.txt;

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

Sent from my iPhone

## Policy 51, Policy SP8 and Policy 2

The evidence does not support this policy It is not sound or complies with the duty to cooperate Legally compliant.

There is compelling arguments that capacity improvements at the junctions A194 / B1306; A194 / A184; Durham Drive / A194; Durham Drive / Fellgate Avenue; Fellgate Avenue / Hedworth will not be achieved from the road improvements past and proposed.

3 local road network surveys carried out:

- 1. White Mare Pool Junction Study Ref GB01T21D46 / GB01T21B22 (AC.21.03 ) 22/12/2021.
- 2. Local Road Network Traffic Capacity Assessment Ref 16L02/001/004 08/05/2022
- 3. Local Road Network Traffic Capacity Assessment Ref 16L02/002/002 20/12/2023
- 1. The Survey White Mare Pool Junction Study, The Executive Summary States:

"An additional test has also been undertaken of the release of 1000 to 1500 houses at the Land south of Fellgate on top of the 2019 draft allocations".

It explains how the traffic flow was carried out, it stated.

"Additionally, a stress test was undertaken to identify the consider the extra trips that can be accommodated on the SRN in the White Mare Pool area for new developments before any scheme is delivered"

It specifically states:

"The outputs present safety concern on the A184 east and A184 south when 100 additional trips per hour are included".

Therefore the study tests are based on 100 addition trips and there is a safety concern.

This contradicts, the calculated number of additional trips identified in the other 2 surveys, which are discussed below.

2.- Local Road Network - Traffic Capacity Assessment Ref 16L02/001/004:

Observation and clarity of communication.

The Introduction of this evidence document has paragraph numbering (used for document flow and referencing). This paragraph numbering is wrong:

From paragraph: "1.2 The study" the paragraph numbers are repeated twice: e.g 1.2.1. is used 2 twice, 1.2.2 is used twice and 1.2.3 is used twice.

This makes the document difficult to read, and may present incorrect information or evidence.

Therefore, for clarity I will use the following (n) to in order to reference the correct paragraphs.

#### It states:

"1.2.6 Junctions (No's 38 to 45) are on the Strategic Road Network and will be assessed by National Highways (working in partnership with the Council) as part of various assessments and

"therefore have not been investigated further as part of this study".

"Studies completed to date include the South Tyneside Infrastructure Study, A19 A185 to A194 Improvement Options, A194(M) / A184 White Mare Pool Junction Study and the A19 / A185 Howard Street Junction Study".

This means that there is no evidence of the traffic relating to Fellgate estate entry/exit onto A184.

"1.2.1(2) These studies have already resulted in the delivery of a number of schemes provided to deliver immediate capacity improvements and future capacity to facilitate the Local Plan"

There is no follow-up evidence of this statement.

3 Local Road Network - Traffic Capacity Assessment Ref 16L02/002/002 20/12/2023

Observation and clarity of communication.

The Introduction paragraph numbering in this evidence document is wrong:

From "1.2 The study" the paragraph numbers are repeated several times. e.g 1.2.1. is used 3 times, 1.2.2 is also used 3 times and 1.2.3 is used twice.

This makes the document difficult to read, and may present incorrect information or evidence.

Therefore, I will use the following (n) to identify the correct paragraph.

"1.2.1(3) South Tyneside Council and National Highways have a longstanding partnership of working closely together and have undertaken various studies that have led to successful delivery of a number of schemes provided to deliver immediate capacity improvements and future capacity to facilitate the Local Plan for example the A19 A194 to A185 Lane gain/lane drop scheme (Junction 41), the Lindisfarne improvement scheme (Junction 42) and A194 / Mill Lane to A194 White Mare Pool capacity improvement scheme (Junctions 47 and 48). In addition major schemes have recently been completed at the A19 / A184 Testo's junction and at the A19 / A1290 Downhill Lane (Junction 45 and 46). In addition, the Tyne Tunnel has recently installed ANPR cameras at the northern portal removing the requirement for vehicles to stop when passing through the Tunnel".

There is no follow up evidence that prove that these improvement schemes have been achieved or successful

"1.2.5 Junctions (No's 34 to 39) have been subject to various pieces of study work and therefore have not been investigated further as part of this study".

"These studies have already resulted in the delivery of a number of schemes to provide immediate capacity improvements and future capacity to facilitate the Local Plan"

There is no follow up evidence that prove that these improvement schemes have been achieved or successful

Analysing 3. Local Road Network - Traffic Capacity Assessment Ref 16L02/002/002 20/12/2023 which is the latest and current document.

Note: the same errors in the paragraph numbering exist in this documents as to its predecessor.

Context:

The document survey covers 33 junctions (3.1 thru 3.33) covering South Tyneside.

The analysis also includes statements about the traffic count from Land South of Fellgate. It also states the Removal of double counting trips.

Analysis: Taking these figures as read:

Thirteen(13) of the 33 junctions surveyed have traffic counts from Land South of Fellgate during peak times Mon - Fri AM/PM.

The actual number of vehicle's traveling from Land South of Fellgate during peak times are:

AM = 312 - PM = 335.

This is 3 times greater than the 100 additional trips per hour used in Survey 1.

The conclusion bases on the evidence: It is fair to say as Durham Drive is an entry and exit point from this land: Durham Drive and the junctions off Durham Drive will:

- a) experience significant traffic congestion,
- b) safety issues (as already states on the 100 extra trips in the 1st survey) Note there is local access to schools on the Fellgate estate. There is also a care home nearby. Also Durham Drive is a popular walking route, which is used by many senior citizens.
- c) will significantly increase Air pollution.

Policy 51 is NOT Legal and is NOT SOUND based on the conclusions and evidence from these surveys.

Also the following policies and supporting evidance are NOT Legal and NOT Sound policies:

Policy SP8\_ Fellgate Sustainable Growth

Policy 2\_ Air Quality. There is additional external evidence that highlights the impact on health due to poor Air Quality:

Exhibit 3 from the British Medical Association Report (BMJ 24/2/24) (Source Dr G Morley). The conclusion of this report was that an increase in cars, resulted in an increase in hospital admissions and death.

Exhibit 4 from The University of Birmingham report (pub 27/3/23)

# More info on why this development should not go ahead

Sat 3/2/2024 1:06 PM

To:Local Plan <local.plan@southtyneside.gov.uk></local.plan@southtyneside.gov.uk>
1 attachments (4 MB)
2018 plans Amended_Final_SLR_Summary.pdf;
*** WARNING - This message has originated from outside the Council. Do not provide any login or password details if requested. Do not click on any links or attachments unless you are sure that the content is safe. If you are unsure about this email or its content forward it to:
email.quarantine@southtyneside.gov.uk, clearly stating your concerns in the email ***
Hi, please see enclosed details/evidence of why this proposal should not be allowed to go ahead, nothing has changed since the last time this was proposed,
Best regards,
Dan Parr.
Sent from my iPhone

# Planning the Future of South Tyneside

South Tyneside Strategic Land Review Study

Methodology and Results

January 2018



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**Boldons and Cleadon Character Area** 

**Whitburn Character Area** 

# **Introduction and Executive Summary**

- 1.1 The Council has prepared a Strategic Land Review (SLR) in order to provide evidence of South Tyneside's capacity to accommodate additional housing and employment development. National planning policy requires local authorities to ensure that there is a supply of deliverable housing site to meet housing requirements and that enough land is available to support the needs of businesses, or whether there is a need to review planning designations such as Green Belt boundaries. The SLR does not allocate sites for development nor does it set planning policy. The evidence in the SLR will be used to help inform policies in the emerging Local Plan. At this stage, no decisions have been made on which sites will be identified.
- 1.2 When planning for growth, it is essential that this approach is underpinned by a robust evidence base. Our current Strategic Housing Land Availability Assessments (SHLAAs) do not identify sufficient deliverable housing sites to meet the requirements for housing land. Conversely, South Tyneside's Employment Land Review identifies an adequate future supply of land for a variety of employment uses, although questions over deliverability remain. Therefore the SLR is needed to establish whether appropriate additional land can be identified, including considering land currently identified as Green Belt land.
- 1.3 The SLR expands upon previous Strategic Housing Land Availability Assessment (SHLAA) studies to assess the potential for land to accommodate development. The site-by-site analysis will then be supplemented by appraisal of the potential cumulative impacts of possible alternative spatial combinations of sites on the Green Belt and infrastructure to determine the sustainable scope for growth in South Tyneside, and thus demonstrate to what extent it may be reasonable for the borough to plan to accommodate its objectively-assessed future development needs.

### Background

- 1.4 **Housing Land:** For the production of a Core Strategy there is a requirement to provide a solid evidence base showing a continuous supply of housing land throughout the plan period. This is usually done through the production and annual updating of a SHLAA. The identification of housing sites by this document therefore acts in addition to, and will eventually merge with, a final SHLAA to form part of the evidence base for the Local Plan.
- 1.5 Government requires local authorities to:
  - Use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for housing, as far as is consistent with the policies set out in the National Planning Policy Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
  - Identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land;
  - Identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15;
  - Illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing, describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
  - Set out their own approach to housing density to reflect local circumstances.

- 1.6 **Employment Land:** The national planning policy background to the identification of the need for additional employment land is given in the Employment Land Review. An updated ELR will be published in 2018.
- 1.7 **Green Belt:** local planning authorities with Green Belt land in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence, so that they should be capable of enduring beyond the plan period. An updated Green Belt Review will be published in 2018.
- 1.8 The SLR process started with a call-out for sites, at which time stakeholders were also invited to provide suggestions on the proposed methodology for assessing the sites. The database contains hundreds of bodies and individuals, ranging from developers and landowners to statutory consultees and interest groups. The information was published on the council's website.

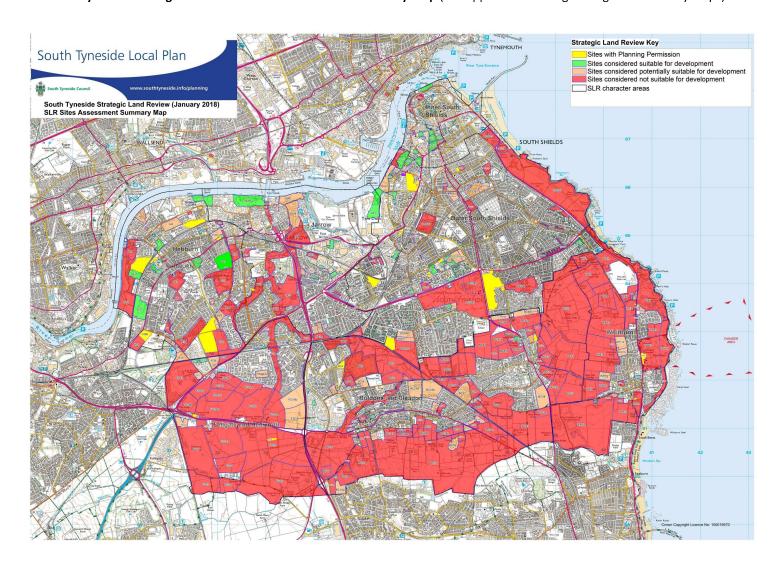
# **Public Consultation on the Draft Strategic Land Review**

- 1.9 The draft SLR study was published for public consultation between 9<sup>th</sup> May and 31<sup>st</sup> July 2016. The consultation period also provided an opportunity to consider the borough's alternative strategic growth options in the light of the 'objectively-assessed needs' scenarios.
- 1.10 Over 4,000 responses were received to that consultation. Those responses providing further information about particular sites have been used to help refine and finalise the SLR's individual site assessments. Some of the original sites have been sub-divided, and additional sites have also been added as they have come to light (e.g. business closure, site clearance).
- 1.11 Our methodology has been further refined, both in response to comments received to the draft SLR consultation and to reflect the findings from other more recent evidence base studies. In particular, the assessment of the Green Belt element is now consistent with the independently-recommended approach applied in the Green Belt site selection options appraisal for the International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP), as well as with Sunderland City Council's corresponding Green Belt Review. Rating of the Biodiversity element has been strengthened according to defined criteria reflecting the potential harm to designated habitats and protected species, while also taking account of findings from the recent Habitats Regulations Assessment (HRA) coastal bird and visitor surveys work. The recent Playing Pitch Strategy and Open Space Study Assessment work has fed into the Green Infrastructure element. The Environment Agency's defined flood risk zone date has been applied to effectively reduce the net developable area and thus the indicative development capacity of those sites that have an element of flood risk.

# **Summary of Strategic Land Review**

- 1.12 The borough-wide SLR summary maps (Appendix E) illustrate whether land has been assessed to be:
  - suitable (green sites) no/minimal mitigation required;
  - potentially suitable (amber sites) moderate-to-high mitigation required; or
  - not suitable (red sites) significant mitigation.
    - Sites shaded in vellow have already gained planning permission since preparation of the SLR began, with the vast majority either under construction or completed. The key findings for each of the seven SLR Character Areas are summarised in more detail in Appendix C of this report and in their respective site assessment annex documents which can be viewed online at www.southtyneside.gov.uk/article/36024/Strategic-Land-Review

# South Tyneside Strategic Land Review Sites Assessment Summary Map (see Appendix C for larger images of summary maps)



# Methodology

- 2.1 The Strategic Land Review (SLR) draws upon the established standard national, regional and sub-regionally agreed methodologies for carrying out Strategic Housing Land Availability Assessment (SHLAA) studies, together with some more detailed assessment criteria for considering previously-undeveloped 'greenfield' and Green Belt sites. The methodology has also been informed by the Local Plan's Sustainability Appraisal scoping process and site appraisal criteria recommended by the independent Planning Advisory Service (PAS). The methodology was further refined following the draft SLR consultation.
- 2.2 Appendix A of this document sets out what these criteria are, Appendix B maps the constraints analysis (stages 1 and 2) and Appendix C shows the (updated) SLR Assessment Framework template used to consider whether a site is considered potentially suitable for development.

### **Sites Assessment**

- 2.3 The appraisal framework (Appendix C) sets out the various assessment themes used to assess a site's potential suitability for development for either employment and/or housing (or mixed), informed by the baseline constraints analysis mapping.
- 2.4 Each of the suitable and potentially suitable sites then underwent Sustainability Appraisals against the Local Plan's established environmental, economic and social criteria these are published separately in full for each Character Area. This does not affect a site's suitability rating but will provide an additional consideration in the strategic selection of sites for allocation.
- 2.5 Summary schedules of the site-by-site assessments for each of the seven Character Areas are set out at Appendix D. The individual site assessments are collated within the separately published Character Area annex documents.

### **Next Steps**

- 2.6 The council will continue to work towards producing a Local Plan. Ongoing work will include:
  - Employment Land Review
  - Strategic Housing Land Availability Assessment
  - Retail Study
  - Green Belt Review
  - Local Plan

# **Sites Assessment Methodology Guidelines**

Assessment Theme	Theme Description	Assessment Assumptions
Land use and adjacent uses	This provides an indication of what the site is used for, what it is adjacent to and what are the key planning policy allocations and designations in the locality.	The characteristics of a potential development are taken into account in the context of the wider area's character to ensure compatibility and that existing amenity is retained where required.
Landscape and	This provides a combined assessment of how any development would impact upon the five nationally and locally defined purposes of the Tyne & Wear Green Belt (below), and how much separation that part of the Green Belt currently provides that would be eroded.  1) Check the unrestricted sprawl of the built up area of South Tyneside.  A No reduction in separation distance B 1-25% reduction in separation distance C 26-50% reduction in separation distance E 76-100% reduction in separation distance E 76-100% reduction in separation distance C Site is surrounded by development on all sides B Site is surrounded by development on all sides C Site is bounded by development on 2 sides D Site is bounded by development on 1 side E Site is in the middle of the countryside  3) To prevent the merging of South Tyneside with Sunderland, Washington or Gateshead. Where relevant, the same scale as Purpose 1 is used.  4) To preserve the special and separate characters of Boldon Colliery, West Boldon, East Boldon, Cleadon and Whitburn.  A Development is likely to have little or no negative impact on townscape character and distinctiveness, and is likely to provide opportunities for major benefits.  B Development is likely to have some negative impact on townscape character and distinctiveness, and is likely to provide opportunities for significant benefits. C Development is likely to have a significant benefits. C Development is likely to have a significant impact on townscape character and distinctiveness. Significant mitigation is likely to be required.  E Development is likely to have a major impact on townscape character and distinctiveness. Major mitigation will be required.  E Development is likely to have a major impact on townscape character and distinctiveness. Major mitigation will be required.  C Greenfield land forming part of the built up area B Greenfield land in urban fringe or brownfield land in urban fringe C Greenfield land in open countryside  D Greenfield land in open countryside	It is considered that the majority of Green Belt sites assessed for development will have some form of impact. However, a site's relationship to its surroundings, its boundaries, its scale and the potential impact on separation distances between settlements are key factors for consideration. Similar to the Landscape and Townscape theme below, site visits provide an important insight into the value of the Green Belt on openness and character of the local area. Plans for Green Belt land within the neighbouring districts of Sunderland and Gateshead are also taken into account insofar as the need to maintain sufficient separation between built-up areas.

Assessment Theme	Theme Description		Assessment Assumptions
Townscape	and value of the existing landscape and townsdand the potential impacts of development.  The quality of agricultural land is also taken into is the presence of Tree Preservation Orders.		(2012) as well as site visits provide an indication of a site's and wider area's character within the surrounding landscape / townscape. A site's relationship to its locality, its visibility, its scale and its contribution to views and the surrounding landscape / townscape are taken into account. Particular consideration is given to whether the site is within an existing or proposed 'Area of High Landscape Value'. While the presence and quality of agricultural land is taken into account, it is noted that only a very small proportion of the borough's land supply is above the majority Grade Level 3 and therefore it is ultimately not considered to add overall significance to the local agricultural industry.
Biodiversity	The analysis considers whether protected is habitats are found on site. As well as speci specifically protected by law, the analysis conspecies and habitats given priority within the Biodiversity Action Plan (DBAP). It also connectivity of habitats, particularly BAP habitate landscape and the risk that development of might lead to their fragmentation.	es that are siders those he Durham nsiders the tats, within	The site's scale and proximity to biodiversity designations is taken account of, as well as its potential impacts upon Wildlife Corridors. Sites closer to the coast will also need further Habitats Regulations Assessment (HRA) screening, with potential further Appropriate Assessment required if there are likely potential impacts on European protected
	Guideline principals for biodiversity impact rati	ngs:	sites and associated land.
	Adverse impact on European designated site – ie. Special Protection Area (SPA) / Special Area of Conservation (SAC) / Ramsar – Habitats	High	
	Regulations Assessment (HRA)  Adverse impact on Site of Special Scientific Interest (SSSI)	High	
	Adverse impact on Local Nature Reserve (LNR)	High	
	European Protected Species on or adjacent to the site (otters / great crested newts / bats)	High	
	Designated Local Wildlife Site (LWS) / Local Geodiversity Site (LGS)	High	
	UK protected species (barn owl / badger / reptiles / water vole)	High	
	Indirect impact on LNR / LWS — severity dependent on development type and proximity, eg. residential (pets and people) will have greater impact than industrial; impact also greater if it is the nearest greenspace	High/ Moderate	
	Adverse impacts on UK priority species / habitats (Section 41 list, NERC Act 2006)	Moderate	
	Adverse impacts on DBAP habitats / species (list see below)	Moderate	
	Wildlife Corridor impacts (severity greater where	High/	
	corridors are narrower)  Impacts on connectivity of habitats	Moderate High/	
	Greenspace (impacts greater where semi-natural habitats are present)	Moderate Moderate /Low	
	Arable – individual site impacts greater if hedgerow / stone wall boundary features are present	Moderate /Low	
	Existing built development & hard-standing	Low	
Historic	The historic and archaeological features of	a site are	The site's scale and proximity to heritage
Environment	assessed with reference to the designated her		assets and designations is taken into account.

Assessment Theme	Theme Description	Assessment Assumptions
and Culture	(and any non-designated heritage assets where known), the Historic Environment Record (HER) and other relevant evidence-based information (eg. Conservation Area guidelines).	Development of a site could potentially have an impact if it includes a heritage asset, or would affect the setting of one, either within or beyond the site boundary. Both potential impacts are considered.
Ground Conditions and Contamination	The topography of the site is assessed, alongside the possible presence of contamination and the proximity to any bad neighbour uses such as hazardous installations and associated safety/consultation zones. Land stability issues and mineral legacy are taken into account as is the presence of electricity pylons.	A site with an uneven topography is assumed to be more difficult to develop than one which is predominantly flat. Those sites identified as former landfill or within an existing industrial area, or that have an industrial function are considered likely to have potential contamination. However this would have to be assessed further with site-specific investigations. It is not considered that the presence of electricity infrastructure would preclude development, but it could affect the potential developability of a site.
Flooding	As well as considering the present flood risk, the potential for development to add to flood risk due to its impermeable surfaces is also taken into account, together with consideration of the impacts of climate change.  [See Deliverability theme below for further reduction of the net developable site area to reflect where a greater proportion of a site falls within designated flood risk zones. No further netting off allowance is made for surface water flooding as this can be appropriately attenuated as part of any development.]	The Environment Agency's latest flood risk maps, together with the Council's Strategic Flood Risk Assessment (2010) and related Surface Water Management Plans (2014), indicate those areas susceptible to flooding. The level of impact considered is also informed by the proportion of the site at risk, and the ability for parts of a site at lower risk from flooding to be developed instead, with appropriate mitigation incorporated into a scheme where appropriate.
Green Infrastructure	This analysis considers where any public open spaces or common land would be affected by a site's development. Green infrastructure includes public open spaces (informal and incidental), playing fields (public and private, including educational facilities), children's play areas, allotments, natural and semi-natural spaces, cemeteries, beaches. Rights of Way are also taken into account.	The council's Green Infrastructure Strategy SPD (2013) and updated Open Space Study (2015) and Playing Pitch Strategy (2016) consider the amount of open space in the borough and its value. It allows account to be taken of whether there are surpluses and deficiencies in particular locations which may impact on a site's suitability for development. Any potential impacts on strategic green infrastructure corridors from potential development are also taken into account.
Infrastructure and Services	This provides an initial assessment of the area's road capacity, the availability and capacity of services such as water and sewerage infrastructure and education / community / health facilities. A site's general proximity to shopping facilities, green infrastructure and public transport are also key considerations.  [Further consideration of the potential cumulative impacts of possible development sites on the strategic highways infrastructure and implications for schools capacity will be taken into account as part of the next stage following on from the SLR.]	The assessment of a site's potential impact is broadly based on the capacity of known infrastructure within an area, along with the site's scale. In regards to broad capacities, ongoing consultation is held with providers such as Northumbrian Water and the council's Education, Community and Health teams. Whether a site's development would reduce current infrastructure provision (such as public open space) is also taken into account. It is assumed that a redevelopment site will broadly have sufficient infrastructure capacity; however some form of mitigation is still likely to be required. New development sites, particularly those of a large scale, are considered to have a potential greater impact and again appropriate mitigation and new services are likely to be required to

Assessment	Theme Description	Assessment Assumptions
ineme		sarve the development
		·
Assessment Theme  Deliverability	The assessment considers the practical and financial viability and deliverability of a site. Landowner / legal / demolition / remediation / infrastructure issues form part of this.  In regards to residential development, a potential indicative dwelling capacity and yield is calculated based on the regional and sub-regional SHLAA methodology (as reflected in current LDF Core Strategy policy):  Indicative site net developable area: <0.4ha gross site area = 100% net area  0.4-2.0ha gross site area = 90% net area    Where part(s) of a site is within a designated flood risk zone, for small sites <0.4ha this extent is netted off; or for larger sites >0.4ha it is assumed that 50% of the above netted off area allows for appropriate mitigation such that if that flood risk extent exceeds 50% of the netted off area (ie. more than 5% or more than 12.5%) then the additional extent at risk of flooding is also netted off.]  Indicative average site housing densities: <400m of town centre/Metro station = 50/ha 400-800m town centre/Metro station = 40/ha >800m of town centre/Metro station = 30/ha  In regards to economic development, a potential number of jobs that a site could accommodate are calculated, based on site area:floorspace:jobs ratios that have been used within the council's Employment Land Review. Assumptions used for suitable averages are:  Indicative site net developable area: <0.4ha gross site area = 100% net area   Where part(s) of a site is within a designated flood risk zone, for small sites <0.4ha this extent is netted off; or for larger sites >0.4ha it is assumed that 50% of the above netted off	serve the development.  It is considered that most areas of the borough are broadly viable / deliverable for residential development (this being based on historical trends of planning applications and the broad identified housing needs in the council's Strategic Housing Market Assessment (2013/15)). However those locations where there is an adjacent likely residential amenity issue (such as Predominantly Industrial Area locations) are generally considered unviable.  In regards to potential B-use class economic development, those areas deemed to be within strong market locations within the council's Employment Land Reviews (2011/2014) are considered to be broadly viable / deliverable for economic development.  In regards to those town centre uses appraised for in town centre locations, all are considered broadly viable. However, further viability work such as that which supports the Council's South Shields 365 regeneration vision will also need to be taken into account for decisions on future development sites.  A broad consideration of whether the site will significantly support the borough's economic growth and regeneration is taken into account. This is an indicative assessment and does not necessarily determine whether a site is suitable for development or not. A site that will broadly deliver at least 100 homes / 250 jobs, and/or is located within a town centre location that is a focus for the Council's regeneration priorities is considered to have an impact.
		,
	<0.4ha net area = 20% B1 use @ 12.5 jobs/ha + 80% B2 use @ 43 jobs/ha	base studies have identified potential for significant economic growth opportunities
	0.4-2.0ha net area = 43 jobs/ha (B2)	located within the broad Green Belt area
	>2.0ha net area = 70 jobs/ha (B8)	north of the existing Nissan plant, including land within South Tyneside.
Suitability and Conclusion	A final assessment of whether overall on balance from all the criteria assessed the site is considered to be suitable, potentially suitable, or not suitable for development.	The impact assessments of each theme within the framework are considered, including a consideration of the developability of the site with regard to adjacent uses, width, layout and any further evidence identifying any wider deliverability and viability constraints/opportunities.

# **APPENDICES**

- A. Sustainability Objectives and Site Appraisal Criteria
- **B.** Strategic Land Review Appraisal Framework
- **C.** Strategic Land Review Summary Maps
- **D.** Character Area Key Findings Summaries
  - Inner South Shields
  - Outer South Shields
  - Jarrow
  - Hebburn
  - Fellgate and Hedworth
  - Boldons and Cleadon
  - Whitburn

Appendix A: Sustainability Objectives and Site Appraisal Criteria

National Diaming	South Typeside	Planning Advisory Service	Strategic Housing Land Availability	Strategic Housing Land Availability	Stratogic Land Boylow
Policy Framework -	Sustainability Appraisal Objectives	Broad Criteria Appraisal	Assessment Criteria Category 1 - Slanificant Constraints	Assessment Criteria Assessment Criteria	Appraisal Themes
Development themes					
Economic	Encourage and support economic growth within	Deliverability criteria:	<ul> <li>World Heritage Site and setting (+ candidate)</li> </ul>	Grade II Listed Building / Structure	Land use and adjacent
	South Tyneside	<ul><li>Access</li></ul>	Scheduled Ancient Monument (+50m buffer zone	Conservation Area	nses
	Section 1	<u> </u>	if not otherwise designated)	<ul> <li>Archaeological site (known and potential)</li> </ul>	+100 000
	education and improve living standards	97IC •	<ul> <li>Grade I or II* Listed Building/Structure</li> </ul>	<ul> <li>Locally-Listed Building/Structure/Space</li> </ul>	סופפון ספור
		<ul> <li>Land ownership</li> </ul>	<ul> <li>Health &amp; Safety Executive (HSE) COMAH</li> </ul>	<ul> <li>Local Wildlife Site (LWS – formerly Site of</li> </ul>	Landscape and
	Ensure vitality of our town centres and villages	:	Development Proximity or Inner Zone	Nature Conservation Importance (SNCI))	Townscape
		<ul> <li>Planning history</li> </ul>	<ul> <li>Electricity Pylon (+10m buffer zone)</li> </ul>	<ul> <li>Local Geodiversity Site (LGS)</li> </ul>	
	Promote sustainable transport and accessibility		Ramsar Site	<ul> <li>Great Crested Newt Pond (+500m buffer</li> </ul>	biodiversity
Social	Promote healthier people and communities	Exclusionary criteria:	<ul> <li>Special Protection Area (SPA)</li> </ul>	zone)	Historic Environment
	-	<ul> <li>Flood Risk areas</li> </ul>	<ul> <li>Special Area of Conservation (SAC)</li> </ul>	<ul> <li>Wildlife corridor (strategic)</li> </ul>	and Culture
	Provide better housing, neighbourhoods and good	and oldinated Alleridation	<ul> <li>Site of Special Scientific Interest (SSSI)</li> </ul>	Area of High Landscape Value or Significance	
	design	<ul> <li>Publically Accessible Open</li> <li>snace and other areas</li> </ul>	<ul> <li>Local Nature Reserve (LNR)</li> </ul>	<ul> <li>Grade 2 or 3a Agricultural land</li> </ul>	Flooding
	Promote equality of opportunity and access and	valued locally	<ul> <li>Grade 1 Agricultural land</li> </ul>	<ul> <li>Woodland plantations</li> </ul>	Ground Conditions
	promote good relations between diverse	•	<ul> <li>Flood Risk Zone 3B (Functional Floodplain)</li> </ul>	<ul> <li>Tree Preservation Order (TPO)</li> </ul>	and Contamination
	communities		<ul> <li>Flood Risk Zone 3A (High Vulnerability)</li> </ul>	<ul> <li>Area of Significant Historic Landscape</li> </ul>	
Environmental		Discretionary criteria:	<ul> <li>Historic Park or Garden (English Heritage list)</li> </ul>	Character	Green Intrastructure
	saleguarding our biodiversity	Fublic rights of way	Village Green	<ul> <li>Public Open Space, Playing Field, Play Area</li> </ul>	Infrastructure and
	Safeguarding our environmental assets and natural	<ul> <li>Agricultural Land</li> </ul>	Cemetery, Churchyard	Allotment	Services
	resources			<ul> <li>Public Right of Way, (strategic) cycleway</li> </ul>	:
	A to	Local Nature Conservation		<ul> <li>Green Infrastructure (strategic) corridor</li> </ul>	Deliverability
	Adapt to and mingare the impacts of chinate change in South Tyneside	designations		<ul> <li>Flood Risk Zone 2 (Medium Vulnerability)</li> </ul>	Suitability and
				<ul> <li>Surface Water Flooding (High Vulnerability)</li> </ul>	Conclusion
	Protecting our Green Belt			<ul> <li>HSE COMAH Middle or Outer Zone</li> </ul>	
	Internation of the state of the			<ul> <li>Minerals legacy (quarries and coal mining)</li> </ul>	
	בווומוגוווף סמו פובבון וווון מאון מרמוב			<ul> <li>Landfill sites, Contaminated land</li> </ul>	
	Promote and enhance South Tyneside heritage and			<ul> <li>High Voltage electricity line (+10m buffer</li> </ul>	
	cultulal assets			(2102	

Appendix B: Strategic Land Review Appraisal Framework

	Low ← Impact → High A B C D E			impact act which can be mitigated. pact would require some mitigation. act with algor mitigation required. pact with significant mitigation required. and in urban fringe d in open countryside	ect - High Impact - Significant mitgation required							act - High impact -				
	Would development on this site impact upon the five purposes of the Green Belt?	1. To check the unrestricted sprawl of the built-up area?     2. To safeguard borough's countryside from fur ther encroachment?     3. To prevent mereine of South Turneside with	Sunderland, Washington or Gateshead?  4. To preserve the special & separate characters of the Urban Fringe villages?  5. To assist in the regeneration of the urban	area, by encouraging the recycling of land?  Purpose 1-4:  A. Development is likely to have little or no adverse impact  B. Development likely to have limited negative impact which can be mitigated.  C. Development likely to have a major adverse impact with major mitigation.  D. Development likely to have a major adverse impact with major mitigation required.  E. Development would have significant adverse impact with algnificant mitigation required.  Purpose 5:  R. Brownfield land forming part of the built up area  B. Greenfield land in a built up area to brownfield land in urban fringe  C. Greenfield land in under hings or brownfield land in open countryside  C. Greenfield land in one ourtroof or our troops.	Zero/Low impact- no or minimal mitigation required required							Zero/Low Impact - no   Medium Impact -				
Is the site in the Green Belt? NO	Green Belt Separation					>	Ramsar Site	Special Protection Area (SPA) Special Area of Conservation (SCA)	Site of Special Scientific Interest (SSSI)	Local Nature Reserve	Local Wildlife Site (LWS)	Local Geodiversity Site (LGS)	Great Crested Newt Pond (+500m buffer)	Wildlife Corridor	known )AP species the site?	relopment of upon the fhabitats?
Is the site		d		Adjacent Designations /	<u>Allocations</u> :	Biodiversity	Category 1: Significant	Constraints			Category 2: Constraints	High Impact—	significant mitigation required		Are there any known gootected / DBAP species or habitats on the site?	Would the development of the site impact upon the connectivity of habitats?
Site Location:	Site appraised for:	Designations Map		Key Designations:								Zero/Low Impact - no Medium Impact -	2			
Site Area:		Site Photos				Townscape	Grade I Agricultural Land	Area of High Landscape Value or Significance	Woodland Plantation	Tree Preservation Order (TPO)	Grade 2 or 3a Agricultural Land		Landscape			
SLR Ref: SHLAA Ref:	Land Use: Adjacent Uses:					Landscape and Townscape		Constraints Category 2: Constraints								

Historic En	Historic Environment and Culture				Green Infrastructure	ructure			
Category 1: Significant Constraints	Scheduled Ancient Monument (+ 50m buffer zone if not designated)	Does the site have any hi	Does the site have any historical or archaeological significance?	significance?	Category 1: Significant Constraints	Historic Park or Garden (का धार) Village Green			
	World Heritage Site & Setting (+ candidate)					Cemetery/Churchyard			
	Grade I/Grade II*Listed Building/Structure	I			Category 2: Constraints	Public Open Space/Playing Field/Play Area			
Category 2: Constraints	Grade II Listed Building/Structure					Allotment			
	Conservation Area				•	Public Right of Way (cycleway/ footpath/bridleway)			
	Archaeological Site (Known & potential)	Zero/Low Impact - no	Medium Impact -	High Impact -		Green Infrastructure corridor	Zero/Low Impact - no	Medium Impact -	High Impact -
	Locally-Listed Building/ Structure/ Space	required	na inchanga in inc	required	Is the proposed development site designated as open space or playinelds?	Is the proposed development site designated as open space or playing fields?	required	required	required
					Site quality classification in Open Space Strategy/ Playing Pitch Strategy 2015?	cation in Open laying Pitch			
Flooding					Infrastructure	Infrastructure and Services			
Category 1:	Flood Risk Zone 3B (Functional	20			Is there road capa	Is there road capacity for site traffic generation?			
Significant	Floodplain)				Is there water and requirements?	Is there water and sewerage capacity for site requirements?			
	Flood Risk Zone 3A (High Vulnerability)				Is there education/ site requirements?	Is there education/community/health facility capacity for site requirements?			
					What is the broad local shopping servand street	What is the broad accessibility of the site to local road network, local shopping services, public transport, education, community, and green infrastructure opportunities?	k,		
Category 2: Constraints	Flood Risk Zone 2[Medium Vulnerability)	Zero/Low Impact - no or minimal mitigation required	Medium Impact - mitigation required	High Impact— significant mitigation required			Zero/Low Impact - no or minimal mitigation required	Medium Impact - mitigation required	High Impact— significant mitigation required
	Surface Water Flooding								
<b>Ground Co</b>	Ground Conditions & Contamination				Suitability and	Suitability and Deliverability			
Site Topography	Predominantly Flat	es es			What is considere How many homes	What is considered deliverable on the site? How many homes could be provided?	Site would significantly support economic growth and/or regeneration priorities?	nomic growth and/or rege	neration priorities?
	Gentle Slope				How many jobs co	How many jobs could the site provide for?	Site would directly support the Sunderland and the North East City Deal's proposed International Advanced Manufacturing Park?	derland and the North East ring Park?	Oity Deal's proposed
	Undulating Steep Slope				Site Appraisal Conclusion				
Category 1: Significant Constraints	Health & Safety Executive (HSE) COMAH Development Proximity or Inner Zone	Zero/Low Impact - no or minimal mitigation required	Medium Impact - mitigation required	High Impact – significant mitigation required			Site is considered suitable for development	Site is considered potentially suitable for	Site is not considered suitable for development
	Electricity Pylon (+ 10m buffer zone)							development	
Category 2: Constraints	HSE COMAH Middle or Outer Zone Landfill sites, Contaminated land								
*50	mining) High Voltage electricity line(+10m)								
	buffer zone)								

Sites considered suitable for development
Sites considered potentially suitable for development
Sites considered not suitable for development DANGER Sites with Planning Permission Strategic Land Review Key ]SLR character areas SOUTH SHIELDS TYNEMOUTH South Tyneside Strategic Land Review (January 2018) SLR Sites Assessment Summary Map South Tyneside Local Plan

Appendix C: Strategic Land Review Summary Maps Strategic Land Review Sites Suitable Sites

# **APPENDIX D: Character Area Key Findings Summaries**

**Inner South Shields Summary** 

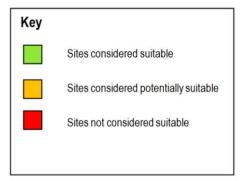
**Indicative Development Capacity** 

368 – Homes and/or 1,246 - Jobs (4.76ha)

# **Inner South Shields Character Area Findings**

The Inner South Shields Character Area covers South Shields Town Centre, the Harton Quay and Mill Dam riverside areas, the Lawe Top, and the wider foreshore areas. 30 sites have been considered and given an 'ISS' site reference. The map below provides a summary of whether a site is considered suitable, potentially suitable, or not suitable.





- The majority of sites considered 'suitable' for development are located within the town centre and are part of the South Shields 365 Regeneration Strategy, and have potential for office, residential, retail, leisure and community uses.
- The majority of potential new housing is on existing/former car parking and industrial sites such as the Winchester Street (ISS15) and Charlotte Street (ISS18) car parks. However, the ability to retain / attract employment to these sites would have to be considered further.
- Land at River Drive (ISS1) and St Stephens Gardens (ISS3) are not considered suitable for development as they provide important open space for the local community.
- Sites (ISS22-24) at the South Shields Foreshore (Ocean Beach Pleasure Park) are not considered suitable but may be required for further travelling showpeople caravan accommodation if future needs dictate.

### **Outer South Shields Summary**

**Indicative Development Capacity** 

2,053 – Homes and/or 2,911 - Jobs (12.73ha)

## **Outer South Shields Character Area Findings**

The Outer South Shields Character Area covers the residential areas of Westoe, Simonside and Rekendyke, West Park, Harton, Biddick and All Saints, Whiteleas, Cleadon Park, Horsley Hill and Marsden. 87 sites have been considered and given an 'OSS' site reference. The map below provide a summary of whether a site is considered suitable, potentially suitable, or not suitable.



# Key Sites considered suitable Sites considered potentially suitable Sites not considered suitable

- Sites along South Shields Riverside (OSS1b-d/3/4 and 67) are generally considered suitable/potentially suitable for new homes and jobs, although flood risk issues render the Middle Docks site (OSS1a) as not suitable.
- The South Shields & Westoe Sports Club (OSS10) and South Tyneside College (OSS 16/16a) sites are considered potentially suitable for residential development, subject to meeting planning requirements.
- Recreational open space areas such as the Coastal Corridor (OSS57), West Park (OSS20), Robert Readhead Park (OSS17), Harton Downhill (OSS56), Temple Park (OSS47/48), Cleadon Park (OSS50), and Newton Garths (OSS42) are considered not suitable for housing/economic development.
- Land at Chuter Ede (OSS41/42), Brinkburn CA (OSS19a-c) and former Temple Park Junior School (OSS46a-b) are considered suitable/potentially suitable for residential development subject to Borough-wide community, playing pitch and open space requirements.
- Green Belt land to the south of the Outer South Shields character area is considered not suitable for development.

#### **Jarrow Summary**

**Indicative Development Capacity** 

1,527 – Homes and/or 2,626 - Jobs (14.95ha)

## **Jarrow Character Area Findings**

The Jarrow Character Area covers Jarrow Town Centre, Jarrow Riverside, the Port of Tyne, Bede and Simonside Industrial Estates and the residential areas of Jarrow, Primrose, Simonside and Brockley Whins. 51 sites have been considered and given a 'JA' site reference. The map below provides a summary of whether a site is considered suitable, potentially suitable, or not suitable.



# Sites considered suitable Sites considered potentially suitable Sites not considered suitable

- The majority of sites along Jarrow Riverside (JA38, 39, 40) are either considered suitable or potentially suitable for development, primarily for the creation of new jobs, but subject to landowners' future plans. Contamination issues may affect whether these sites can be delivered.
- Land above the new Tyne Tunnel (JA48, 49) is not suitable for development.
- Land along the River Don corridor, particularly land around Bede's World and the St Paul's Conservation Area (JA7, 8, 9), and further south (JA20) are considered not suitable for development.
- Various sites within the Bede and Simonside Industrial Estates (JA2, 3, 4, 5, 6, 25, 45) are considered suitable for economic development.
- Various sites within the Simonside area (JA21, 23, 26, 27) are considered suitable or potentially suitable for new homes subject to landscape and open space requirements.
- Various sites within the Primrose, Scotch Estate and Brockley Whins area (JA32/a, 33, 36, 37) are considered potentially suitable for new homes subject to landscape and open space requirements.

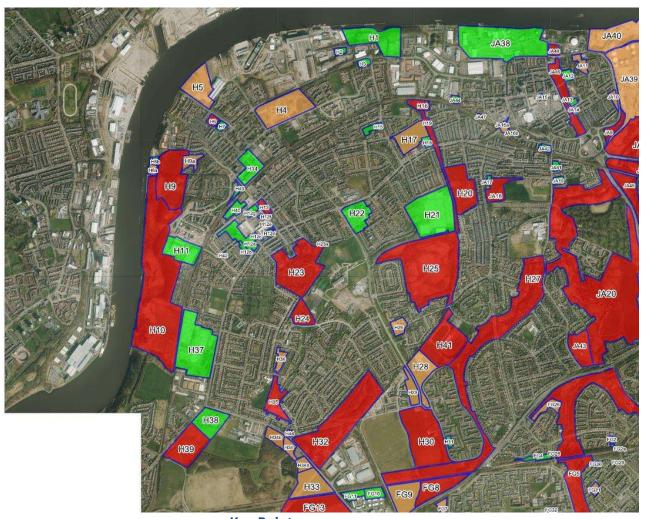
#### **Hebburn Summary**

**Indicative Development Capacity** 

1,233 – Homes and/or 2,544 - Jobs (11.38ha)

# Hebburn Character Area Findings

The Hebburn Character Area covers Hebburn Town Centre, Hebburn Riverside, and those residential areas of Hebburn and Monkton. 55 sites have been considered and given an 'H' site reference. The map below provides a summary of whether a site is considered suitable, potentially suitable, or not suitable.



- The majority of sites along Hebburn Riverside (H1, 5, 8b) are considered suitable or potentially suitable for development, mainly economic development. The Argyle Street (H4) site is subject to biodiversity issues.
- The regeneration of Hebburn Town Centre and New Town area (H12a-g) is ongoing. New homes and retail development are considered suitable in the town centre. Adjacent sites such as the Ashworth Frazer Industrial Estate (H14) are considered suitable for new homes.
- Various open spaces including Hebburn Riverside Park (H10), Carr Ellison Park (H23) and Campbell Park (H25) are considered not suitable for development.
- The former Lukes Lane Primary School site and its surrounding land (H28) is considered potentially suitable for new homes subject to open space and landscape requirements.
- The Clock Playing Fields (H17), land at Campbell Park Road (H29) and Beresford Avenue (H36) are considered potentially suitable for new homes subject to landscape, playing pitch and open space requirements.
- The former South Tyneside College playing field (H39) between Hebburn and Gateshead is considered not suitable for development. However, Green Belt land along Mill Lane (H33, 34/a/b) is considered potentially suitable for development, subject to landscape impacts.



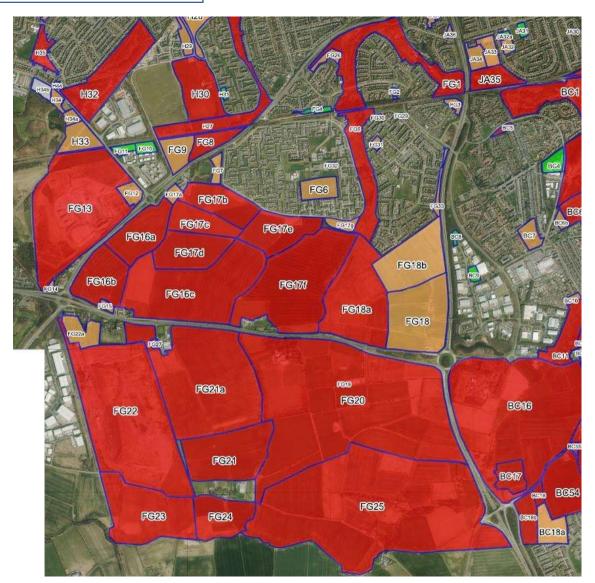
#### Fellgate and Hedworth Summary

**Indicative Development Capacity** 

1,452 – Homes and/or 3,234 - Jobs (5.12ha)

#### **Fellgate and Hedworth Character Area Findings**

The Fellgate and Hedworth Character Area covers both the Fellgate and Hedworth residential estates, land around the Monkton Business Park and the wider Green Belt. 46 sites have been considered and given an 'FG' site reference. The map below provides a summary of whether a site is considered suitable, potentially suitable, or not suitable.



#### **Key Points**

- Land within the Fellgate and Hedworth estates (FG2, 3, 6, 7, 26, 28, 29, 30, 31, 32) are considered potentially suitable for residential development subject to landscape, playing pitch and open space requirements.
- The majority of sites within the Green Belt between the South Tyneside urban area and Gateshead and Sunderland (FG13, 16a-c, 17b-f, 18a, 20, 21/a, 22, 23, 24) are considered not suitable for development to ensure separation and strategic green infrastructure corridors between those areas are maintained.
- Sites around the Fellgate and Hedworth estates (FG17a/g, 18, 18b) and Wardley Colliery (FG22a) are considered potentially suitable for a range of uses such as new homes and/or jobs. However, site-specific as well as cumulative impacts upon the Green Belt, landscape and infrastructure capacity/access issues would have to be considered further, as well as the overall impact on separation and openness within the Green Belt.
- Some of the land to the west of the A19 Downhill Lane interchange (FG25) is being planned for release from the Green Belt for the International Advanced Manufacturing Park (IAMP) as part of the joint Sunderland and South Tyneside City Deal.

## Key Sites considered suitable Sites considered potentially suitable Sites not considered suitable

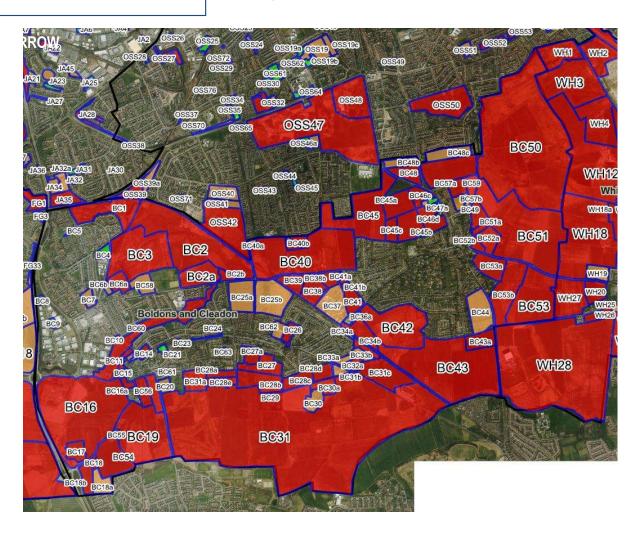
#### The Boldons and Cleadon Summary

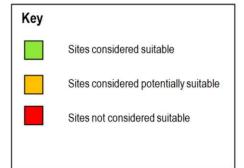
**Indicative Development Capacity** 

2,099 – Homes and/or 1,653 - Jobs (9.31ha)

#### **The Boldons and Cleadon Character Area Findings**

The Boldons and Cleadon Character Area covers Boldon Colliery, East and West Boldon, and Cleadon, as well as the green belt surrounding them. The appraisals have considered 105 sites and given a 'BC' site reference. The map below provides a summary of whether a site is considered suitable, potentially suitable, or not suitable.





#### **Key Points**

- The majority of the Green Belt surrounding the Boldons and Cleadon is considered not suitable for development to ensure separation between those areas and the wider South Tyneside and Sunderland urban areas and maintain strategic Green Belt and green infrastructure corridors.
- Green Belt sites to the southern edge of Cleadon Park (BC48b & c), at West Hall Farm (BC44) Cleadon, Boldon North Farm (BC25) and Low House Farm (BC33a & b), the former MoD Bunkers and Medical Stores (BC30) and north of Town End Farm (BC18a) are considered potentially suitable for new homes, subject to Green Belt, landscape and open space impacts.
- Brownfield land at Cleadon Lane Industrial Estate (BC36a & b, 37) is considered potentially suitable for new homes dependent on the need and viability for retaining employment land in this area.
- The East Boldon junior school site would be considered potentially suitable
  for new homes if cumulative growth impacts required the school to be
  significantly extended with relocation to an alternative nearby site.
- Land at the Disco Field (BC7), former Boldon Church of England Primary School (BC13) and New Road (BC58) are considered potentially suitable for new homes dependent on open space and landscape impacts.

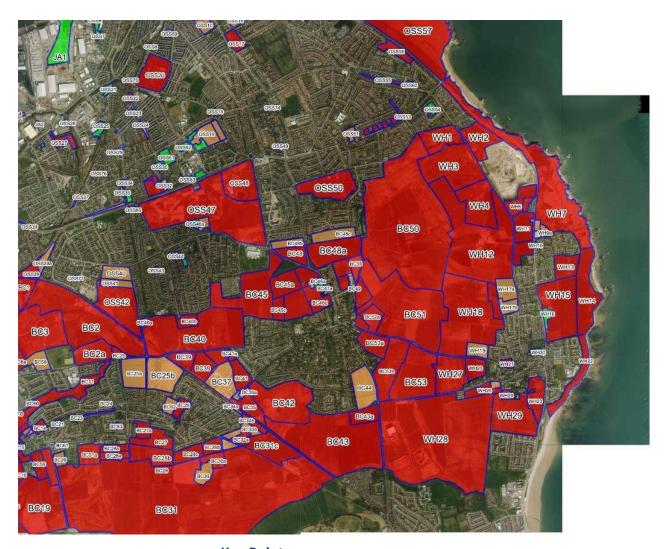
#### Whitburn Summary

**Indicative Development Capacity** 

397 - Homes 0 - Jobs (0.0ha)

#### **Whitburn Character Area Findings**

The Whitburn Character Area covers the village of Whitburn and its surrounding Green Belt areas, including those areas south of Marsden, east of Cleadon and north of Sunderland. 34 sites have been considered and given a 'WH' site reference. The maps and table below provide a summary of whether a site is considered suitable, potentially suitable, or not suitable for development.



# Sites considered suitable Sites considered potentially suitable Sites not considered suitable

#### **Key Points**

- The majority of sites around Whitburn, including those that separate
  Whitburn from Cleadon, Marsden and Sunderland, as well as along the
  coastal corridor are considered not suitable for development due to likely
  impacts upon the Green Belt, landscape and biodiversity.
- The former Croftside care home site is considered suitable for new homes.
- Land at the former Whitburn Lodge (WH8) Shearwater (WH9a & b),
   Wellands Lane (WH17a & b) and the former Charley Hurley Centre,
   Cleadon Lane (WH19) are considered potentially suitable for new homes
   dependent on Green Belt, landscape and biodiversity impacts.
- Land to the west of Marsden Quarry (WH4) is considered potentially suitable for mineral extraction, as the existing Marsden Quarry nears completion. However, impacts upon the landscape and other considerations such as access would need to be considered further.

#### To find out more about the Local Plan, please contact:

Spatial Planning
Development Services
South Tyneside Council
Town Hall and Civic Offices, Westoe Road
South Shields, Tyne & Wear NE33 2RL

Telephone: (0191) 424 7688

E-mail: **local.plan@southtyneside.gov.uk**Visit: **www.southtyneside.gov.uk/planning** 

If you know someone who would like this information in a different format contact the communications team on (0191) 424 7385

#### Proposed new "village " at Fellgate

Thu 2/29/2024 9:49 PM

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

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

Here are a few points why I think this cannot go ahead,

- 1. Lack of accessible information website has faulty links, cannot be accessed from south Tyneside hubs, no hard copies available, missing documents.
- 2. Repeated requests for extensions refused despite all of the access issues.
- 3. In the 2016 plan the Fellgate greenbelt was deemed not suitable for development what has changed?
- 4. Impacts on local habitats including farm birds which have migrated from other developed areas, flora and fauna, lack of robust environmental survey.
- 5. Impacts on sustainable public transport which is already unable to cope with demand.
- 6. Impact on health of existing residents as a result of increased traffic and emissions, exacerbated by removal of greenbelt which reduces existing impacts.
- 7. Impact on local road infrastructure which is unable to cope with existing demand frequent gridlocks across proposed access routes to new estate.
- 8. Consideration of access routes for emergency services through gridlocked roads, especially with the proposed new tri-station in Hebburn.
- 9. Impact on secondary school provision across Jarrow and Hebburn with schools at capacity and no plans for additional secondary school places.
- 10. Lack of GP access plans show proposed GP surgery but current surgeries are over capacity with insufficient GPs available to support them.

Best regards,	
---------------	--

Dan parr.

#### LP2008 - Duncan Donnelly

#### Local Plan Fellgate and Hedworth Green elt

Fri 3/1/2024 9:59 PM

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

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<a href="mail.guarantine@southtyneside.gov.uk">email.guarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*

I would like to register my concerns and views relating to the use of the Fellgate and Hedworth greenbelt area as part of the current South Tyneside Council Local Plan. In my view the use of the greenbelt as part of the plan is neither legally compliant or sound. Please find below my reasons:

- 1. Lack of accessible information on the council website which has faulty links and cannot be accessed from South Tyneside hubs, no hard copies available and various missing and misidentified documents.
- 2. Repeated requests for extensions refused despite all of the access issues.
- 3. In the 2016 plan the Fellgate greenbelt was deemed not suitable for development what has changed and how is the greenbelt suitable now.
- 4. Negative Impact on local environment, habitat, wild life, and nature including birds which have migrated from other developed areas, flora, trees, rivers, streams. All of this negative impact has been clearly identified in the Councils sustainability study.
- 5. Impact on sustainable public transport which is already unable to cope with demand.
- 6. Impact on health of existing residents as a result of increased traffic and emissions, exacerbated by removal of greenbelt which negatively impact climate change and increase pollution.
- 7. Impact on local road infrastructure which is unable to cope with existing demand frequent gridlocks across proposed access routes to new estate.
- 8. Consideration of access routes for emergency services through gridlocked roads, especially with the proposed new tri-station in Hebburn.
- 9. Failure to answer questions and concerns from community resident at consultation meetings.

Breaking guidance and rules linked to the Equality Act by refusing to make Local Plan paperwork in particular Reg 19 concerns paperwork available in a range of suitable formats,

Regards.

**Duncan Donnelly** 



#### LP2010- Lindsey Grieveson



Lindsey Grievson

Fri 3/1/2024 4:47 PM

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

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### **Regulation 19 Local Plan Consultation Representation Form**

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

#### **Data Protection and Freedom of Information**

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

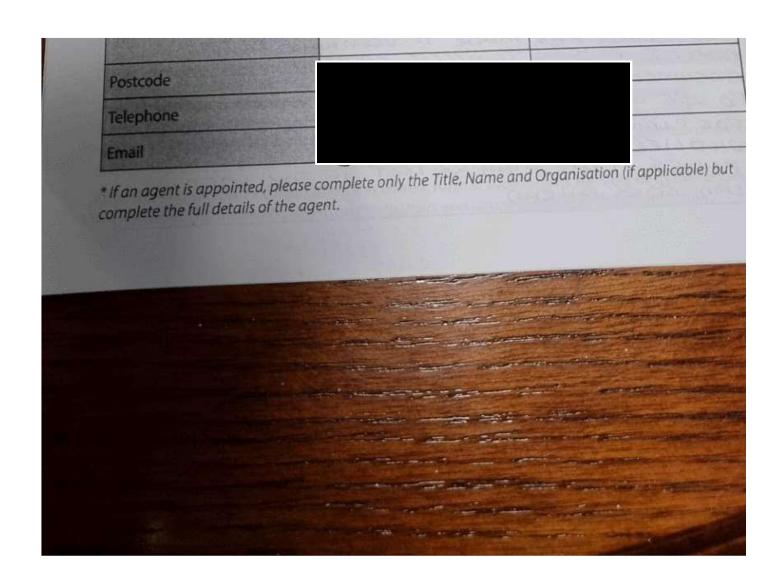
#### This form has two parts:

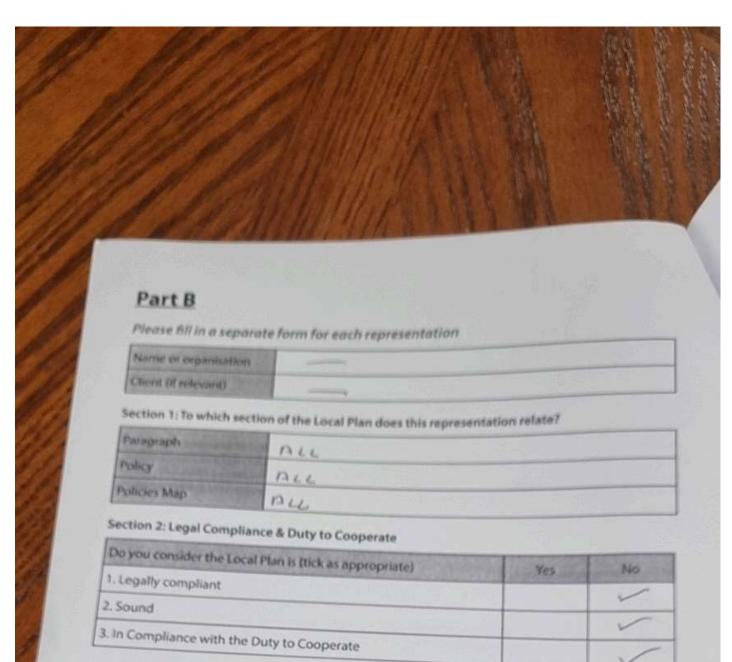
- Part A Personal details (need only be completed once)
- Part B Your representation(s). Please fill in a separate sheet for each representation you wish to make.

This form can also be completed online at haveyoursay southtyneside gov.uk If you are having difficulty submitting representations, please contact local.plan@southtyneside.gov.uk or call 0191 424 7692

Part A: Your Details		VALORED SERVICE SERVIC
	Personal Details*	Agent's Details (if applicable)
Title	miss	
First Name	LINDSEY	
Last Name	GRIEUSON	
Job Title (where relevant)		The Asset of the Control
Organisation (where relevant)		The state of Police
		Same negligible

Address





## 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 LOCAL PLAN IS NOT LEGALLY COMPLIANT.

IT'S NOT SOUND ITS IT HAS NOT BEEN MADE EASY

SO THAT THE AVERAGE PERSON IS STRUGGLING TO

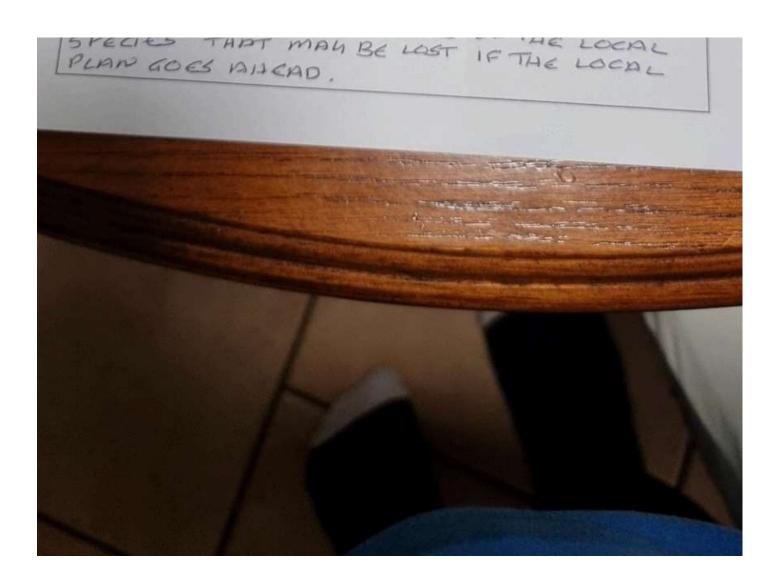
STATE THAT BEFORE GREEN FIELD SITES ARE EVEN

FOR BUILDING.

RESIDENTS OF FELLGATE AND HAS BEEN USELL POORLY COMMUNICATED WITH THOSE THAT DO KNOW ABOUT

THE COUNCIL HAS MADE IT VERYHARD FOR THE DUEBAGE PERSON TO ACCESS OR REPLY TOTAL DOCUMENTATION ESPECIALLY IF THEY STRUGGLE TO USE COMPUTERS AND OTHER TECHNOLOGY.

THE PLANDOES NOT CONSIDER THE MANY WILDLIFE AND THE HABITATS OF THE



## 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 revised wording of any policy or text. Please be as precise as possible.

THE PLAND SHOULD CONSIDER THE
GOVERNMENT GULDELINES WHICH STATE THAT
BEOWNFIELD SITES SHOULD BE USED
BEFORE ANY GREENFIELD SITES

THE PLAN SHOULD BEAUDILABLE ON A PAPER CUPY FOR PEOPLE WHO CANT USE OR STRUGGLE TO USE COMPUTERS ETC.

SHOULD THE LOCAL PLAN GO AHEAD IT WILL HAVE A MASSIVE NEGATIVE EFFECT ON LOCAL RESIDENTS QUALITY OF LIFE DUETO EXTRA AIR POLLUTION, NOISE, INCREASED FLOOD RISK AND EXTED TRAFFIC IN THE AREA THIS WILL AFFECT BOTH MENTALLY AND PHUSICALLY ON THE LOCAL RESIDEN

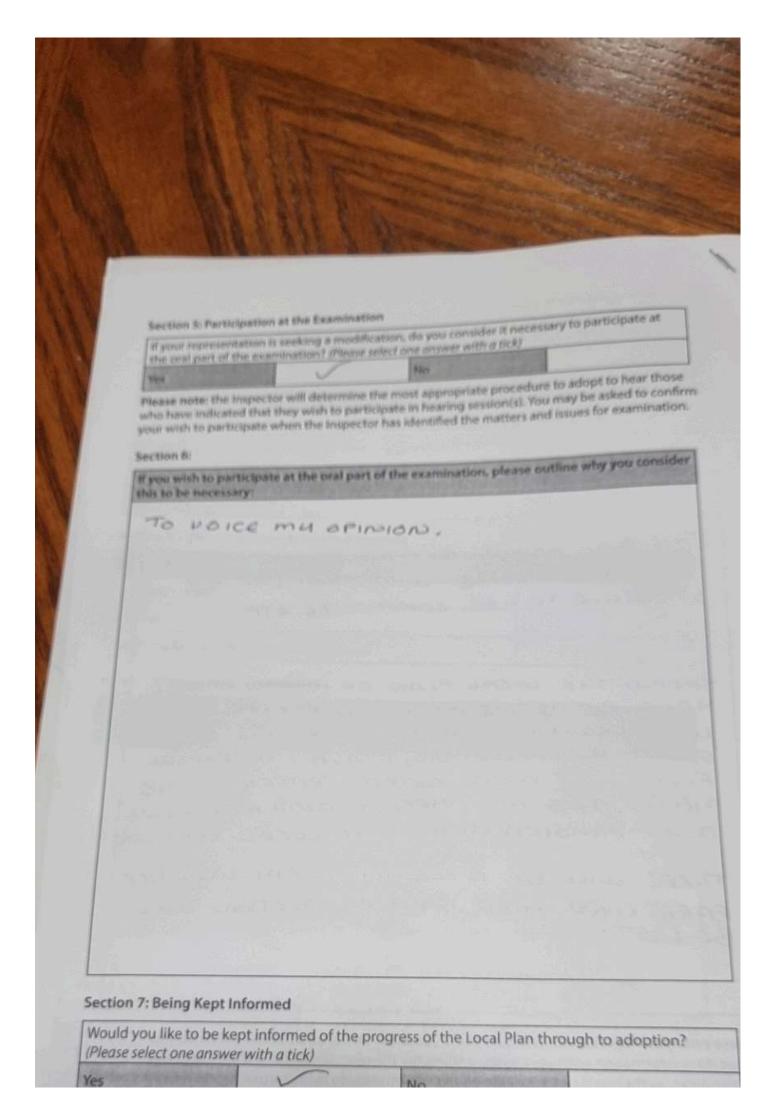
THERE WILL BE DLOSS OF LOCAL WILD LIFE FARM LAND AND FOOD PRODUCTION WILL BE LOST-

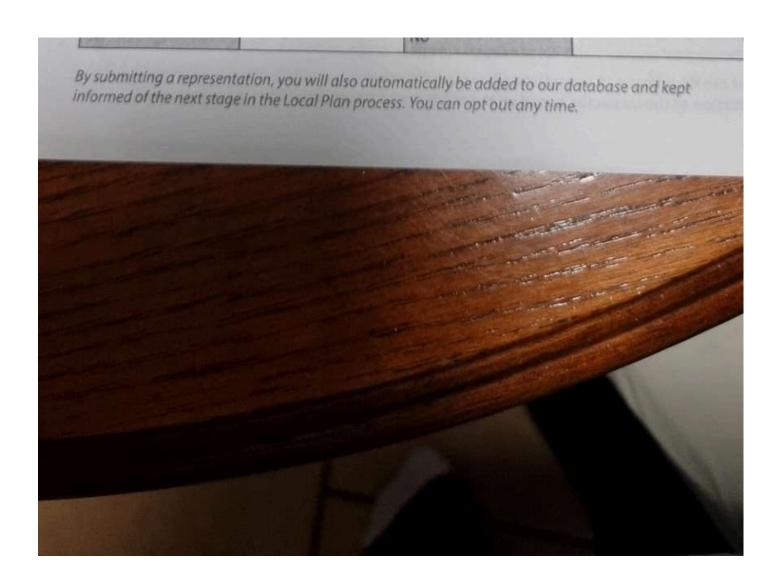
(Continue on a separate sheet if neces

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 on the original representation at publication stage.

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







Sent from Yahoo Mail on Android

#### LP2011 - ED and FM Williams

#### Comments of local plan South Tyneside 2024



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Comments on draft local Plan South Tyneside 2024

We are resident in the local plans and are where we have lived for 40 years. We have seen the local plans and are

concerned that they would irreversibly damage our environment currently protected by the green belt. We have also seen the submission with objections to the process of the plans prepared by the Cleadon and East Boldon Branch Labour Party, and are broadly supportive of the objections included.

In particular <u>we object to Policy SP2..</u> We consider that the basis for calculation of the number of new homes required using out of date statistics is not sound. The Council should make the case to use current data to produce new figures showing the lower requirement for new homes.

<u>We object to SP3.4</u> The case to amend the green belt boundaries to locate new housing has not been made. The areas were previously listed as unsuitable for development and there has been no credible justification for the change.

<u>We object to GA4</u> re Land at West Hall Farm. New housing would impact on the wildlife corridors network and nearby SSRI and Boldon Flats Local Wildlife Site and lead to loss of Grade 3 agricultural land. Off site mitigation could not compensate for the impact.

<u>We object to SP 3.2</u> The council has not made the case for management of the unsustainable growth proposed which will have a detrimental impact on local infrastructure and the distinctive character of Cleadon and East Boldon.

Mr ED and Mrs FM Williams

#### **Rhiannon Laverick**

From:

**Sent:** 29 February 2024 23:18

To: Local Plan

**Subject:** Fwd: Objections to the Local Plan 2024-2040

Categories: Deborah Lamb

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Dear Sir/Madam,

I should like to register my objections to the Local Plan as detailed by my sister,

Kathleen Ramm.

I agree entirely with her submission.

Your sincerely,

Janet Ramm

Janothamm

Sent from my iPad

Begin forwarded message:

From:

Date: 26 February 2024 at 19:18:53 GMT

To:

**Subject: Fwd: Objections to the Local Plan 2024-2040** 

Sent from my iPad

Begin forwarded message:

From:

**Date:** 25 February 2024 at 20:22:21 GMT **To:** local.plan@southtyneside.gov.uk

**Subject: Objections to the Local Plan 2024-2040** 

To whom it may concern:

The final draft of the above plan needs to be radically changed and improved especially in respect of the proposed use of Green Belt land for housing.

The residents of East Boldon and Cleadon value their green belt extremely highly.

On or around 10th February 2024 Michael Gove, the Housing Secretary announced changes to the law which will scrap the size and time limits on turning office blocks into homes for residential use. Councils are to be allowed to turn offices into homes as soon as they become vacant. The aim of the strategy is to ensure that new housing is focused on already built up areas to limit development sprawling into the outskirts of villages.

I understand that there are office blocks such as this in South Shields town. In this case there should be no need to build on the Green Belt.

The housing developments proposed by the Council are as follows: Boker Lane 263 houses (Local Plan 2024) Moore Lane 259 houses (Local Plan 2024) Cleadon Lane 202 houses (Local Plan 2023) Mayflower Glass 9 houses (Local Plan 2023) Total 733 houses in Cleadon and East Boldon

In addition 400 houses are proposed to be built at Town End Farm in Sunderland but close to West Boldon and 1200 houses at South Fellgate, both in the Green Belt.

The purposes of the Green Belt according to the National Policy Planning Framework (NPPF ) are as follows:

- to prevent urban sprawl
- to keep land permanently open
- to retain the essential character and openness of the villages and the land
- to restrict and prevent neighbouring towns merging
- to safeguard the countryside from encroachment
- to assist urban regeneration, encouraging the recycling of derelict buildings and urban land.

The Green Belt may only be altered in exceptional circumstances. These must be fully evidenced and justified.

Those wishing to take Green Belt land for building must demonstrate that all other reasonable options have been fully examined.

The permanence of the Green Belt maximises the use of brownfield and underdeveloped land. In this case only thirty houses from small brownfield sites have been identified as available.

The Green Belt optimises the density of developments in town centres with appropriate infrastructure.

Proposals must have been informed by discussion with neighbouring authorities (see Townend Farm and South Fellgate figures).

The whole point of the Green Belt, when it was created, is that it is permanent.

In this case there are no exceptional circumstances.

STATEMENTS OF HOUSING NEEDS in South Tyneside to 2040 produced by the Office of National Statistics (ONS)

These figures are well out of date and overestimated.

Houses required ONS 2014 77,425

Houses required ONS 2018 75,412

Overestimate

These figures include the 72,081 homes already in existence in South Tyneside.

2013

There are no more recent figures.

The Council's housing targets are well above the figures projected by the ONS.

There is actually no population growth in South Tyneside and this has been the case for many years. Moreover an analysis of properties available to buy or rent shows that there is no excess demand.

There are no positives here but it is to be hoped that new homes can be built in converted offices in the town centre following Mr Gove's recent intervention and that the Green Belt is kept intact.

#### OTHER OBJECTIONS to the Local Plan:

The natural environment will be ruined as the site is a wildlife corridor. For example mixed hedges on the Ash Path to the east of the Boker Lane site have been full of birdsong from robins, blackbirds, long tailed tits, bluetits, great tits, bullfinches, green finches, chaffinches and long eared owls which are rare visitors to Britain, in the last three weeks. The path is also a corridor for pipistrelle bats. This is only one of many mature hedges which would be ruined if housing plans go ahead. If the mature hedges of Cleadon and East Boldon are damaged or destroyed we shall have only a silent spring.

The infrastructure will be unable to cope with the extra sewage created. Sewage is already discharged into the sea at times of heavy rain which are now very frequent indeed as the result of climate change.

There is a obvious risk of flooding as another result of excessive rain and climate change.

Valuable agricultural land will be lost when it is most needed for food security.

Traffic is already well over capacity and the air quality in East Boldon Front Street is already terrible.

Infrastructure will be overwhelmed.

Village identity will be lost as villages are merged.

Finally I understand that the proposed development on the Boker Lane site is in contravention of the Neighbourhood Plan.

Yours sincerely, Kathleen Ramm,



Sent from my iPad

#### LP2014- Michele Ross

#### expansion of 474 new homes in east boldon

Michele Ross

Sat 3/2/2024 9:46 AM

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

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<a href="mail.quarantine@southtyneside.gov.uk">email.quarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*

I think this is not sustainable.

The addition of 263 houses off Boker Lane, this will impact on habitat of the surrounding area.

The infrastructure will not cope.

I agree using brown field sites but NOT green field sites. There are plenty brown field sites in South Tyneside, why take away our green spaces

Sent from Outlook for Android

#### LP2015- Lynda Kohberg

#### Objection to local plan and supplementary proposed planning documents

Lynda Kohberg

Sat 3/2/2024 12:29 PM

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

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<a href="mailto:email.guarantine@southtyneside.gov.uk">email.guarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*

The plan is not legally compliant or sound due to the following –

- 1. Lack of accessible information-website has faulty links cannot be accessed from South Tyneside hubs, no hard copies available missing, documents.
- 2. Repeated requests for extensions refused despite all of access issues.
- 3. In the 2016 plan the Fellgate green belt deemed not suitable for development -what has changed
- 4. Impacts on local habitats including farm birds which have migrated from other developed areas, Flora And Fauna, lack of robust environmental survey .
- 5 . Impacts on sustainable public transport which is already unable to cope with demand.
- 6. Impact on health of existing residents as a result of increased traffic and emissions ,exacerbated by removal of greenbelt which reduces existing impacts.
- 7. Impact on local road infrastructure which is unable to cope with existing demand- frequent gridlock across proposed access routes to new estate.
- 8. Consideration of access routes through gridlocked roads for emergency services . Especially with Proposed new tri-station in Hebburn.
- 9. Impact on secondary school provision across Jarrow and Hebburn with schools at capacity and no plans for additional secondary school places.
- 10. .Lack of GP access plans show proposed GP surgery but current surgeries are over capacity with with insufficient GP's to support them.
- 11. Also this area has a history of flooding. Great concerns that this development could add to this problem.

Sent from Mail for Windows Across

#### LP2016 - Donna Ord

#### Objection to local plan and supplementary proposed planning documents

Sat 3/2/2024 7:55 AM

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

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<a href="mail.guarantine@southtyneside.gov.uk">email.guarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*

The plan is not legally compliant or sound due to the following -

- 1. Lack of accessible information website has faulty links, cannot be accessed from south Tyneside hubs, no hard copies available, missing documents.
- 2. Repeated requests for extensions refused despite all of the access issues.
- 3. In the 2016 plan the Fellgate greenbelt was deemed not suitable for development what has changed?
- 4. Impacts on local habitats including farm birds which have migrated from other developed areas, flora and fauna, lack of robust environmental survey.
- 5. Impacts on sustainable public transport which is already unable to cope with demand.
- 6. Impact on health of existing residents as a result of increased traffic and emissions, exacerbated by removal of greenbelt which reduces existing impacts.
- 7. Impact on local road infrastructure which is unable to cope with existing demand frequent gridlocks across proposed access routes to new estate.
- 8. Consideration of access routes for emergency services through gridlocked roads, especially with the proposed new tri-station in Hebburn.
- 9. Impact on secondary school provision across Jarrow and Hebburn with schools at capacity and no plans for additional secondary school places.
- 10. Lack of GP access plans show proposed GP surgery but current surgeries are over capacity with insufficient GPs available to support them.
- 11. Significant flood risk, history of flooding on Fellgate Estate, concreting over green belt would increase this risk.

Thankyou for your consideration in this matter

Donna Ord

#### LP2017- Frances O'Neil

#### SP8 Fellgate Sustainable Growth Area

Frances O'Neil

Sun 3/3/2024 9:18 PM

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

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Regulation 19 Local Plan Consultation SP8 Fellgate Sustainable Growth Area

The current proposal is NOT sound for the following reasons:

Lack of accessible information - website has faulty links and cannot be accessed from South Tyneside hubs. Also, no hard copies available.

The number of new homes proposed is NOT sound as it uses out of date statistics to calculate the number of homes needed. The proposed 1,200 new homes will bring an unsustainable level of growth which will have a significant, detrimental impact on local infrastructure, road networks and public transport, (already unable to cope with demand). Consideration of access routes for emergency services through gridlocked roads, especially with the proposed new tri-station in Hebburn.

The site is classed as Category 2:

A wildlife site, geodiversity site, and wildlife corridor. Building on this site will therefore have an impact on local habitats including farm birds which have migrated from other developed areas.

Fellgate has been prone to flooding, and parts of Durham Drive still have localised flood from heavy rain.

Impact on health of existing residents as a result of increased traffic and emissions, exacerbated by removal of greenbelt which reduces existing impacts.

Impact on secondary school provision across Jarrow and Hebburn with schools at capacity and no plans for additional secondary school places.

In 2016, Fellgate greenbelt was deemed not suitable for development - what has changed?

#### LP2018 - Colleen Anderson

#### FW: Objection to proposed housing development near Fellgate Estate

Planning applications < Planning applications @southtyneside.gov.uk >

Sun 3/3/2024 9:20 PM

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

Kind regards

Tricia

From:

**Sent:** Sunday, March 3, 2024 9:09 PM

**To:** Planning applications <Planningapplications@southtyneside.gov.uk> **Subject:** Objection to proposed housing development near Fellgate Estate

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#### Good Evening,

With regards to the proposed housing development near Fellgate Estate and the surrounding area, I wish to raise a strong objection to the same. The greenbelt should remain.

As a resident of the area this will transform the visual aspect of the Estate aswell as increase the volume of traffic and pressure on our roads which are already busy enough without further residents using the roads etc. The increase in traffic may lead to further pollution and health implications, especially for those with respitory problems (my family has members who live locally who have respitory issues including asthma). The development will significantly impact local noise, air and light both during and after any development and will have an impact on people's mental health as the area becomes more urbanised...not what the area was supposed to be like for people who live on the Estate.

The green belt incorporates areas for people such as myself to walk our dogs and enjoy the natural environment which houses many birds and other wildlife. Have steps been taken to ensure there are no protected species living within this area? Any development will have a significant impact upon the local wildlife.

Furthermore, my property has been one of those impacted by flooding and I was provided with a flood gate and door. Keeping in mind the nearby development at Monkton Gardens, the risk of flooding Fellgate has anyway, I am deeply concerned that the proposed development could increase the risk of flooding as where is excess water going to be diverted to?! What has changed since the council's flood recommendation that this area was unsuitable for development.

I am also aware of the negative impact this possible development would have on our local farmer who has used these fields for generations. Why should they lose their job and livelihoods when the council could consider other more suitable sites, including brownfield sites.

I welcome your response to my objection and look forward to hearing from you.

Regards

Colleen Anderson

Sent from Yahoo Mail on Android

#### Fw: Objection to proposed housing development near Fellgate Estate

Mon 3/4/2024 11:03 AM

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

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Good morning,

I've been made aware that this may be the email address I should have sent my objection to.

Please confirm receipt and that it will be taken into account as you can see below, the original email was sent in before the deadline.

Regards

Colleen Anderson

Sent from Yahoo Mail on Android

---- Forwarded message ----

From:

To: "planningapplications@southtyneside.gov.uk" < planningapplications@southtyneside.gov.uk>

Cc:

Sent: Sun, 3 Mar 2024 at 21:08

Subject: Objection to proposed housing development near Fellgate Estate

Good Evening,

With regards to the proposed housing development near Fellgate Estate and the surrounding area, I wish to raise a strong objection to the same. The greenbelt should remain.

As a resident of the area this will transform the visual aspect of the Estate aswell as increase the volume of traffic and pressure on our roads which are already busy enough without further residents using the roads etc. The increase in traffic may lead to further pollution and health implications, especially for those with respitory problems (my family has members who live locally who have respitory issues including asthma). The development will significantly impact local noise, air and light both during and after any development and will have an impact on people's mental health as the area becomes more urbanised...not what the area was supposed to be like for people who live on the Estate.

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I am also aware of the negative impact this possible development would have on our local farmer who has used these fields for generations. Why should they lose their job and livelihoods when the council could consider other more suitable sites, including brownfield sites.

I welcome your response to my objection and look forward to hearing from you.

Regards

Colleen Anderson

Sent from Yahoo Mail on Android

#### LP2019 - Helen and Brian Hudson

Fellgate sustainable growth area supplementary planning document scoping report 2024 public consultation

Helen Hudson Sat 3/2/2024 12:43 rivi

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

7 attachments (2 MB)

Fellgate sustainable growth area.docx; Addendum 1.jpg; Addendum 2.jpg; Addendum 3.jpg; Addendum 5B.jpg; Addendum 4.jpg; Addendum 5A.jpg;

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<a href="mail.guarantine@southtyneside.gov.uk">email.guarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*

Pease see enclosed my objection to this plan

Helen and Brian Hudson,

Email

Fellgate sustainable growth area

Regulation 19 submission: This report is unsound. This plan is unsound on many levels. It is not justified as the need for housing is not high, you say on your website there is little homelessness in the borough. Not as many children are being born, school rolls are falling, and there are already many houses being built. Also it is unjustified as there is no need to take a Greenfield site of ancient farmland as there are 45 Brown field sites available.

I consider much of this report to be unsound. There are issues surrounding the health of residents, how the council will cope with the extra @2000 cars on a road system which is currently woefully inadequate for the amount of cars already using it. As well as the effect on wildlife and flooding. It also not legally compliant as it goes against both Government and published ST policies on wildlife and health among others.

#### **Section 1 Need**

I wish to object to the basic premise of the plan. I consider it is based on out of date information and so should be withdrawn.

#### Number of houses required

The plan says there is a need for 1,200 houses.

This is the same number as quoted in 2022. However there has been a lot of building work going on in the area and several more planned

A total of **914** houses have been or are being built at the end of 2023 and beginning of 2024 Hebburn Metro area 2024, **92** houses being built

Monkton Gardens: houses being built, including room for future development **127** Bedewell court. Houses, (2 left to sell, 3 and 4 bedrooms, from £233,995) **335** Swallow Drive (Persona) **100+** houses built

College site, Avant Homes 260

See enclosed ST report on housing in the borough. Addendum1

#### **Schools**

Schools in the area demonstrate the fall in numbers of children (Source school service.gov.uk)

Fellgate School has capacity for 204 pupils, but only has 165 on its roll. Deficit: 39 St Josephs catholic primary, Capacity 210, roll 151, deficit 59

#### The fall in number of children being born means less housing is needed

NewcastleWorld.com says that South Tyneside has seen the fewest births in a decade in 2022 than in any year since 2013 (data from ONS)

This is in line with the decline in births in England and Wales

#### **Section 2 Traffic numbers and Health**

I reject this plan on the grounds that it will adversely affect the health of approximately 2000 people living on Fellgate and is therefore unsound.

The plan to take over the greenbelt around Fellgate will have a detrimental effect on our health which is already worse than the national average. (Source your report **Addendum 2**) your report says you will be "working with partners to drive improvement" But you will be making it much worse for Fellgate residents.

Fellgate has a large number of people entering their 60s and above. A lot bought houses here 30 to 40 years ago in order to raise children in the safe and healthy environment. Good

Helen and Brian Hudson, 23 Canterbury Way, Fellgate ne32 4td
Email helenhudson 14@gmail.com

schools and access to fresh air from the farmland as well as a lower crime rate attracted people to move here. A lot of them have stayed and so have a lot of their children, moving into flats until they decide to have children of their own

This means that health problems of the elderly are already a problem for some of the residents. As acknowledged in your report, (**Addendum 2**) See **Addendum 2 to 3**, I find it an **unsound policy** that you know that the health of our area is bad and that you would further worsen it by Building this amount of houses and introducing 2000 new cars. Lung and heart problems will be massively impacted by:

- The stress of building 1200 houses over a period of 20 years.
- The effect of @ 2000 cars on air pollution and the subsequent rise in the number of asthma, COPD and lung cancer sufferers caused by the policies outlined in this document
- I enclose a copy from South Tyneside council's own publication (Addendum 2)"
  Our South Tyneside" 2023 which shows that the health of people in the borough is already worse than the national average Addendum 2 and 3
- Addendum 2 and 3, from your own statistical report, shows that COPD levels in the borough at 740 per 1,000 are already higher than the regional rate of 638 per 1K, and the national rate of 415 per 1K. You are considering deliberately causing the health of Fellgate people to massively decline if you go ahead with this plan due to dust from developing housing and the effect of another 2,00 cars
- Addendum 4 from the British Medical Association Report (BMJ 24/2/24) (Source Dr G Morley)
- This report demonstrates the findings of a US study into the effect of fine particulate matter on cardiovascular and respiratory morbidity.
- It's worth noting that the study group was:
- 1. Large containing 50.1 million people
- 2. Contained people who had medical insurance, and so therefore not already disadvantaged poor.
- 3. Extensive: it lasted from 1/1/2010 to 31/12/2016

The conclusion of this report was that an increase in cars, resulted in an increase in hospital admissions and death.

Addendum 5 A and B from the University of Birmingham report (pub 27/3/23) source University of Birmingham shows that all cars produce airborne particles for emissions and are not filtered out, even in new cars. This means that the approximation of 2000 extra cars will significantly raise the levels of dangerous and deadly airborne toxins.

It goes on to say that a concentration of cars, as will happen at Mill Lane roundabout, will cause a concentration of pollution which will be dispersed around Fellgate and Hebburn. This will further increase the detrimental effect on Fellgate residents in the form of COPD, Asthma, Cardiovascular problems and deaths.

There is nothing in your plan to say you have investigated the effect of this plan on the health of Fellgate residents, or indeed the other people who use this road from South Shields, Jarrow and Hebburn.

## The Traffic Assessment 2023 PDF. ST website. Shows that this plan is not legally compliant and is totally unsound.

Because of the massive impact on the number of cars that will be introduced to the roads, there will be continual gridlock on the A194 and Mill Lane, the fire service, ambulance and police will not be able to get to the area in an emergency, they are to be stationed at the Tristation in Hebburn and will have to journey through a stationary A194, Further putting residents lives at risk.

You have looked at traffic flow at Mill lane roundabout, section 3.4.2 .Even without the local plan increase in numbers, there is major congestion

Helen and Brian Hudson, 23 Canterbury Way, Fellgate ne32 4td
Email helenhudson 14@gmail.com

Fig.3.5 can be seen to be exceeding capacity at both morning and evening peak, without the local plan introduced

Fig 3.5.2 shows this will be exacerbated by the Local plan and this situation will be "significantly worsened" by its introduction

You have not said how this will be fixed, apart from a vague statement at the public meeting. This is a major consideration and the situation will cause danger and chaos for all South Tyneside residents.

## Wildlife. This plan is not legally compliant as it goes against government policy on wildlife corridors

There is a lot of wildlife on the greenbelt and around Fellgate, the ponds, the field beside the ponds, and other parts of Jarrow including Monkton ponds. This plan will disrupt the wildlife corridor and fragment habitats such as the pond area and that goes against the Lawton principle of bigger, better and more joined up care for Wildlife.

## Source gov.uk protected species and development advice for local planning authorities.

This particularly mentions species we have seen on the disputed area: Bats, Pigeons, Starlings, Owls, Dormice, Hedgehogs, Great Crested Newts, Larks, Blackbirds, plus other breeding birds.

Gov.uk says that LPAs should consult natural England, and prepare an environmental impact assessment, the absence of such may lead to objections from Natural England.

There is no proper environmental impact assessment specific to Fellgate greenbelt (Natural England advice) included in this report, which goes against ST Council stated Policies.

#### **Available Brownfield sites**

There are 45 Brownfield sites in South Tyneside that could be built upon (Brownfield land register 2023. ST.gov.uk)

Why aren't you using these?

Nothing in the plan to say why not.

## Flooding. The deprivation of the greenbelt is both unsound and not legally compliant. It is against government policy to reduce flooding

Fellgate has been severely flooded in the past, even though the fields absorbed some of the water. Measures were taken by council to mitigate the effect of this by introducing washaways on the farm track to Fellgate farm. The farmer's fields also help by absorbing the water. If this is taken away and 1.200 houses built, there is likely to be severe flooding for the houses on Fellgate, which is slightly lower than the fields

Additionally: This plan is basically unsound. The previous edition of the plan stated the area involved (SP6) is 51.5 hectares, but is stated in Policy SP 8 to be 58 hectares. A significant change of 12.7% which changes the whole issue.

St Pepot OUR SOUTH TYNESIDE ON \$ 54% 1 22:38

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Housing

67,167 dwellings in the borough.

57.1% of our residents live in privately owned homes (27.1% owed with a mortgage, 30% owned outright), 29.6% of households live in social rented accommodation (23% in rented council homes, 6.6% in other social rented homes), and 13% of households live in privately rented accommodation, with the remainder having other types of tenure including shared ownership.

There is less homelessness in South Tyneside than the regional or national averages.

MI ... ≈ 20 0 M & 58% ■ 1944

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South Tynesi... outhtyneside.gov.uk

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Our Health and Wellbeing picture is challenging with higher rates of residents with health challenges, long-term conditions, obesity and/or mental health disorders. There is a clear link between health outcomes and wider social determinants, such as employment and housing

Ageing section describes how life expectancy locally is beneath the national average. We have comparatively lower rates of dementia and hospital admissions for falls (However, this could be affected by the fact that we have a lower than average life expectancy) but admissions to residential and nursing Care are nearly double the national average

OUR SOUTH TYNES IDE 

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24% of South Tyneside residents report a long term musculo-skeletal

problem (such as

arthritis). A higher proportion than regionally

(23.1%) or nationally (18.6%).

**COPD** (chronic obstructive pulmonary disease) emergency rates are at 740 per 100,000 population in South Tyneside. Higher than the regional rate of 638 per 100,000 and national rate of 415 per 100,000.

## **Disabilities**

2.2% (2832) of local adults aged 18+ have a learning disability.

This includes:

# ORIGINAL RESEARCH Case time series study

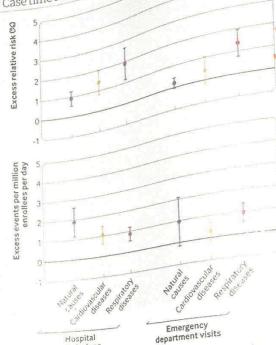
Short term exposure to low level ambient fine particulate matter and natural cause, cardiovascular, and respiratory morbidity among US adults with health insurance

Sun Y, Milando CW, Spangler KR, et al Cite this as: *BMJ* 2024;384:e076322 Find this at doi: 10.1136/bmj-2023-076322

Study question Is daily exposure to fine particulate matter (PM<sub>2.5</sub>) at concentrations below the new World Health Organization air quality guideline (15 µg/m²) associated with higher risks of hospital admissions and emergency department visits for natural causes, cardiovascular disease, and respiratory disease among adults with health insurance in the contiguous US?

Methods The authors included 50.1 million commercial and Medicare Advantage beneficiaries aged 18 years and older across the contiguous US between 1 January 2010 and 31 December 2016. A case time series study design with time stratified conditional Poisson regression was applied to estimate the excess relative and absolute risks of natural cause, cardiovascular, and respiratory morbidity associated with short term exposure to PM<sub>2.5</sub>.

Study answer and limitations
The daily PM<sub>2.5</sub> levels were below



Excess relative risk (percentage) and excess events of hospital admissions and emergency department visits for natural causes, cardiovascular disease, and respiratory disease associated with each 10  $\mu g/m^3$  increase in fine particulate matter (PM, s) during the current and previous day

the WHO guideline limit of 15 µg/m³ for 92.6% of county days (7 360 725 out of 7 949 713). During the study period, 10.3 million hospital admissions and 24.1 million emergency department visits for natural causes were recorded among the 50.1 million adult enrollees across 2939 US counties. On days when daily PM<sub>27</sub>, levels were below the new WHO air quality guideline limit of 15 µg/

m°, an increase of 10 µg/m² in PM<sub>2.5</sub> during the current and previous day was associated with higher risk of hospital admissions for natural causes, with an excess relative risk of 0.91% (95% confidence interval 0.55% to 1.26%), or 1.87 (95% confidence interval 1.14 to 2.59) excess hospital admissions per million enrollees per day. The increased risk of hospital admissions for natural causes.

was observed exclusively and adults aged ≥65 years and was not evident in younger adults PM<sub>2.5</sub> levels were also statistical significantly associated with relative risk of hospital admissions for cardiovascula. and respiratory diseases. For emergency department visits, a 10 µg/m3 increase in PM2s during the current and previous day was associated with respiratory disease, with an excess relative risk of 1.34% (0.73% to 1.94%) or 0.93 (0.52 to 1.35) excess emergency department visits per million enrollees per day. This association was not found for natural causes or cardiovascular disease. The study population was limited to US adults with health insurance, which may limit the generalisability of the findings to individuals without medical insurance, children and adolescents, and individuals living outside the contiguous US

"As

What this study adds Short term exposure to ambient PM<sub>25</sub> at concentrations below the new WHO air quality guideline is statistically significantly associated with hospital admissions for natural causes and cardiovascular and respiratory diseases, and with emergency department visits for respiratory disease.

Funding, competing interests, and data sharing Supported by grants from the National Institutes of Health and National Institute of Environmental Health Sciences. No competing interests declared. No additional data available

ADDENDUM 4

The BMJ is an Open Access journal. We set no word limits on BMJ research articles but they are abridged for print. The full text of each BMJ research article is freely available on bmj.com.

ne online version is published along with signed peer and patient reviews for the paper, and a statement about how the authors will share data from the last includes a description of whether and how patients were included in the design or reporting of the research.

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24 February 2024

ADDENDUM SA

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## Vehicle exhaust filters do not remove 'ultrafine' pollution – new study

Pto

Filters fitted to vehicle exhaust systems to remove particulate matter pollution have limited impact on ultrafine particles, new research shows.

Published 27 March 2023 · 3 minute read

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Credit: Matt Boitor / Unsplash

Airborne particles from vehicle emissions are a major contributor to air pollution levels. Exhaust filters designed to mitigate this pollution have been

5 B

a legal requirement in new cars since 2011, and in heavy duty vehicles since 2013.

The filters are able to remove the majority of larger, solid particles, but the new study, published in *Environment International*, shows they are less effective at removing smaller liquid particles.

While the World Health Organisation has not yet set a guideline for safe levels of ultrafine particles, it recognises that particulate pollution overall is associated with negative impacts on cardiovascular and respiratory health. Air quality guidelines published by WHO in 2021 also outline concerns over ultrafine particles and their ability to be transported around the body. Lead author on the study, Professor Roy Harrison, said: "Our research shows clearly that current, widely-used filters are not effective against these smaller particles and we welcome recommendations from the World Health Organisation that surveillance of these measurements increase and note with concern that current concentrations measured in London are classified as 'high'."

High concentrations of ultrafine particles are likely to be a widespread and persistent phenomenon. In order to meet WHO guidelines we are likely to need a much higher uptake of electric vehicles, as well as additional measures to reduce emissions from diesel vehicles.

#### Professor Roy Harrison, School of Geography, Earth and Environmental Sciences

The team used data collected in from a monitoring station in Marylebone Road, in London. Air quality sampling at this site has produced the most comprehensive, long-term dataset in the world, containing data for particle mass and number dating back to 2010.

The data showed a steep decline in larger particles. Black carbon, for example, declined by 81% between 2014 and 2021. This is a clear indication that there has been a positive impact from the introduction of exhaust filters.

In contrast, however, the number of particles described as 'ultrafine' – smaller than 100 nanometres – reduced by only 26%. The smallest group of particles, measuring less than 30 nanometres, did not reduce at all, giving a clear indication that filters are not effective against these types of particle. WHO guidelines define concentrations of ultrafine particles above 10,000 per cubic cm as "high" and concentrations measured at the Marylebone Road site were around twice this level.

Professor Harrison added: "High concentrations of ultrafine particles are likely to be a widespread and persistent phenomenon. In order to meet WHO

#### LP2020 - Lawrence Taylor

#### Regulation 19 Local Plan Consultation Representation Form

Lawrence Taylor

Sun 3/3/2024 3:20 PN

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

1 attachments (842 KB)

STC Local Plan 2023-2040 - Chapter 2.Context.pdf;

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<a href="mailto:email.quarantine@southtyneside.gov.uk">email.quarantine@southtyneside.gov.uk</a>, **clearly stating your concerns in the email** \*\*\*\*

Please find attached a completed Regulation 19 Local Plan Consultation Representation Form, To be used by the Inspector in the forthcoming examination.

Attachment: STC Local Plan 2023 -2040 Chapter 2. Context.pfd



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

#### **Data Protection and Freedom of Information**

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#### Part A: Your Details

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

<sup>\*</sup> 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	Lawrence Taylor
Client (if relevant)	

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

Paragraph	Draft Local Plan 2023-2040 - Chapter 2.Context
Policy	
Policies Map	

#### Section 2: Legal Compliance & Duty to Cooperate

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

#### **Section 3: Details of Representation**

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 documentary evidence is extensive, with many documents spanning hundreds of pages and presented in various formats, leading to a lack of consistency in readability for the reader.

Most documents are challenging to decipher, with some missing altogether or returning "page not found" errors. Moreover, the evidence is suspect and often inaccurate, particularly evident in the contradictory and conflicting nature of the three traffic studies. These studies exhibit duplicated paragraph numbering and draw conclusions based on erroneous evidence.

Due to the imposed timeframe and the difficulty in locating relevant, up-to-date documents pertaining to specific subjects or policies, I have not had the opportunity to review every document thoroughly.

Due to methods used to communicate this process with the public, I was only made aware of it in January 2024 following a comment on social media.

A quick number of searches outline the way the council communicated the forthcoming process.

Flyers delivered to the Door. I can't say that I can remember seeing anything relating to this process, However, if I did see it, then based on what happened before, I believed that the Green Belt had been assessed, and the results were that land was not suitable for development.

**Local Press:** 

Web pages highlight that articles were published in the the Shields Gazette. I do not access or

#### **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. The draft Local Plan and accompanying supplementary evidence documents necessitate reevaluation for the following reasons: The contents and conclusions are rendered invalid owing to inadequate, outdated, conflicting, or erroneous data. There is a requirement to rectify proofing errors and guarantee that the documents are factual and easily readable. Ensuring compliance with recent amendments to planning legislation/regulations, in accordance with the NFPC (National Framework Planning Commission), ministerial statements, and official government publications is imperative.

**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.

(Continue on a separate sheet if necessary)

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)			
V	No		
	•	nination? (Please select one answer with a tick)	

**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:
To ensure that the objections (noted NOT SOUND) are recorded, listened to by the inspector and the public at large.

#### **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	<b>✓</b>	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.

#### Lawrence Taylor

Sun 3/3/2024 5:15 PM

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

1 attachments (848 KB)

STC Local Plan Consultation Chapter 3 Spatial Vision and Strategic Objectives.pdf;

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Please find attached a completed Regulation 19 Local Plan Consultation Representation Form, To be used by the Inspector in the forthcoming examination.

Attachment: STC Local Plan 2023 -2040 Chapter 3 Spatial Vision and Strategic Objectives

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

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#### Part A: Your Details

	. Tour Details			
	Personal Details*	Agent's Details (if applicable)		
Title	Mr			
First Name	Lawrence			
Last Name	Taylor			
Job Title (where relevant)				
Organisation (where relevant)				
Address				
Postcode				
Telephone				
Email				

<sup>\*</sup> 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	Lawrence Taylor
Client (if relevant)	

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

Paragraph	Draft Local Plan 2023-2040 - Chapter 3 Spatial Vision and Strategic
Policy	
Policies Map	

#### Section 2: Legal Compliance & Duty to Cooperate

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

#### **Section 3: Details of Representation**

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.

#### This question asks:

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?

The Strategic Objectives outlined in the Spatial Vision exhibit several shortcomings, yet they do present a favourable outlook on the Council's aspirations for the Draft Local Plan, characterized by a "highly ambitious" stance toward housing and economic growth.

#### However:

Numerous contradictions arise between the Sustainability Objectives and the delivery of the Policy objectives and Community Hub designations, which are purported to yield substantial sustainability benefits.

As there is no clear objective and delivery methods for local multiple and significant employment opportunities, this will lead to an increased reliance on private vehicle travel on and off Durham Drive and the surrounding road network.

The supporting Traffic Assessment studies have failed to address these known issues and their conclusions based on their invalid number of trips in peak time is at worst poor work, unacceptable and overall wrong.

This Policy need to be revisited, all involved parties need to start again and get it right.

The proposed Spatial Vision and Strategic Objectives stands in contrast to the National Planning Policy Framework (NPPF), and the Government's Zero Carbon objectives

#### **Section 4: Proposed Modifications**

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. <i>Please be as precise as possible</i> .
Remove the land south of Fellgate from any development now and in the future and ensure it stays as a green belt.
By doing so the Local Plan will be legally compliant and Sound.
(Continue on a separate sheet if necessary)

Discrete the sead of action (s) you consider necessary to make the Legal Discrete

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#### 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:

o ensure that the objection (noted NOT SOUND) are recorded, listend to by the inspector and the public at large.

#### **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.

Lawrence Taylor

Sun 3/3/2024 2:19 PM

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

1 attachments (846 KB)

STC Local Plan Policy SP 41 Green Belt.pdf;

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Please find attached a completed Regulation 19 Local Plan Consultation Representation Form, To be used by the Inspector in the forthcoming examination.

Attachment: STC Local Plan Policy SP 41 Green Belt.pdf



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#### Part A: Your Details

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

<sup>\*</sup> 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	Lawrence Taylor
Client (if relevant)	

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

Paragraph	
Policy	Policy 41: Green Belt
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.

I oppose the reclassification of Green Belt Land to the south of Fellgate, and I contend that the plan lacks viability, citing aspects outlined in the Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report concerning the following points.

The housing demand estimation for the South Shields, Hebburn, and Jarrow communities is flawed, as the current housing need in the borough falls well below the Government figures.

It can be argued that the removal of Greenbelts from other areas in South Tyneside under the same criteria to protect the "vitality of the villages of Cleadon, Whitburn, and the Boldons" may be attributed to and influenced by the affluent status of these areas within the borough, thereby granting them more sway over the council's decisions.

It's evident that political factors hold considerable sway across the borough, particularly in affluent regions like Cleadon, Whitburn, and the Boldons. The governing party is inclined to prioritize securing votes by addressing the concerns of constituents in these areas. Notably, these locales area's boast the smallest populations, each with fewer than 5,000 residents according to the last census, and residents vehemently oppose any encroachment on the undeveloped land surrounding them. There needs to be a "leveling up" process, as emphasized by the government, to reassess the utilization of a shrinking pool of usable land without sacrificing green belt areas.

Over the years, developers have put forth numerous proposals for the greenbelt, some of which remain accessible online. These proposals range from plans for 5000 houses to proposals for a business park. Historically proposals have been dismissed, following several surveys. All current proposals should be dismissed, using the same criteria to the preservation of green helt land

#### **Section 4: Proposed Modifications**

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. <i>Please be as precise as possible</i> .
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~	No		
	•	nation? (Please select one answer with a tick)	

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Yes	~	No	

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#### Lawrence Taylor

Sun 3/3/2024 11:50 AM

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

1 attachments (831 KB)

STC Local Plan Consultation Chapter 1 .pdf;

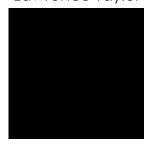
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Please find attached a completed Regulation 19 Local Consultation Representation Form.

To be used by the Inspector in the forthcoming examination.

Attachment: STC Local Plan Consultation Chapter 1

Regards Lawrence Taylor





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

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#### Part A: Your Details

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

<sup>\*</sup> 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	Lawrence Taylor
Client (if relevant)	

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

Paragraph	Local Plan Chapter 1 Introduction	
Policy	N/A	
Policies Map	N/A	

#### 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.

Q01 Draft Local Plan 2023-2040 - Chapter 1\_ Introduction.

The Publication\_Draft\_Local\_Plan\_2023\_to\_2040.pdf and its documentary evidence is huge.

#### Observation:

The organization of the documents, such as the layout and the structure of the "Your Say" questionnaires, can be perplexing and challenging to navigate.

For instance, the online questionnaire titled "Chapter 1: Introduction" lacks alignment with the content of the PDF version of "The Publication\_Draft\_Local\_Plan\_2023\_to\_2040.pdf". In the PDF, there are no references to Chapter 1, nor are there mentions of Chapters 2, or 3. Instead, the numbered chapter begins with Chapter 4.

To respond to the inquiries outlined in the "Have Your Say" questionnaires, one must traverse the council's website, which hosts numerous documents. A considerable portion of these documents, particularly the evidence documents, extend beyond 100 pages. Due to their technical nature, they are challenging to locate and comprehend. Moreover, some documents are missing, leading to a "page not found" error. Additionally, the evidence provided appears to be inconsistent and contradictory, raising concerns about its reliability.

I reported this error and asked for an extension of the deadline due to the delay in reading the relevant evidence document, in an email from the operations manager Spatial Planning with regards to the documents not found, her reply:

"Good Afternoon Mr Lawrence,

Thank you for your email regarding the link to the PDF Hahitat Regulations Assessment on the

#### **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. The Local Plan and supplementary evidence documents, has to be reassessed due to the following: The contents and conclusions of many documents are contradictory or invalid. Proofing errors need to be fix to ensure that documents are factual and are readable. The need to ensure conformity and clarity with recent changes to planning legislation / regulations, and to address the National Planning Policy Framework, ministerial statements and official government publications. (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:			
To express the reasons and offer evidence why this document fails to communication to the people impacted by this plan.			

#### **Section 7: Being Kept Informed**

Would you like to be ke (Please select one answe		ess of the Local Plan thro	ugh to adoption?
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.

#### Lawrence Taylor

Sat 3/2/2024 10:00 PN

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

1 attachments (840 KB)

STC Local Plan Policy SP8 Fellgate Sustainable Growth Area.pdf;

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

Please find attached a completed Regulation 19 Local Plan Consultation Representation Form, To be used by the Inspector in the forthcoming examination.

Attachment: STC Local Plan Policy SP8 Fellgate Sustainable Growth Area.pdf

Regards Lawrence Taylor





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

#### **Data Protection and Freedom of Information**

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

This form has two parts:

- Part A Personal details (need only be completed once)
- Part B Your representation(s).
   Please fill in a separate sheet for each representation you wish to make.

This form can also be completed online at haveyoursay.southtyneside.gov.uk If you are having difficulty submitting representations, please contact local.plan@southtyneside.gov.uk or call 0191 424 7692

#### Part A: Your Details

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

<sup>\*</sup> 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	Lawrence Taylor
Client (if relevant)	

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

Paragraph	Local Plan Appendix 3
Policy	SP8
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.

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 to live. Development of the area will respond to the site's spatial context and incorporate all the necessary components to achieve a healthy, liveable, and vibrant new community"

These goals offer a chance for progress, but success is not assured. The calculations rely on outdated data to determine the required number of residences, leading to an inflated estimate. The proposed housing figures are based on 2014 household projections, which have been proven to be overstated according to the 2021 Census. Thus, the method used to calculate the proposed new homes lacks reliability and credibility.

Based on this analysis SP8 is NOT Sound.

The evidence document LSH 2 Employment Area Assessment.xlsx delineates the classification of the 46 Employment sites in South Tyneside as follows:

13 are deemed good,

13 average, and

20 poor.

Notably, the International Advanced Manufacturing Park (IMAP) 1 and IMAP 2 are categorized as None. While these structures fall within the jurisdiction of the Sunderland local authority area, it's worth mentioning that the northern section of phase one is expected to extend into South Tyneside if and when built.

One could make the case that employment areas are currently experiencing a downturn, with

#### **Section 4: Proposed Modifications**

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. <i>Please be as precise as possible</i> .
Remove the land south of Fellgate from any development now and in the future and ensure it stays as a green belt.
By doing so the Local Plan will be legally compliant and Sound.
(Continue on a separate sheet if necessary)

Please set out the modification(s) you consider necessary to make the Local Plan locally

**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.

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#### **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				

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#### Section 6:

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:			
To ensure that the objection (noted NOT SOUND) are recorded, listend to by the inspector and the public at large.			

#### **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.

Lawrence Taylor

Fri 3/1/2024 10:07 PM

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

1 attachments (834 KB)

STC Local Plan Policy 51 Traffic Assessment.pdf;

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Attachment: STC Local Plan Policy 51 Traffic Assessment.pdf

#### Regards





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#### Part A: Your Details

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

<sup>\*</sup> 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	Lawrence Taylor
Client (if relevant)	

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

Paragraph	14.9
Policy	51Traffic Assessment
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**

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The evidence does not substantiate this policy, as it lacks soundness and fails to adhere to the duty to cooperate in a legally compliant manner.

Compelling arguments suggest that capacity improvements at the following junctions—A194/B1306, A194/A184, Durham Drive/A194, Durham Drive/Fellgate Avenue, and Fellgate Avenue/Hedworth—will not be attained through the road improvements implemented or proposed.

3 local road network surveys carried out:

- 1. White Mare Pool Junction Study Ref GB01T21D46 / GB01T21B22 (AC.21.03 ) 22/12/2021.
- 2. Local Road Network Traffic Capacity Assessment Ref 16L02/001/004 08/05/2022
- 3. Local Road Network Traffic Capacity Assessment Ref 16L02/002/002 20/12/2023
- 1. The Survey White Mare Pool Junction Study, The Executive Summary States: "An additional test has also been undertaken of the release of 1000 to 1500 houses at the Land south of Fellgate on top of the 2019 draft allocations".

It explains how the traffic flow was carried out, it stated.

"Additionally, a stress test was undertaken to identify the consider the extra trips that can be accommodated on the SRN in the White Mare Pool area for new developments before any scheme is delivered"

It specifically states

#### **Section 4: Proposed Modifications**

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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

(Continue on a separate sheet if necessary)

on the original representation at publication stage.

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#### 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	

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#### LP2021 - Mr & Mrs A Metcalfe

#### Response ID BHLF-5JMM-6ZH4-5

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report Submitted on 2024-04-09 13:34:49

#### Have your say

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

#### Comments:

I do not believe plan to be legally compliant or sound because of the following:-

- 1) Reg 18 in 2016 stated land was classified as Greenbelt what has changed?
- 2) Lack of accessible information- website has faulty links, cannot be accessed from South Tyneside hubs no hard copies available missing documents.
- 3) Repeated requests for extentions refused, despite access issues.
- 4) Impacts on local habitats including farm birds migrating from other developed areas, flora/fauna, lack of robust environmental survey.
- 5) Impacts on sustainable public transport already unable to cope with demand.
- 6) Impacts on residents health as result of increased traffic and emissions, exacerbated by removal of Greenbelt, which reduces existing Impacts.
- 7) Impact on local road infrastructure, which is unable to cope with existing demand frequent gridlocked across proposed access routes to new estate.
- 8) Consideration of access routes for emergency services through gridlocked roads, especially with proposed new tri-station in Hebburn.
- 9) Traffic survey for development was carried out just after Covid so not a true picture of everyday traffic.
- 10) Impacts on secondary school provision across Jarrow and Hebburn schools already at capacity and no plans for additional secondary school places.
- 11) Lack of GP access plans show proposed GP surgery, but current surgeries are over capacity, with insufficient GP s available.
- 2 What is your name?

Name:

Mr Metcalfe

3 What is your email address?

Email:

4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

#### Response ID BHLF-5JMM-6ZHG-R

Submitted to Fellgate Sustainable Growth Area Supplementary Planning Document: Scoping Report Submitted on 2024-04-09 13:35:43

#### Have your say

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

#### Comments:

I do not believe plan to be legally compliant or sound because of the following:-

- 1) Reg 18 in 2016 stated land was classified as Greenbelt what has changed?
- 2) Lack of accessible information- website has faulty links, cannot be accessed from South Tyneside hubs no hard copies available missing documents.
- 3) Repeated requests for extentions refused, despite access issues.
- 4) Impacts on local habitats including farm birds migrating from other developed areas, flora/fauna, lack of robust environmental survey.
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- 10) Impacts on secondary school provision across Jarrow and Hebburn schools already at capacity and no plans for additional secondary school places.
- 11) Lack of GP access plans show proposed GP surgery, but current surgeries are over capacity, with insufficient GP s available.
- 2 What is your name?

Name:

Mrs A Metcalfe

3 What is your email address?



4 What is your organisation?

Resident of member of the general public

Organisation:

5 What is your postal address?

Address:

#### LP2022- Matthew Johnston

#### Response ID BHLF-RUCU-JV1S-3

Submitted to Sustainability Appraisal 2024 Submitted on 2024-04-23 13:08:48

Have your say

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

Section of the SA:

**Employment sites** 

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

Comments:

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

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

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

The Sustainability Appraisal Report states:

"Preferred Options

- 4.41 Within the Draft Local Plan 2019, the Council took forward the following preferred options for employment land: 
  ☐ General Employment Land Option 2: Policy-on Scenario ☐ Port and Marine Land Option 3: Past Completions (net)
- 4.42 These options were selected because the Council considered them to have the most positive effects on SA objective 9 (encourage and support economic growth within South Tyneside) and SA objective 10 (increase opportunities for employment and education and improve living standards). The Council's reasons for this were set out in the 2019 SA Report.
- 4.43 In the Draft Regulation 18 Local Plan (June 2022) the Council's preferred scenario for employment land requirements over the Plan period was the Baseline Labour Demand Scenario. The reasons for this were set out in detail in the 2022 Employment Land Technical Paper, which explained that in choosing this scenario the Council was being cognisant of the constraints imposed by the Green Belt and the very high value placed on this resource by local communities."

And

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

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

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

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

"Preferred Options

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

3 What is your name?

Name:

Matthew Johnson

4 What is your email address?

Email:

5 Who are you responding as?

Resident or Member of the General Public

Organisation:

6 What is your postal address?

