

## **Appendix C – EBNF Comments on Agent’s Statement of Community Involvement**

### **NPPF guidance:**

Paragraph 132:

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

### **South Tyneside Council policy**

Part 3 of the Council’s Statement of Community Involvement (SCI) specifies that that, dependent upon the nature and potential impact of the development proposal on the local community, developers may need to carry out their own pre-application public consultation. For those proposals considered as ‘major planning applications’, the applicant may be required to submit an accompanying SCI as part of the application.

The Council’s Statement further sets out that consultations should be carried out at an early stage in the design process to enable community views to be incorporated into submitted proposals. The form of consultation is to be tailored to suit the particular circumstances of the site, proposal and locality. Accordingly, the Council are able to provide advice on appropriate levels of pre-application consultation to support any development proposal. As a minimum, the Council confirms that the consultation statement submitted within the planning application should include the following information:

- The houses, businesses and local community groups consulted;
- Methods and timing of consultation; and
- Feedback and information on how development proposals were addressed

### **Avant Homes Statement of Community Involvement**

Lichfields were responsible for carrying out the consultation on behalf of Avant Homes. The report makes the case that due to Covid restrictions, it was not possible to hold a physical consultation event, so it has relied on an online process alongside the delivery of leaflets to homes and businesses in the vicinity of the site.

Approximately 650 Leaflets were delivered on 22 August 2021 and included a questionnaire which had to be returned by 8<sup>th</sup> August. The website containing details of the proposal was live before the leaflets were delivered, and also required comments to be made by 8<sup>th</sup> August.

- It is noted that the Forum wasn't contacted by Lichfields about the proposed development in advance of their consultation, despite their awareness of the developing Neighbourhood Plan.
- The associated map of the distribution area shows the limit of leaflet distribution was Langholm Rd & Glencourse to the south west and Kelvin Grove and East Drive to the north east. Even the houses and businesses near Tiledshed crossing were excluded. Given the size of the proposed development and likely impact on local services and infrastructure, the leaflets should have been distributed much more widely.

The report notes that 37 questionnaire forms were returned via the post, and 179 responses submitted online via the website form. The report notes that responses received shortly after the deadline date were included to allow for any delays in the postal system.

The responses to the questionnaire are summarised in para 3 of the report. The questions asked were as follows:

**Question 1:** Do you generally agree that East Boldon provides a sustainable location for new homes, with good transport links and access to local services?

- 33.97% (71/209) of respondents either Strongly Agreed or Agreed
- 58.85% (123/209) of respondents either Disagreed or Strongly Disagreed

**Question 2:** Do you generally agree that the site provides an appropriate location for new homes?

- 38.94% (81/208) of respondents either Strongly Agreed or Agreed that.
- 53.37% (111/208) of respondents either Disagreed or Strongly Disagreed

**Question 3:** The proposed layout is well designed and will provide an attractive development.

- 31.40% (65/207) of respondents either Strongly Agreed or Agreed
- 51.69% (107/207) of respondents either Disagreed or Strongly Disagreed

**Question 4:** Any other further comments

139 respondents shared further comments, with 33 opting to skip this question.

Para 3.14 states: "Overall, the findings from the consultation process confirmed some support for new homes. Key comments are included in Table 1 below".

- **The report makes no mention of the fact that a clear majority of the responses to each question were against the development, only choosing to select positive comments as justification for proceeding.**

However, the report does go on to note that:

“there was some concern amongst local residents with regards to additional housing development; including impact on the highway network; and the proposed development’s impact upon local infrastructure, namely the potential for additional requirements from prospective residents in terms of education, GPs and other community services.

- Additional housing development in the area;
- Concerns relating to the impact upon capacity of local highway network;
- Impact / capacity upon local social infrastructure.
- Poor access to services and facilities

Although it does emphasise that “An encouraging number of respondents expressed positive comments and the provision of more choice of housing in the area.”

The report then sets out the project team’s response under the following headings:

### **Additional Housing Development**

They argue that the site is suitable for housing development because:

- It is allocated in the Council’s emerging Local Plan as suitable for mixed development including up to 245 homes
  - Its proximity to the already built up area of E Boldon and existing services
  - The site is supported by a ‘wealth’ of sustainable transport options including the metro and local bus services
- **No reference is made to how the site has been marketed for employment use. The use of the all or part of CLIE for housing is dependent on this being clearly demonstrated.**

### **Highways concerns**

Concerns over impact on the highways network are dismissed as follows:

- The proximity of the site to local shops and public transport networks will “reduce the reliance of residents on driving for commuting purposes and carrying out daily needs. ...traffic flows associated with the proposed development will be satisfactorily accommodated on the local highway network without resulting in any severe impacts on the free flow of traffic.
- **The report relies on the data provided in the Transport Assessment to justify this conclusion.**
- “the delivery of proposed measures to provide pedestrian and cycle connectivity with the existing public adopted highway, the development will ensure that access to local services and amenities by sustainable modes of travel will be available to future residents.” “Pedestrian links will be provided between the site and the wider area, and cyclists will be able to utilise the nearby cycle routes”
- **This claim is unjustified as the scheme does not provide any additional walking or cycling routes linking with the wider area.**

## Local Service Provision

The report states that discussions will be held with the Council about the impact of the development on local services such as schools and health services. It states that: “where there are shortfalls in capacity within the social infrastructure, where justified and necessary, the Applicant would be willing to provide contributions (subject to project viability) via a Section 106 agreement to mitigate any detrimental impacts upon local service provision.”

The report concludes that the measures outlined above will mitigate all concerns over the impact of the development.

## CONCLUSIONS

While the report demonstrates that the developers have complied with the Council’s requirements for community involvement, the conclusions Lichfields have drawn are clearly flawed and biased in favour of supporting the development. Key areas of concern:

- **The Forum wasn’t contacted by Lichfields about the proposed development in advance of their consultation, despite their awareness of the developing Neighbourhood Plan.**
- **The associated map of the distribution area shows the limit of leaflet distribution was Langholm Rd & Glencourse to the south west and Kelvin Grove and East Drive to the north east. Even the houses and businesses near Tiledshed crossing were excluded. Given the size of the proposed development and likely impact on local services and infrastructure, the leaflets should have been distributed much more widely.**
- **The report makes no mention of the fact that a clear majority of the responses to the questions in the consultation questionnaire were against the development, only choosing to select positive comments as justification for proceeding.**
- **No reference is made to how the site has been marketed for employment use. The use of the all or part of CLIE for housing is dependent on this being clearly demonstrated.**
- **The claim that traffic from the site will be reduced by the provision of cycling and walking connections with local services and amenities is unjustified as the scheme does not provide any additional walking or cycling routes linking with the wider area.**