

EAST BOLDON FORUM

RESPONSE TO ADDITIONAL INFORMATION SUBMISSION - ST/1109/21/FUL – ERECTION OF 196 RESIDENTIAL UNITS AT CLEADON LANE INDUSTRIAL ESTATE

1. Introduction

- 1.1 The scheme that has now come forward is significantly changed from the previous submission and East Boldon Neighbourhood Forum (EBNF) acknowledge that improvements have been made. The reduction in the number of dwellings has afforded the opportunity for greater open space/landscaping. The landscaped area which now runs from the Suds basin through the center of the site is particularly welcomed, as is the 5m buffer which now abuts the green belt to the North. The layout also responds more positively to Cleadon Lane, and the separation that is now provided between the dwellings and the remaining, noisy, industrial premises is a positive revision. Access to the bridleway (Public Right of Way) which runs parallel to the railway line from the South West corner of the site, allows greater pedestrian connectivity, and is also a positive step forward.
- 1.2 There are, however, many issues that remain problematic. East Boldon Forum hope that these can be addressed in a positive way so that further improvements can be made resulting in an acceptable solution that both reflects NPPF and the policies set out in the East Boldon Neighbourhood Plan. These issues are dealt with in turn below:

2. Community Engagement and clarity of information provided

- 2.1 Following a request from Lichfield Consultants, representatives of East Boldon Neighbourhood Forum met Avant Homes in May to discuss the amended scheme that has now come forward. We highlighted a number of issues in relation to the Neighbourhood Plan and asked about Community Engagement. We were told that the public would have the opportunity to comment on the proposal by way of the Planning Application process and no other engagement was planned.
- 2.2 Great weight is given in the NPPF to collaborative working throughout the evolution of a proposal especially in relation to design. Para 132 calls for early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes and the need for clarifying expectations and reconciling local and commercial interests. It states that 'applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community'.

Policy EB10 seeks to do just that by involving the community in a Masterplan process.

- 2.3 Many of the issues that continue to adversely affect the amended scheme would have been resolved had this approach been adopted.

- 2.4 Scrutiny of the scheme is made more difficult by the absence of a number of important documents and drawings, not least a revised Design and Access statement. In many respects the statutory consultation process seems premature and hurried without this information.

3 Loss of Employment land

- 3.1 The East Boldon Neighbourhood Plan (EBNP) recognised the need to support the continued use of the estate for main employment uses. (Paras 7.11 -7.14) This position was supported by the Independent Examiner, who stated that if a housing scheme was brought forward in advance of the Local Plan, it was reasonable for the EBNP to seek justification for the loss of employment land. Policy EB10 of the approved EBNP states that: “The applicant must also demonstrate that there is no need or demand for the existing employment related uses. Evidence should include details of the comprehensive marketing exercise undertaken.”
- 3.2 As requested, the applicants have provided more information on the need and demand for the existing employment uses on the site. They state that the site has two active short term leases. The first is the sawmill business in the south west corner operated by North East Machinery Services. The second is to Vertu Motors in the south west portion for the storage of motor vehicles. They also state that the phasing of the housing development will allow these businesses to continue operating until their lease comes to an end. It is assumed that the remaining active uses on the site for container storage and aggregate storage are under the control of the site owners.
- 3.3 The applicant also refers to the intention of the Council to de-allocate the site for employment purposes and allocation of the remaining part of the industrial estate for general economic development as part of the emerging Local Plan. It is noted that consultation has only just commenced (June 2022) on the draft plan and no decision has been made, or will be made for some considerable time.
- 3.4 The applicant has also confirmed that the landowner has actively marketed the site for a significant period of time and provided links to the marketing website. They state that no interest has been reported.
EBNF requests that this statement is verified and checked by the Planning Authority.

4. Housing Position

- 4.1 The applicants refer to the 2021 Housing Delivery Test results published in January 2022 and argue that the consequences of Government actions place more prominence on releasing the site for housing development. They argue that for short housing supply needs (The Borough only has a housing land supply of 2.05 years) and for avoiding Green Belt release, their site provides a valuable opportunity to the Council. They also compare the site to one south of Argyle Street, Hebburn which the Council has approved as part of its brown field first policy.
- 4.2 The applicants have reduced the number of housing units from 245 to 196 in this revised application. While the Forum welcomes this reduction, it is noted that the proposed numbers will take up the vast majority of the assessed housing need for the village, and this will be in

the early part of the Neighbourhood Plan period (the plan was informed by a Housing Needs Assessment which was endorsed by the Examiner. The HNA determined a figure of 12 dwellings per year for East Boldon and this equates to 192 dwellings over the 16-year period 2020-2036.)

- 4.3 Although Policy EB12 supports the delivery of new housing within the plan's settlement boundary (and Cleadon Lane Industrial Estate is within this boundary), the impact on the infrastructure of the village by this proposal remains a strong concern of the Forum and we set out further details later in our response.

5 Phasing

- 5.1 The Forum notes the proposed phasing plan. The applicants informed us that their build out rate would be around 40 houses per year. In view of the importance of completion numbers in both meeting the three year housing requirement and the local housing needs, the Forum requests a detailed estimate of the build out rate.

6 Implication on weight of the East Boldon Neighbourhood Plan

- 6.1 The National Planning Policy framework (NPPF) sets out a series of conditions that follow the situation of a failure of the Housing Delivery Test. We are currently in a conflicting situation. On the one hand, we have a very up to date Neighbourhood Plan which contains policies to meet its identified housing needs. On the other hand, the local planning authority does not have at least a three year supply of deliverable housing sites. This is an extremely frustrating position for the Forum, as the lack of a three year supply is not in our control.
- 6.2 The applicants argue that a reduced weight needs to be taken account of the policies in the Neighbourhood Plan when considering the merits of the planning application. Indeed, rather than seeking the best outcome, the Applicant seems to rely on this argument.
- 6.3 The Forum would respectfully remind the Council that the East Boldon Neighbourhood Plan was supported at referendum by 95% of those residents who voted and that the turnout was very strong at 42%, and is underpinned by rigorous community involvement, the robustness of which was recognised by the Independent Examiner.
- 6.4 The Forum also would point out that the policies within the Neighbourhood Plan and its Design Code are based on NPPF and National Design Guide documents. The background papers that sit behind the Plan are a testament to this, as is the fact that the plan was scrutinised very recently by an Independent Examiner. In terms of best practice, the plan invokes recognised guidance such as Building for a Healthy Life, The Manual for Streets etc.
- 6.5 In view of this the Forum would urge the Council to continue to take into account the policies and design guides within the Neighbourhood Plan when assessing this revised submission.

7 Housing Mix

- 7.1 The housing mix does not meet the required mix identified in the East Boldon Housing Needs Assessment (2019) (HNA). This indicated a substantial portion of residents over the age of 65, a

lower proportion of one person households compared to South Tyneside as a whole, and that the current provision of specialist accommodation for the elderly was not sufficient to meet the projected need.

- 7.2 The Forum's HNA identified a housing split for new houses as: 26% 1 bedroom; 42% 2 bedroom; 32% 3 bedroom; and, 0% 4 bedroom properties.
- 7.3 The proposed scheme offers 0% 1 bedroom; 18 % 2 bedroom; 43% 3 bedroom; 35 % 4 bedroom; and, 4% 5 bedroom properties, and no provision is made for specialist elderly accommodation.
- 7.4 Once again, the applicants argue that this should be seen in the context of the Council's current housing position and the severe 5-year housing land supply shortfall. They argue that the policies on housing delivery and housing mix in the East Boldon Neighbourhood Plan should be afforded limited weight.
- 7.5 The Forum would point out that the EBNP contains the most up to date assessment of housing needs and has recently been approved by referendum.

8 Affordable Housing

- 8.1 The applicants are exercising their ability to reduce their affordable housing requirements by using Vacant Buildings Credits, which they calculate reduces their requirement from 25% to 16.4%. This results in proposals for 33 affordable units. These are distributed in small clusters as they say this is a preferred arrangement for Registered Providers for management and maintenance reasons.
- 8.2 EBNF is particularly concerned that there is a high concentration of affordable dwellings in the South West corner of the site creating a separate enclave. The Forum does not think that this distribution contributes to a varied community arrangement and seems to be contrary to National guidelines.

The Local Authority is requested to give further consideration to this aspect.

- 8.3 It is noted that in the main, the affordable properties put forward do not seem to comply with Nationally Described Space Standard. This is dealt with below.

9. Nationally described space standards (NDSS).

- 9.1 This requirement seems to be brushed over by the applicant, but has consequences especially for the affordable properties included. As stated, most of the house types put forward for this element do not seem to comply. NDSS state double bedrooms should have a floor area of at least 11.5 sq. m. and single bedroom 7.5 sq. m. A minimum width dimension for bedrooms is set out, as is the minimum gross floor area of a dwelling, depending its height, number of bedrooms and occupancy
- 9.2 For instance, the Eastburn (7 affordable dwellings), is a 2.5 storey dwelling where the second-floor area is affected by the constraint of the roof slope. NDSS is area prescriptive in relation how floor areas and heights are assessed and measured where room-in -the-roof areas are put

forward as bedrooms. Two double bedrooms are shown indicating a 4 person house type. It has a gross floor area of 74.7 sq. m. To comply this should be 79 sq. m. Its first floor double bedroom also does not comply having a floor area of 11.1 sq. m. (should be 11.5 sq. m.). The first floor live/work room has a floor area of 6.65 sq. m. (against 7.5 sq. m.), for a single bedroom space and its dimensions and layout make it non-compliant as a bedroom. The house type has no effective built-in storage other than a cupboard at second floor level. The vast majority of the under eaves storage at second floor level that is indicated is below 900mm and is not counted as gross floor area.

9.3 The Thirsk (8 affordable dwellings), is a two storey, two-bedroom dwelling. One bedroom is shown as a double room the other has no bed room furniture shown. This second bedroom is 8.5 sq. m. and is non-compliant as a double bed room. The bedroom shown with furniture has a floor area of 9.5 sq. m. and is also non-compliant as a bedroom (should be 11.5 sq. m.). The gross floor area of the dwelling is 52 sq. m. If this is put forward as a 4 person property, the floor area should be 79 sq. m., and if it is put forward as a 3 person property then the floor area should be 70 sq. m. In both cases the gross floor area is non-compliant. The bedrooms do not comply with the area required for double sized rooms and the house type does not offer any built in storage.

9.4 The remaining affordable properties are provided by two bedroom, 4 person apartments arranged in three storey blocks. Each block has 12 properties and there are three blocks, a total of 18 dwellings. Each floor level has two different house types. a Fairford and a Burford. The Burford has a floor area of 70.3 sq. m. and is compliant in terms of gross floor area. The Fairford has a gross floor area of 66.8 sq. m. and is non-compliant (should be 70 sq. m.). All bedrooms are compliant. The dwellings, however, do not offer storage or practical space for pushchairs, kiddies' paraphernalia or cycle storage. As apartments, they are inflexible and do not offer practical and well designed accommodation for young families. Nor do the upper apartments offer suitable accommodation for elderly residents, having no lift. Clarification is needed concerning how refuse and bin storage is to be dealt with in connection with the apartment blocks.

10 House Types Generally

10.1 The applicant should be required to clarify on the layout drawing schedule, the number of persons each house type is intended for, not just the number of bedrooms, and to highlight the gross floor area of each dwelling (as they have for the Fairford and Burford house types). Bedroom spaces that are counted as such should be clearly indicated with furniture on the house type drawings. If live/work rooms area also counted as bedrooms, this should be made clear. For instance, house types Askern, Fernlee, Ripon, Saltaire and Thornton appear also to count live/work areas as bedrooms (but bedroom furniture is not shown). This is important for several reasons, but especially in relation to NDSS.

10.2 The issue of NDSS non compliance is not limited to affordable properties. For instance, the Askern house type (10 properties) has a gross floor area of 65.6 sq. m. This should be 79 sq. m. if it is intended to be a 4 person house, and 70 sq. m. if it is to be a 3 person house. As referred to in the paragraph above, the second room at first floor is called a live/work space but in the

layout schedule it is counted as a bedroom. The live/work space, or bedroom is 10.2 sq. m., and is non compliant as a double bedroom. The applicant should be required to state which other house types do not comply with NDSS.

- 10.3 As with the Burford and Fairford house types clarification is needed concerning how refuse and bin storage is to be dealt with in connection with all properties across the site, in particular how bins are to be collected/dealt with where there are private drives.

11 Flood Risk and Drainage

- 11.1 The applicants have submitted a new version of the Flood Risk Assessment prepared by RWO. This assessment includes a Flood Zone Review report prepared by Envireau Water. This proposes to re-zone the site as Flood Zone 1.

This requires agreement by the Environment Agency and so the Forum requests confirmation of this as soon as possible.

12 Transport

- 12.1 The applicants have made available the response from their consultants, SAJ to a response commissioned by the Council from SYSTRA. The Forum welcomes the clarifications sought by SYSTRA on behalf of the Council relating to vehicle trip generation, the impact on current traffic queues at East Boldon metro station. It is noted that there is reference to reducing the speed limit on Cleadon Lane to 30 MPH. It is also noted that the applicant's consultants refer to a lower build out rate of 30-35 houses per year, making it a six year development. We would refer to our earlier request for clarity on this.
- 12.2 It is also noted that the impact of IAMP 2 on the local road network has been raised and that dialogue between both sets of consultants could continue. The Forum requests that it receives an update from the Council on the issues raised in these responses as soon as possible.
- 12.3 The issue of traffic, its impact on air quality and queuing at the Tilsheds and East Boldon rail crossings remains a major concern to our members and the wider community. The volume of traffic on the B1299 is already excessive at peak times and the addition of significant numbers of additional cars will only exacerbate that.

Layout Design, Pedestrian Connectivity and Active Travel

13 South West corner of the Site:

- 13.1 A key feature of the revised layout is the introduction of a pedestrian connection in the southwest of the site to the existing Public Right of Way (PROW) which runs parallel to the railway line. The current change in level between the PROW and the site suggests that an access ramp will be necessary at the transition. There is no doubt that this will become a major pedestrian route into the site at all times of the day, leading as it does to the shops, metro railway and bus stop for the No 30 service. Surface treatment and street lighting from the site up to the point of the highway must be given due consideration as part of the proposal. These aspects should form part of any planning permission.

13.2 The houses that are located in the South West corner of the site are extremely close to the railway line that carries the Metro Railway, the diesel-powered Northern Trains passenger service from and to Middlesborough, and heavy freight trains. The verification by the Local Authority of the information provided by the applicant in respect to noise attenuation etc. is of critical importance, as is the need to understand the impact of vibrations on the dwellings from these separate sources. The visual impact of the 3.m and 2.5 m high acoustic fences in this area of the site is important to understand in assessing the suitability of the proposal. Sections and elevations that show the fences in relation to the houses should be required. This is especially important in relation to the properties that are adjacent to the railway line where there is a difference in level between the PROW and the site. For instance, is the 2.5 m fence to be placed at the higher level in order for it to be an effective barrier?

14 Road and Footpath Design: Cul-de-Sacs

14.1 The revised scheme now incorporates footpaths for significant areas of the development, is less reliant on cul-de-sacs and has a better connected road network. This is an improvement on the original scheme. However, two of the remaining cul-de-sacs offer poor access for pedestrians. Firstly, the cul-de-sac in the North West Corner that abuts the Suds Basin: This seems to deny pedestrians a direct route to Cleadon Lane and requires them to walk in the opposite direction along a much longer route that follows the road network. A footpath connection from the end of the cul-de sac to the adjacent hammer-head (next to the pumping station) would alleviate this. Secondly, the central cul-de-sac in the Eastern half of the site adjacent to Cleadon Lane: Similarly, pedestrians requiring access to Cleadon Lane are required to walk in the opposite direction along a much longer route that follows the road network. This could be overcome by providing footpath connection from the cul-de-sac across the landscape area into Cleadon Lane. In both of these instances, if the footpath connections are not provided, in all probability some people will follow a desire line and create their own unauthorised access, creating damage and conflict.

15 Pedestrian Connectivity adjacent to the site

15.1 As touched upon in our response to the original scheme, consideration and clarity is needed in relation to a number of issues outside of the site boundary that affect movement. Crossing Station Road, east of the rail level crossing is problematic for pedestrians, especially for those in wheelchairs. The new pedestrian route for the South West corner of the site increases the need for this to be addressed. The proposed treatment of the footpath along Cleadon Lane is not made clear. This path will need to be extended and possibly resurfaced. Is this to be included? In order to address the need of pedestrians who wish to cross the busy Cleadon Lane, for example to reach the bus stop, it seems necessary to provide a crossing point/island between the footpath on either side. Is this addressed or included?

16 Shared surface area and private drives without footpaths

16.1 The incorporation of footpaths generally is welcomed. There remains however a section of shared surface centre/west of the site. Could this be looked at so at least an uninterrupted footpath on the West side of the street is provided? The Manual for Roads in Section 7.2.12 states: Consultation with the community and users, particularly with disability groups and

access officers, is essential when any shared surface scheme is developed. Early indications are that, in many instances, a protected space, with appropriate physical demarcation, will need to be provided, so that those pedestrians who may be unable or unwilling to negotiate priority with vehicles can use the street safely and comfortably. The other concern is that the shortage of visitor parking space may mean that these areas (including private drives) will facilitate indiscriminate parking causing a hazard.

- 16.2 There seem to be a considerable number of private drives. How will maintenance and street lighting be addressed? If lighting is not provided by the Authority will this cause a security issue ('secured by design') and be a risk to pedestrians?

17 Landscaping and Open Space

- 17.1 The Forum welcomes the Council's recommendations to the applicants to make improvements in line with the East Boldon Design Code. The 5 m buffer zone to the northern boundary is an improvement to the original scheme and will provide a soft transition into the Green Belt. The Forum also welcomes a further landscape buffer to Cleadon Lane.
- 17.2 A landscape strategy is submitted to show the species of trees, shrubs and other plants to be planted in the different areas. The Forum requests the views of the Council on their suitability for the site.
- 17.3 The site adjoins the Tiledsheds Burn Local Wildlife Site to the North West and is within the Green Infrastructure Corridor under Development Plan Supplementary Planning Document SPD 3. The applicants state that a Local Wildlife Site Assessment, dated, February 2022, prepared by OS Ecology is to follow. The Forum requests a copy of this report as soon as it is available.

18 Trees

- 18.1 The revised layout still requires the removal of 10 mature trees, two tree groups and a section of another group. The area of tree group 4 to be removed has been clarified, however the remaining part of this group remains outside the application site. The Forum considers that our request to reconsider the impact on mature trees within the site has not been acted upon.
- 18.2 Tree lined streets - The Forum notes that no attempt has been made to create tree lined streets or incorporate grass verges. The reliance of trees planted within curtilage as a substitute is unsatisfactory. The suggested legal arrangement to safeguard the trees is not considered a sustainable alternative and will undoubtedly result in conflict between the Local Authority and house owners in the future.

19 Green Belt Boundary to the North of the Site

- 19.1 With regard to the 5m landscaped area has been introduced along the whole of the Northern boundary: For the Western section of this, a back-to-back arrangement of dwellings has been utilised allowing the properties to front onto the Green Belt and the landscaped area. This arrangement works very well as it allows the landscape area to contribute positively to the open space within the site as well as providing a transition between the site and the green

belt. The landscape area also allows the opportunity for some visitor parking and facilitates view from within the site toward the green belt and beyond.

- 19.2 The applicant states that for the Eastern section of the Northern boundary this arrangement is considered to be a problematic in design terms. Properties along this section are placed between the landscape area and the access road, turning their frontages away from the green belt. As a consequence, the landscaped strip is concealed and isolated by the properties that back onto this section of the Northern boundary. The landscape area therefore makes no contribution to the amenity of the site as a whole and runs the risk of being poorly maintained or subsumed into the rear gardens of the dwelling at a future date. In addition, views toward the green belt from inside the site are obstructed.
- 19.3 The potential of the landscape area to make a significant contribution to design of what is a major gateway into the site is also lost. Currently, the design of the site entrance at this point is considered to be poorly designed. The inclusion of the landscape area immediately behind the entrance road would give every opportunity for a more acceptable solution.
- 19.4 Whilst acknowledging that also adopting a back-to-back arrangement along the whole of the Northern boundary and allowing all dwellings to present a frontage to the green belt may result in the need for some compromises elsewhere, the Forum requests that this issue is given further consideration by the Planning Authority.

20 Central Open Space

- 20.1 EBNF welcomes the increased open space within the centre of the site. The area around the SUDS basin has potential to provide space which the community could enjoy. The current proposal does not seem exploit this opportunity and it is impossible to appreciate how this area will work. Simplistically, it would benefit from a circular footpath around its perimeter with connections to the footpath network. This would allow improved pedestrian connectivity from the North West cul-de-sac. It is recognised, however, that there may be a safety issue with the SUDS basin itself which requires it to be isolated from the landscape area around it.
- 20.2 As part of this area, the plan indicates an area of 14m x 14m for a pumping station, including a hardstanding for a tanker. The arrangement for the pumping station could be obtrusive and unsightly if not sympathetically designed and detailed. The applicant should be required to provide further information and details of how this area will be designed, including a proposal which allows the area to be enjoyed by the public, prior to planning permission being granted.

21 Gateways into the site

- 21.1 The site entrance from the South East has been afforded more generous landscaping and there is good potential to create an inviting gate way into the site at this point by the inclusion of well-designed signage, semi mature trees and shrub planting. Within this area, perhaps on the northern corner of the entrance, there is scope to incorporate some seating for the community use (a place where people could rest, sit and chat). Details of this gateway, including how it responds to people's needs, should be required as part of the planning permission.

- 21.2 The North East entrance to the site is afforded less landscaping. Views to the green belt area obstructed by the dwelling that are located along the Northern boundary (see 2.2 above). The entrance is dominated by the proximity of the dwellings and their (unadopted?) driveways on either side. No opportunity has been taken to create 'a sense of place' or an area that offers something to the community. Pedestrians are given little consideration and 'desire lines', which will cut across the landscape along Cleadon Lane, will, no doubt, accrue. EBNF request that further thought should be given to this area.
- 21.3 The Gateway entrances to the site are fundamental feature to achieve 'good design'. Planning permission should be subject to further refinement of these areas.

22 Ecology

- 22.1 Once again, the applicants state that an Ecological Assessment, dated May 2022, prepared by OS Ecology will follow. The Forum requests a copy of this report as soon as it is available. This also applies to the Habitats Regulations Assessment and the Biodiversity Net Gain Calculation also prepared by OS Ecology. We will submit a full response to these aspects as soon as more information is made available.

23 Architecture and Materials

- 23.1 The amended scheme fails to respond to the points made by EBNF in relation to the repetitive, bland architecture of the previous scheme. The failure to provide a revised Design and Access statement that explains how the current proposal responds to NPPF and the EBNP, and the comments made in respect of the original scheme, indicates an unacceptable lack of ambition to achieve good architecture and create a beautiful place where people are put first.
- 23.2 The explanation in the applicants covering letter, that hipped roofs are provided in response to the Council's concerns; while the justification for unvarying materials and monotonous detailing is the referencing of the properties immediately on the West side of the railway line, noting that they have grey tiles and are predominantly red brick. This is an inadequate response. In reality only 9 properties are provided with hipped roofs in the amended scheme, and for clarity, the properties to the west of the Railway line have grey slated roofs, not tiles. The properties to the west of the railway line, although the closest, do certainly do not represent the extent of the built environment in East Boldon.
- 23.3 The use of standard house types employing the same detailing and the same materials across the whole of the site is at odds with the East Boldon Neighbourhood Plan. Policy EB3: Design, calls for development to conserve local distinctiveness by demonstrating high quality design which both respects the existing character of the area and responds to the distinctive character of the village. Development will be supported where it 'Reflects the incremental and phased development of the village including its diverse range of architectural styles and avoids repetitive development proposals'. This amended scheme does not achieve any of these requirements.
- 23.4 The phasing of the development gives an ideal opportunity to reflect different architectural interpretations and materials, and in so doing would allow a more distinctive and incremental

design solution. A more imaginative approach to the use of different materials in order to create small areas of interest, or recognisable reference points to aid navigation, would also be easy to achieve and help enhance the proposal.

- 23.5 EBNF believes that currently this aspect is a major obstacle in achieving an acceptable solution. The proposal does not respond to the distinctiveness of the village and offers architecture that is uninteresting and monotonous.

24 Vehicular Parking

- 24.1 The applicant states that the parking levels across the site broadly meets requirements for on-plot parking but fails to deliver the 1 visitor parking space per 2 dwellings as set out in the NP. The applicant also acknowledges that the visitor parking standard do not accord with the Council's SPD6 Parking Standards which require 1 space per 3 dwellings.
- 24.2 Only 35 visitor parking spaces are provided. This equates to just more than one space for every 6 dwellings. For clarity the Council's own standard would require 65 visitor spaces and the NP would require 98 spaces. The main justification put forward by the applicant for the under provision of visitor parking is the imperative to deliver housing numbers. EBNF have explained the rationale behind their policy, and the need for adequate parking is set out in guidance referred to in the NPPF and the Manual for Streets. Without a sensible provision the proposal will undoubtedly be adversely affected by unplanned parking, the street scene will be blighted and may become unsafe for cyclists and pedestrians alike. The point made by the applicant that if the requirement for visitor parking was to be met, then the streetscape would be unattractive ('have significant and detrimental impacts on visual amenity'), is a moot one. The inclusion of visitor parking within a grass verge interspersed with trees is a recognised solution to this very issue. The Manual for Streets in Section 8.3.12 refers to this approach: 'An arrangement of discrete parking bays adjacent to the running lanes is often the preferred way of providing on-street parking. It has little effect on passing traffic and minimises obstructions to the view of pedestrians crossing the street', and is referred to in the NP and design guide.

25 Cycle Storage

- 25.1 The requirements for this are clearly set out in the Neighbourhood Plan. It is difficult to understand how this is to be met. Will garages, where they are provided, be used. If so, will the size comply in each case with the NP? What is to be provided where garages are not provided? The Forum requests confirmation of this aspect.

26 Sewage

- 26.1 We have been informed by the Planning Authority that Northumbria Water has confirmed that capacity is available for foul sewage. However, a storage tank, pumping station and parking arrangements for tankers to visit the site is deemed necessary. In addition, a SUDS Basin is provided which will see surface water diverted to a local water course.
- 26.2 Forum members and the wider community are concerned about this aspect and seek clarity on how the system will work and what will happen if the pumping station fails. They want to know who will maintain it and who will be responsible for its going forward. We are concerned over

how any additional sewage may contribute to the problems of discharge elsewhere in the Borough. We are also concerned if there is a chance that foul sewage may be discharge into the stream (watercourse) if there is a mechanical or electrical failure.

The applicant must be required to give assurances to the community in respect of these concerns.

27 Ground Conditions

27.1 We understand that further information has just come forward giving a clearer picture of the whole of the site. We hope that this can be made available asap. We continue to be troubled by the fact that contaminates will be retained on the site, especially given that the SUDS basin is now included, and the open watercourse is adopted.

28 Conclusion

28.1 Although improvements have been made, the proposal still requires further work in order for it to become acceptable, even in terms of NPPF and the best practice design guides it contains. In addition, we content that the proposal should reflect the Neighbourhood Plan and demonstrate how it does that (a Design and Access Statement is necessary). The imperative to address the Council's Housing Delivery Test failure should not be at the expense of good design. The Neighbourhood Plan is an up to date document, well supported by the community, and should not be overlooked.

28.2 Paragraph 134 of the NPPF states: 'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.'

28.3 Paragraph 134 goes on to state: 'Conversely significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'

END

5th June 2022

