

EAST BOLDON FORUM

Cleadon Lane Industrial Estate - Public Consultation by Lichfields on behalf of Avant Homes

Response from East Boldon Neighbourhood Forum

Introduction

East Boldon Neighbourhood Forum is extremely disappointed not be consulted directly about this proposal. The site lies within the East Boldon Neighbourhood Plan area and has been subject to extensive community consultation by the Forum in preparation of the Plan.

It is very surprising that there is no reference to the Neighbourhood Plan on the public consultation website. This is because, Lichfields, on behalf of the site's principal landowner, made submissions about the site at both the Pre- Submission and Submission Plan stage of the Neighbourhood Plan

This public consultation has been staged just as the Independent Examiner has produced her report on the East Boldon Neighbourhood Plan which supports a detailed policy for the industrial estate.

The consultation period is very short and has been staged just as the school holidays have begun, leaving the possibility that some residents will not be able to take part.

It also appears that the leaflets giving details of the consultation were delivered very selectively. As far as we are aware, only residents living in the immediate vicinity of Cleadon Lane received the leaflet. The proposed development will impact the infrastructure of the whole village – traffic, schools, footfall in local shops etc. The limited nature of the consultation is undemocratic and undermines any conclusions that Lichfields may draw from it.

Community Engagement by the Forum

The Forum carried out four community engagement drop in events between July 2017 and June 2019. In June 2018, 50 out of 54 respondents supported the plan's objective on local economy which includes the protection of employment opportunities in the neighbourhood plan area.

In June 2019, residents were asked whether they considered that Cleadon Lane Industrial Estate should be retained as a whole or in part for employment uses. 56 of the 77 respondents

considered that it should. 19 respondents highlighted the importance of using brownfield sites for residential developments and 13 refer to the potential use of the industrial estate as a car park.

As a result the Forum identified a policy for the future development on the Cleadon Lane Industrial Estate, uses could include housing, employment and parking. (East Boldon Neighbourhood Plan: Local Economy Background Paper, Para 4.8)

The preferred approach which emerged was to identify the industrial estate as a designated site within the plan and include detailed guidance on land use and design.

Four businesses on the estate were interviewed as part of the business survey which also informed the plan.

Pre- Submission Draft Plan

The Pre-Submission Draft Neighbourhood Plan published in October 2020 contained Policy EB11 on Cleadon Lane Industrial Estate. This policy firstly supports the continued use of the industrial estate for employment development. Secondly should proposals come forward for the redevelopment of the site as a whole or in part for a wider mix of uses , Policy EB11 requires the proposal to be informed by a masterplan which has been prepared in consultation with the forum and the local community.

The policy identifies key policy considerations, including: phasing, mix, impact on existing businesses, parking, access, pedestrian linkages, sustainable travel, landscape impact, flooding, drainage, and biodiversity and mitigation measures.

Submission Draft

The Submission Draft, published in February 2021, acknowledged that the masterplan could be prepared by the local authority or the developer, and stated that the vital element is that the work is truly collaborative, as required by National Planning Policy Guidance.

Land contamination and remediation were added to the details to be included in the masterplan.

Independent Examiner's Final Report

The Examiner's report was published on 21 July 2021 and it considered Policy EB11 in great detail. It states that the draft Local Plan **(to which little weight should be given)** includes a proposal under Policy RG5 for the redevelopment of part of the estate for 245 houses. The report analyses the representations made by Lichfields on behalf of the majority landowner and contrast that with the background evidence used in preparing the East Boldon Neighbourhood Plan.

It considers that it is a reasonable step to undertake a masterplan as part of the preliminary site assessment work and consideration of options for the design and layout of possible housing development and for the community to be consulted, in accordance with NPPF paragraph 124.

It goes on to state that it is appropriate for the policy to support the continued use of Cleadon Lane Industrial Estate for employment uses. If the housing scheme is brought forward in advance of the allocation of the site for housing in the emerging Local Plan, it is considered reasonable for the East Boldon Neighbourhood Plan to seek justification for the loss of employment land.

South Tyneside Draft Local Plan

The Pre-Publication Draft was subject to consultation between August and October 2019. Following the consultation, a report on the South Tyneside Local Plan: Spatial Options Review was considered by the Council Cabinet meeting of 17 March 2021. In view of the number of representations received, the Council agreed to undertake a review of the spatial options and progress to a new draft Regulation 18 Local Plan to be informed by that review.

South Tyneside Council has confirmed that the status of the Pre-Publication Draft Local Plan is that it **carries very limited weight** as, subject to Cabinet approval, it will superseded by a new Regulation 18 draft local plan.(Examiner's report on EBNP Para 2.33)

In view of this, it follows that the status of Policy RG5 is that it also carries limited weight.

Response to Avant Homes proposal

Q1 - Is East Boldon a sustainable location for new homes, with good transport links and access to local services?

The East Boldon Housing Needs Assessment (2019) indicates there is a local requirement of 12 dwellings per annum. This equates to 192 dwellings over the 16 year period 2020-2036. (Examiner's Report Para 3.18) So the development of 230 homes as proposed by Avant Homes would meet this local requirement and means that the mix of the scheme is vitally important. The delivery of affordable homes on the site is referred to by Avant homes and the Forum requires more information about this. The Forum considers the provision of affordable housing to be vital to allow young people and young families to get on the housing ladder and stay within the local community.

In terms of East Boldon's infrastructure, the Forum has particular concern over the impact of traffic and parking levels within the area. The community have expressed concern over their ability to access dentist and GP services. In addition there is concern regarding the potential future location of the schools,

In their website FAQs, Avant homes refer to financial contributions towards the provision of additional school capacity, open space, play areas, affordable housing, travel and transport improvements.

The Forum considers that it is vital the appropriate legal agreements are secured by South Tyneside Council in their pre-application discussions with Avant Homes.

Q2 - Is the site an appropriate location for new homes?

The site is within the settlement boundary approved by the Examiner for the East Boldon Neighbourhood Plan. The applicant must demonstrate that there is no demand for the existing employment related uses. Evidence should include details of the comprehensive marketing exercise undertaken.

A comprehensive masterplan must be prepared in consultation with the Forum, the local community and other key stakeholders. Policy EB11 sets out 12 detailed issues that must be included. These are phasing, mix of development which will not undermine existing businesses, housing mix which will contribute to delivering local housing need parking, highway access, pedestrian links, design, landscape, flooding and drainage, biodiversity and land contamination.

Q3 - Is it a well designed, attractive development

East Boldon Forum believe that the site offers great potential for the creation of a beautiful, enduring and successful place to live.

Although brownfield, the site sits next to the green belt and an important wildlife corridor. It also lies in close proximity to Boldon Flats, an area of special significance for birdlife and a site which includes a SSI. The watercourse which runs through the site provides the chance to create meaningful habitat and deal with drainage in a more sustainable way. It also provides an opportunity to create a tranquil and inviting place where residents can meet with good landscaping and tree planting.

The location of the site gives the opportunity to access a major cycling and walking route which runs parallel to the railway line and in turn connects the area with the metro station and shops at East Boldon. This provides a great opportunity to embrace the Government's agenda for healthy lifestyles and more sustainable modes of transport.

The Neighbourhood Plan sets out clear design objectives for new development and this site give every opportunity to achieve these. **The design objectives within the Plan have been arrived at after rigorous consultation with those who live and work in the Forum area. We ask that you respect these and work with all parties to achieve a design solution which addresses the key points set out below:**

Design Objectives

Setting:

- Deliver a built environment of the highest quality which is empathetic and sensitive to the characteristics of East Boldon.

Design:

- Create inspiring, sensitive design and avoid bland, extensive, and repetitive housing development.

Sustainability:

- Create a built form which is sympathetic to sustainable living and provides a public realm that encourages people to walk and cycle to local destinations including local centres, schools and parks, along attractive safe, direct routes, and whenever possible maximise the opportunity to use public transport.

Housing provision:

- Deliver a range of accommodation and a mix that will help foster a strong sense of community and reflects the needs of East Boldon residents.

Accessibility:

- Ensure that new development successfully integrates with adjoining areas and provides street patterns and pedestrian routes which are easy to navigate, accessible to all, and promote community interaction.

Environment:

- New development must be sensitive to the existing habitat and biodiversity of the area. It must provide high-quality landscaping, including tree planting, and a comprehensive and interconnected network of green infrastructure which links and complements the green spaces and community assets, especially those identified by the Neighbourhood Plan. It must provide design solutions that help to promote wildlife.

Achieving a well-designed solution.

Paragraph 126 of the National Planning Policy Framework states: *“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential*

for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

The Neighbourhood Plan sets out a number of key policies which will be applicable to all development in the Settlement Boundary and we ask that you take these into account, particularly EB11 which specifically addresses this site.

The Neighbourhood Plan also includes a Design Code which has been prepared by Aecom, a national firm of consultants. We have done this in direct response to paragraph 127 of the National Planning Policy Framework which states: *“Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers”.*

We ask that you pay particular attention to the Design Code and work with the Forum and the wider community to achieve the best outcomes for this site.

Outline Proposal

We appreciate that the proposal included on your website is at a very early stage in development and note your comments about more detailed proposals in due course. Nevertheless, we feel it important to say that the standard of design and the architectural solution offered for comment is particularly disappointing. It seems unsupported by in-depth analysis of the site and infrastructure issues. Above all it misses the opportunity to be ambitious and create a beautiful, enduring and successful place to live. **We hope that through constructive engagement with the wider community and the Forum a more acceptable design can be realised.**

East Boldon Neighbourhood Forum

5th August 2021

info.eastboldonforum.org.uk