**East Boldon Neighbourhood Forum (EBNF) - Response to the South Tyneside draft Local Plan, Pre-Publication Draft (Regulation 18) – July 2022**

**DOCUMENT 1: EXECUTIVE SUMMARY**

**Introduction**

The NPPF in section 3, Plan-making (16 c) calls for plans *‘to be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.*

The East Boldon Neighbourhood Plan (EBNP) was agreed by South Tyneside Council and endorsed in a public Referendum in October 2021. In spite of this, East Boldon Forum (EBF) was not involved in any discussions to determine how the Neighbourhood Plan and its policies would work or be affected by the proposed Draft Local Plan. Nor was it consulted over any of the policies put forward in the draft local plan that would affect East Boldon and its residents. The background documents were not released to the Forum prior to the commencement of the six week public consultation. It is unsurprising, therefore, that East Boldon Forum has many reservations and misgivings over the draft local plan.

**Our detailed comments and objections are set out in Document 2 – Detailed Response.**

**The following information gives an overview of our main concerns:**

**Summary**

In line with National Planning Policy, the EBNP was based on a conversation and consultation with the local community. The robustness of this was commented on by the External Examiner, Rosemary Kidd. Key issues for residents were the need to retain the Green Belt boundary, to protect the environment and the distinctiveness of the village. The settlement boundary adopted in the Neighbourhood Plan (NP) attempted to do this and at the same time provide a positive opportunity to meet the housing requirement identified in the East Boldon Housing Needs Assessment (EBHNA). The current policies in the draft local plan will result in the failure to meet these objectives.

There are currently 1,860 homes in the EBNP area and the addition of 650 new homes across the four housing sites proposed by the draft plan represents a 37% increase. This will bring an unsustainable level of growth and will have severe detrimental impact on the local infrastructure, distinctiveness and character of the village. This effect will be exacerbated by the additional proposed housing sites, also included in the draft plan adjacent to the Forum area. The total number of houses proposed for sites within or adjoining the Cleadon and East Boldon Ward is 1,160, of which 960 are on sites within the Green Belt. The loss of farming land and wildlife habitat in such a concentrated area, coming hard on the heels of the removal of 65 hectares of green belt to make way for the International Advanced Manufacturing Park nearby, will have a profound and far reaching negative effect in so many ways.

Such numbers will undoubtedly impact the well-being of its residents. The A184 which connects the proposed sites, runs through the centre of East Boldon and has residential properties, a school and churches built either side. The increased traffic and air pollution that will result from these numbers will have a detrimental effect on the health and safety of its residents.

Three of the proposed sites in the EBNP area are located within the Green Belt and will result in the loss of arable land and important wildlife habitat. EBNF believe that insufficient weight is given to the value of these sites within the background documents, or the role Green Belt land will need to play in combating climate change.

EBNF do not accept that a robust or convincing case has been made to amend the Green Belt boundary. The number of houses proposed in the Local Plan is based on 2014 household projections and inflated by the application of a high ‘buffer’ element. The 2014 household projections have been shown to be an overestimate by the 2021 census.

The Office for National Statistics issued the most up to date Census information in June 2022. This indicates that In South Tyneside, the population size has decreased by 0.2%, from around 148,100 in 2011 to 147,800 in 2021. This figure contrasts with the population figure set out in para. 1.15 of the Strategic Housing Market Assessment of 151,936.

The census records 68,300 households whereas the 2014 based projections used in the plan estimates 71,170. The ONS census information also indicated that as of 2021, South Tyneside is the fourth most densely populated of the North East's 12 local authority areas. South Tyneside’s land area is constrained by the River Tyne to the North, the sea to the East and Green Belt land that separates it from the neighbouring Authorities of Gateshead and Sunderland.

EBNF contend that is should be possible for South Tyneside Local Authority to put forward a case for ‘special circumstances to justify an alternative approach.’ EBNF wrote to the Secretary of State for Levelling Up about this on 30 June 2022 and received a reply on 20 July (**see attached Appendix 1**).

This reply states that “the standard method does not impose a target, it is still up to the local authority to determine its housing requirement, and this includes taking local circumstances and restraints such as Green Belt into account “. This statement, when combined with the new up to date demographic information, provides the basis for STC to make a case for a much lower Housing Requirement to be used in the Regulation 19 version of the Plan.

The detailed comments contained in document 2 are made in good faith. Since it was established, East Boldon Forum has been proactive in seeking to work with Officers of the Local Authority and its Elected Members. We remain committed to do so in the future.

**Appendix 1**

|  |  |
| --- | --- |
|  | ***Department for Levelling up, Housing and Communities***  Planning Policy Division  3rd floor, Fry Building  2 Marsham Street  London SW1P 4DF |
| East Boldon Neighbourhood Forum  [info.eastboldonforum@gmail.com](mailto:info.eastboldonforum@gmail.com) | Email: alan.scott@levellingup.gov.uk  www.gov.uk/dluhc  Our Ref:19055016  20 July 2022 |

Dear Ms Richardson

Thank you for your letter of 30 June to the Secretary of State on behalf of East Boldon Neighbourhood Forum about local housing need and the potential consequences for the neighbourhood.  I have been asked to reply.

I understand your concerns. However, you will appreciate that, because of the Secretary of State’s quasi-judicial role in the planning system, I cannot comment on local planning matters or the way an area’s housing need has been assessed.

While central government sets planning policy for England through the National Planning Policy Framework, elected local authorities are responsible for planning their areas.  Local Plans indicate how land should be used, the type and location of future development, and the presence of restraints such as Green Belt.  Each Plan is submitted for rigorous independent examination by planning inspector. The examining inspector acts on behalf of the Secretary of State to make sure the Plan is sound and accords with national planning policy.

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

At the same time, the Government expects local authorities to plan and deliver the housing and infrastructure our communities need   We want to get more people on the housing ladder, support local economic growth, and create stronger and more sustainable communities.   It is important to strike a balance between enabling development and growth, including housebuilding, while continuing to protect and enhance the natural environment and land for agriculture.

Having an effective, up to date plan in place is essential to planning for and meeting housing requirements; in ways that make good use of land and result in well-designed and attractive places to live. The Government expects local authorities to work together to plan for and deliver the housing and infrastructure our communities need.  In 2018 the Framework introduced a standard method for calculating local housing needto make the process simple, quick and transparent.  The standard method does not impose a target; it is still up to the local authority to determine its housing requirement, and this includes taking local circumstances and restraints such as Green Belt into account, and working with neighbouring authorities if it would be more appropriate for needs to be met elsewhere.  It is recognised that not every community will be able to meet its housing need in full.

I understand that South Tyneside’s Local Plan review is undergoing Regulation 18 consultation, due to end on 14 August 2022.  The Neighbourhood Forum will have a further opportunity to make representations at the Regulation 19 consultation stage, scheduled for Winter 2022.

We are continuing to monitor the operation of Local Housing Need assessments, particularly as the effect of changes to the way we live and work.  We are developing policy on this topic and intend to set out further thinking on direction of travel as soon as we are able to do so.

You mention government intervention, but I take this to be a reference to the fact that South Tyneside Council’s Housing Delivery Test result (74%) caused the presumption in favour of sustainable development to be applied.  As the Framework makes clear, local authorities which trigger this presumption are expected to approve applications for housing unless policies in the Framework protecting areas or assets of particular importance provide a clear reason for refusing the development, or unless any adverse impacts of approving the proposal would significantly and demonstrably outweigh the benefits, when assessed against the Framework’s policies taken as a whole.  Once again, this is not a matter on which the Department would comment.

Thank you again for writing, and I hope this information is of use.

Yours sincerely

**Alan C Scott**

*Planning policy adviser*