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

**DOCUMENT 2 – Detailed Response**

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| **Paragraph/Policy** | **Support / Object** | **Reason / Comment** |
| **Introduction** |
| **Neighbourhood Plans** **Para 1.6** Two Neighbourhood Forums have progressed Neighbourhood Plans in South Tyneside: • East Boldon Neighbourhood Plan…. https://www. southtyneside.gov.uk/ article/60588/East-Boldonneighbourhood-planning • Whitburn Neighbourhood Plan… https://www.southtyneside. gov.uk/article/57607/WhitburnNeighbourhood-Planning **Para 1.7** Neighbourhood Plans can be prepared at any time, but they must be in general conformity with the adopted Development Plan’s strategic policies | **Comment** | The draft local plan fails to set out how it affects the policies in the neighbourhood plan. The neighbourhood plan is based on a conversation with the local community, reflects the aspirations of the residents of East Boldon and was overwhelmingly supported in a recent referendum.**The National Model Design Code part 1 states in point 19: *The National Planning Policy Framework is clear that design policies should be developed with local communities, so they reflect local aspirations.***Clarity is needed to enable to ensure that future decision making over planning applications is based on relevant policy and all parties have a clear understanding of what is applicable. |
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| **South Tyneside** |
| **Para 2.11** Housing plays a fundamental role in supporting the health andwellbeing of its residents and it is vital to ensure more housing choiceis available to support the needs of residents.**Para 2.13** Key conclusions of the Strategic Housing Market Assessment (SHMA) (2021) are that there needs to be a broader housing offer for older people across South Tyneside and there is a significant need for more affordable housing. The evidence from engagement through the SHMA suggests that the inner urban areas have a more challenging housing market and that many of the more desirable market areas within South Tyneside (e.g. the Boldons, Cleadon, and Whitburn) have a limited amount of family market housing due to planning constraints such as Green Belt.**Para 2.54**: A high proportion of households in South Tyneside do not own a private motor vehicle (38.5%). This is higher than the regional (31.5%) and national averages (25.8%). That said, commuting by car is the most popular mode of transport for residents within South Tyneside, with the number of residents opting for this method having increased by 6,321 between 2001 – 2011. | **Comment****Object****Object** | Site specific guidance should highlight opportunities for the inclusion specialist housing including those for older people. For instance, sites close to shops and good public transport links should be identified as being particularly suitable for this.This is not what the East Boldon Housing Need Assessment indicated. Consistent with figures across the Borough, the HNA indicated a need for older residents/smaller dwellings. To say only family housing has been limited because of planning constraints such as the green belt is a fallacy. The mix of housing types and tenure on new housing proposals should have regard to and be informed by evidence of housing needs, including the current East Boldon Housing Needs Assessment (2019). A further comment is made in relation to this matter in response to policy 19This statement should be more balanced. Car ownership in East Boldon is one of the highest in the Region |
| **Strategy for Sustainable Development** |
| **Policy SP1: Presumption in favour of Sustainable Development**3. Planning applications that accord with the policies in the Plan (and, where relevant, with polices in made Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise. | **Object****Comment** | The draft local plan fails to set out how it affects the policies in the neighbourhood plan. The neighbourhood plan is based on a conversation with the local community, reflect the aspirations of the residents of East Boldon and was overwhelmingly supported in a recent referendum.**The National Model Design Code part 1 states in point 19: *The National Planning Policy Framework is clear that design policies should be developed with local communities, so they reflect local aspirations.***Clarity is needed to enable to ensure that future decision making over planning applications is based on relevant policy and all parties have a clear understanding of what is applicable. |
| **Policy SP2: Strategy for****Sustainable Development to meet identified needs.****Point 8**. Secure the sustainability and vitality of the Villages of Cleadon, Whitburn and the Boldons by supporting growth which respects the distinctive character of each Village.**Point 4**. (Deliver 5778 new homes and create sustainable mixed communities), and**Para 4.12** - The household projections that inform the housing baseline are the 2014 based household projections. This figure could change upwards or downwards based on new data. South Tyneside's housing requirement will not be" locked in" until the Plan is submitted to the Independent Planning Inspectorate.**Para 4.10** (The NPPF states ‘to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - **unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals**). | **Object****Object****Object** | There are currently 1,860 homes in the EBNP area and the addition of 650 new homes will bring an unsustainable level of growth which will have detrimental impact on the local infrastructure of the area and on the character of the village.The proposed allocations of housing sites within the Green Belt in the EBNP area arise solely because of the use of these household projections. The recent official household figure for the 2021 census was 68,300 households compared with the 2014 based projection of 70,170. So the number of households in the Borough has been overestimated and there is no evidence of any likely increase.Indeed, the 2021 South Tyneside Strategic Housing Market Assessment which states in para, 1.15……*’The resident population of the borough was estimated to be 151,936 in 2021 which is based on the 2021 population estimate from the 2018-based ONS population projections’* is no longer credible when scrutinised against the most up to date information from the Office for National Statistics (ONS). The 2021 Census issued in June 2022 indicates that In South Tyneside, the population size has decreased by 0.2%, from around 148,100 in 2011 to 147,800 in 2021. The information also indicated that as of 2021, South Tyneside is the fourth most densely populated of the North East's 12 local authority areas, and there has been an increase of 15.1% in people aged 65 years and over, a decrease of 5.4% in people aged 15 to 64 years, and an increase of 3.9% in children aged under 15 years.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 .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. |
| **Policy SP3: Spatial Strategy for Sustainable development****2.** Amend the Green Belt boundary at East Boldon to allocate additional land for housing to:i. allocate additional land for housingii. create a sustainable, new community for new homes on land south of Fellgateiii. safeguard land for future development beyond the plan period | **Object** | This issue was considered by the Independent Examiner for the East Boldon Neighbourhood Plan , who considered that it was appropriate to retain the Green Belt around the village in order  to meet the housing need in the plan area .This recommendation was approved by the Council and then endorsed by residents  in a Referendum in October 2021. The Council then adopted the Plan.The proposal is not justified, uses of out-of-date evidence, and an exceptional circumstances case to do this has not been made.As we understand it, the prioritisation of brown field sites before the loss of green belt to development, is a policy of the Council and a requirement of the NPPF (before green belt boundaries are changed). Yet there is evidence of brownfield sites not being brought forward. For example, the site between Wagonway Road and Argyle Street in Hebburn (SHB035/H4/RG4) is an isolated brown field site in the middle of an urban centre. In spite of its ideal location for development and its potential to provide many, many houses, it has not been put forward on the basis of its re-wilding. At the same time as dismissing this site, and perhaps others, the Council is proposing to allow green belt land that has greater environmental significance and continues to fulfil the five core functions as green belt, for development. **Such decisions seriously undermine the credibility of the Councils draft local plan.**The realignment of the green belt in East Boldon does not comply with guidance in the National Planning Policy Framework regarding green belt boundaries. For example, the green belt boundary proposed for the MoD site (GA5) is non-compliant. The assessment itself states that "It is acknowledged that release of this parcel of land from the Green Belt would produce a Green Belt boundary that is neither logical nor robust and could lead to development pressure on parcels to the north." The assessment also states "However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement and would not help in preventing further sprawl going forward." |
| **Strategic Allocations** |
| **Policy SP5: Urban and Village Sustainable Growth Areas**1 - The following sites will be removed from the Green Belt and are allocated for housing development:* GA4 Land at North Farm
* GA5 Former MOD bunkers, medical stores and associated land
* GA6 Land at south of St John's Terrace and Natley Avenue
 | **Object** | These proposals are in conflict with the adopted East Boldon Neighbourhood Plan as they are outside the settlement boundary approved in the plan. These sites are within the Green Belt and their removal can only be agreed if the Council can prove exceptional circumstances and can demonstrate that all other reasonable options have been met.Comments on specific sites:**GA4 - Land at North Farm**EBNF objected to the allocation of this site in 2019 and continues this objection with the knowledge that the independent examiner to the EBNP rejected the site following submission by the landowners and their agents.EBNF disagrees with the Green Belt Review Site Assessment for this site, which is a moderate impact that can be mitigated.  The development of the site will reduce the gap, in terms of distance, between Boldon and South Shields still further and would increase pressure on the remainder of the Green Belt in this area. The open space and separation along Boker Lane will be lost, effectively merging East and West Boldon.There is a risk of surface water flooding for this site and it is located within Flood Zones 2 and 3. The Sustainability Appraisal (SA) states therefore the site may have significant negative effects towards the climate change objective.Only an 8 metre buffer from the watercourse is proposed in the Key Considerations at Appendix 3 of the Plan Document. This should be increased to 50 metres to be consistent with the design of the IAMP.The site is located within 5Om of a SSSI and 250 m of a local wildlife site and nature reserve. The SA states that a significant negative effect is expected in relation to the objective of conserving and enhancing biodiversity.  The Wildlife Corridors Network Review identified the site as within the wildlife corridors network and within the buffer zone to Tilesheds Burn. The adjoining field to the east is identified as a secondary feature in the network and as a result has been rejected for housing due to impacts on biodiversity.The site has been removed from Map 44 Wildlife Corridors and the interactive policies map.The site intersects with a Source Protection Zone for groundwater.The development of the site which is in agricultural use would result in the loss of Grade 3 agricultural land and the SA states that is therefore considered to have a significant negative effect in relation to the objective of protecting our soils and promoting efficient land use.There is a public right of way crossing the site and it adjoins another. The site forms part of the wider green infrastructure corridor and the SA considers that development of the site will have a minor negative impact.EBNF considers that the impact of building 263 houses on this site will be considerable on the infrastructure of the village. The Traffic Capacity Assessment shows that the site would contribute significant additional capacity through the A184/ Boker Lane junction , which is already over capacity at the evening peak. When the impact of full barrier closure at the Tilesheds level crossing  is included the impact on this junction is even greater.. Similar impact is forecast for the Sunderland Road/ Station Road junction.The Infrastructure Delivery Plan indicates a lack of capacity in local primary schools and it is estimated that this site would generate 66 extra primary school places and 33 extra secondary school places.**GA5 - Former MOD Bunkers, medical stores and associated land**This site was not allocated for housing in the 2019 Local Plan and it was not put forward to EBNF during the NP examination process. It is outside the settlement boundary of the NP and although a brownfield site it is in the Green Belt.Responding to the concerns of residents at the time, in the mid 1990s the Council fought a long and expensive legal battle to prevent unauthorised development of the site, due to its Green Belt location. This resulted in enforcement action. At the time there was recognition that the site should be returned to its pre-war condition and continue to function as green belt. Those arguments still hold true today and are reinforced by the ecological importance of the site and how it fit in with the wider green infrastructure of the surrounding countrysideSince 2019 further evidence of its biodiversity importance has emerged in the Wildlife Corridors Network Review, where the site has been identified as a Core Site, which is a site of high nature conservation value. There are mature trees and vegetation throughout the site, including Black Poplar trees, one of Britain's rarest trees. Long Eared Owls breed on the site and Buzzards breed nearby.EBNF does not agree with the Stage 2 Green Belt Review: Site Assessment which states that the site has a moderate impact, which can be mitigated.**The assessment itself states that "It is acknowledged that release of this parcel of land from the Green Belt would produce a Green Belt boundary that is neither logical nor robust and could lead to development pressure on parcels to the north."**EBNF received proposals for the development of two parcels of land to the north of the site for 215 houses during the NP examination and these were rejected by the independent examiner. However the proposed allocation of this site now will bring these proposals forward once again.**The assessment also states "However, there is a risk that the new Green Belt boundary would not provide a firm and distinct edge to the settlement and would not help in preventing further sprawl going forward."**EBNF agrees with this and considers that the site should remain as Green Belt land.The SA site assessment contains some other negative aspects; including the risk of surface water flooding and that it intersects a groundwater source protection zone.It also states that development of the site could have a significant negative effect upon the objective of enhancing our green infrastructure as it is located within a green infrastructure corridor.SPD3 Green Infrastructure Strategy 2013 stated that the site "allocated for remediation as a means of enhancing the function and appearance of the Green Belt and the wildlife corridor through this area and in furthering the aims of the Great North Forest and Durham Biodiversity Action Plan"EBNF agrees with this proposal, which is further justified following the Wildlife Corridors Network Review.The South Tyneside Landscape Character Study (2012) also suggested reclamation of the site which is compatible with the purposes and functions of the Green Belt.The site is also within the current area of landscape significance, which is shown at Map7, Annex 3 of the EBNP.The key considerations for the site state that the development should be led by a thorough understanding of heritage significance and consider whether the bunkers could be incorporated into the development. This is because the buildings on site are listed on South Tyneside's Locally Significant Heritage Assets List and the site is associated with an Historic Environment Record for a Second World War Anti-Aircraft Supply Depot. In recent years , EBNF has been approached by a group hoping to develop the site for heritage interpretation So development of the site for housing could result in a loss of locally significant heritage.EBNF considers that the development of 120 houses on the site will make a considerable impact on the infrastructure of the village.The Traffic Capacity Assessment shows that this site would contribute the largest amounts of additional trips along the A184, with the highest impact on the A184/Boker Lane junction, which is already over capacity at evening peak.The site would generate an additional 30 primary school places and 15 secondary school places.**GA6 - Land south of St John's Terrace and Natley Avenue**EBNF objected to this site in the 2019 Local Plan. It is outside the settlement boundary of the EBNP and was rejected by the Independent Examiner. The site was promoted to EBNF during the examination process along with land opposite to the west of Sunderland Road in the same ownership.This Green Belt site is at the eastern gateway to the village and gives a sense of arrival to a tree covered village, from a greenfield approach. This is the only gateway to the village that gives an introduction to the character, identity and atmosphere of the village, and must be preserved. Access to this infill site is problematic:From A184, would create significant road safety issues, including the close proximity of current accesses to Boldon Cricket Club, Low House Farm, Green Lane and Natley Avenue.Access from St John’s Terrace: This is a narrow road, which cannot cope with existing traffic demands and is plagued by parking problems, mainly from commuters using the Metro system.  Some traffic from the development will use Natley Avenue - this is a very narrow road with on-kerb parking on both sides of the road for residents (some houses don't have garages or adequate off-street parking). This will significantly increase highway and pedestrian safety concerns should the site be brought forward.The siting of new houses immediately adjacent to a long established (and high level) cricket club, with licensed bar and function room, is incompatible. The Site Specific Sustainability Appraisal identifies that the site has a significant negative impact against the climate change objective.The site is close to the Low House Copse and Boldon Flats Local Wildlife Sites and the Boldon Pastures SSSI and within the South Tyneside Wildlife Corridors Network.Flood risk issues have been identified, particularly to the north east of the site, which could be exacerbated through development. It is within Flood Zones 2 and 3 and overall the site has a negative impact. To the north east of the site the land is low lying and is crossed by a burn (River Don tributary), which creates a potential flood risk. The site is in close proximity to Low House Copse local wildlife site. Development of this site will further erode the Green Belt.  The site intersects with a Source Protection Zone for groundwater and this provides a negative impact in the SA site appraisal.The development of this site would result in the loss of Grade 3 agricultural land and therefore is considered to have a significant negative effect in relation to the objective to protect our soils and promote efficient land use.The site is within the green infrastructure corridor and there are mature trees and vegetation on the site.EBNF considers that development of the site will have a considerable impact on the infrastructure of the village:The Site Frameworks document suggests access from St John's Terrace only but  proposals must be supported by a site specific transport assessment, with particular focus on the A184.The Traffic Capacity Assessment states that the development of the site will contribute to increasing capacity at the Station Road and Boker Lane traffic light junctions on the A184. The Boker Lane junction is already over capacity at evening peak.The site will generate 15 additional primary school places. |
| **Policy SP14: Employment Land for General Economic Development****1.** To ensure there is a continuous and flexible supply of employment land to meet the Borough’s needs over the plan period, the following sites, as shown on the Policies Map, are allocated for general economic development:**ED11 Cleadon Lane Industrial Estate** | **Support** | EBNF welcomes this allocation as it safeguards the sites at the south of the industrial estate and south of Station Approach for general economic development. This complies with Policy ED10 of the East Boldon Neighbourhood Plan and is in line with the feedback from businesses and the local community that is important to retain vibrant businesses. |
| **Meeting the challenge of climate****change, flooding, and coastal change** |
| **Policy 6: Renewables and Low Carbon Energy Generation - Wind Energy Development****3.** New wind energy developmentswill be supported in areasidentified as suitable on map19…. | **Comment** | It is noted that this includes Boldon Business Park and most employment areas and some areas of open space such as Temple Park. However when you view the interactive policy maps you see that most of the Green Belt around East Boldon is shown as potentially suitable for wind energy development. This is because that in the Wind Development Study is states the following:  “8 - Given the requirement of Local and Neighbourhood Plans to identify suitable areas for wind energy development, and the NPPF’s requirement for developer’s to demonstrate the very special circumstances for renewable energy schemes in the Green Belt, it is considered appropriate to exclude Green Belt from the constraints mapping, to enable full analysis of the potential suitable areas for wind energy developments in the Borough. This approach will allow developers to demonstrate the very special circumstances for renewable energy projects in the Green Belt and assess the cumulative impacts of the proposed development on a case by case basis, when submitting a wind energy planning application.”Para 7.22  of the plan states:   “…. Following public consultation, if it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing, the Council will then determine which areas should be designated in the next iteration of the Plan.”   In view of this EBNF considers that it is essential that the Council undertakes such a public consultation with our community before considering whether any further areas are identified. |
| **Delivering a Mix of Homes** |
| **Policy SP18: Housing Supply and Delivery**The Council will work withPartners and landowners to deliver South Tyneside’s overall housing requirement of 5778 net additional dwellings (321 per year) and maintain a rolling five-year land supply. This will be achieved by:**2.** Making provision for the delivery of at least 658 new homes within the designated East Boldon Neighbourhood Forum Area | **Object** | This figure (658) is not based on housing need (see East Boldon HNA) but on an arbitrary allocation of land. The allocation will result in a 37% increase in dwellings and as a consequence the distinctiveness of the village will be lost. The infrastructure of the village is inappropriate for this increase in size.Furthermore, the proposal is in conflict with the adopted East Boldon Neighbourhood Plan. The EBNP includes a Housing Needs Assessment of 12 dwellings per year which amounts to 192 dwellings over the plan period up to 2036. This need can already be met by site H40, land at Cleadon Lane industrial Estate. This site will make a significant contribution to the Borough's 5 year housing land supply should planning permission be granted. |
| **Para 8.6** - Buffer. The NPPF places a requirement on Local Authorities to not only identify sufficient sites to meet the housing need, but to also ensure that they are delivered. The Government has recently introduced penalties through the annual Housing Delivery Test. | **Object** | There is great uncertainty over the housing requirement that is set out in the draft local plan as this is based on out of date (2014) statistics. The 2021 population figures indicate a continuing downward trend as far as the population is concerned in South Tyneside. Given that land availability requires precious green belt land to be sacrificed for residential development, it seems sensible and appropriate to use the minimum 5% figure as the buffer. This would reduce the number of houses by 447 units and make a significant difference to the amount of land being lost from the green belt. |
| **Neighbourhood Plans Housing Requirement****Para 8.11** The NPPF states that within the overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The NPPF notes that, where it is not possible to provide a requirement figure for a neighbourhood area, an indicative figure can be provided if requested by the neighbourhood planning body. **Para 8.12** -The plan has identified an indicative figure for the neighbourhood areas based on the latest evidence of local housing need and the Plan's spatial strategy and allocations. | **Object****Object** | This figure is arbitrary. It is based on land that has been identified as a possible location for housing and not on need. It is disproportionate to the overall housing allocation. As stated above, it will result in a 37% increase in dwellings in the neighbourhood forum area. This number will have serious consequences for infrastructure especially in relation to the long-established road network which struggles to cope as it is with vehicle numbers. The impact on the distinctiveness of the village of east Boldon will be profound and devastating.The indicative figure is not based on the latest evidence of local housing need. The East Boldon Neighbourhood Forum commissioned an independent Housing Needs Assessment which was endorsed by the Independent Examiner and then approved by the Council for Referendum and voted by residents in a 95% yes vote on a 42% turnout. |
| **Policy 18: Affordable Housing**1. To meet the Borough-wide need for affordable housing, developments of new housing of 10 or more dwellings, or development with a gross internal area of more than 1,000m2 willbe required to deliver affordable housing², where appropriate and viable2. Affordable housing provision shall be delivered on site or, where robustly justified, an equivalentfinancial contribution in lieu of onsite provision3. Development of new housing of 10 or more dwellings or gross internal area of more than 1,000m2 shall deliver:iii. 30% affordable homes in Cleadon, East Boldon and Whitburn: 10% to be provided as an affordablehome ownership product (e.g. Discounted Market Sale, First Homes etc), with a minimum of 7.5% to be provided as FirstHomes. The remaining 20% to be provided as an affordable rented product (i.e. Social Rent orAffordable Rent, to be agreed with the Council). | **Comment** | The EBNP contains Policy EB14 on Affordable Housing which is currently in operation for assessing the application at Cleadon Lane Industrial Estate. EBNF is not opposed to the more specific proposal within Policy 18 in relation to East Boldon and requests discussion as to how a transition will occur if this policy passes examination. |
| **Policy 19: Housing Mix**Housing development shall deliver an appropriate mix of housing types, sizes, and tenures to meet identifiedneeds and to create and maintain mixed and balanced sustainableneighbourhoods by:1. Contributing to meetingaffordable housing need, market housing demand and specialist housing2. Providing an appropriate mix of house types and sizes which enhance local housing options and are acceptable for the site andits location3. Where appropriate, increasing the supply of detached homes in theBorough4. Where appropriate, increasing the choice of suitable accommodationfor the elderly population and those with special housing needs including bungalows and extracare housing5. Encouraging the inclusion of selfbuild and custom housebuildingplots as part of larger housing developments, where it is viable and where there is an identifiedneed6. Ensuring new homes meet the needs of our aging population andare accessible to all. | **Object** | The housing needs assessment (HNA) for E Boldon referred to in the Neighbourhood Plan gives a clear indication of the housing mix best suited to the needs of residents. Reference should be made to this document within the draft local plan if the needs of residents are to be truly met.Experience of the recent Cleadon Lane Planning application suggests that if left to Developers/market decision making, the needs of local residents in relation to housing mix will not be met. Therefore, the local plan should be more explicit in its requirements in relation to this aspect.Paragraph 8.7 of the Neighbourhood Plan refers to the housing mix identified and states: A key role for the neighbourhood plan is to provide a policy framework to support the provision of a mix of homes to meet local needs. The East Boldon HNA provides evidence to illustrate the required mix of new homes across the plan area: • Home ownership is the most common tenure in the plan area, whilst privately rented homes have increased their share significantly between 2001 and 2011 – this suggests a rising demand for rented properties and also that there should be a greater emphasis on delivering homes for private rent and shared ownership; • There is a lower proportion of one person households compared to South Tyneside as a whole and of these, a substantial proportion are aged 65 and over. The recommended housing split for new dwellings is: 1 bedroom – 26%; 2 bedrooms – 42%; 3 bedrooms – 32%; 4+ bedrooms – 0%.• The current provision of specialist accommodation for the elderly is not sufficient to meet the needs of the projected elderly population. There is a need to deliver an additional 64 bed spaces to 2031.The draft Local Plan should reflect the above and shape policy so that any site put forward in the East Boldon Forum Area is required to cater for the need and wishes of its residents. |
| **Policy 20: Technical Design****Standards for New Homes**1. Up to 12% of new build housing in developments of 50 homes or more shall be designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users (compliant with Building Regulations M4(3)Category 3: Wheelchair user dwellings).2. All residential dwellings shall be designed to be accessible and adaptable (compliant withBuilding Regulations M4(2)Category 2: Accessible andadaptable dwellings). | **Object** | The National Model Design Code part 2 (guidance)185. states: *At a national level building regulations set out three categories of accessibility and local planning authorities are expected to set requirements for accessibility that reflect local needs.* The draft Plan is clear over the challenging health and demographics of South Tyneside’s population. The standards set out in the Building Regs now replace Lifetime Homes etc.The inclusion of a policy that will see all homes built to some level of accessibility is welcomed. However, the wording of ‘Up to 12%’ for Category 3 is confusing. Does this relate to properties only in the control of the Local Authority? If not, and it relates to other development, will this leave the provision too open for Developers to interpret. **The application of this only for schemes over 50 in number makes little sense.** Would it not be better to require it to be included for all major house building i.e., 10 dwellings or more? Or indeed all homes?Habinteg, a recognised expert in this area, has produced some guidance for Local Plan preparation:https://www.housinglin.org.uk/\_assets/Resources/Housing /OtherOrganisation/Accessible-Housing-Impact-Accessment-Emailable.pdfand recommend that local authorities build 90% of new homes to the accessible, adaptable standard (category 2) and 10% to the wheelchair standard (category 3).This policy should be re-examined and discussed further with community groups and organisations able to give expert advice, **but does not seem sufficiently robust as it is currently drafted. It also seems in conflict with the wording in the South Tyneside 2021 SHMA Final Report Page | 111 November 5.55 :**Given the ageing population of the borough and the identified levels of disability amongst the population, it is recommended that 6.8% of new dwellings are built to wheelchair accessible M4(3) standard and all remaining new dwellings are built to M4(2) accessible and adaptable standard to take account of the ageing demographics of the borough.**Policy 20 -** EBNF contend that this policy should also cover internal space standards. It is necessary for the local plan to invoke internal space standards as a policy unless it is included in a design code that is formally adopted by the local plan. It is doubtful that reference to the space standards within the National Design Code alone will be adequate to ensure its application. **The National Model Design Code part 2 (guidance)** 183. States: Design codes can support the delivery of housing quality by including Nationally Described Space Standards. These need to be included in local plans or design codes that are adopted in local plans. For clarity, Policy 20 should include this aspect especially because it is referred to alongside accessibility standards in the 2015 guidance note on Technical Standards.NPPF para 133 states: “*Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”.*The move toward smaller and smaller room sizes as witnessed in recent planning applications (such as Cleadon Lane) provides sufficient justification. |
| **Policy 21: Gypsies, Travellers and Travelling Showpeople**1 As defined on the Policies Map, the existing authorised Gyspy and Traveller site at West Pastures shall be maintained unless it is no longer required to meet an identified need. 2. Where proposals for Gypsy and Traveller sites or Travelling Showperson yards are brought forward on non-allocated land, proposals will be supported where they can demonstrate: i. The need for the number, size, type, and tenure of the proposed pitches/site ii. The occupants meet the definition set out in national policy iii. The proposal would not be located within any known flood risk areas iv. The necessary infrastructure services could be made available v. The proposed site is accessible to education, health, and other community facilities vi. The proposed site is not located within Green Belt except where is can be demonstrated that very special circumstances outweigh harm to theGreen Beltvii. The proposal can be sympathetically assimilated into the surroundings.**8.58:** There is one permanent site in South Tyneside for the travelling community at West Pastures, West Boldon. This site is fully authorised and was granted planning permission in December 2013 for 11 Gypsy and Traveller pitches, providing a settled base for residents that allows them to access local health care and education provision. All 11 pitches were occupied when last surveyed in 2018. | **Object** | EBNF consider the following amendments and additions provide a more comprehensive and robust policy that reflects some of the recommendations put forward in the **South Tyneside Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021**  but not included in the Draft Local Plan, and takes account of the policies within the Neighbourhood Plan such as Green Spaces and Protected Open Spaces within the settlement boundary (EB17 and EB18):Amend point vi) as follows:vi. The proposed site is not located within Green Belt ~~except where is can be demonstrated that very special circumstances outweigh harm to the Green Belt~~ Add at the end of point vii):….*and includes appropriate screening and landscaping to protect local amenity and the environment.*Add new point: *viii) The proposed site is not located in a Local Wildlife Site, Nature Reserve, Local Green Space, Protected Open Space, Wildlife Corridor or in an area of High Landscape Value.*Add the following new points to reflect recommendations in the **Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2021:***ix) the proposed site will promote peaceful and integrated co-existence between the site and the local community.**x) The proposed site will avoid undue pressure on local infrastructure and services. Xi) In rural areas, the size of the site does not dominate nearby settled communities.* *xii) The proposed site is capable of accommodating on-site facilities that meet best practice for modern Traveller site requirements, including play areas, storage, provision for recycling and waste management.* |
| **Ensuring the vitality of Centres** |
| **Policy SP20: The Hierarchy of Centres****3.** Local Centres: Cleadon Village, **East Boldon Village**, Harton, Westoe Road, Whitburn serve the everyday needs of local communities and are the focus for small scale shops and services accordingly. | **Object** | Map 37 defines East Boldon Local Centre as 1-9 Station Terrace. EBNP Policy EB11: Local Retail Centres, covers the areas of Front Street, St Bede's and Langholm Road as well as Station Terrace. The definition of the Local Centre should be amended to align with that in the NP. |
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| **Conserving and enhancing the Natural Environment** |
| **Policy 33: Biodiversity, Geodiversity and Ecological Networks****1.** To ensure the protection andenhancement of biodiversity,geodiversity, and ecological networks, development shall, where appropriate:**i.** Avoid/minimise adverse impactsupon biodiversity and geodiversityin accordance with the mitigationhierarchy**ii.** Provide measurable net gains forbiodiversity in accordance withPolicy 35**2.** For development which is likelyto adversely affect biodiversityand/or geodiversity, planningconditions and/or obligations will be sought to secure the provision, maintenance and monitoring of appropriate mitigation, compensation and/or enhancement measures. | **Object** | The EBNP area contains a wide range of species and habitats and as a result Policy EB7 : Biodiversity  seeks to protect and enhance biodiversity across the plan area.EBNF is concerned that the proposed housing allocations will have significant impact on the biodiversity, geodiversity and ecological networks.The land at North Farm (West) is located within 50m of a SSSI and 250 m of a local wildlife site and nature reserve. The sustainability appraisal for the site states that a significant negative effect is expected in relation to the objective to conserve and enhance biodiversity. The appraisal also states that the development of this greenfield site would result in the loss of Grade 3 agricultural land and result in having a significant negative effect in relation to the objective to protect our soils. This is also the case in relation to land south of St John's Terrace and Natley Avenue., which is also Grade 3.Opening up areas of the Green Belt is not easily mitigated. Long-term development of ecosystems comprises both progressive and retrogressive stages and involves interactions between soil pedogenesis (soil formation) and plant communities (Walker and Chapin 1987, Wardle, 2002; Richardson et al. 2004; Peltzer et al. 2010).Communities of plants and animals are moved on or pushed to the brink of extinction in a given area when developers move in. Furthermore, it is not just about animals and green plants as shown by Monika A. Gorzelak, Amanda K. Asay, Brian J. Pickles, Suzanne W. Simard, Oxford University May 2015<https://academic.oup.com/aobpla/article/doi/10.1093/aobpla/plv050/201398>Plants and underground fungi form symbiotic relationships called mycorrhizae (e.g., arbuscular mycorrhizae (AM) with trees and ectomycorrhizae (ECM) ). These connection networks are widespread in nature and are well developed in green belt soils. Green plants give the underground fungus food and the fungus helps the green plant with uptake of nutrients, disease and drought resistance. In green belt land these mycorrhizal networks extend for tens of square metres. It may help to explain why rare plants which flourish on ancient meadows no longer appear once the soil has been disturbed for development. Also, why disturbed soils contain only the common ‘weeds’. Rarer plants which may once have grown at the location cannot thrive once the underground mycorrhizal network is destroyed. |
| **Policy 34: Internationally, Nationally and Locally Important Sites** | **Object** | The EBNP contains Policy EB5: Green and Blue Infrastructure which seeks to protect and where practical improve the green and blue infrastructure network of the plan area. EBNF is concerned about the impact the proposed housing allocations will have on the Locally Important Sites and Wildlife Corridor within the NP area.Para 11.24 refers to the Wildlife Corridors Network Review (2020). These are shown on Map 44, however this map excludes land at the MOD Depot. This site is allocated for housing (GA5) but was designated as a Core Site in the review.EBNF proposes that this designation be reinstated. |
| **Policy 35: Delivering Biodiversity Net Gain** | **Comment** | At para 11.27, it is stated that a Biodiversity Supplementary Planning Document (SPD) will be produced. EBNF requests consultation on this document when it is produced.  |
| **Policy 39: Areas of High Landscape Value****11.62** Cleadon Hills and Boldon Downhill have been subject to landscape designations in the LDF; however the Study recommends amendmentsto the boundaries of these designations as some areas of the LDF designation do not display the qualities needed to merit the designation. | **Object** | The EBNP includes Policy EB6: Landscape which seeks to ensure that new development will maintain and where appropriate enhance important elements of the landscape of the NP area. The current area is shown on Map 7 Existing Environment Assets at Annex 3 of the EBNP.Paras 11.61 and 11.62 of the LP refer to the South Tyneside Landscape Study. This study recommended the removal of the Area of Landscape Significance east of Boldon Downhill. EBNF does not agree with the conclusions of the study and proposes that it be retained in the Local Plan. |
| **Policy 40: Agricultural Land**Development proposals will beexpected to demonstrate that theyavoid the best and most versatileagricultural land (grade 1, 2, 3a).Development of best and mostversatile agricultural land will only besupported where:1. There are no suitable alternativesites on previously developed orlower quality land.2. The need for the developmentclearly outweighs the need toprotect such land in the long term. | **Object** | Residents have raised with the Forum the issue of the increasing need for food security and the retention of agricultural land to supply locally grown crops.Para 11.66 refers to the national definition of the best and most versatile (BMV) land as being defined as Grades 1, 2 and 3a of the Agricultural Land Classification(ALC).The interactive policy map shows areas of Grade 2 and 3a in the NP area to the south of South Lane. However, the Sustainability Appraisal states that the proposed housing sites at North Farm West and South of St John's Terrace and Natley Avenue are Grade 3.The Council should seek further evidence of the exact ALC classification of the soils at both these sites. |
| **Conserving and enhancing the Historic environment** |
| **Policy 43: Development Affecting Designated Heritage Assets** | **Comment****Object****Object** | Policy EB4 of the EBNP seeks to ensure that appropriate weight is given to the impact of a development proposal on the significance of a heritage asset. This accords with Para 1 of Policy 43.Para 12.23 refers to Conservation Area Management Plans and the one for East Boldon  dates from 2009 and EBNF would wish to see this updated.Para 12.35 refers to three Conservation Areas that have been identified as At Risk and one of these is East Boldon. EBNF urges the Council to take a proactive approach to dealing with this.The Heritage Impact Assessment 2022 is an evidence report which explores the impact of the proposed site allocations on the historic environment. This includes the MOD Site (SBC08$), which is on the Council's Local List of Heritage Assets. It concludes that the site makes a high contribution to the significance in respect of heritage values and the development of the site would result in a medium impact to the significance of the heritage asset.EBNF considers that Heritage Impact Assessments should also be carried out on the proposed housing allocations at North Farm West and Land south of St John's Terrace and Natley Avenue with particular regard to their impact on East Boldon Conservation Area. |
| **Well-designed places** |
| **Policy 47: Design Principles**Design Principles 1. To achieving high quality, beautiful, safe, and inclusive design, development shall: i. Maintain and enhance the Borough’s local distinctiveness whilst supporting innovation through design ii. Contribute positively to the townscape by considering physical aspects of the area, views, and sense of place iii. Have regard to local distinctiveness, taking into consideration building types, scale, massing, and materials to preserve and reinforce distinctive features iv. Contribute to the conservation or enhancement of the Borough’s heritage assets v. Consider the relationship between the proposed scheme and the existing settlement and surrounding landscape, in terms of visual and historic settings vi. Enhance the character of the area through the retention of good quality open space, trees, and hedgerows, additional planting, street trees and soft landscaping vii. Be sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation viii. Respect building lines, frontages, plot sizes and patterns, building heights, storey heights and massing ix. Make provision for soft and hard landscaping, prioritising soft landscaping and permeable surfaces, including the planting of trees and shrubs, earthworks, boundary treatments and surfacing, with full consideration being given to future management and maintenance and the need for landscape measures that are appropriate and resilient. x. Incorporate high quality landscape design (including public art, where appropriate) with full consideration given to future maintenance.xi. Integrate well with the surrounding streets and open spaces, improve movement through the site and wider area with direct, accessible, and easily recognisable routes, contribute positively to the street frontage, and minimise the amount of blank and inactive frontages xii. Be secure and designed to minimise crime, fear of crime and antisocial behaviour | **Object** | How will this policy relate to the East Boldon Neighbourhood Plan, its Design Policies and Design Code?Section 12 - **Achieving well-designed places** of the NPPF states in para 129. “*Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents”.*This issue of conflict and the need for clarity between the Local Plan and the Neighbourhood Plan should be resolved as a matter of some urgency.The policy as set out however, is a positive statement and requires the applicant to comply. This is to be welcomed. The following points and additions would add to this policy and further improve its effectiveness in terms of achieving best practice.Add to vii): *and energy use.*Add to viii): *and roof lines that are in keeping with the street scene.*Add to xi or add new point): *Ensures the development will not prejudice the amenity of adjacent properties in terms of overshadowing, loss of light, dominance, loss of privacy, noise or general disturbance*Add the following points:*1) Provides adequate refuse and recycling storage, which is incorporated into the scheme to minimise visual impact and complies with best practice.;**2) Incorporate parking provision in ways that enhance to beauty of the street scene and minimises danger to pedestrians and cyclists.**3) Avoid bland, extensive and repetitive residential development .proposals which offer little variety and use ‘off the shelf’ house types which offer little regard to the setting.**4) Ensures that lighting associated with the development will not have a significant effect on residential amenity or wildlife**5) Incorporate measures to support species and habitats, where appropriate.**6) Incorporate tree lined street to create shading, combat Climate Change, provide habitat and facilitate the connection of green spaces.**7) Provides sufficient car parking and cycle storage to meet parking standards and which is appropriately sited within the development.**8) Where a design and access statement is required as part of a planning application, this must demonstrate how the proposal has responded to the above principles and the national design codes and guide as an integral part of the design process.*It is disappointing that the Planning Authority is not putting forward its own Design Code based on National Guidance or making reference to the East Boldon NP within the policy. There has been no meaningful community engagement in developing policy 48. This is disappointing given the amount of community engagement that has gone into the East Boldon NP’s design policy and Design Code. It should be possible for the Planning Authority to develop its own code, perhaps as an SPD and at that stage engage more with the public, East Boldon and Whitburn Neighbourhood Forums.NPPF is quite clear over this matter. Section 12,**“Achieving well-designed places”** states:“127. 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.128. To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.”**National Planning Guidance is also clear:****Effective community engagement on design: How can local communities be effectively engaged in the design of their area?**Communities can effectively shape both design policies and development through a collaborative process of meaningful participation. Early engagement and linking engagement activities to key stages of design decision-making and plan-making can empower people to inform the vision, design policies and the design of schemes.East Boldon Forum is committed to working with the Planning Authority to ensure that development achieves the highest standard of design as envisaged in the NPPF and Guidance. |
| **Infrastructure** |
| **Policy 51: Social and community****Infrastructure****Para 14.9** Where a need for additionalschool places is identified becauseof pressure on places from development, either individually or because of multiple developments within an area, requests for S106 contributions will be made. | **Comment** | Policy EB15 of the EBNP supports the provision of new and enhancement of existing community uses, as well as seeking to resist the loss of existing facilities. This compliments Policy 51.Para 14.9 refers to the need for additional school places and the impact of the proposed housing allocations in the EBNP area is highlighted in the Infrastructure Delivery Plan (IDP)2022.At Para 8.57 and 8.58  of the IDP, it confirms that in the Boldons area only one primary school has spare capacity to meet increased demand for places from planned developments. It states that the action required from 2026 would be either a new one and half form entry school, ie. 315 additional places or expansion of existing schools in the Boldons area.EBNF is concerned at this situation, as we are currently involved in assessing the impact of the Cleadon Lane planning application on our local schools. |
| **Policy 53: Accessible and****Sustainable Travel****1 iv) Additional Metro stations on the network…****1 vi) - Enhancements at existing Metro stations including Park and Ride expansion at East Boldon****7 Improving walking and cycling networks as defined in the Local Cycling and Walking Infrastructure Plan (LCWIP)…** | **Comment** | Since the last Local Plan, there has been a proposal for a new metro station at Boldon North, close to the level crossings. EBNF requests an update on the status of this proposal.Policy EB19 of the EBNP provides a flexible and positive policy approach which supports the principle of the creation of additional metro parking in order to improve the environment of the plan area and residential amenity. The level of proposed parking should be informed by an understanding of current and future demand. It is also essential that any new parking proposals do not have significant adverse effects on the environment, residential amenity or highway safety.EBNF is concerned that in the Infrastructure Delivery Plan 2022, the indicative phasing of the project is not until 2030.Policy EB23 of the EBNP seeks to support proposals to improve or extend the walking and cycling network within the plan area, as well as protecting existing routes.EBNF has been a consultee to the LCWIP and has proposed several schemes for implementation as part of the EBNP Community Actions.It is noted that in the IDP 2022, there is a project under Policy 53 for East Boldon Pedestrian Enhancements with an indicative phasing of 2030. EBNF considers that this should be brought forward. |
| **Policy 54: Improving capacity on the road network****viii)** Working with Network Rail to assess the implications of full barrier operation at Tileshed and Boldon level crossings**14.22** The Council will continue toinvestigate the implications of fullbarrier operation at Tileshed andBoldon level crossings in respect ofroad safety and traffic flows. | **Object** | **viii)** of the policy and para 14.22 state that the Council will continue to investigate the implications of full barrier operation in respect of road safety and traffic flows.EBNF is already concerned at the impact of the housing proposal at Cleadon Lane on these crossings and the one at East Boldon Station. The proposed housing allocations in the NP area will only create further traffic wishing to use these crossings.EBNF supports the use of new technology to help reduce the barrier closure time at these crossings and opposes any proposal to resurrect the idea of a bridge crossing at Tilesheds. ENBF considers that the environmental impact of a bridge is unacceptable on the area which includes a SSSI, Local Nature Reserve and Local Wildlife Site and is part of the Wildlife Corridor Network.It is noted that in the Traffic Capacity Assessment 2022 undertaken by Systra, that at Paras 3.21.24 and 3.22.26  there is reference to a study for the a bridge over the Tileshed railway crossing and state that full barriers are anticipated to result in crossing closure being 30 minutes in every hour.Clarification is required by EBNF as to the exact position of the investigation referred to at Para 14.22.The IDP includes two other projects under Policy 54 in the EBNP area. These are Junction Improvements at A184 Front Street/Sunderland Road/B1299 Station Road and A184 Front Street/Boker Lane. The indicative phasing for these is 2026 and considered essential.It is noted that the Traffic Capacity Study concludes that these junctions would operate above capacity in part, especially in the evening peak.EBNF is concerned at the results of this study and it confirms residents’ views that the road network of the village will not be able to cope with additional traffic generated by the proposed housing allocations.The Traffic Capacity Assessment includes a range of mitigation measures to be implemented along the A184 in an attempt to discourage extraneous vehicles passing through the village. **See Appendix 1 for a commentary on the impact of traffic on the A184 junctions 21 and 22**EBNF is not convinced that measures will have the desired effect and will also rely on further upgrades to the A1231 corridor to provide a suitable alternative route to and from Sunderland. |
| **Policy SP26: New Development****viii) Ensure sufficient conveniently sited and secure cycle spaces are provided****xii) Ensure that sufficient car parking spaces will be provided in accordance with parking standards** | **Object** | Policy EB18 of the EBNP provides a positive framework to seek to ensure transport and movement issues are fully considered as part of the development management process. This includes reflecting the requirements of the East Boldon Design Code. EBNF is concerned to ensure that this policy is integrated with Policy SP26.Policy EB20 states development must provide appropriate cycle parking in accordance with the East Boldon Design Code.Policy EB21 states that development should provide an adequate level of parking for residents and visitors in accordance with guidance set out in the East Boldon Design Code Annex on parking.Para 14.29 states that the Council is currently preparing a successor document to its Parking Standards SPD. EBNF requests involvement in this process. |
| **Implementation and Monitoring** |
| **Policy 60: Implementation and****Monitoring****7 - Working and engaging with various partners across the public, private and voluntary sectors** | **Object** | EBNF considers that both Neighbourhood Forums should have a direct involvement in the implementation and monitoring of the Local Plan.**Amend 7** to state Working with East Boldon and Whitburn Neighbourhood Forums and various other partners.... |
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