

**South Tyneside Regulation 19 Draft Local Plan 2024**

**East Boldon Forum is preparing a detailed response, which will be technical and lengthy.**

**The notes below, which contain our main findings following careful reading of all parts of the draft plan, may help you formulate your submission.**

**The deadline for submitting comments to South Tyneside Council is midnight on Sunday 3 March 2024.**

You can choose to send your comments using one of the following:

1. **Reply via the Council Website**: [https://haveyoursay.southtyneside.gov.uk/spatial-planning/south-tyneside-publication-draft-local-plan-2023-2/](https://haveyoursay.southtyneside.gov.uk/spatial-planning/south-tyneside-publication-draft-local-plan-2023-2/%20)
2. **By email**: local.plan@southtyneside.gov.uk The council have provided a format that they would like email responses in, it is available on their website: <https://www.southtyneside.gov.uk/article/21048/How-to-have-your-say>
3. **By post:** Spatial Planning, Development Services, Regeneration and Environment, South Tyneside Council, Town Hall and Civic Offices, Westoe Road, South Shields, Tyne and Wear, NE33 2RL.

**How to fill in your response:**

*Representations at this stage can only be made on the legal compliance and soundness of the Local Plan. That is, has the Plan been prepared in accordance with all legal and procedural requirements, and does the Plan meet the prescribed tests of soundness.*

When responding please quote the policy number or the paragraph number and state why you think the policy is not sound.

In relation to the soundness of the plan the following questions need to be asked:

* Has the Plan been positively prepared to meet the objectively assessed need for homes, jobs, services and infrastructure and deliver sustainable development?
* ls the Plan justified by a robust evidence base?
* ls the Plan effective in delivering sustainable development?
* ls the Plan consistent with the National Planning Policy Framework (NPPF) for sustainable development?

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The Regulation 19 Draft Local Plan 2024 only includes one development site in the Forum area. However, the plan makes no mention of the Cleadon Lane site which was granted provisional approval in 2023 for 202 homes or the Mayflower Glass site which has permission for 9 homes. Added to the 263 homes proposed on North Farm, the total increase in the Forum area is 474 homes, a 26% increase in the size of the village without any real consideration of the impact on infrastructure or services.

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**Points raised by Forum members, you may have others you wish to add.**

1. **SP2 –Strategy for Sustainable development to meet identified need**

**Object to 2.2 – the basis for the calculation of the number of new homes proposed is not sound or credible.**

It uses out of date statistics to calculate the number of homes needed and this results in an overestimate. The number of homes proposed is based on the 2014 household projections, which have been shown to be an overestimate by the 2021 Census.

1. **SP3 Spatial Strategy for sustainable development**

**Object to 3.2- the policy has not been positively prepared to deliver sustainable development in the East** **Boldon Neighbourhood Plan area**.

There are currently 1,860 homes in the EBNP area and the addition of 474 new homes will bring an unsustainable level of growth which will have a detrimental impact on the local infrastructure of the area and on the distinctive character of the village.

**Object to 3.4 – the policy is not justified, uses out of date evidence and exceptional circumstances case to amend the Green Belt boundary has not been made.**

The 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 housing need in the plan area.

1. **SP7: Urban and Village sustainable Growth Areas**

**Object to GA2 – Land at North Farm This proposal is not justified and is not effective in delivering sustainable development.**

It is in conflictwith the adopted East Boldon Neighbourhood Plan as it is outside the settlement boundary approved in the plan. The Green Belt Review Site Assessment for this site is not correct as it says development will only have a moderate impact. 263 new homes on the site will have a considerable impact as evidenced by the Traffic Assessment and Infrastructure development Plan.

1. **SP16 Housing Supply and Delivery**

**Object to 16.2 – Provision of at least 263 homes in the EBNP area -the policy is not sound or justified.**

This figure does not include202 homes given conditional approval at Cleadon Lane or 9 homes with permission at Mayflower Glass. It is not based on housing need but on an arbitrary allocation of land. The total number of new homes planned will result in 26% increase in the size of the village and as result the distinctiveness of the village will be lost. The infrastructure of the village is inappropriate for this increase in size.

**GA2 Land at North Farm, Boker Lane, Boldon (263 houses)**

**This proposal is not justified and is not effective in delivering sustainable development. We object to this site being allocated for housing for the following reasons:**

**CONTRADICTION OF THE NEIGHBOURHOOD PLAN**

The development of the site is a major reversal of the East Boldon Neighbourhood Plan agreed at referendum in 2021.

**LOSS OF VILLAGE IDENTITY**

The Green Belt Review Site Assessment undervalues the importance of the site.

The development of the site will reduce the gap, in terms of distance, between Boldon and South Shields and the open space and separation along Boker Lane will be lost, effectively merging East and West Boldon.

**INCREASED RISK OF FLOODING**

There is a risk of surface water flooding for this site (it is located within Flood Zones 2 and 3) and the development of the site will have significant negative effects towards the climate change objective.

**DAMAGE TO THE ENVIRONMENT**

The site is within the wildlife corridor, is located within 5Om of a SSSI and 250 m of a local wildlife site and nature reserve. The Sustainability Appraisal (SA) states that a significant negative effect is expected in relation to the objective of conserving and enhancing biodiversity.

**LOSS OF AGRICULTURAL LAND**

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.

**OVERLOAD ON INFRASTRUCTURE**

The development of 263 houses on this site will have a major impact on the infrastructure of the village including the need for an extra 66 extra primary school places and 33 extra secondary school places. The Infrastructure Delivery Plan indicates a lack of capacity in local primary schools.

**EXTREME INCREASE IN TRAFFIC - ALREADY OVER CAPACITY**

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.