

EAST BOLDON FORUM

Planning application ST/1109/21/FUL – Erection of 245 residential units at Cleadon Lane Industrial Estate

RESPONSE TO DESIGN QUALITY

Design response

Introduction

The Applicant has set out how the development responds to the expectations of the various policies and engagement which directly and indirectly affects design quality in a i) a Planning Statement, and ii) a Design and Access Statement. The application is accompanied by layout drawings, house types and elevational drawings.

East Boldon Forum contend that: i) with regard to engagement, the application falls short of the requirements set out in current guidance, ii) the application does not comply with the Neighbourhood Plan; and iii) the proposal does not demonstrate compliance with best practice guidance and fails to achieve an acceptable level of high quality design; and, iv) there are a number of design issues inherent in the proposal that affects the scheme detrimentally to such an extent that the proposal is unacceptable in its current form.

The following commentary highlights some of the major deficiencies.

1.0 Design: Engagement.

1.1 Great weight is given in the NPPF to collaborative working throughout the evolution of a proposal especially in relation to design. Para 132 calls for Early discussion between applicants, the local planning authority **and local community** about the design and style of emerging schemes and the need for clarifying expectations and reconciling local and commercial interests. It states that *‘applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community’*. It states that *‘Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for a Healthy Life (para 133).*

1.2 East Boldon Forum (EBF) has been established and recognised by South Tyneside Council (STC) since 2018. East Boldon Neighbourhood Plan (EBNP) was adopted (made) by STC at the end of 2021 and for much of that year the Neighbourhood Plan (NP) was at an advanced stage.

Despite this, there was no involvement, discussion or collaborative working on the scheme now put forward for the 245 houses proposed for Cleadon Lane with the Forum.

1.3 For clarity, the Forum was first made aware of the development when a consultative leaflet, which included a site layout showing 230 houses, was delivered to residents living on

the periphery of the site in August 2021. At this point EBF wrote to Lichfields, the Agent for the development setting out the position of the Forum (see Appendix A), and was subsequently successful in holding an online meeting in the following September with Avant Homes and Lichfields, when a number of issues which concerned the Forum were highlighted (See Appendix B).

1.4 The leaflet and a web-based questionnaire are sighted by the Agent as evidence of consultation. The Forum does not believe that this represents an adequate level of consultation with the community. The Forum also fails to understand how increasing the number of houses from 230 to 245 following this exercise responds to the majority response which was against the proposal. Our detailed comments on the Agent's Statement of Community Involvement are set out in Appendix C.

1.5 Section 4.16 of the Applicant's Planning Statement refers to paragraph 126 of the National Planning Policy Framework (NPPF) which 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.*

East Boldon Forum contend that the scheme put forward is not based on genuine engagement and, as set out in the next section, is not in conformity with the East Boldon Neighbourhood Plan

2.0 Design: The Neighbourhood Plan, Local Design Guides and Policies

2.1 Section 4.17 of the Applicants Planning Statement highlights paragraph 134 of the NPPG which states:

Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.

Paragraph 134 goes on to state that:

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

2.2 The importance of local design policies and government guidance on design is highlighted in Planning Practice Guidance (*Design: process and tools*) and how the role of how non-strategic policies can be used to establish more local and/or detailed design principles for an area, including design requirements for site specific allocations. PPG explains that Non-strategic policies can be prepared by local planning authorities

or neighbourhood planning groups, and are most effective when based on appropriate evidence of the defining characteristics of the area, such as its historic, landscape and townscape character.

PPG goes on to state *‘Non-strategic policies are important for providing a clear indication of the types of development that will be allowed in an area, especially where they provide a hook for more detailed local design guides, masterplans or codes’; and ‘Neighbourhood plan-making is one of the key ways in which local character and design objectives can be understood and set out, and with the benefit of being a community-led process’.*

2.3 PPG (Design: process and tools) also explains the meaning and purpose of design guides and masterplans:

‘Local design guides are prepared by local planning authorities and neighbourhood planning groups to set out the general design principles and standards that development proposals should follow in the area, building on policies in the development plan. They are an important way of communicating local design expectations and requirements, and are one of the visual tools that the National Planning Policy Framework expects authorities or neighbourhood planning groups to prepare and use’.

‘Masterplans set the vision and implementation strategy for a development. They are distinct from local design guides by focusing on site specific proposals such as the scale and layout of development, mix of uses, transport and green infrastructure. Depending on the level of detail, the masterplan may indicate the intended arrangement of buildings, streets and the public realm. More specific parameters for the site’s development may be set out in a design code, which can accompany the overall masterplan’.

2.4 East Boldon Neighbourhood Plan (EBNP) is based on a high level of community engagements and this was recognised by the External Examiner in her assessment of the draft Neighbourhood Plan. Many of the policies set out in the plan are applicable to the application in question, including EB1: Sustainable Development; EB3: Design; EB5 Green and Blue Infrastructure; EB6: Landscape; EB7: Biodiversity; EB9: Homeworking; EB12, 13 and 14: Housing; EB18: Sustainable Transport; EB23 Walking and Cycling. In addition, EB10 relates specifically to this site. The design code was prepared by Aecom Consultants and is consistent with the principles set out in the National Design Guide, The Manual for Streets and Building for a Healthy Life, documents which help identify how to create well designed places. The East Boldon Design Code sets out in section 2 a summary of Community Consultation and the Design Objectives defined through engagement with the local community.

2.5 Design: East Boldon Neighbourhood Plan/Policy EB 10: CLEADON LANE INDUSTRIAL ESTATE.

2.5.1 Section 5.27 of the Planning Statement poses the question: *Does the proposed development comply with the Neighbourhood Plan?* The report confirms that at the time of writing the NP was at an advanced stage. It refers to the requirement concerning a change of use (this issue is dealt with elsewhere in the Forums response to this application) and acknowledges that should the site come forward for Housing *‘it must be informed by a*

comprehensive masterplan to be prepared in consultation with the East Boldon Neighbourhood Forum, the local community and other key stakeholders.

2.5.2. The Planning Statement sets out the requirements of the master plan envisaged by the NP:

As a minimum the masterplan must include details of: *a. The phasing of the proposed development; b. The proposed mix of development, illustrating how this will not undermine the viability and operation of existing businesses on the site; c. Housing mix and how this meets identified local needs; d. Parking provision, ensuring this does not exacerbate current parking issues in the wider area; e. Highways access to the site and the impact of the proposals on the highway network; f. Pedestrian linkages through the site, including how opportunities for sustainable travel will be embedded within the development; Cleadon Lane Industrial Estate : Planning Statement Pg 19 g. How the development accords with the East Boldon Design Code; h. A landscape framework for the site, addressing matters such as green infrastructure, open spaces and relationship with the Green Belt beyond the site; i. How flooding and drainage considerations have informed the overall site design, particularly as areas of the site lie within flood zone 2 and 3; j. Opportunities to enhance biodiversity; k. Land contamination and remediation; and l. Any mitigation measures required as a result of the development.*

2.5.3 Sections 5.28 to 5.39 of the Planning statement goes on to addresses each of the above points in turn and endeavours to explain how the proposal satisfies the requirements of the Masterplan. **However, the overriding requirement for the Masterplan to be prepared in consultation with the East Boldon Neighbourhood Forum, the local community and other key stakeholders' is completely disregarded.**

The Forum can't second guess what issues the community might have identified had they been involved in a collaborative exercise however; we must challenge the assertion that the application satisfies the main headings of the Masterplan as set out in policy EB10.

To illustrate this and taking each point in turn (5.28 to 5.39), the Forum would make the following observations, highlighted in coloured text at the end of each point. The observations made are not exhaustive and are made without prejudice to more detailed considerations which must involve the community, they do however illustrate how this application **does not address the requirements of policy EB10 in any respect.** The figures in brackets refer to the applicable section of the Planning Statement:

a) (5.28) *The proposed plans indicate the proposed phasing of the development with the northernmost portion of the site being developed first and the southernmost areas being built out last to allow for continued use of the site for existing tenants. Criterion A is considered to be satisfied.* **Phasing plans need to demonstrate a thorough understanding of how the site will be developed. For instance, how the site will be accessed by those who live in the completed houses while the remaining phases are built, what are the actual requirements of the remaining users of the industrial units and how will they be affected during the construction phase etc.**

b) (5.29) *The site would be developed for residential uses as the existing industrial stock is unattractive to the market. Criterion C is considered to be satisfied.* **It is assumed that there**

is a typo in this sentence and it refers to item b (Criterion B) of the Masterplan. Detailed discussions with the operators of the remaining businesses would be necessary to consider many issues, for instance: how traffic from the development might affect access, how amenity issues as a result of the proximity residential development might affect the present and future operations and business plans of the retained businesses.

c) (5.30) *The development would deliver a mix of 2, 3-, and 4-bedroom properties, which would deliver much needed family housing to the Borough. Criterion C is considered to be satisfied.* An important assessment of current Housing Need within the local area is set out within the 2019 East Boldon Housing Needs Assessment (commissioned as part of the EBNP), the East Boldon Forum's Housing Need Survey and the South Tyneside Strategic Housing Market Assessment (2015). There is no evidence that the proposal references such information. The limited consultation that was carried out by the Applicant did not elicit feedback in regard to this aspect from those who were approached last year. East Boldon has an aging population are many family houses are occupied by one or two residents. See section 8.9 of the NP.

d) (5.31) *Criterion D was recommended to be changed by the Independent Inspector to align with the Council's adopted parking standards. Considering the sustainable location of the development, parking is provided on site to an appropriate level. Criterion D as recommended to be revised is considered to be satisfied.* i) Parking issues are a major problem affecting East Boldon and especially those residents living in the vicinity of the Metro Car Park. The park and ride facility of East Boldon Metro Station is greatly oversubscribed and this site, lying so close to the Metro Station, will no doubt be adversely affected by the overspill issue; ii) A case can be made for some of the site area to be used for additional parking for the Metro Railway; iii) South Tyneside's SPD6 (2012) rely on the much-discredited maximum standard which so exacerbate the issue of inappropriate parking, or the loss of garden space to hardstandings in areas of high car ownership such as Cleadon and East Boldon; iv) The Parking Standards referred to in the NP were not dismissed by the Examiner but moved to the East Boldon Design Guide (Annex 2a) and set out more appropriate minimum standards based on house occupancy; iv) South Tyneside's SPD6 includes a requirement for Urban and Urban Fringe areas and set out a provision for 2 spaces per dwelling and 1 space for every 3 dwellings for visitor car parking. It recognises it may be appropriate to allow provision above these in the case of larger dwellings where the provision can be linked to the number of bedrooms per proposed dwelling. The proposal does not appear to reflect either the standard in SPD6 especially in relation to visitor parking or the standard set out in in EBNP Design Code; v) Achieving 'Well Designed Places' is inexorably linked to street design and how car parking is accommodated. The proposal falls below expectations on many counts and the Forum believes in its present form layout is unacceptable; vi) No mention is made of cycle parking.

e) (5.32) *The site benefits from an existing access off Cleadon Lane which would be upgraded and improved. A secondary access to the north would also be provided. The supporting Transport Statement demonstrates that the proposal would not have a severe impact on the highway network and criterion E is considered to be satisfied.* Clarity is needed over the car usage associated with the site.

f) (5.33) *The site benefits from a right of way to the west and pedestrian access along Cleadon Lane. A Welcome Pack as part of the Travel Plan would be provided to encourage sustainable travel and shared surfaces within the development would give priority to pedestrians. Criterion F is considered to be satisfied.* i) The site does benefit from a bridleway along its Western boundary which gives direct access to the Metro Railway station, Tiledsheds Nature Reserve to the North and is a major cycle route giving off road access to other cycle routes in the area. The bridleway offers a great opportunity to achieve many of issues around sustainable transport, active travel and creating healthy and inclusive communities the set out in the Neighbourhood Plan and other design guides. However, the proposal fails to offer direct access to the bridleway. Instead, all non-motorised activity is directed via Cleadon Lane. This is a busy road requiring a much longer and arguably more dangerous route to the Metro Station, local shops and access to the countryside for cyclists and pedestrians. ii) The Manual for Streets gives good guidance on the application of shared surfaces, in particular how they impact people with disabilities. The Forum has major concerns about their use in this proposal.

g) (5.34) *The supporting Design and Access Statement provides a comprehensive overview of the iterative design process followed along with an assessment against national and local planning policy in design terms. Criterion G is considered to be satisfied.* Item g) asks for details of how the development accords with the East Boldon Design Code. The only reference to the NP in the Design Statement is a paragraph on page 9 which states: 'Draft East Boldon Neighbourhood Plan (Feb 2021) and refers to the policy contained within it that deals specifically with Cleadon Lane Industrial Estate and the requirement for a masterplan etc. To claim that the Design and Access Responds to this particular point, the East Boldon Design Code, is a serious misrepresentation of the facts.

h) (5.35) *The application is supported by a Landscape and Visual Impact Assessment (LVIA) along with a landscaping scheme which address the transition into the Green Belt to the north and east along with open space and green infrastructure on site. Criterion H is considered to be satisfied.* i) The application does not include a landscape scheme: ii) The importance of the need to transition from the green belt is recognised but the response is inadequate. iii) There is no reference to how the site relates to Boldon Flats or the potential to provide improved linkages between Boldon Flats and the Tiledshed Nature Reserve . No attempt is made to demonstrate how net gains can be achieved in a meaningful way.

i) (5.36) *An FRA has been provided which demonstrates the risk of flooding on the site is low from all sources. A drainage strategy has been provided which details foul and surface water drainage systems and doesn't increase the risk of flooding elsewhere.* It is noted that the Environment Agency has yet to accept the Applicants assertion that the classification of flood zones 2 and 3 is incorrect.

j) (5.37) *Ecological surveys have been undertaken to assess the ecological value of the site. Landscaping and green space will be incorporated within the proposed development to enhance opportunities for biodiversity net gain.* Details of how the scheme will enhance biodiversity are not given. The proposal lacks an understanding of Tiledsheds Nature Reserve and Boldon Flats and fails to respond to guidance recommending the promotion of green connectivity and the creation of movement corridors for nature.

k) (5.38) *The application is supported by a Remediation Strategy which demonstrates the measures required to bring the site to an acceptable standard for the sensitive end use and to ensure no Cleadon Lane Industrial Estate : Planning Statement Pg 20 harm to human health for workers during the construction process. Criterion K is considered to be satisfied.* Site investigation information is only provided for part of the site. Given the opening up and use of the watercourse for surface water disposal and the risks to human and wildlife, it is essential that a full assessment of site contaminants is made and design proposals eliminate any risk.

l) (5.39) *The application is supported by a range of technical documents outlining where mitigation is required. Criterion L is considered to be satisfied.* In order to fully address this aspect, it is essential that a conversation with the community and other stakeholders is conducted. The requirement of EB 10 in respect of a collaborative approach would achieve this.

Section 5.40 of the Planning Statement summarises, *Taking into account the above (5.28 to 5.39), the proposal is considered to comply with the emerging East Boldon Neighbourhood Plan.* EBNF strongly disagree and contend that the planning statement does not give any weight to EBNP, has not taken into account the local policies of the NP, its Design Code or the policy (EB10) which is specific to this site and which requires a community led Masterplan. In addition, while the requirements of the planning policies affecting the site are set out (save for the NP), there appears little evidence to show a genuine engagement with principles of good design contained in a number of important publications which help identify how to create well designed places. This aspect is dealt with below

3.0 Design: achievement of high-quality design. Design and Access Statement.

3.1 The Planning Statement refers to a separate Design and Access statement (DAS) as a means of showing compliance with the planning framework and demonstrating the achievement of good design.

It is important to note that the DAS does not address the NP apart from stating:

Draft East Boldon Neighbourhood Plan (Feb 2021) Policy EB11 relates specifically to Cleadon Lane Industrial Estate. The policy allows for the redevelopment of the site for housing provided the proposals are informed by a comprehensive masterplan to be prepared in consultation with the East Boldon Neighbourhood Forum, the local community and other key stakeholders.

The statement fails to record the requirement set out in the NP for the site to be market tested before a change of use, but does acknowledge to requirement for **a Masterplan involving the community.**

3.2 Does the Design and Access statement, and the proposal, respond to achieving well designed places?

3.2.1 Planning Practice Guidance (*Design: process and tools*) is helpful in defining the role of a Design and Access Statements in achieving well-designed places and states:

*Design and Access Statements (DAS) set out the narrative for the design approach and design rational for the scheme. They demonstrate **how the local character of an area has been taken into account and how design principles will be applied to achieve high quality design.** They set out concisely how the proposal is a suitable response to the site and its setting, taking account of baseline information.*

The Design and Access Statement which accompanies the application is structured around the following headings: *Section 1 Introduction • Section 2. summarises the context of site, including a description of the surroundings, and its accessibility • Section 3. outlines the relevant planning policies, both national and local • Section 4. covers the constraints and opportunities presented by the application site • Section 5. describes the application proposals • Section 6. outlines the development of the application proposals, and how feedback from the pre-application consultation process and the Council's response to the pre-application enquiry have been incorporated within the design • Section 7. explains how the development responds to the site context and complies with the relevant national and local planning policies re*

3.2.2 '**How the local character of an area has been taken into account**' (context): Section 2 and 4 of the report gives some information concerning the immediate context of the site and highlights the sites relationship with the green belt to the North and East, the issue of noise and vibration from the railway line to the west; the impact of the remaining industrial units to the South, though the composition and operation of the remaining industrial businesses is not explored; the part open watercourse running through the site; the issue of land contamination from previous uses. In Section 6 (the proposed development) the issue of zone 2 and 3 flooding on part of the site is referred to.

The report refers to the bridleway which run alongside the railway line to the West but fails to identify how this connects the site to the Tiledshed Nature Reserve, and gives access to a wider network of footpaths and cycleways linking East Boldon to other settlements.

The analysis does not adequately highlight or discuss desire lines, the constraints affecting these and how such issues could be overcome. Problems affecting the pedestrian route to the Metro Station and shops, including the difficulty of crossing the road East of the level crossing, are not dealt with. The remoteness of the nearest play area, Grange Park, is not discussed as a possible constraint. Grange Park is some 775 metres, approximately a half mile from the further reaches of the site.

Generally, there is little contextual information in the report concerning how the site sits in terms of the wider area. For instance, mapping of the wildlife corridors in relation to the position of the site is not provided; important ecological assets such as the Tiledsheds Nature Reserve, just 225 metres to the North and the Boldon Flats Wildlife Site, 200 metres to the South when measured from the outer edges of the site, are not referred to; there is no discussion of the role the adjoining green belt plays in establishing green links between Boldon Flats and Tiledshed Nature Reserve, or how the design of the site could be used to reinforce this aspect. There is also no discussion of East Boldon settlement in terms of its historical development, identity or architecture, in short, all of those things which contribute to its uniqueness and which are set out with care in the East Boldon Neighbourhood Plan.

While there has been no discussion with the Forum or collaborative working with the community, the Design and Access Statement in section 6 comments on 'pre-application discussions' with the Planning Authority and highlights the following issues:

i) Appropriate transition between the Green Belt and the development and the enhancement and retention of Landscaping along the north and eastern boundaries is referred to. Also raised as a potential concern is the noise and vibration from the railway line and existing industrial uses.

ii) The Design and Access Statement states: "The Parking and internal vehicle movements were considered by the Council and have been considered in the design process. Off-street parking will be provided for each dwelling in line with the Council's standards whilst priority will be given to pedestrians through shared surfaces for secondary routes off the main arterial route through the site'.

iii) With regard to biodiversity, existing tree coverage on site is limited given its industrial use. Areas of open space will be subject to a comprehensive landscaping scheme to enhance their ecological value whilst planting at the boundaries of the site will also contribute to providing an overall net gain.

EBNF confirms that it was not involved in any pre application discussions concerning this application. It has asked the Planning Authority for details of these discussions but the information, at the time of writing, has not been provided. We would nevertheless make the following observations:

With regard to i) and iii), whilst a Landscape and Visual Appraisal (LVA) has been prepared, the application has not been accompanied by a detailed Landscape Scheme or information

on how net biodiversity gains are to be achieved. The little information that is provided in the LVA and shown on the site layout drawing suggests that there would be insufficient provision of good landscaping to achieve the desired affect required either by the pre application discussions, or by the standards envisaged by most guidance referred to in the NPPF.

With regard to ii), Parking, EBNF has serious misgivings over how the design addresses highway matters and deals with car parking. These are dealt with in the following Section.

EBNF are of the view that the local character of an area has not been sufficiently taken into account and as a result the proposal does not respond adequately to its context.

3.2.3 Does the Design and Access statement, and the proposal, demonstrate ‘how design principles will be applied to achieve high quality design’: Planning Practice Guidance sets out key points to be taken into account on design. In category **Design: process and tools** it sets out how well designed places can be achieved through the planning system and refers to the **National Design Guide** and states ‘*the National Design Guide sets out ten characteristics of well-designed places and demonstrates what good design means in practice. These are:*’:

- *context*
- *identity*
- *built form*
- *movement*
- *nature*
- *public spaces*
- *uses*
- *homes and buildings*
- *resources*
- *lifespan*

There are a number of guides in addition to the National Design Guide that can be used to help inform and test good design. A number of these are written with collaborative working and community engagement in mind. Common to most is helpful information which can be used to deliver the requirements of the NPPF, avoid the pit-falls of poor design and help achieve beautiful places, sympathetic to nature, where people wish to live. Among these are Building for a Healthy Life, Manual for Streets and Streets for a Healthy Life. The East Boldon Design Code endeavours to reflect some best practice from these sources and set out useful context in relation to the East Boldon settlement.

The Design and Access statement sets out the planning framework against which the application must be tested, save for the essentials of the Neighbourhood Plan. There is no reference however, to any of the design guides, or acknowledgement that they have been used to test the proposed design. We know there has been no collaborative working despite the weight that is given to this in paragraph 132 of the NPPF. The proposal remains without validation in respect to achieving an acceptable level of ‘good design’. There are a number of design issues inherent in the proposal that East Boldon Forum believe affect the scheme detrimentally to such an extent that, in its current form, the scheme does not achieve ‘good

design' as required by the NPPF. Many of these may have been identified at an early stage had there been a collaborative approach, and many might have been eliminated if the proposal had been screened against best practice documents such as those referred to above. Some of the deficiencies that East Boldon Forum believes result from this failure are set out in the following section.

4.0 Design: Current proposal

4.1 Issues affecting street design: inadequate parking

The context to this is set out in 2.5.3 d) above.

4.1.1 The East Boldon Design Code (EBDC) sets out in annex 2a, a minimum standard based on the likely occupancy of the house and the likely car ownership level. It calls for two- and three-bedroom dwellings to be provided with two off street parking places, and four and above bedroom dwellings to be provided with three off street parking places. Garages are counted as a parking space and their size is prescribed by the design code. The code also calls for visitor parking distributed evenly across the site on the basis of one place for every two dwellings.

4.1.2 The current parking standard for South Tyneside, SPD 6, is based on the much-discredited maximum provision, originally arrived at with the aspiration of motivating residents to use public transport and deter car ownership. For Urban and Urban Fringe areas such as East Boldon, it calls for a maximum provision *‘normally two spaces per dwelling, plus one space per every three dwellings for visitors’*. SPD 6 goes on to state: *‘it may be appropriate to allow provision above these figures in the case of larger dwellings, where provision can be linked to the number of bedrooms per proposed dwelling’*.

Section 43 of the National Model Design states. *‘Maximum parking standards can be considered in circumstances where there is a clear and compelling justification’*. It goes on to say: *‘Design codes are concerned with the design of parking and its impact on the quality of place. They may identify appropriate parking options for area types, street types and building types and detailed design requirements associated with them.’*

EBF do not think there are *a clear and compelling justification’* for disregarding the East Boldon Design Code’s parking standard, and believe the context of the site requires parking to be carefully considered if a high standard of design is to be achieved.

Using the EBDC to determine private car parking provision around 550 car parking spaces and 123 visitor car parking spaces would be generated.

Using SPD 6, the Councils own standard, a provision of 490 private spaces and 83 visitor car parking spaces would be generated.

Section 9 of the Application Form indicates that 245 car parking spaces will be generated.

There appears to be no provision for visitor car parking.

The Manual for Streets in Section 8.3.2 sets out: *‘PPS3 makes it clear that, when assessing the design quality of a proposed new development, it is important to consider a design-led approach to the provision of carparking space that is well-integrated with a high-quality public realm. PPS3 (paragraph 51) advises that: ‘Local Planning Authorities should, with stakeholders and communities, develop residential parking policies for their areas, taking account of expected levels of car ownership, the importance of promoting good design and the need to use land efficiently.’*

For additional context East Boldon is a village and does not have the benefit of large numbers of public car parks. The level of car ownership in the Cleadon and East Boldon

Ward is high in comparison to other areas. A report published in 2007 on 'Car Ownership in Tyne and Wear' using data from the 2001 census found that the ward had the highest level of car ownership in the county.

This was at 13,829 cars per 10,000 households, with 86.4% of households having access to a car. The ownership of two cars per household was also the highest in the county and the ownership of three or more cars was in the top three wards. (Source - Tyne and Wear Research and Information)

The housing mix and type proposed for the site, and the market value that the housing units will command, correlates to anticipated high car ownership. The Manual for Streets in section 8.3.4 recognises this and states: *'Although the ability of residents to reach important destinations by other modes is one factor affecting car ownership, research⁷ has shown that dwelling size, type and tenure are also important'*.

EBNF can only conclude that should this scheme be allowed to proceed as submitted, car parking will be a major problem for residents, gardens will be lost to the creation of new hard standings, and the complete absence of visitor parking will result in anti-social parking behaviour that will make the streets unnavigable, unsafe and ugly. This issue will have a major impact on cyclists, push chair users, pedestrians and especially those with disabilities (see also 4.3.3 below).

Section 2.3.9 of the Manual for Streets states: Parking is a key function of many streets, although it is not always a requirement. *'A well-designed arrangement of on-street parking provides convenient access to frontages and can add to the vitality of a street. Conversely, poorly designed parking can create safety problems and reduce the visual quality of a street'*; and in Section 2.7.3 reminds us: *The Disability Rights Commission (DRC) have published a Statutory Code of Practice on the Disability Equality Duty and they have also published specific guidance for those dealing with planning, buildings and the street environment.*

4.1.2 Cycle storage: The emphasis by the Government to encourage the use of cycles is acknowledged in the EBNP, which calls for two and three bedroom dwellings to have two bike storage places; and four and more bedroom dwellings to have three bike storage spaces. The application does not reference this or set out what provision is made or how it is to be met.

4.2 Issues affecting street design: shared surfaces, junctions and turning.

4.2.1 The under provision of carparking and the problem issues highlighted above is exacerbated by the proposed use of shared surfaces in some stretches of the road network. The absence of footpaths within shared surface areas makes it difficult at the best of time for people with visual impairment. *The Manual for Streets in section 7 recognises 'People with cognitive difficulties may find the environment difficult to interpret. In addition, the absence of a conventional kerb poses problems for blind or partially-sighted people, who often rely on this feature to find their way around. It is therefore important that shared surface schemes include an alternative means for visually-impaired people to navigate by'*. However, where there is antisocial parking in shared surface areas, these difficulties apply

to all road users especially unsupervised children who may be at a greater risk of not being seen because of poorly parked vehicles.

4.2.2 The transition between roads that have footpaths and those which do not seems poorly handled and arbitrary. It is recognised that the use of shared surfaces works best at low speed and is perhaps more suited to a cul-de-sac situation. The change to this treatment mid-section of a relatively long roads seems mis-judged and in the context of no visitor parking provision, ill advised.

The Manual for Roads in Section 7.2.12 states: *Consultation with the community and users, particularly with disability groups and access officers, is essential when any shared surface scheme is developed. Early indications are that, in many instances, a protected space, with appropriate physical demarcation, will need to be provided, so that those pedestrians who may be unable or unwilling to negotiate priority with vehicles can use the street safely and comfortably.*

4.2.3 The turning for refuse vehicles is structured around hammer heads which are ugly and requires a reversing manoeuvre for large vehicles. Figure 33 on page 37 of EBDC illustrates how a circular layout avoids this and creates the opportunity for open space.

4.3 Issues affecting street design: lack of play, trees, landscape and public spaces.

4.3.1 The reliance on Shared Surface areas for play provision, as set out in the application, seems ill advised for many of the reasons, including those concerns around parking, referred to above. While it is recognised that shared surface areas can help create an impression that the street is not the sole preserve of cars, East Boldon Forum do not consider they are a substitute for small areas where children can move safely, freely and play.

4.3.2 The scheme fails to respond to the aspirations of most good practice publications in achieving an attractive neighbourhood, or to the ideas set out in Section 4.2 of the East Boldon Design Code. 'Beautiful tree lined streets' are not created, dangerous reversing manoeuvres for large vehicles are needed, and as pointed out above, the highway is likely to be overwhelmed by unplanned, anti-social parking.

4.3.3 To overcome the issue of inappropriate and dangerous parking, on street visitor parking could be been created along the length of the carriageways, interspersed with trees. This approach would have provided the opportunity for planting to 'soften' the proliferation of hard surfaces that dominate the proposed design, and allow for on-street charging points for electric vehicles. The Manual for Streets in Section 8.3.12 refers to this approach: 'An arrangement of discrete parking bays adjacent to the running lanes is often the preferred way of providing on-street parking. It has little effect on passing traffic and minimises obstructions to the view of pedestrians crossing the street'.

4.3.4 Apart from the area where the watercourse is opened up, there are no public spaces and little meaningful landscape within the development. The design of the open area next to the open water course is a wonderful opportunity to create a significant space. The area is well supervised, being overlooked by dwellings. The lack of a detailed landscaping scheme makes it impossible to determine how the area is to be designed and more information is necessary. The apparent absence of footpaths, seating and a pedestrian connection with

both sides of the stream is a missed opportunity which should be addressed. So too is the opportunity to extend the open watercourse to a greater degree within the site.

4.3.5 The open aspect of layout design results in property boundaries that are not 'defended'. Using hedging to do this in strategic locations would deter desire line trespass, and at the same time create additional habitat and soften the street scene.

4.4 Issues affecting street design: movement and connectivity.

4.4.1 The proposed layout requires vehicular and non-vehicular uses to exit the site from Cleadon Lane. Yet the desire lines from the site indicate that most pedestrians would wish to leave the site via the South West corner, the most direct route to local services, the metro station and schools. The site abuts the bridleway at this point, and although there is a change of level, it does seem feasible for a pedestrian route to be created at this juncture. The provision of such connection would also provide a direct route to the bridleway for cyclists.

4.4.2 EBNF would request that consideration is given to a number of issues outside the site that affect movement. Crossing Station Road, East of the level crossing is problematic for pedestrians, especially for those in wheelchairs. The proposed treatment of the footpath along Cleadon Lane is not made clear. This path will need to be extended and possibly resurfaced. It may also be necessary to provide a crossing point/island between the footpath and the East side of Cleadon Lane.

4.5 Issues affecting street design: noise.

4.5.1 The problems associated with noise are highlighted in the application and are referred to in the pre-application discussions with the Local Authority. The proposal, we understand, addresses this issue by the erection of high, physical barriers. We feel this approach needs clarification. What will be the impact and the appearance of these structures? Will they be screened with planting?

4.5.2 With regard to the noise that emanates from the retained industrial units, instead of a high structure, could a landscaped area be created to act as a buffer; or should this area be reserved for Metro car parking.

4.5 Nature: Issues relating to biodiversity and green infrastructure, including garden design.

4.5.1 Section 57 of the National Design Code tell us that: *'Development should enhance the natural as well as the built environment. Nature is essential for health and wellbeing, for biodiversity, shading and cooling, noise mitigation, air quality and mitigating flood risk as well as contributing to tackling the climate emergency. Nature is also central to the creation of beautiful places.'*

The National Guide also reminds us: *Government is committed in the 25 Year Environment Plan to embed a 'net environmental gain' principle for development to deliver environmental improvements locally and nationally and to green our towns and cities by creating and improving green infrastructure.*

EBNF believe that in its current form the proposal fails to adequately respond to this, the requirements of NPPF and The East Boldon Design Code.

4.5.2 The application lacks context. There is no recognition of the important habitats that are in the vicinity of the site, and the proposal fails to provide sufficient new landscaping to achieve green connections and wildlife routes between these assets. There is no strategy to deliver net biodiversity gains and the scheme is not supported by a detailed landscape scheme.

4.5.3 EBF does not believe that the scheme deals adequately with the transition between the site and the green belt. For instance, the proposed timber fence along the Northern boundary seems completely inappropriate. To suggest that shrub planting on the private garden side of this fence is an adequate solution seems nonsensical, especially given the prominence of this boundary when viewed from the North and moving along Cleadon Lane.

4.5.4 Private gardens can play a useful role in helping wildlife and supporting nature. It is hoped that measure can be incorporated to encourage and support birds, bats and hedgehogs.

4.5.5 Opening up the watercourse to the whole of the site would provide significant benefits not just for nature. Extended tree planting along its course would give identity and a unique reference point to those negotiating the site, and would address the absence of public space which currently affects the proposal. The opening up of this feature would obviate the complication of building over a culvert in terms of foundation design and services.

4.6 Design Issues affecting Built Environment: the built form, architecture and house types.

4.6.1 The use of standard house types employing the same detailing and the same materials across the whole of the site is at odds with the East Boldon Neighbourhood Plan, creating as it does repetitive, bland and boring architecture that could have been imported from anywhere, and certainly fails to reflect or add to the distinctiveness of East Boldon Village.

4.6.2 EB3: Design, calls for development *to conserve local distinctiveness by demonstrating high quality design which both respects the existing character of the area and responds to the distinctive character of the area*. While all of the points set out EB3 apply to the development, point b) has particular relevance to the architecture employed and states: development will be supported where it *‘Reflects the incremental and phased development of the village including its diverse range of architectural styles and avoids repetitive development proposals’*.

4.6.3 The phasing of the development gives an ideal opportunity to reflect different architectural interpretations, and in so doing create a more distinctive and incremental design solution. A more imaginative approach to the use of different materials in order to create small areas of interest, or recognisable reference points to aid navigation, would also be easy to achieve and help enhance the proposal. So too would varying the building line and form of the carriageway. The long, straight streets and unyielding lines of semi-detached houses contribute nothing to distinctiveness or the creation of good street architecture. Adding variety to these elements would create visual interest and provide

opportunity to vary materials and building types. East Boldon Design Code gives additional guidance, including Figures 16, 17, 33 and 36.

4.6.4 EBNF would request clarity over room sizes and bedroom designation. House types and garages are not dimensioned. Do the house types comply with The National Space Standards? Do all rooms classed a single bedroom have a floor area of at least 7.5m² and are at least 2.15m wide? Do garage sizes comply with the East Boldon Design Code, including where these are to be used for bike storage?

4.7 Issues concerning inappropriate density and housing mix.

4.7.1 The density that is achieved in the application is high compared to much of East Boldon, and is arrived at by the use of predominantly semi-detached houses. The result of this is to 'squeeze' the site so there is insufficient space for other features such as public spaces, areas for play, trees and landscaping, and adequate car parking.

4.7.2 The provision of three storey retirement accommodation; starter homes/apartments for young people; and more 2.5 storey house types, but with integral garages, could have been employed to create more space and avoid the issue outlined in 4.7.1 above. Not only would this approach have created more open space, but the application would have been more in keeping with the housing needs identified in the Neighbourhood Plan and the aspiration of East Boldon Residents.

END