

APPENDIX 1 to EBNF Regulation 19 Local Plan Consultation Representation Form

Impact of Regulation 19 Local Plan policies on infrastructure in East Boldon

1. Schools

Developments in East Boldon Forum Area LP 2024 = 202 Cleadon Lane Industrial Estate, Mayflower Glass (9), (263) GA2 -North Farm = **474**

Developments within a mile of EBNF area at Town End Farm and at Moor Lane = **730**

Total number of homes potentially depending on East Boldon Forum infrastructure = **1204 homes**

Using methodology in Infrastructure Delivery Plan (IDP) Page 50, 8:22, this could mean **301 new primary school places needed.**

We are concerned that the educational needs of the community cannot be met by the existing school infrastructure, given the scale of new housing proposed in the Local Plan.

2. Health

The LP acknowledges in the Infrastructure Delivery Plan (IDP) page 37 that “The health of residents in South Tyneside is generally worse than the regional and national averages with many residents facing health inequalities across the borough”

IDP (P40) ‘GP surgeries experience difficulties in recruiting medical staff including all healthcare workers and pharmacists. There are insufficient clinical rooms across the borough’ and Colliery Court practice has closed its doors to new patients for 6 months.

The ST District Hospital is only mentioned twice in the plan, (2.14 and 6.26) and neither references any need to increase the capacity of the hospital within the borough despite the proposed increase in residents. It is clear we need more GP’s, more appointments and more hospital beds.

IDP Page 40, 7.14 admits that the scope to create a new GP practice is limited in terms of available sites and may not be viable. Creating small branch surgeries is no longer financially viable for most practices and **no longer aligns with the NHS’s desire to provide primary care services at scale within the community.**

We are worried that with not enough GPs and healthcare workers, insufficient clinical rooms and appointments, insufficient hospital capacity, an increase of 1204 homes requiring these services and no plans to increase capacity, residents living in East Boldon Forum area may experience increasing difficulty in obtaining timely and necessary healthcare appointments and treatment.

3. Concerns About Unequal Treatment of Infrastructure provision between East Boldon Forum Area and the Fellgate Sustainable Growth Area

The scale of development proposed in the SPD for Fellgate Sustainable Growth Area is for around 1200 homes but it has a suite of attractive policies attached to the development including;

Page 6 of the Fellgate Sustainable Growth Area Supplementary Planning Document, SP8:5ii Make provision for a well located and connected local centre providing social and community infrastructure of a scale proportionate to the nature of the development and to address local needs. The local centre shall include:

- a) Primary school provision
- b) Opportunities for healthcare provision
- c) Local retail facilities

Is the LA Relying on Section 106 Agreements to Address Insufficient Infrastructure in EBNF Area?

The IDP acknowledges (page 54) Boldons area only one school has spare capacity in every year group and overall there is **insufficient spare capacity** to meet the increased demand for places from planned developments. **Policy 50, Page 151, 14.10 states that because of multiple developments within an area a request for section 106 contributions will be made. 14.11 states that if demand for school places cannot be met through expansion of schools or academies a section 106 may be sought to include land needed to develop a new school including capital costs needed to establish the school.** So unlike at Fellgate, there are no actual policies to improve school or health infrastructure to deal with a similar scale of development in and near East Boldon.

Queries relating to Section 106 in EBNF Area

EBNF is concerned about the deliverability of the LP: Have section 106 requests been made of developers and are new school sites being planned? If so, where? Are there plans to keep our highly praised and much valued village schools in operation? Are new sites being earmarked for development of new schools? How will the issue of oversubscribed schools be addressed?

Re: Section 106 Payments: How are these calculated (from the Developer's point of view). Where is the tipping point that means a development becomes uneconomic (to the Developer) because of the size of the required S106 payment? Or, does it just change the type of development e.g., to higher price houses which means even less chance of meeting affordable housing targets. If schools are asked to expand e.g., East Boldon Juniors, access is a problem for parents travelling in cars (e.g., from Moor Lane/ Town End Farm). What plans are in place to address access issues?

4. Traffic and Roads

COMMENTARY - Focusing on the A184 corridor and junctions 20, 21 and 22

Summary

The ambition in the Local Plan - to move towards being green, healthy and carbon neutral cannot be fully realised in the East Boldon Forum area if the proposed 1204 new houses in the village and other developments in surrounding areas materialise. This is due to the increased traffic and resultant air and noise pollution, caused by overcapacity, queuing and the incapacity of the highway infrastructure (A184 and feeder roads/junctions 20, 21 and 22) to cope, despite the proposed actions, mitigation measures and incremental roll out of these.

EBNF Comment

The Local Plan 2024 has 3 scheduled essential junction improvements inside the EBF area under policy 51 and 10 scheduled junction improvements (labelled either essential or desirable) just outside the EBF area which will be needed to cope with development inside and immediately adjacent to EBF area (pages 63 and 64 ,2024 IDP). All 13 projects have an indicative phasing date of 2030. In addition, a Sunderland- South Shields metro extension is scheduled (2045) using East Boldon Curve. Given the 6-year timescale for the road network projects, the work needed seems highly intensive on our already capacity roads in the EBF area and will be taking place at the same time as housing sites are being developed. ***(Not sustainable -this will make road travel in the Forum area very difficult for the next 5 years at least. Air pollution and congestion will both increase)***

South Tyneside Council's ambition to ensure that the transport infrastructure required to support new development and to improve any deficiencies in existing provision cannot be met in the EBNF area.

The aims of Points 1 and 2 in Policy SP25: Infrastructure cannot be fulfilled in terms of the transport infrastructure required and the mitigation needed,

The package of proposed mitigation measures will not sufficiently reduce the predicted increased volume of traffic and congestion along the A184 corridor and feeder Junctions 19-22. The restrictive nature of the largely Victorian village infrastructure where residential housing and businesses line the roads, minimises the impact of sustainable transport infrastructure, disallows physical alteration of junctions or expansion of the road system.

Traffic Capacity Assessment 2023

The Local Plan, Local Road Network Traffic Capacity Assessment (TCA) 20.12.23. Report analyses how planned growth will impact on the local road network in South Tyneside and identifies indicative mitigation measures.

The previous assessment of the network with regulation 18 developments had a higher forecast traffic for the end of plan, +18% and +21% relative to the 2022 base for morning and evening periods. The current assessment suggests a 15% increase, resulting in a reduction in anticipated queues and capacity during morning and evening peaks at all junctions along the A184.

Despite encouraging the use of buses, car ownership is increasing, and bus patronage is falling. Infrastructure Delivery Plan (2024) Para 3.25.

As shown in the 2023 TCA Report, queues along the A184 corridor particularly at Junctions 20, 21, 22 are set to increase and be 'exacerbated' by predicted traffic increase at both morning and evening peaks due to proposed Local Plan developments (**Annex 1**).

Junction 20 is over capacity at both morning and evening peaks (3.20.1). With the addition of Local Plan traffic queuing will be exacerbated at the junction with worst case queuing on the A184 East in the morning peak and the A184 West in the evening peak (3.20.2). Junctions 21, 22 are 'exacerbated with the junctions continuing to approach theoretical capacity'.

The suggested mitigation and physical interventions largely remain the same as those in the 2022 report. Travel Plans (3.2.10 TCA) such as incorporation of offices in new homes, encouraging sustainable travel through design and restricting parking will be required.

Despite the proposed pack of mitigation measures the report acknowledges that queuing will still occur across all junctions (e.g. 3.21.12 TCA) and anticipates that substantial queuing could occur, if it does "it is assumed that drivers will naturally alter their route choice and divert to an alternative route or change their travel patterns." (3.21.13 TCA).

Since this statement is unsubstantiated, placing reliance on drivers to change their travel patterns is 'happenstance'. Only direct intervention, well in advance of the village proximity, may affect real change and divert new and extraneous traffic from using the A184 corridor to access Testo's roundabout. New housing in and around the village will continue to overload the road infrastructure and generate queues that exceed capacity.

New Trips at junctions

The predicted composition of new traffic trips passing through junctions 19-22 by the end of the Local Plan period appears to be modest when considering that the Department for Transport, National Travel Survey 2021 states that "...in 2021 there were 12 cars for every 10 households in England."

<https://www.gov.uk/government/statistics/national-travel-survey-2021/national-travel-survey-2021-household-car-availability-and-trends-in-car-trips>

Published 31 August 2022

In all cases the majority of new trips passing through junctions are predicted to be generated by Land at South Fellgate and West Hall Farm. No specific reference is made to trips generated by new developments at Cleadon Lane and Mayflower Glass (211 houses). Are these covered in the committed development section?

Wider sustainable transport projects

The 2022 TCA stated that greater reduction in traffic could only come about as the result of future large strategic infrastructure projects (3.20.6). A new Park and Ride scheme at East Boldon metro station remains in 2024 as the example of a wider sustainable transport project (3.21.9 TCA), no site is identified.

This proposal is not feasible given that the location of the metro station is next to the very busy B1229. The small car park is often over capacity resulting in spillage onto the surrounding residential streets. The addition of a future park and ride scheme, to promote sustainable travel and accommodate increased demand (estimated 24,000 extra passengers per day across ST) will add yet more traffic to the road system, potentially encroach into the greenbelt and aggravate the already serious parking situation in surrounding residential streets.

In the shorter term no reliance can be placed on uncertain future projects to further reduce over traffic capacity and congestion.

Comments on Policy 51: Improving capacity on the road network:

Full Barriers

Para 14.23 The Council will continue to investigate the implications of full barrier operation at Tiledshed and Boldon level crossings in respect of road safety and traffic flows.

The Local Plan Traffic Capacity Assessment has failed to include any investigation data into the implications of full barrier operations at the above locations and yet these will have a significant impact on traffic flow. No assessment of the nearby East Boldon fully signalised level crossing barriers (B1229) has been undertaken which would also have provided valuable data.

New Local Plan traffic exiting and turning right out of Cleadon Lane onto the B1229 and exiting turning left onto Tiledsheds Lane will encounter and add to delays caused by full barrier level crossings.

Due to the volume of commercial, domestic through trains and Metros utilising the rail track, current traffic queues are often substantial. (From the station to Junction 22 residents experience pollution at both ends of the road.) Improvements to the Metro system are predicted to increase frequency of trains to 1 every 10 minutes and add future new routes (3.20.13 TCA) – to promote ‘sustainable travel’, however no calculation of these improvements has been undertaken. Vehicles accessing the station and traffic from new housing will continue to exacerbate queue lengths at all full barriers in operation.

5 Failure of Regulation 19 Local Plan to comply with NPPF

NPPF 2 - Achieving Sustainable Development Paras 7 and 8: states that the purpose of the planning system is to contribute to sustainable development includingsupporting infrastructure.. .to address social progress.

SCHOOLS:

EBNF cannot see how the required number of school places for families living in the EBNF area will be deliverable without a clear understanding of LA future plans for new school places to serve residents of EBNF area. With 1204 new homes scheduled to be built in and close to the Forum Area. If solutions are available, they have not been shared with EBNF, so we cannot understand how the current plan will work in terms of sustainability.

- **Because of this, the Reg 19 LP fails to comply with NPPF 2 Para 7 and 8 Social and economic objectives.**

HEALTH:

The same comment/ objection applies to the failure of the LP to set out how NPPF 2 para 7 and 8 is to be addressed when it comes to providing medical infrastructure; doctors, pharmacies, dentists, hospital places.

- **The Reg 19 LP Fails to comply with NPPF 2 Para 7 and 8 Social and economic objectives.**

TRANSPORT:

In terms of road and rail infrastructure, plans are set out to improve both but it is acknowledged in the LP that the rail network improvements envisaged in the LP including the Metro will be much longer-term projects than the housing developments. In the past, unprofitable bus routes have been cancelled, so the Bus Service Improvement Plan is welcome. However, it is likely that the improvements to road and rail infrastructure will be delivered after housing sites have been developed.

Traffic is a very difficult issue for EBNF because we already have one of the highest car ownerships in the country and our roads are already at capacity. Our Forum engages with the ST Highways department on a regular basis because of existing problems with our over-crowded streets and congested roads. 1204 new homes with owners all needing to use the road infrastructure will put our roads under even greater strain and will generate even more road congestion, parking problems and atmospheric pollution, further reducing air quality.

- **The Reg 19 LP fails to comply with NPPF 2 Para 7 and 8 environmental objective.**

Appendix 2 in the Infrastructure Delivery Plan (Pages 61 - 81) tabulates the planned changes to existing roads and public transport including new cycling and walking pathways. Many of these projects have an indicative phasing date of 2030 at the earliest, after much of the new development has been built, which renders the SP25 Infrastructure objective 1 (page 150 in the LP) of ensuring that 'infrastructure is delivered as an integral part of development' somewhat meaningless.

NPPF Plan Making, Para 16(b) States the LP should be prepared positively, in a way that is aspirational but deliverable

It is difficult to see how the Plan can be deliverable when the infrastructure required to make new housing liveable is absent. Is deliverability linked to section 106 in EBNF area? How much can our LA rely on section 106 for infrastructure when it is gifted by developers?

There seems to be an aspiration to achieve sustainability written into the fabric of the LP but no concrete methodology as to how that will be achieved.

ANNEX 1 to Appendix 1

INFORMATION EXTRACTED FROM TRAFFIC CAPACITY ASSESSMENT REPORT COMMENTARY_(traffic light colours denote - red over capacity, amber approaching capacity, green working within capacity).

3.19 Junction 19 – A184 / Downhill Lane Priority Junction

2023 Base + Committed Development + Other Development

3.19.1 The junction can be seen to be working **within its theoretical capacity during the morning peak period and evening** peak period.

3.19.2 With the addition of Local Plan traffic, the junction continues to work **within its theoretical capacity during the morning peak period and evening peak period.**

3.20 Junction 20 – A184 / Hylton Lane Signalised Junction

2023 Base + Committed Development + Other Development

3.20.1 The junction can be seen to be **over capacity in both morning and evening peaks.**

3.20.2 With the addition of **Local Plan traffic at this junction, queuing is exacerbated at the junction with worst case queuing on the A184 East in the morning peak and the A184 West in the evening peak.**

3.21 Junction 21 – A184 / Boker Lane Signalised Junction

2023 Base + Committed Development + Other Development

3.21.1 The junction can be seen to be operating **approaching capacity in the evening peak** with worst queuing on the A184 Western Terrace.

3.21.2 With the addition of **Local Plan traffic, queuing at the junction is exacerbated with the junction continuing to approach theoretical capacity.**

3.22 Junction 22 – A184 / Whitburn Road / Whitburn Terrace Signalised Junction

2023 Base + Committed Development + Other Development

3.22.1 The junction can be seen to be **approaching capacity in the evening peak.**

3.22.2 With the addition of Local Plan traffic at this junction, **the morning and evening peak operates approaching capacity with exacerbated queuing across the junction.**