

East Boldon Neighbourhood Forum - Regulation 19 Local Plan Consultation Representation Form – March 2024

Part A

Your Details

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Part B – Representations from East Boldon Neighbourhood Forum (EBNF)

Note: The response below is set out in the order of the Chapters as they appear in the Council’s Regulation 19 draft Local Plan. However, our main objection concerns the 263 houses proposed to be built on the North Farm site (adjacent to Boker Lane). As well as being outside the settlement boundary, they are in addition to the 211 planned at Cleadon Lane and Mayflower Glass, placing an unsustainable strain on the services and infrastructure of East Boldon. Full details of our objection are set out below under Chapter 5 – Strategic Allocations.

Chapter/Policy/page number	Compliance with Statutory Tests	Details of Representation and proposed modifications
Chapter 3- Spatial Vision and Strategic Objectives		
<p>Strategic Objective 5, Delivering a mix of homes: (page 28),</p> <p>Also Chapter 4: Policy SP2 Strategy for Sustainable Development to Meet Identified Need, (page 31)</p>	Policy Not Sound	<p>Details of Representation:</p> <p>EBNF believe Objective 5 and policy SP2 have not been met with regard to the needs of older people for the: Urban and Village Sustainable Growth Area (and others), and the plan is therefore not sound and does not comply with NPPF and guidance.</p> <p>Planning Practice Guidance (Do plans need to allocate sites for specialist housing for older people) states that <i>'It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. Adding, 'This may be appropriate where there is an identified unmet need for specialist housing'</i>.</p> <p>The Strategic Housing Market Assessment in table 5.4 sets out an assessment of need for different types of older persons accommodation. In total it recognises a projected shortfall of 3,361 units across all classes of accommodation for the elderly by 2040. With regard to category C3, those with a lesser need for support, the table identifies a current shortfall of 470 units rising to 1803 units by 2040.</p> <p>While the local plan is positively written in trying to secure accessible standards in the housing that is proposed (Policy 20), this is not the same as providing the housing mix that will suit older people. Without a policy that will actively require developers to consider the provision of accommodation for the elderly from the outset, it is unlikely that the local plan will deliver the housing mix that is required and is identified in its evidence base. This is especially the case because as the plan recognises in 8.47 <i>".....most of the development within the Plan period will be carried out by private developers"</i>, as is the case with the North Farm site.</p> <p>Planning Practice Guidance recognises: <i>'The location of housing is a key consideration for</i></p>

		<p><i>older people who may be considering whether to move (including moving to more suitable forms of accommodation). Factors to consider include the proximity of sites to good public transport, local amenities, health services and town centres.</i></p> <p><u>Proposed Modification:</u></p> <p>To remedy this, EBNF request that:</p> <p>1) Policies SP7 (and others where applicable), be expanded to include the identification of suitable sites where appropriate accommodation for the elderly is also to be provided, i.e. ‘as a key consideration’; and</p> <p>2) Amend Policy 19 to include the requirement: Accommodation for the elderly is to be provided as identified in policies listed under Strategic Allocations.</p> <p>The provision on site GA2 of adequate affordable housing & accommodation for older people, would also achieve conformity with the East Boldon Neighbourhood Plan, in particular Policies EB12, EB13 & EB14. The Neighbourhood Plan illustrates a need for 64 retirement type properties over its plan period. Should this site proceed, then an appropriate allocation for this type of accommodation should be required as part of the housing mix.</p> <p>This is based on the Housing Needs Assessment (HNA), which was prepared by Aecom in 2019 details of which are documented in the East Boldon Neighbourhood Plan. The HNA found that there is a great need & demand in East Boldon for affordable housing, & for housing for older people. These findings have been consistently highlighted & supported by the local community. EBNF consider that adequate provision must be included on this development, for these 2 groups.</p> <p>Affordable housing will help to prevent young adults, couples & families from seeking accommodation elsewhere (often out of the area), thereby retaining vibrancy & vitality within the village, achieving a younger profile in the population mix.</p> <p>We are disappointed that the percentage of affordable housing to be built on new</p>
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		<p>developments in East Boldon has been reduced from 30% in the Regulation 18 draft LP to 25% as this will reduce the opportunity to allow young people and young families to get on the housing ladder and stay within the local community. Affordable housing should be provided on the associated development site and be provided in line with policy EB14 in the East Boldon Neighbourhood Plan.</p> <p>There is a high demand in the village for bungalows & other ‘retirement’ accommodation, to suit the needs of older residents or allow down-sizing. If such provision was to come forward, larger existing properties elsewhere in the village would be made available for families, and the opportunity would be provided for a wider section of residents to stay within the community, a need identified in the Neighbourhood Plan.</p> <p>The inclusion on the site of a 3-storey retirement building would have the additional benefit of maintaining the housing density at the same time as creating the opportunity for greater greening and reducing the car numbers generated.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
<p>Chapter 4 – Strategy for Sustainable Development</p>		
<p>Policy SP2 - Strategy for Sustainable development to meet identified needs, Page 31</p>	<p>Policy Not Sound</p>	<p>Details of Representation:</p> <p>Object to SP2.2 - 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.</p> <p>The 2023 South Tyneside Strategic Housing Market Assessment provides the following estimates for the number of households in the Borough in 2023:</p> <ul style="list-style-type: none"> • 2014 based - 71,074 • 2018 based - 70,762

	<p>The number of households at the 2021 Census was 68,300 and there are currently approximately 72,000 dwellings in the Borough. These household estimates which are out of line with the Census figure are then projected forward to 2033 to provide the housing requirement figure of 309 dwellings per year and a total of 5,253.</p> <p>If you take the population estimates and compare that to the 2021 Census, this also shows an overestimate:</p> <ul style="list-style-type: none"> • 2021 Census - 147,800 • 2021 (2018 based) -151,936 <p>The proposed allocation of a housing site within the Green Belt in the EBNP area arises solely because of the use of these household projections. In 2022 EBNF stated that it should be possible for the Council 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 2022. 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"</p> <p>Since then, the Government has consulted on the status of the standard method for calculating the housing requirement. This has resulted in an updated National Planning Policy Framework (NPPF) published on 19 December 2023. In Paragraphs 60 and 61 of the new NPPF there is greater flexibility for local authorities in assessing housing needs.</p> <p>Under paragraph 61, the revised NPPF states that the standard method for calculating housing need, to establish the number of homes required, is now considered as "an advisory starting point". Under the previous NPPF, the standard method was not classified in this way and there was no similar explanatory text.</p> <p>As a result of these changes, local authorities have greater flexibility to plan for fewer or higher number of homes than the standard method indicates, and where there are specific local circumstances that justify an alternative approach to assessing housing need, that is</p>
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		<p>now explicitly supported.</p> <p><u>Proposed Modification:</u></p> <p>Notwithstanding the transitional arrangements being applied that this Local Plan should be examined under the September 2023 NPPF, EBNF submits that there remains a clear case for a much lower housing requirement figure based on local circumstances and Green Belt constraint.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
<p>Policy SP3 - Spatial Strategy for sustainable development – P33</p>	<p>Policy Not Sound</p>	<p>Details of Representation</p> <p><i>SP3.2 “The Plan will....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”</i></p> <p>This policy has not been positively prepared to deliver sustainable development in the East Boldon Neighbourhood Plan area. The proposed development of 263 houses at GA2, Land at North Farm, along with 202 houses already approved at Cleadon Lane and 9 at the Former Mayflower Glass site will result in a 26% increase in the number of houses in East Boldon. The impact of this on the ‘distinctive character of the village’, local services and infrastructure as set out in our comments on Chapter 6, Policy SP16 below is unsustainable.</p> <p><i>SP 3.4 “Ensure the delivery of housing in sustainable locations through the allocation of sites in the Main Urban Area and by amending the Green Belt boundary to allocate Urban and Village sustainable growth areas”</i></p> <p>The policy is not justified, uses out of date evidence and the 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</p>

		<p>need in the plan area.</p> <p><u>Proposed Modification:</u></p> <p>Remove from the Plan entirely or significantly reduce the number of houses proposed for GA2 Land at North Farm under policy SP7.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
Chapter 5 – Strategic Allocations		
<p>Policy SP7, Urban & Village Sustainable Growth Areas, Page 46 – GA2, Land at North Farm</p>	<p>Policy not Sound</p>	<p>Details of Representation:</p> <p>EBNF objects to this proposal as it is not justified and not effective in delivering sustainable development.</p> <p>This proposal is in conflict with the adopted East Boldon Neighbourhood Plan as it is outside the settlement boundary approved in the plan. The site is within the Green Belt and its removal can only be agreed if the Council can prove exceptional circumstances and can demonstrate that all other reasonable options have been met.</p> <p>Furthermore, it does not believe that the number of houses proposed for the village of East Boldon that will result from the development of this site is sustainable, and it does not believe that the mitigation proposed for the site within the draft local plan is shown to be deliverable or adequate to address its loss.</p> <p>EBNF objected to the allocation of this site in 2019 and 2022 and continues this objection with the knowledge that the independent examiner to the EBNP rejected the site following submission by the landowner and their agents.</p> <p>EBNF disagrees with the assessment of this site in the Green Belt Study Final Report, which is that the release of the land would only cause moderate harm to Green Belt purposes. 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</p>

		<p>in this area. The open space and separation along Boker Lane will be lost, effectively merging East and West Boldon.</p> <p>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.</p> <p>The proposal for an 8 metre buffer between the watercourse and residential development was proposed in the Key Considerations at Appendix 3 of the 2022 Plan Document. This has been omitted from this Plan. EBNF considered the buffer should be 50 metres in line with the proposal at IAMP.</p> <p>The site is located within 50m of a SSSI and 250 m of a local wildlife site and 1km of a nature reserve. The SA states that a significant negative effect is expected in relation to the objective of conserving and enhancing biodiversity.</p> <p>The Wildlife Corridors Network Review identified the site as within the wildlife corridors network and within the buffer zone to Tiledsheds 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 northern two thirds of the site are shown as part of the Wildlife Corridor on Map 29 and the interactive policies map.</p> <p>The site intersects with a Source Protection Zone for groundwater.</p> <p>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.</p> <p>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.</p> <p>EBNF considers that the impact of building 263 houses on this site will be considerable on</p>
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		<p>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 Tiledsheds level crossing is included the impact on this junction would be even greater. Similar impact is forecast for the Sunderland Road/ Station Road junction.</p> <p>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. The plan concludes that this development along with that at the Cleadon Lane and Town End Farm sites would require an additional 105 additional primary places in the Boldons area. Similarly, the site would contribute to the need for 150 additional secondary places across the villages.</p> <p><u>Proposed Modification:</u></p> <p>For the reasons set out above we contend that site GA2 should be removed from the list of sites proposed under policy SP7.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p> <p>However, should the inspector decide that it is acceptable for the Green Belt boundary to be redrawn to allow this site to be used for housing development, we request that the impact of development on the village and on the biodiversity and wildlife habitat be addressed by a reduction in the housing numbers proposed and by the on-site mitigation discussed below.</p> <p>The Draft Local Plan states at Para 5.17 that compensatory improvements to offset the loss of land from the Green Belt may include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity, new or enhanced walking and cycling routes and improved access to new, enhanced or existing recreational and playing field provision.</p> <p>EBNF supports all of these measures and should this site be allocated as part of examination; it would be subject to the relevant policies of the East Boldon Neighbourhood Plan which encourage development to provide such improvements.</p>
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		<p>(Policies EB1, EB3, EB5, EB6, EB7, EB12 and the East Boldon Design Code).</p> <p>Potential mitigation and enhancement measures for the allocation of the site are outlined in the Green Belt Study (2023) and the South Tyneside Green and Blue Infrastructure (GBI) Strategy (2023).</p> <p>EBNF has scrutinised these potential measures and offers our own suggestions as well.</p> <p>The Green Belt Study suggests that in addition to potential mitigation measures around the edge of the site that a number of potential enhancements measures could occur as a result of development at North Farm (site GA2).</p> <p>These are: Increase riparian planting along the river Don; Enhance and join up the PROW network including the bridleway to the east of the site; Enhancements to West Farm Meadow SSSI and biodiversity enhancements to land to east of the site GA2 to establish and join up wildlife corridors.</p> <p>These potential enhancements are directly linked to the proposed Strategic Projects in the GBI Strategy, in particular the River Don Linear Park.</p> <p>The northern part of the site GA2, and the northern part of the field to the east was proposed for designation as Local Green Space in the Submission Draft of the EBNP. It received substantial support in our community consultation. Although the Examiner did not approve this designation, she regarded the area’s safeguarding as Green Belt as adequate but noting that:</p> <p><i>“I acknowledge that the eastern field has acquired some importance to the local community through informal usage. However, as the community has no right of access to this privately owned land, I consider that its safeguarding as Green Belt is adequate and there is insufficient justification to designate it as Local Green Space.”</i></p> <p>The Green Belt Study indicates that biodiversity enhancements to the field east of site GA2 would require working with landowners/managers. This could include expanding the berry –bearing native hedgerow network, incorporating buffer strips of wildflower for pollinators and “edge habitats” for mammals/birds/insects and expand/connect existing woodland</p>
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		<p>blocks.</p> <p>EBNF welcomes this idea but recognises the chance of it happening is extremely unlikely given that ‘options’ on the site are held by a developer. It considers, and would ask the examiner to take into account, little has been done by the Council to demonstrate that such compensation and mitigation as envisaged in Planning Practice Guidance paragraphs 002 and 003 (green belt) has been agreed, planned for or is likely to take place, critically in this area of the green belt where development will interrupt the wildlife corridor and connectivity of habitat.</p> <p>EBNF believe that the most realistic opportunity for mitigation linked to the development of the North Farm site would be a greater utilization of the low-lying topography toward the northern part of the site close to the Tiledshed Burn. This area is in Flood Zone 2 and 3, and the indicative layout already suggests a SUDS pond in the north east corner of this part of the North Farm site.</p> <p>EBNF believes that in accordance with Draft Policy 9 and Para 7.54 a wetland habitat can be created here. It would also support the Strategic Project 5.2: Wetland Creation in the GBI Strategy 2023.</p> <p>EBNF accept that to a lesser degree, mitigation around the edge of the site can play some part, but consider that a wider landscape buffer should be provided along the western boundary abutting Boker Lane. This would not only increase the opportunity for mitigation and connectivity through creative planting etc. but would will help to achieve a greater degree of physical separation between the urban communities of East Boldon and West Boldon. In addition, the proposed housing adjacent to the busy Boker Lane highway would benefit from reduced noise and air pollution from traffic, as well as enjoying an improved outlook.</p> <p>The northern two thirds of the North Farm site is shown as part of the Wildlife Corridor network defined under Draft Policy 34 and shown on Map 29 and on the Interactive Policies map. Draft Policy 34.8 states that development proposals that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable mitigation and/or compensation is provided to retain and where</p>
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		<p>possible enhance the value and integrity of the corridor.</p> <p>NB. The eastern field is identified as a secondary site with the Wildlife Corridors Network Review and the Site Selection Paper states that the loss of this field would be a significant impact on the Wildlife corridor network which could not be readily mitigated or compensated for. It concludes that the site has not been allocated due to impacts on biodiversity and the Wildlife Corridor.</p> <p>The presence of the Wildlife Corridor at North Farm provides an overriding reason for mitigation measures should the site be allocated. It is clear that development on the northern part of the site would cut off transit routes for water and land based wildlife between Colliery Wood and West Farm Meadows to the North West and the eastern field.</p> <p>The north eastern portion of the site GA2 is included in the Blue and Green Infrastructure Corridor and is subject to Strategic Policy SP22. Para 11.46 of the Draft Local Plan states that development can provide opportunities to create new Green and Blue Infrastructure assets and corridors; as well as strengthening the existing network.</p> <p>This builds upon Para 5.5 of the Draft Local Plan which says: <i>“it will be a requirement for development on land allocated for housing to protect, maintain and where possible enhance open spaces in order to encourage improved quality and accessibility and contribute towards the delivery of a high quality multi –functional green infrastructure network.”</i></p> <p>EBNF believes that the Blue and Green Infrastructure Corridor should be widened to include all the area of the site north of the Public Right of Way (PROW), stretching from Boker Lane to the Bridleway. The well-defined and established break marked by the PROW creates two distinct parcels of land, (the Northern most area is seen by the Council in its site appraisal as requiring its own site entrance from New Road). We strongly urge the examiner to exclude this particular area of the site for development and retain it as green belt, requiring the local plan to allocate its use for compensatory mitigation should the proposal proceed.</p> <p>The impact of this development site if built out to its maximum capacity as envisaged in</p>
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		<p>the draft local plan & the loss of the Green Belt, will have a major and damaging impact on the character and distinctiveness of the village, and the lives of its residents. Such consequences would be lessened by the omission of this area of the proposed site, and would offer several other advantages:</p> <ul style="list-style-type: none"> • An increased level of physical separation between the built-up areas of East Boldon and South Shields when compared to the proposal as set out in the draft local plan. • A reduction in the loss of green belt. • It would create a physical separation between the proposed housing and the vehicular traffic on the very busy New Road (B1298), thereby reducing the impact of noise, vibration and air pollution and at the same time increasing privacy and outlook. • It would allow a larger and improved design of the SUDS area, more akin to that envisaged in paragraphs 7.54 and 7.55 of the local plan (<i>‘Well-designed SuDs can deliver urban wildlife habitats and provide opportunities for plants and trees that encourage invertebrates, birds, bees and other pollinators. They can also deliver new green places for biodiversity by creating new habitats or link with existing habitats creating greater connectivity’</i>). Such a provision would address the need to protect the existing wildlife corridor etc., as explained above, and provide an opportunity to create open space that could be connected to the development site via the existing public footpath. • The creation of an improved SuDs area at the northern part of the site, which is low lying and adjacent to an existing water course (Tilshed Burn/River Don tributary), would provide the opportunity to address the issue of flooding. This part of the site is at risk from surface water flooding and is identified as being in Flood Zones 2 and 3 by the Environment Agency. A more extensive SuDs area would give increased attenuation capacity in order to deal with surface water drainage which will in all probability be directed to the river Don from the development site. • Would give improved road & pedestrian safety: The removal of this area of the site and the proposed vehicular access from New Road (B1298), an extremely busy route linking South Shields and Cleadon to the Boldons, will eliminate a dangerous intersection.
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		<p>Older Person’s accommodation</p> <p>The Councils Strategic Housing Market Assessment in table 5.4 sets out an assessment of need for different types of older persons’ accommodation, and EBNP’s Housing Needs Assessment identifies a requirement for a housing mix to reflect local need, including accommodation for the elderly. EBNF does not believe that the draft local plan is effective in directing effectively how these considerations should be addressed. This is set out in separate comments on Strategic Objective 5, Policy SP 2 and Policy 19, Housing Mix.</p> <p>Local Walking and Cycling Network</p> <p>Should this site come forward, the PROW which runs through the site, connecting Boker Lane and the bridleway, offers the potential to provide an upgraded cycling and walking route as identified in the draft local plan. EBNF believe that it is important, if the potential of this is to be maximised, for the scope of the route to be seen beyond the immediate site area, and the local plan should signal how it is to be considered connecting to the wider footpath and cycling network. Further details are set out below and also link to Policy SP 25 – Infrastructure (page 150), and Policy SP26 – Delivering Sustainable Travel (page 152) and the Council's Infrastructure Delivery Plan (Paragraphs 3.49 to 3.57)</p> <p>In March 2020, East Boldon Neighbourhood Forum submitted a comprehensive response to South Tyneside Council, as a result of their Local Walking and Cycling Infrastructure Plan (LCWIP) consultation exercise. This process is identified in the East Boldon Neighbourhood Plan and the supporting Transport and Movement Background Paper.</p> <p>One of the suggestions made by East Boldon Neighbourhood Forum, was the upgrading of the existing public footpath across the North Farm site, into a bridleway / cycleway. This would provide an important footpath / cycleway linkage to the River Don footpaths to the west (leading to Boldon Colliery, West Boldon and beyond), and to the east, leading to the existing north/south bridleway, giving access to Tiledshed crossing, Cleadon and the coast; and also to South Shields to the north.</p> <p>East Boldon Neighbourhood Forum consider that the upgrading of the North Farm public footpath to a bridleway / cycleway must form an integral part of the North Farm development site, which will accord with South Tyneside Council's objectives and will help</p>
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		<p>to promote sustainable transport and reduce reliance on private car journeys, and will enhance wellbeing within the community. The upgrading of this public footpath must take place, irrespective of how much of the available site is considered as being acceptable for development.</p> <p>This proposal would also be in accordance with policies EB18 and EB23 of the East Boldon Neighbourhood Plan.</p> <p>EBNF request that the key considerations for site GA2 set out under policy SP7 in respect to the public right of way (Enhance the surrounding PROW network) be amended to include reference to work to the wider network area beyond the immediate sitewhich should be funded from S106 contributions related to the site, should the scheme come forward.</p> <p>This work should include the following measures:</p> <p>1. Upgrading and increasing the width of the existing footpath/cycle route from the existing Boker Lane bridleway (north end), along Tiledshed Lane, to the level crossing. This route is very narrow and is kerbside to the very busy, but narrow, Tiledshed Lane, which leads east to Cleadon and the proposed Cleadon Lane Industrial Estate housing site. The very restricted width of this path also creates safety concerns, particularly where users need to pass each other.</p> <p>This route, with slight revisions, was fully documented in the response made by EBF to the Council's LCWIP consultation exercise in March 2020.</p> <p>2. Item 1 above, would improve the active travel linkage to the adjacent bridleway which runs from Tiledshed crossing, parallel to the railway, to Station Approach, immediately adjacent to East Boldon metro station. This bridleway is classed by the council as a traffic free path and cycle path and is well used.</p> <p>However, this path is narrow in parts and is in a very poor state of repair and is frequently subject to localised flooding of large potholes/ground depressions - improvements, repairs and some resurfacing of this active travel route are long overdueand should be funded as part of the site's development.</p> <p>Both of these routes provide excellent linkages to South Shields in the north, West</p>
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		<p>Boldon/Boldon Colliery and beyond, to the west; & to Cleadon, Whitburn & the coast, to the east. The suggested improvements would achieve significant benefits for both the local community and users of the wider footpath/cycle route network (including linkages to regional & national cycle network routes), & would also benefit people with buggies, wheelchair users & others with mobility issues.</p> <p>These routes also achieve off-road access to East Boldon Metro station, thereby helping to alleviate the additional on-street parking in the streets around the Metro station, which will result if the scheme proceeds.</p> <p><u>Proposed Modification:</u></p> <p>Reduce the size of the size for development to allow adequate onsite mitigation as set out above.</p> <p>Extend the onsite public right of way as explained in the text above to provide effective active routes including connections to East Boldon metro station.</p> <p>Include in the key considerations the requirement for provision for accommodation for the elderly as set out above.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
Chapter 8 – Delivering a Mix of Homes		
<p>SP16:Housing Supply and Delivery page 84</p>	<p>Policy Not Sound</p> <p>Not consistent with the NPPF.</p>	<p>Details of Representation:</p> <p>Housing numbers for the two Neighbourhood Forum areas are dealt with in section 8, page 84 of the proposed local plan. SP16: Housing Supply and Delivery identifies in point 2.</p> <p><i>‘Making provision for the provision of at least 263 new homes within the designated East Boldon Neighbourhood Forum Area;’</i></p> <p>The Regulation 19 Local Plan does not acknowledge an additional 202 houses proposed for</p>

	<p>Cleadon Lane, a site that was included in the Regulation 18 document, and which in all probability, will still proceed (the Council was minded to approve this proposed development in 2023, but at the time of preparing the Regulation 19 document had not granted formal permission, it being subject to legal agreement). To our knowledge, as of February 2024, this is still the case.</p> <p>Along with a smaller development recently approved at the former Mayflower Glass site, and the Land at North Farm (GA2/163 dwellings included in the Reg 19 plan), some 470 houses could now come forward within the EBNF area. East Boldon, a village of around 1,800 dwelling constrained by its Victorian infrastructure and ‘at capacity’ services, will be subject to a growth of 26%.</p> <p>The effect on the village of East Boldon will be exacerbated by other sites included in the plan that are close to the EBNF area. Site GA4, Land at West Hall Farm, where 259 dwellings are proposed, is immediately adjacent to the Forum’s boundary. Most of the traffic from this site heading North to the access the A19 will travel through East Boldon using Whitburn Road or Moor Lane, and the problem of nuisance parking associated with those travelling into East Boldon to use the Metro system will be made worse. A further 400 dwellings are proposed for site GA3 (Land to North of Town End Farm), which is also adjacent to Forum boundary in the West.</p> <p>A separate commentary on the impact of the Reg 19 Plan policies on local Infrastructure are set out in the attached APPENDIX 1</p> <p>EBNF believe that the true extent of development, the 470 dwellings referred to above, should have been made clear to the public and referred to within the local plan and at the local consultations. The absence of this information, key to understanding the impact of the local plan on a village such as East Boldon, is misleading and disingenuous.</p> <p>We believe that the inclusion of GA2, Land at North Farm, site will result in development that is not sustainable, and will destroy the character and distinctiveness of the village. We believe its inclusion does not adhere to the commitment embodied within strategic policy SP3 (2), <i>“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.”</i></p>
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		<p>Noncompliance with NPPF</p> <p>EBNF believe that in relation to achieving sustainable development the NPPF is relevant to the proposals which will affect the Forum Area. Paragraph 8 sets out three overarching objectives:</p> <ul style="list-style-type: none"> • <i>an economic objective</i> – <i>to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available <u>in the right places</u> and at the right time to support growth, innovation and improved productivity; <u>and by identifying and coordinating the provision of infrastructure</u></i> • <i>a social objective</i> – <i>to support strong, vibrant and healthy communities, by ensuring that a <u>sufficient number</u> and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</i> • <i>an environmental objective</i> – <i><u>to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</u></i> <p>Sub section 9 the NPPF goes on to state: <i>These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. <u>Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.</u></i></p> <p>Economic Objective:EBNF does not believe that the location of site GA2 ‘is in the right place’, there are serious concerns over its impact on wildlife and its effect on the distances between settlements. Nor does it believe that the plan addresses, identifies or attempts to coordinate the provision of infrastructure in any meaningful or tangible way that can be understood or which reassures its residents.</p>
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		<p>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.</p> <p>A separate commentary on the impact of the Reg 19 Plan policies on local Infrastructure is set out in the attached APPENDIX 1</p> <p>EBNF believe the Plan has not been positively prepared to meet the objectively assessed need for homes, services and infrastructure in East Boldon and is not effective in delivering sustainable development in the Forum Area.</p> <p><u>Proposed Modification</u></p> <p>Remove or significantly reduce the provision of 263 homes within the designated East Boldon Neighbourhood Forum area.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
<p>Policy 18.3iv Affordable Housing (page 92)</p>	<p>Policy Not Sound</p>	<p>Details of Representation</p> <p>In 2022 EBNF commented on draft Policy 18 in the Regulation 18 draft LP, stating that the EBNP contains Policy EB14 on Affordable Housing and that 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. EBNF did have a discussion with the Council about this following submission of the comments.</p> <p>Policy 18 in the Regulation 18 Plan would have required 30% affordable homes on new developments in East Boldon. However, in the Regulation 19 version of the Policy this has been reduced to 25 %</p> <p>The need for Affordable Housing as part of any new housing development in East Boldon was one of the main reasons given in the Housing Needs Survey which provided evidence to the Neighbourhood Plan.</p>

		<p>In view of this, EBNF is not supportive of this reduction. It will set the standard for the whole of the plan period.</p> <p>The Strategic Housing Market Assessment (SHMA) 2023 identified a huge need for affordable housing in the borough at 361 affordable units per year. This is up from the 2021 assessment of 209 units per year. However, given that much of the new housing development is provided by the private sector, in market led schemes, the Draft Local Plan accepts that the identified need will be difficult to achieve.</p> <p>These schemes are required to undergo viability testing to determine a realistic target for the delivery of affordable housing.</p> <p>The Council employed CP Viability Ltd to undertake this testing and the draft Regulation 19 Plan relies on their report Local Plan Viability Testing Update 2023.</p> <p>This report separates Cleadon from East Boldon and Whitburn in its new definition of the Affordable Housing Area (Map 22, Page 23). The company held a stakeholder workshop and used post workshop stakeholder questionnaires to inform its findings. It did not invite the two Neighbourhood Forums to participate despite both Neighbourhood Plans containing policies on affordable housing.</p> <p>The separation of Cleadon seems to have occurred from the valuation industry view that Cleadon Village is a higher market value area than East Boldon or Whitburn. However, no explanation is given by the company or the Council as to why this separation was deemed necessary and then led to the change in policy.</p> <p><u>Proposed Modification</u></p> <p>Policy 18.3 should be amended to retain 30% affordable homes in East Boldon.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
Chapter 13 – Well Designed Places		

<p>Policy 47– Design Principles (page 143)</p>	<p>Policy Not Sound</p>	<p>Details of Representation:</p> <p>Policy 47 as currently drafted does not specifically provide for:</p> <ol style="list-style-type: none"> 1. The use of Neighbourhood Plan Design guides to inform local development proposals. 2. New development proposals to include a requirement for tree lined streets. 3. The use of nationally Described Space Standards in new development proposals. 4. Creation of places that are safe, inclusive and accessible and which promote health and well-being. <p><u>Proposed Modifications:</u></p> <p>Modification 1 EBNF notes the absence of a design Code in the local plan but welcome a commitment to one at a future date</p> <p>The NPPF states in para 129. <i>“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”.</i></p> <p>Policy 47 states in its final sentence: <i>Development proposals will be expected to satisfy requirements of any adopted local design guide or design code where relevant to the proposal.</i></p> <p>The Neighbourhood Plan is not specified or directly addressed at this point, but is referred to in the supporting commentary which states in paragraph 13.12 (page 146):</p> <p><i>“Neighbourhood Plans provide an important resource in terms of assessing local character and distinctiveness and Design Codes describe and illustrate the principles guiding future development. Where development proposals fall within a neighbourhood plan area, regard should be had to design policies and any supporting Design Codes should be used to inform development proposals from the outset.”</i></p>
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		<p><u>EBNF request that to be consistent with paragraph 129 of the NPPF, and in order for the design code within the Neighbourhood Plan to carry weight, this commentary (13.12), should be included within Policy 47 itself.</u></p> <p>Modification 2 The NPPF in paragraph 136 states <i>'Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. <u>Planning policies and decisions should ensure that new streets are tree-lined....</u></i></p> <p>Policy 47 does not include such a requirement, yet this aspect can have a fundamental effect on the design of the site layout, affecting as it does distances between building plots, the manner in which car parking is dealt with and the composition of the street scene.</p> <p>Unless it is given consideration from the outset of the design process it will be extremely difficult for it to be incorporated satisfactorily at a later stage.</p> <p>As clearly stated in the NPPF, a planning policy is needed. As this is so fundamentally a part of the design process, EBNF believe that the most appropriate place for this is within Policy 47. (We note that the commentary (11.39) to policy 36 on Page 125, calls for tree lined streets but Policy 36 itself does not refer to the requirement).</p> <p><u>EBNF request its inclusion within Policy 47, and the supporting commentary be expanded to include reference to the guidance.</u></p> <p>Modification 3 Policy 47 section 6 i) of the plan states: <i>Homes and Buildings i) Provide homes with good quality internal environments <u>with adequate space for users</u> and good access to private, shared or public spaces.</i></p> <p>The National Model Design Code part 2 (guidance) 183. States: <i>Design codes can support the delivery of housing quality by including Nationally Described Space Standards. <u>These need to be included in local plans or design codes that are adopted in local plans.</u></i></p>
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	<p>With regard to Paragraph: 020 Planning practice guidance, how should local planning authorities establish a need for internal space standards? EBNF and the Local Planning Authority have compelling evidence of how developers are putting forward proposal where room sizes are well below what is regarded as acceptable. The Cleadon Lane planning application for 202 houses recently considered in the Forum Area was beset by this issue. The inclusion of the National Described Space Standards, which was included in the Neighbourhood Plan, was used by the Authority to achieve an increase in room sizes across the majority of house types.</p> <p>Adequate room sizes are important in terms of ensuring that there is sufficient space for people with mobility issues, often those associated with the elderly, to navigate furniture and move with ease around a dwelling.</p> <p>The issue of an aging population and the need for dwellings to support independent living into old age is highlighted and addressed in the draft local plan. Technical Design Standards for New Homes Policy 20 requires all residential dwellings to be designed to be built at least to meet Building Regulations Requirement M4(2). EBNF support this ambitious policy but believe that without a requirement for minimum room sizes the policy will not be successful in meeting the needs of those people who would most benefit.</p> <p>The RTPI Practice Advice, November 2022 Housing for Older People, endorsed by the Chartered Institute of Housing (CIH) and other campaigning groups, recognises this very issue (Page 41: <i>The nationally described space standard is important in terms of accessibility as internal space is an important aspect of how accessible a home is, and how adaptable it is to changing household needs. People with impaired mobility usually require larger floor areas to accommodate mobility aids and specialist equipment</i>).</p> <p><u>As this version of the plan does not yet adopt a design guide, we request the inclusion of the Nationally Described Space Standards within Policy 47 or within Policy 20 Technical Standards.</u></p> <p>Modification 4 EBNF believes that insufficient weight is given <u>Inclusive design</u> within Policy 47 or its supporting Commentary. The SHMA report highlights the issue of an aging population and</p>
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		<p>the effect of chronic health conditions etc on its residents. The scale of this issues indicated in Table 5.4, section 5.12 SHMA report, yet little emphasis is placed on the need to address this aspect within the section, Well Designed Places.</p> <p>EBNF believe that it is even more important to highlight the need for inclusive design given the Councils requirements in respect to accessibility standards set out in Policy 20. Unless the design of the site layout is developed with the requirements of Policy 20 in mind, it will not be practical, in many instances, to achieve satisfactory outcome in terms of accessibility. Relegating these considerations to a future design code seems unsatisfactory given its importance.</p> <p>Planning Practice Guidance, Homes for Older and Disabled People states:</p> <p><i>‘Inclusive Design acknowledges diversity and difference and is more likely to be achieved when it is considered at every stage of the development process, from inception to completion. However, it is often mistakenly seen as a Building Regulations issue, to be addressed once planning permission has been granted, not at the planning application stage. The most effective way to overcome conflicting policies and to maximise accessibility for everyone is for all parties to consider inclusive design from the outset of the process.</i></p> <p>EBNF would welcome improvements to this policy that would promote and signal this guidance and reflect paragraph 127 of the NPPF:<i>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.</i></p> <p><u>EBNF requests that Section 3 of Policy 47 is expanded to reflect paragraph 130 of the NPPF and include the requirement:</u></p> <p><i>‘Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.’</i></p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>
Chapter 14 – Transport and		

Infrastructure		
<p>Policy 50, Social and Community Infrastructure (page 150)</p>	<p>Policy Not Sound</p>	<p>Details of Representation</p> <p>Policy 50 does not contain sufficient detail about how appropriate social, environmental, and physical infrastructure will be provided to cater for the impact of new development on local communities.</p> <p>There is a thematic approach cutting across all the Plan policies which highlights “policies seeking to improve health and wellbeing for residents.” (Page 12 Chapter 6: Promoting Healthy Communities).</p> <p>Policy 50, Social and Community Infrastructure (page 150), addresses these issues in a non-committal way but the East Boldon Neighbourhood Plan would need to be used to deliver the detail on this to address the impact of this 26% increase in households on the Health and Wellbeing of the residents of East Boldon, both current and proposed. Schools, medical facilities and road networks are already under pressure and the draft plan is therefore only sound in conjunction with the Neighbourhood Plan in order to deliver sustainable development in regards to its aspiration to improve health and wellbeing of the residents.</p> <p><u>Proposed Modification:</u></p> <p>Policy 50 should be amended to provide more detail about how the delivery of appropriate social, environmental and physical infrastructure will be achieved to mitigate the impact of new development on local communities. This could include the acknowledgement of the policies within a Neighbourhood Plan within a Neighbourhood Forum area.</p> <p>EBNF reserve the right to speak at the oral part of the examination.</p>