

East Boldon Neighbourhood Forum (EBNF) - Response to the South Tyneside Local Plan, Pre-Publication Draft (Regulation 18) – August 2019

Policy	Support / Object	Reason / Comment																														
Spatial Vision and Strategic Objectives																																
Spatial Vision		A number of the proposed policies in the Draft Local Plan will not deliver the vision and objectives particularly in respect to: <ul style="list-style-type: none">• Providing the infrastructure to serve residents needs• Improving air quality• Optimising the re-use of brownfield land• Maintaining the openness and permanence of the Green Belt																														
Strategic Objectives																																
Delivering the Strategy																																
Policy S1 Spatial Strategy(Strategic Policy)	Object	<p>EBNF consider the wording of Policy S1 does not reflect the local plan development strategy and conflicts with the emerging East Boldon Neighbourhood Plan for the for the following reasons:</p> <p>a) A strategy of balanced urban growth with the majority of new development focused to the Main Urban Area of South Shields, Hebburn and Jarrow, supporting the regeneration of the River Tyne Corridor as a location where people can live, work and visit;</p> <p>As shown in the table below the majority of new housing development would be located in Boldon and South Shields, and not South Shields, Hebburn and Jarrow as stated in Policy S1 a).</p> <table><tr><td></td><td colspan="2">ST Pre-Publication Local Plan Allocation Supply</td></tr><tr><td></td><td>No. Homes</td><td>Percentage</td></tr><tr><td>South Shields</td><td>1839</td><td>34%</td></tr><tr><td>Fellgate & Hedworth</td><td>178</td><td>3%</td></tr><tr><td>Jarrow</td><td>365</td><td>7%</td></tr><tr><td>Hebburn</td><td>818</td><td>15%</td></tr><tr><td>Boldon</td><td>1597</td><td>29%</td></tr><tr><td>Cleadon</td><td>231</td><td>4%</td></tr><tr><td>Whitburn</td><td>397</td><td>7%</td></tr><tr><td>Total</td><td>5425</td><td></td></tr></table> <p>Policy S1 b)Securing the sustainability of our Villages, Cleadon, West Boldon , East Boldon and Whitburn by supporting growth which respects</p>		ST Pre-Publication Local Plan Allocation Supply			No. Homes	Percentage	South Shields	1839	34%	Fellgate & Hedworth	178	3%	Jarrow	365	7%	Hebburn	818	15%	Boldon	1597	29%	Cleadon	231	4%	Whitburn	397	7%	Total	5425	
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		<p>the distinctive character of each Village;</p> <p>There are 1,861 residential properties in the East Boldon Neighbourhood Plan Area. The proposed addition of 950 homes would result in an increase of over 50% of the existing housing stock which would not respect the distinctive scale and character of the village.</p> <p>Extracts from Draft Local Plan Interim Sustainability Appraisal, page 17 Table 4.1:</p> <p>Sustainability Objective: 1. Adapt to and mitigate the impacts of climate change in South Tyneside</p> <p>The comment states that there is no direct relationship between Policy S1 Greenbelt and this Objective. In order to react to the Climate Change emergency declaration, Greenbelt Policy should be determined by the Climate Change emergency.</p> <p>Sustainability Objective: 2. Conserve and enhance biodiversity</p> <p>The comment on the LA document states “There is no direct relationship between Policy S1 Greenbelt and this objective”</p> <p>If there is not a relationship between conserving and enhancing biodiversity, Greenbelt policy and sustainability, EBNF respectfully suggests that there should be.</p> <p>The Climate Emergency has been called because of an axis of catastrophic changes across the Earth. These include Climate Change, rising sea levels, an increasing number of global catastrophic weather events and the global extinction of species. Here in the UK 500 species have become extinct in the past 200 years, an average of 2.5 species per year. The realisation of this current Holocene extinction by scientists is the driver of the Extinction Rebellion movement.</p> <p>In the UK the overwhelming majority of extinctions are caused by removal of habitats and wildlife corridors due to poor planning decisions and bad land management. East Boldon residents are well aware of the richness of biodiversity in East Boldon because we are surrounded by greenbelt, a wildlife corridor. We know that the planning decisions relating to the East Boldon greenbelt will deplete our wildlife and put pressure on the internationally recognised migratory routes through the greenbelt of the Forum area.</p>
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<p>Policy S2 Strategic Development Principles(Strategic Policy)</p>	<p>Support policy in principle, but object to how it is being applied to sites H3.59, 61, and 65.</p>	<p>1) The East Boldon Forum supports the general principle set out in this section, in particularly sub section 4.17 The Forum believes that new development should retain existing landscape features including trees, plants, streams and water courses, and these should be enhanced where possible to create 'green corridors' linking the development to the adjoining countryside. We believe the landscape and open space proposals within any development must be carefully designed to create such a series of interconnected spaces which, where possible, allow pedestrians, including those with mobility impairments and parents with children in prams or buggies, and cyclists the facility to move around within a safe and attractive environment. The Neighbourhood Plan for East Boldon will seek to establish a number of green spaces to that end.</p> <p>Paragraphs 4.12 and 4.14 state that new development can offer opportunities to enhance landscape character, green infrastructure and biodiversity networks; and positively contribute to the character of the area. How will the development of sites H3.59, 61 and 65 achieve these objectives?</p> <p>2) To avoid conflict between the Local Plan and any relevant Neighbourhood Plan, this section should highlight that where a Neighbourhood Plan is adopted, then there may be additional and specific requirements with regard to Development Principles etc. For clarity, East Boldon Forum is developing a Design Code in association with Locality to help inform good design in the Forum area.</p> <p>3) Given the scale of the development envisaged throughout the Boldons and Cleadon, the issues concerning distinctiveness of our villages, the sensitivity associated with developing existing Green Belt land, and the Climate Change Emergency declared by the Government and South</p>

		<p>Tyneside Council, the section falls short of dealing with design principles comprehensively and in a way which sets out what is expressly required in order to address these important aspects. The Forum respectfully contend that South Tyneside Council should adopt a Design Code which would guide future development in a clear and unambiguous way, and provide for the creation of well designed places and sustainable homes, which are future proofed and appropriate to the needs of all . Many Local Authorities have adopted such documents, and the Design Guide issued to elected members of South Tyneside Council would make a good start to such a piece of work.</p> <p>4) In addition to a design guide, East Boldon Forum believe that some of the sites proposed for development are sufficiently sensitive to warrant the requirement of a comprehensive planning brief and master planning approach to ensure that the issues highlighted in this section, and those of good design principles in general, are an intrinsic feature of any proposed scheme. For clarity, East Boldon Forum will endeavour to include this approach within its proposed Design Code, depending on the final sites identified by the Local Plan. The Forum respectfully suggest that South Tyneside Council should adopt this approach from the outset for those sites that fall into this category.</p> <p>5) Whilst the principles included in Policy S2 a) and b) are supported by EBNF, these principles are incompatible with the proposed development of sites H3.59, 61 and 65.</p> <p>Inset map 1 indicates proposed Green Belt development sites H3.59, 61 and 65 as being included as urban area/village in the legend. This is incorrect at this stage in the process and these sites must be identified accordingly.</p>
Policy S3 Promoting health and wellbeing in South Tyneside (Strategic Policy)	EBNF strongly supports this policy and thinks it should be implemented in full; however we have noticed some inconsistencies with this in the application within the rest	<p>Elsewhere in the draft LP there are proposals to reduce the green belt and increase the number of dwelling by 50% within the EBNF area. EBNF objects to this on the grounds that it will result in detrimental impacts on health & wellbeing by destroying biodiversity, increasing traffic and therefore making our roads even less safe for walking, running and cycling, and impacting negatively on air quality.</p> <p>By objecting, EBNF is in alignment with the government's aims to 'improve existing green infrastructure' and to connect people with the environment to improve health and wellbeing .'</p>

	<p>of the draft LP.</p> <p>(DEFRA – 'A Green Future: Our 25 Year Plan to Improve the Environment' 2018, revised 2019)</p> <p>EBNF Supports Open Space Study 2015 expansion of allotment provision healthy lifestyle choices.</p> <p>EBNF Supports further healthcare provision. A 50% increase in dwellings would require a significant increase in primary care services and dental services.</p> <p>EB has an aging community which requires health and care services (30% of the population is over 65). As this increases, and particularly if there is an expansion in the number of dwellings, there needs a proportionate increase in health and social care provision for this age group. Eg, there is no GP surgery in the EBNF area and a lack of adequate bus services makes access to facilities difficult.</p> <p>We currently have one dentist in EB, who is at capacity and has been for many years. Despite moving to new premises, he has not been allowed to increase his provision and so the LP should allow this to expand.</p> <p>EBNF has evidence from its consultations that residents value Open and Green Spaces and support the improvement of potential green spaces in the centre of the village to encourage social interaction and healthy lifestyle options such as walking to school.</p> <p>We therefore support the creation of well designed public and residential spaces in any new developments – in line with our emerging Neighbourhood Plan.</p> <p>EBNF Supports safe walking and cycling routes as currently they are disjointed and neglected in parts, any new development should link in with and enhance current routes.</p> <p>EBNF acknowledges Nursery, Infant and Junior Schools make a significant contribution to the wellbeing of the community and are thought to be the “Heart of Community” by many residents. Through a project done by EBNF in the junior school we have evidence that children and families place great importance on promoting health and</p>
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		<p>wellbeing through greenspaces, playing fields and parks and safe walking and cycle routes in our village.</p> <p>EBNF requests that this section of the LP makes reference to the emerging Neighbourhood Plan for East Boldon.</p>
Policy S4 Presumption in favour of Sustainable Development (Strategic Policy)	Support	EBNF supports presumption in favour of sustainable development where it is in line with the NP, once it is adopted.
Policy S5 Re-use of Previously Developed Land(Strategic Policy)	Support this policy in principle, but challenge the application of the policy as specified:	<p>EBNF supports the re-use of previously developed land. Our community consultation has shown strong support for this policy. The vast majority of respondents believe that if any new housing is to be built in the EBNF area it should be located on brownfield sites (93%). This is a priority for the residents of the EBNF area.</p> <p>EBNF supports development of some housing on Cleadon Lane Industrial Estate, should the need arise, in order to prevent development on Green Belt land.</p> <p>Para 4.32 of the Council's draft LP states "The use of suitable brownfield sites within the built up areas should always be given priority over less sustainable greenfield sites."</p> <p>With reference to para 4.33 of the draft Local Plan, which acknowledges that new brownfield sites will come forward over the Plan period, these sites should be developed in preference to green belt sites.</p> <p>In relation to para 4.33, if it is anticipated that brownfield sites will come forward over the lifetime of the Local Plan, how can this information be used to mitigate the use and change of designation of the current green belt sites identified for potential development in the draft Local Plan?</p> <p>What methods are the Council using to facilitate the delivery of Brownfield sites? The Local Plan should prioritise development on Brownfield sites in preference to Green Belt. However, the Brownfield land register on the Councils website does not form part of the local plan evidence library</p>

		. It is also out of date, last being updated in 2016. If the Council is to effectively encourage the use of Brownfield sites, it is essential that these documents are current, accurate and positive.
Policy S6 Appropriate Development within the Green Belt(Strategic Policy)	Object	<p>The policy states that development on Green Belt land can be considered in “very special circumstances” and reference made to “limited infilling sites”.</p> <p>EBNF does not accept that the sites within the Forum area satisfy those criteria. (for justification of this stance, see EBNF comments on the south Tyneside Stage 1 Green belt Review: Exceptional Circumstances)</p> <p>EBNF Supports protection and development of existing sites for sports facilities with the forum area.</p> <p>Feedback from the Forum’s Consultations supports a sporting hub based on east Boldon Cricket Ground site which might include archery,squash,cricket,tennis,bowls,table tennis and potentially act as space for village events/festivals.</p>
Policy S7: Extensions and alterations and replacement of buildings in the Green Belt(Strategic Policy)	Support	
Policy S8: Replacement of buildings in the Green Belt (Strategic Policy)	Support	
Planning for Homes		
Policy H1: The Number of Homes Needed by 2036 (Strategic Policy)	Object	<p>Policy H1 provides a housing requirement figure that is based on 2014-based household projections. The more recent 2016 based projections would have produced a figure of 4,280 negating the need to allocate Green Belt sites. It is likely that even more up to date information will be available next year based on 2018 based household projections. EBNF urges the Council to revise the Local Plan housing requirement figures to acknowledge the 2018 based household projections when they become available?</p> <p>Policy H1b provides the Housing Requirement for the Neighbourhood Plan area of <u>at least</u> 950 homes. This figure is just the total of the sites</p>

		<p>proposed for allocation. No attempt has been made to take into account of completions and commitments for the NP area in contrast to the calculations for the whole Borough at Para 5.6, Table 1. This is despite Para 5.7 stating it reflects housing commitments.</p> <p>In contrast to the 950 homes proposed by the Council in the draft Local Plan for East Boldon, the East Boldon Neighbourhood Forum commissioned its own independent Housing Needs Assessment from independent consultants, Aecom, in May 2019. This proposed a figure of 240 new homes for the East Boldon Neighbourhood Forum area within the Local Plan period using a similar base figure for the calculation. By comparison, the Council's proposal for 950 homes is completely disproportionate to the size of East Boldon in relation to South Tyneside as a whole.</p> <p>Policy S1 states:</p> <ul style="list-style-type: none"> a) "A strategy of balanced urban growth with the majority of new development focused to the Main Urban Area of South Shields, Hebburn and Jarrow, supporting the regeneration of the River Tyne Corridor as a location where people can live, work and visit; b) b) Securing the sustainability of our Villages, Cleadon, West Boldon , East Boldon and Whitburn by supporting growth which respects the distinctive character of each Village." <p>Including 950 dwellings in the East Boldon Forum area, the draft Local Plan proposes a total of 2,252 homes in Cleadon, the Boldons and Whitburn combined. This represents 42% of the total number of new homes allocated in the draft Plan and clearly contradicts the statements in policy S1.</p>
Policy H2: Ensuring a sufficient supply of deliverable and developable housing land	Object	<p>Figure for NP area is totally disproportionate. Site-specific Transport assessment should be completed before development of sites is approved.</p> <p>Necessary associated key infrastructure requirements for the proposed sites have not been demonstrated.</p>
Policy H3: Housing	Object	The Policy states that all site allocations will be

<p>Allocations and Commitments(Strategic Policy)</p>		<p>required to be consistent with the wider policies set out in this Local Plan and any Neighbourhood Plan that are “made”.</p> <p>Housing Allocations H3.59, H3.61, H3.65 and RG5 provide for 950 homes and EBNF objects to this number.</p> <p>EBNF proposes a Neighbourhood Plan that provides for up to 240 homes on brownfield land, along with appropriate infrastructure. This is based on our Housing Needs Assessment produced by our Independent Consultants, Aecom, in May 2019.</p> <p>EBNF also objects to the location of the proposed allocations within the existing Green Belt. Our community consultations have shown strong objections to the development of Green Belt sites. EBNF considers that the exceptional circumstances case has not been made in the Stage One Green Belt Review (see detailed response to this paper). Building on green belt land will have a negative impact on:</p> <ul style="list-style-type: none"> • Public Health, by reducing opportunities for reduction of stress and exercise, contributing to increased stress, obesity and heart disease. • Biodiversity, • Climate Change– by reduction of woodland and healthy soil. • Air quality, • Sound quality • Light quality • Understanding of farming and rural issues. <p>H3.59 –Land at North Farm-</p> <p>This site is currently within the Green Belt. The development of the site will reduce the gap, in terms of distance, between Boldon and South Shields still further and would increase pressure on the remainder of the Green Belt in this area. The open space and separation along Boker Lane will be lost, effectively merging East and West Boldon.</p> <p>This site is two fields separated by the bridleway and footpath. In the Final Strategic Land review, the two fields were identified as separate sites. We consider that they have very different characteristics, one being arable, and one re-wilded. We therefore feel that the two fields should be considered in the draft LP as two separate</p>
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		<p>entities each with each site requiring individual assessment.</p> <p>The emerging NP proposes this bridleway as Local Green Space. The eastern field which has been rewilded over the last 23 years is being assessed by EBNF as Protected Open Space and a Local Wildlife Corridor in the emerging NP.</p> <p>A public footpath/public right of way crosses the western half of this site and also forms part of a wider green infrastructure corridor. This should be retained.</p> <p>Tiledshed Burn runs through the north of the eastern field and along the boundary of the western field. STC has identified Tiledshed Burn as a wildlife corridor (Policies Map). This should be retained.</p> <p>H3.59 states that a buffer between the water course and residential development should be at least 8 metres. EBNF considers this is wholly inadequate and should be at least 50 metres, as was applied at the IAMP site.</p> <p>Flooding issues have been identified on this site.</p> <p>The Policy should include the creation of a wetland area adjacent to Tiledshed Burn.</p> <p>Green Belt Review Stage 2, Annex 2 supports this by stating “ a significant landscape buffer should be introduced between any new development and the SSSI to the north in order to continue to support biodiversity”</p> <p>The landscape buffer around the perimeter of the sites should be significantly wider, particularly alongside the existing bridleway and abutting Boker Lane.</p> <p>The Infrastructure Delivery Plan assess the site as “red”- a site that can only come forward once identified transport infrastructure is implemented. In contrast the Green Belt Stage 3 Assessment states that the Infrastructure Delivery Plan has not identified any constraints that would prevent its development.</p> <p>Inset Map 3 shows three preferred access points. EBNF consider all three points as unacceptable in their current form and two of them may change if the Boldon and Tiledsheds Crossings are closed and replaced by a bridge.</p> <p>The increased traffic generation from 588 new homes would have a major impact on the community and highway infrastructure.</p>
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		<p>large Green Belt expanse to the west. The site is very close to Heritage Assets contained in the West Boldon Conservation Area, including the recently sympathetically redeveloped Hall Green Farm site. Development of this site will further erode the Green Belt.</p> <p>Access to the site would create road safety issues – any junction with Hylton Lane would be relatively close to the Dipton Lane junction, and speeding traffic from the blind hill on Hylton Lane would worsen the situation. Increased traffic generation would impact on the community.</p> <p>The Site Specific Sustainability Appraisal notes that this site could have a negative impact due to loss of green belt and impact upon the landscape. Overall it is considered to have a NEGATIVE effect against the sustainability appraisal.</p>
Policy H4: Windfall Housing Proposals (Strategic Policy)	Support	
Policy H5: Efficient Use of Land and Housing Density		
Policy H6: Our Existing Stock	Support but with queries	<p>EBNF support the general principles of this policy, in particular paragraph e), “Bringing empty homes and other appropriate buildings back into use as homes”.</p> <p>Paragraph 5.24 identifies that 0.7% of the borough’s housing stock is classed as long term vacant , ie approx 500 homes. Is the Council doing enough to bring these properties back into use and when will the “Enforced Sale Policy” be introduced? (paragraph 5.25) .</p>
Policy H7: Houses in Multiple Occupation		
Policy H8: Specialist Housing – Extra Care & Supported Housing (Strategic Policy)	Support	Our comments in H10 d) regarding suitable housing for elderly people apply here.
Policy H9: Affordable Housing	Support with queries	<p>EBNF supports the provision of affordable housing – see our comments under H10 c).</p> <p>How will the Council ensure that the affordable housing units are genuinely affordable?</p>

Policy H10: Housing Mix	Object to specified aspects	<p>Paragraph 61 of the NPPF requires 'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).</p> <p>Policy H10 b) providing an appropriate mix of house types and sizes which enhances local housing options and is acceptable for the site and its location.</p> <p>The policy wording is not clear about the size, type and tenure of housing needed for different groups in South Tyneside and defers consideration of this matter to the planning application stage contrary to the NPPF.</p> <p>Policy H10 c) increasing the supply of detached homes in the Borough, including 'executive' housing</p> <p>Paragraphs 5.55 – 5.59 of the draft LP: Paragraph 5.5 of the Pre-submission Local Plan sets out the need for executive housing in South Tyneside. The findings from the East Boldon Housing Needs Assessment 2019 states that there is a much higher proportion of detached housing in the East Boldon Neighbourhood Area than elsewhere in the Borough, and that no further 4 bedroom plus housing is required. This assessment supersedes the SHMA 2013 and 2015. The text should therefore be amended to state that executive housing is needed in some parts of borough where there is an identified need. It should also acknowledge that providing smaller properties suitable for the older population will release larger family homes. The text should provide a more balanced commentary on the different types of housing needed in South Tyneside i.e. executive housing, housing for older people etc.</p> <p>Making the case for more executive housing seems to fly in the face of dealing with the 'housing crisis' as we understand it. The 'nod' toward executive housing will undoubtedly result in the provision of houses which do not meet the needs of local</p>

		<p>people in this area and will do much to undermine the meager provision for affordable houses set out in the Local Plan document.</p> <p>EBNF is particularly concerned over the issue of viability and would ask that the Local Plan is revised to deal with this issue more effectively. The high land prices in this area and the drive for Executive Housing referred to above will result in developers making the case for less affordable properties, or offering compensation so that affordable properties are built elsewhere. This will result in the provision of homes which do not meet the needs of local people.</p> <p>Policy H10 d) where appropriate, increasing the choice of suitable accommodation for the elderly population and those with special housing needs including bungalows and extra care housing</p> <p>The policy wording is not clear about how much accommodation for the elderly and those with special needs is required. What sites are allocated in the Local Plan to meet the needs of the increasing elderly population?</p> <p>We request that the Local Plan makes reference to emerging Neighbourhood Plans. The emerging East Boldon Neighbourhood Plan will propose for the provision of suitable specialist accommodation as identified by the Aecom Housing Needs Assessment.</p>
Policy H11 - Technical Design Standards for New Homes		Our comments expressed regarding policies D2 and D3 also apply here.
Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)		
6. PLANNING FOR JOBS		
Policy ED1: Strategic Economic Development (Strategic Policy)	Support	<p>EBNF supports proposals that contribute towards building a stronger and more resilient local economy that will provide jobs for the residents of East Boldon.</p> <p>EBNF was recently consulted on Phase 2 of the International Advanced Manufacturing Park and raised concerns about its impact on East Boldon in terms of traffic and housing demand.</p> <p>We request continuing discussions on these issues.</p>
Policy ED2: Provision of	Support	Reference to 2.1 ha at Cleadon Lane Industrial

Land for General Economic Development (Strategic Policy)		Estate is supported. (Note the policy reference to Cleadon Lane as RG4 should be RG5) Our comments on re-use of Brownfield land under RG5 is also relevant here.
Policy ED2.1 Wardley Colliery (Strategic Policy)		
Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)	Query application of policy	The Employment Land Review (2019) states that with respect to specialist employment sites for port/river related uses, the table highlights the existence of a clear over supply in quantitative terms. It recommends that the Council may want to carefully consider whether it is necessary and appropriate to retain all of this land for specialist employment uses. Have the Council considered this in demonstrating the exceptional circumstances for going into the Green Belt?
Policy ED4: Protecting Employment Uses	Support	EBNF would seek to protect the viable business within the NP area.
Policy ED5: Employment Development Beyond Our Employment Allocations		We would hope that EBNF is consulted at an early stage should such employment development be proposed on any sites within the NF area.
Policy ED6: Leisure and Tourism	Support	EBNF supports enhancement of diverse range of leisure attractions as evidence from our consultations shows support for the expansion of cycleways/walkways/sporting hub.
Policy ED7: Tourist and Visitor Accommodation	Support with reservations about traffic and parking	EBNF supports this policy and would draw attention to the fact that Parking standards are not being met currently in the EBNF local hub areas; any increase in traffic due to expansion of dwellings, Metro services, tourism and leisure services will further impact on our parking problems and must be addressed.
7. PLANNING FOR OUR TOWN CENTRES		
Policy R1: The Hierarchy of Our Centres (Strategic Policy)	Support with amendments to Local Centre	EBNF supports the designation of East Boldon Village Local Centre. However, this should also include retail premises located at St Bedes, Front Street and Grange Terrace. These are listed in the attached Appendix 1 and shown on the accompanying map. However there is a contradiction between Inset Map 10 and Para 7.10. EBNF considers that units in Langholm Road should be incorporated as stated in Para7.10.
Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)	Support	EBNF would seek to protect our Local Centre to maintain its vitality and viability.

		<p>Reference to Paragraph c) and paragraph 7.16 of R2</p> <p>For many years, the upper stories of many retail premises in King Street, South Shields (and Fowler Street to a limited extent) have been empty, unused or under utilised. The properties, many of which are of heritage value, are continuing to deteriorate and decay.</p> <p>The Local Plan provides an ideal opportunity to bring these upper floors back into use, for residential purposes. The potential target client group could be for younger people (possibly including students) who are not car owners. Such clients and the existing retail and leisure businesses could have a mutually beneficial co-existence.</p> <p>This will not only help to reduce housing demand elsewhere (especially on green belt sites), it would also be of great benefit in revitalising and reinvigorating this very important area, which is increasingly in decline and under-utilised. What is the Council doing to address this problem?</p>
Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)		
Policy R4: South Shields Market		
Policy R5: Prioritising Centres Sequentially	Support	
Policy R6: Proposals Requiring an Impact Assessment	Support	EBNF would seek to protect our Local centre against edge of centre or out of centre retail development which would have a detrimental impact.
Policy R7: Evening and Night-time Economy in South Shields Town Centre		
Policy R8: Hot Food Takeaways (Use Class A5)	Support	
Policy R9: Local Neighbourhood Hubs		
8. REGENERATION		
Policy RG1: South Shields Riverside (Strategic Policy)		
Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)		

Policy RG3: Winchester Street Housing-led Regeneration Site (Strategic Policy)		
Policy RG4 Argyle Street Housing-led Regeneration Site (Strategic Policy)		
Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)	Support with reservations.	<p>Should the need for new housing in the area arise, EBNF supports only the re-use of brownfield sites for housing within the plan area. This has been overwhelmingly confirmed in our community consultations.</p> <p>Using some of this site for housing will help divert development away from Green Belt land. Unlike the other housing sites proposed in the draft LP, this site has the advantage of close proximity to transport (Metro) links and local shopping facilities.</p> <p>However, the allocation of 5.45 ha for 245 homes may represent over provision in terms of our Housing Needs Assessment, when taking into account other commitments.</p> <p>EBNF will make a specific proposal as part of the emerging Neighbourhood Plan.</p> <p>EBNF supports the allocation of 2.1ha for B1 And B8 uses to retain and support the vibrant local businesses located towards the south of the estate. The proposed boundary shown on Inset Map 30 requires clarification. It includes within it two residential properties, a barbers premises, a restaurant, a food take away premises and two vacant showroom premises.</p> <p>It excludes a large warehouse adjoining the metro line.</p> <p>There should be a site specific policy in the Local Plan for this site which requires:</p> <ol style="list-style-type: none"> 1. Development to be comprehensively masterplanned. 2. A design code to ensure development of a distinctive neighbourhood that is in keeping with the local area and is sensitive to the proximity of residential and business use. 3. The range, size, type and tenure of housing expected on the site to meet housing needs. <p>EBNF is working with Aecom to prepare a design code for the neighbourhood area which should inform the site specific policy requirements for this site.</p> <p>The Site Specific Sustainability Appraisal concludes</p>

		that this site has a POSITIVE impact. It should therefore be developed in preference to other proposed housing sites which have a NEGATIVE impact.
Policy RG6: Fowler Street Improvement Area		
Policy RG7 Foreshore Improvement Area		
9. PLANNING FOR OUR BUILT ENVIRONMENT		
Policy D1: Our Strategic Approach for the Built Environment (Strategic Policy)	Support	<p>East Boldon Neighbourhood Forum agrees with the sentiment expressed in this section concerning the importance of good design and appropriate layout standards, and that these are necessary in order to protect and enhance the quality and value of our environment.</p> <p>It welcomes the priority given in sub sections 9.1 to 9.4 to the importance of achieving good design and in particular to 'local distinctiveness', and the recognition that 'The quality of architecture and design are both relevant to the impact that development will have on the character of the area'.</p> <p>East Boldon Neighbourhood Forum believe that the distinctiveness of our villages must be protected and this section should be expanded to deal with that aspect more comprehensively.</p> <p>The East Boldon Neighbourhood Forum welcomes the acknowledgement that 'Local Plans, including Neighbourhood Plans, should develop robust and comprehensive policies that set out the quality of development that is expected for the area', and that 'such policies should be based on stated objectives for the future of the area and an understanding and an evaluation of its defining characteristics.</p> <p>With regard to sub section 9.5 East Boldon Neighbourhood Forum also share the belief that securing good design is central to good planning and it is essential that new schemes are built to appropriate design and layout standards.</p>
Policy D2: General Design Principles (Strategic Policy)	Support	<p>East Boldon Neighbourhood Forum fully agrees with the principles set out under Policy D2, especially in respect of designs which:</p> <p>b) enhance the local setting and reinforce local identity, and give sensitive consideration to their surroundings.</p> <p>d,e,f) the importance of retaining existing natural features and trees/shrubs, and the crucial role of</p>

		<p>high quality landscaping.</p> <p>g) achieving good movement within the site and good integration with surrounding streets and open spaces.</p> <p>h) adopting the principles of Lifetime Neighbourhoods.</p> <p>l) seek to improve the character and quality of the area.</p> <p>However, we believe without more comprehensive guidance to developers, the principles set out in this section may fail to be achieved and the opportunity to deliver the type of homes and communities that are need for the future, and which the people of South Tyneside so richly deserve, may be missed.</p> <p>Given the scale of the development envisaged throughout the Boldons and Cleadon, the issues concerning distinctiveness of our villages, the sensitivity associated with developing existing Green Belt land, and the Climate Change Emergency declared by the Government and South Tyneside Council, we think sections D2 and D3 falls short of dealing with design principles comprehensively and in a way which sets out what is expressly required in order to address these important aspects. The Forum respectfully contend that South Tyneside Council should adopt a Design Code/Guide which would steer future development in a clear and unambiguous way, and provide for the creation of well designed places and sustainable homes, which are future proofed and appropriate to the needs of all . Many Local Authorities have adopted such documents, and the Design Guide issued to elected members of South Tyneside Council, is a document of some merit in its own regard.</p>
<p>Policy D3: Promoting Good Design with New Residential Developments (Strategic Policy)</p>	<p>Object</p>	<p>Reference is made in Policy D3 merely ' to encourage developers to seek' BFL12 standards. This is unsatisfactory, inadequate and lacks ambition to achieve the best for the residents of South Tyneside.</p> <p>East Boldon Neighbourhood Forum believe that as a very minimum, BFL12 standards must be insisted upon, but preferably that South Tyneside Council should develop/adopt its own minimum Design Guide, as suggested and set out in our comments in section D1 and D2 above.</p> <p>For clarity, East Boldon Neighbourhood Forum intend to produce our own design code and guide as an integral part of the Neighbourhood Plan so</p>

		<p>that the recommendations of NPPF are adequately addressed.</p> <p>We welcome the point made in sub section 9.6 regarding the effect of our built environment on health and wellbeing.</p> <p>We also welcome sub section 9.7 but would ask that reference is made to the emerging Neighbourhood Plan(s) and the possibility that master planning may be a component. For clarity, East Boldon Neighbourhood Forum is considering this approach for sites within the Forum Area.</p> <p>We support in principle the point made in sub section 9.9 to 9.20.</p> <p>Would ask that reference is made to the means by which developers are expected to adequately communicate how they will achieve these objectives.</p> <p>With regard to sub sections 9.22 to 9.24, we believe the changing demographics and needs of an aging population should be dealt with more robustly and the Local Plan should set out explicit requirements regarding this aspect. A Design Guide would do much to communicate what is needed.</p> <p>We also welcome the emphasis on the Public Realm and the need for sensitively designed Landscape, points 9.26 to 9.32 . East Boldon Forum supports the general principle set out in this section. The Forum believes that new development should retain existing landscape features including trees, plants, streams and water courses, and these should be enhanced where possible to create 'green corridors' linking the development to the adjoining countryside. We believe the landscape and open space proposals within any development must be carefully designed to create such a series of interconnected spaces which, where possible, allow pedestrians, including those with mobility impairments and parents with children in prams or buggies, and cyclists the facility to move around within a safe and attractive environment. The Neighbourhood Plan for East Boldon will seek to establish a number of green spaces to that end.</p> <p>We also believe that creating streets that are wide enough to support meaningful landscaping through the inclusion of grassed and tree lined verges is an important feature and would ask that this section (LANDSCAPE), is expanded to include these aspects. The role gardens can play in helping to mitigate the loss of habitat and helping to promote wildlife is an important also an important consideration. We request that requirements reflecting best practice</p>
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		should also be referred to and set in this section.
Policy D4: Alterations and Extensions to Residential Buildings	Support in principle but with reservations.	East Boldon Neighbourhood Forum support in principle the criteria set out in the policy but would point out that section D4 should be inserted elsewhere in the text. Its present position confuses the information set out in the sub sections which naturally flows from policies D2 and D3. The policy D4 should be adjacent to subsection 9.21 and moved elsewhere for clarity.
Policy D5: Shopfronts	Support	As most of the shops in East Boldon are Victorian or Edwardian and lie within the Conservation Area, East Boldon Neighbourhood Forum is supportive of the policies. It is particularly important in an historic village setting that the shops should retain active frontages, both day and night.
Policy D6: Advertisements	Support	East Boldon Neighbourhood Forum supports the policy, especially in relation to any advertising proposals within the Conservation Area. However, specific reference should have been made to address smaller scale, local advertising ie A-boards, bill boards, DIY signs, & general street clutter etc.
10. PLANNING FOR OUR HERITAGE ASSETS		
Policy HE1: Our Strategic Approach For Our Heritage Assets (Strategic Policy)	Support	The policy acknowledges the contribution the historic environment can play regarding quality of life, by giving people a sense of place and identity. East Boldon Neighbourhood Forum looks forward to being consulted on the Council's proposed Heritage Strategy. The Local List of Heritage Assets has not been revised since November 2011 – this needs to be reviewed and updated as a matter of urgency.
Policy HE2: World Heritage Sites	Support	East Boldon Neighbourhood Forum acknowledge the importance of South Tyneside's World Heritage Site.
Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)	Support	East Boldon Neighbourhood Forum support the general principles set out in this Policy, and the supplementary paragraphs referring to Conservation Areas are particularly relevant. Reference is made to the Council's Conservation Area Management Plans and Character Appraisals – East Boldon's version of these documents were produced in 2009 and 2006 respectively, and are in urgent need of review.
Policy HE4: Archaeology		
Policy HE5: Development Affecting Non-Designated Heritage Assets	Support with reservation.	Whilst supporting this policy, East Boldon Neighbourhood Forum notes that the Local List of Heritage Assets has not been revised since November 2011 – this needs to be reviewed and


		updated as a matter of urgency.
Policy HE6: Heritage At Risk	Support	It is noted that none of the Designated Heritage at Risk Structures are located within the East Boldon Neighbourhood Forum area (South Tyneside Grade II Listed Buildings at Risk report).
11. PLANNING FOR OUR NATURAL ENVIRONMENT		
Policy NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)	Support policy in principle but unsure about method of delivery under current Draft Local Plan	<p>Ref: NE1 a: In light of the Climate Emergency declaration in Parliament on May 1st 2019 and South Tyneside on July 18th, EBNF is supportive of carbon divestment schemes including greenbelt retention.</p> <p>EBNF is working closely with the community and is taking advice from local Nature organisations e.g. NEENP, DWT, CPRE, RSPB to get the best, carbon neutral outcomes for the Forum and for South Tyneside.</p> <p>Ref: NE1 b: In order to protect and enhance biodiversity, high value sites with high biodiversity require protection and enhancement.</p> <p>Proposed new housing site H3.59 (North Farm, 588 homes)</p> <p>This site is completely rewilded with high biodiversity. Infected animal carcasses were buried on the site in 1957 (Foot and mouth outbreak). Permission to build onsite was refused as recently as the 1990's.</p> <p>"Net gains' are characteristically achieved by 'OFFSETTING' e.g. build in one area and plant trees in another area to offset the loss. This approach has been found to fail locally. For example: "We fight climate change and our kids won't get as much asthma." That win-win ends up being broken under the terms of offsetting because you get a deal that says, "OK we can start polluting here but we will buy offsets somewhere else." The win is gone locally. It is sacrificed for unwanted development for ever in the case of greenbelt.</p> <p>H3.65 - Downhill site, 54 homes</p> <p>Large site on the magnesian limestone Downhill escarpment. South Tyneside regards Downhill as one of 3 priority landscapes in South Tyneside. NEENP regard such sites as rare Nationally and seek to protect them.</p>

		<p>https://neenp.org.uk/natural-environment/durham-priority-habitats/magnesian-limestone-grassland-action-plan/</p> <p>Priorities:</p> <ol style="list-style-type: none"> 1. Protect and maintain the current extent of Magnesian Limestone Grassland and re-create it where opportunities allow. 2. Restore degraded sites and ensure appropriate management. 3. Establish sustainable populations of all priority species supported by Magnesian Limestone Grassland. 4. Raise public awareness of the importance and special characteristics of Magnesian Limestone Grassland. <p>Evidence that greenbelt is being put forward for development even though the homes may never be needed: Ref the Guardian September 10th 2019:</p> <p>https://www.theguardian.com/uk-news/2019/sep/09/green-belt-to-be-destroyed-for-homes-which-wont-be-needed</p> <p>NE1c: A significant number of trees will be lost with the development of housing on site H3.59. This is in direct contravention of this policy</p> <p>NE1d: We support this policy. The Forum is at an advanced stage preparing nominations for Local Green Space and Open Space sites in consultation with our community in the EBNF area.</p> <p>In the associated Local Plan document ‘Stage Three Green Belt Review: Site Specific Exceptional Circumstances’</p> <p>Para 3.119: <u>Proposed housing site H3.61:</u></p> <p>The site performs moderately in terms of its contribution to the NPPF purposes and the overall integrity of the wider strategic Green Belt. It is considered that any harm arising from the release of the site could potentially be mitigated.</p> <p>Comment: The term ‘performs moderately’ has no meaning. In order for it to mean anything it must be measurable and therefore quantifiable.</p> <p>The fact is, we simply do not know what the impact of building on this site will be in terms of the impact on nature, the SSSI and on the wildlife corridor.</p>
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		<p>'Mitigation' in this context means offsetting by planting biomass somewhere else in an effort to remediate the harm done by the destruction of development. The method has been found unsuccessful, as previously stated and there is no mitigation for the pressure on the SSSI nearby.</p> <p><u>Para 3.107 - Site H3.65 Land West of Boldon Cemetery, (54 homes)</u></p> <p>"The site performs relatively strongly in terms of its contribution to the NPPF purposes and the overall integrity of the wider strategic Green Belt. It is considered that any harm arising from the release of the site could potentially be mitigated"</p> <p>Comment: The statement is unconvincing. It reads as though even the author is not convinced that it will be easy to mitigate harm resulting in a narrowing of the greenbelt between Sunderland and South Tyneside at this location. Again, 'performs relatively strongly' is not quantifiable.</p> <p>The site is on the Magnesian Limestone escarpment. It is one of three protected landscapes 'of high value' in South Tyneside. Close to the site of the Battle of Nanny Cow Hill. Close to the Boldon Downhill quarry Neolithic burial site. It is greenbelt although degraded in biodiversity because of modern farming practices it still has the potential to be a site where the following nationally rare species (on this nationally rare habitat): Chalk Carpet moth, Least Minor moth, Cistus Forester moth, Northern Brown Argus could make a welcome return.</p>
Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)	Support in principle but with the specified reservations about its application in the Forum area.	<p>EBNF supports the adherence of the LP to the Statutory Obligation to conserve and enhance biodiversity, in particular through 2017 conservation and Habitats and Species Regulations plus 2006 Natural Environment and Rural Communities Act.</p> <p>It is essential that there is APPROPRIATE ASSESSMENT, at the design stage, to show that any development has no adverse effect on our SSSI, Boldon Flats (referred to as Boldon Pastures in the draft LP document)</p> <p>Draft LP Ref paras 11.3 -11.9 - EU HABITATS</p>

		<p>DIRECTIVE – this confers special protections on coastal sites.</p> <p>There are no coastal areas inside EBNF area. EBNF agrees with this approach. A healthy coastline is an indicator of a healthy environment.</p> <p><u>Nationally Important Sites</u> (Ref: NE2 g) SSSI Boldon Flats is within the EBNF area.</p> <p>EBNF believes that this is a move away from the position previously adopted whereby changes/developments that adversely affect a SSSI are not permitted. We believe this to be a retrograde step.</p> <p>We query the statement “(g) we will only support an exception where the applicant can demonstrate that: The benefits of the development clearly outweigh both any adverse impact on the features of the site that makes it of special scientific interest, and any broader impacts on the network of SSSIs (i) The appropriate level of mitigation, and/or, where necessary, the appropriate level of compensation, is provided to redress the impact.” Under those terms the Boldon Flats site could be permanently harmed.</p> <p><u>Locally Important Sites</u></p> <p>General Observation: <u>Page 137 Local Plan: Wildlife Corridors:</u></p> <p>We note that the Boldon Greenbelt is not mentioned as a wildlife corridor. We have a lot of evidence (including film) to support its status as a wildlife corridor.</p> <p>The following sites are regarded in the Local Plan as Wildlife Corridors: South Pier to Trow Point; Trow Point to Whitburn Steel; Cleadon North Farm to Cleadon Hill; Cleadon Lane to Marsden; River Tyne; Bede’s World to River Tyne; West Fellgate Farm to River Don; Boldon Fellgate Farm to River Don; Boldon North Bridge to Bede’s World.</p> <p>We challenge the omission of the Boldon greenbelt land from the list and request that it is added to this list.</p> <p>While two wildlife corridors in the EBNF area are shown on the map which accompanies the draft LP, they are not explicitly mentioned in Table 3. The Boldon greenbelt is part of the greenbelt</p>
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		<p>swathe separating South Tyneside from Sunderland and Gateshead to the south of the Tyne and merits inclusion in the list.</p> <p>Other additions to Locally Important Sites are listed below. Please may we request that these sites are added to the South Tyneside list:</p> <p><u>Mundles Farm.</u></p> <ul style="list-style-type: none"> • Peter Alderslade is on the steering committee of BASE UK https://base-uk.co.uk , a National farming organisation for progressive, ecology minded farmers. His pioneering ploughing methods have made him a World leader in the practice of this methodology. He lectures all over the world and his methods have caused “ an explosion of biodiversity” on Mundles Farm in East Boldon. He has attended our consultations and shown us the rare species his innovative techniques attract. Justification: evidence of local wildlife in area – little owls, redshank, lapwings, reptiles. <p><u>Site H3.59 - Land at North Farm</u></p> <ul style="list-style-type: none"> • This field to the east of the bridleway has been inaccessible to vehicles for almost 30 years and has re-wilded. It has a wetland area because Tiled Burn flows through the site. The RSPB has advised residents to approach the Council in order to secure designation for this site. <p><u>Site H3.61 - Land to the east of St John’s Terrace and Natley Avenue</u></p> <p>Ref: Environment Agency Flood Map below</p> <p>(A larger version occurs in the Natural Environment Background Paper (page 36) produced by EBNF to help inform the Local Plan)</p>
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		 <p>It clearly shows that the H3.61 site lies directly above the same body of water that supplies Boldon Flats and the area is therefore prone to flooding. It is on the South Tyneside Excel Spread sheet in flood zone 3b (highest risk) The area is damp and is a location where animals moving to and from the flats are able to rest and reconnect. The Flats are metres away, across the railway line. It is part of the SSSI wildlife corridor.</p>
Policy NE3: Green Infrastructure (Strategic Policy)	Support in principle but with the specified reservations about its application in the Forum area.	<p>EBNF supports this policy in full and will have identified needs from the Neighbourhood Plan for developer contributions to improve the quality, use and value to the green infrastructure network of the green spaces.</p> <p><u>Evidence from EBNF Consultation Event March 16th 2019: Questionnaire on Natural Environment:</u></p> <p>Q1: Do you think EBNF should attempt to protect the existing greenbelt? - 99% of 111 responses answered Yes</p> <p>Q2: Should any new development in East Boldon contain an appropriate provision of landscaping, green corridors and wildlife habitats which link to the existing network? - 97% of 111 responses answered Yes</p> <p>Q3: Do you think that the Neighbourhood Plan should designate areas within the Plan area as Green Space? – 95% of 111 responses answered Yes</p> <p>72 (64%) East Boldon resident's responses to questions in the Community Consultation of March 16th 2019 highlighted 23 different green spaces that are favoured for enhancement and protection (see the list below), the number of respondents is noted at the end of each heading. Some people made multiple suggestions as to which green</p>

		<p>spaces should be designated, 15 people want all green spaces to be included.</p> <p>The 5 other most highly rated are: The fenced area in front of St. George's Church, Grange Park, the Mundles/Recreation Park, fields around, the fenced area behind the Cenotaph. Examples of comments by EBNF residents are included below against the different types of green spaces identified in the Local Plan.</p> <p>Para 11.15 (page 138): River corridor – River Tyne and River Don and associated tributaries; eg Tiledshed Burn on site H3.59. Part of the River Don corridor will be adversely affected by the proposals for this site.</p> <p>Durham Biodiversity Action Plan Prioritises Wet Woodland and scrub as a habitat – we would argue that the field forming the eastern part of H3.59 should be classified as such a habitat and should be protected.</p> <p><u>In the EBNF Community Consultation March 16th 2019 we received 4 written responses</u> specifically about Tiledshed Burn</p> <p>Wetlands/Tiledsheds Burn/along railway/Tiledsheds Nature reserve: EBNF notes that the site consists of two fields separated by an ancient bridleway. It has previously been described on the SLR as 25A and 25B. There was an acceptance from the LA that H3.59 is two sites. The fields are very different in character. One is in use for arable farming. The other has been rewilded and undisturbed over a period of thirty years.</p> <p>EBNF believes that the original designation of the North Farm site as 2 sites was a better, fairer description of this large area of greenbelt land.</p> <p>Re-wilding strips are evident on combined Local Authority plans for the IAMP to a width of 50 metres. Inside site H3.59, a tributary of the River Don; Tiledshed Burn flows through this site. Associated with the site are frogs, toads, smooth and palmate newts and various water birds including grey heron.</p> <p>At this site, the draft Plan specifies an 8-metre wildlife strip associated with Tiledshed Burn.</p>
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		<p><u>Conclusion</u></p> <p>EBNF believes that this seems a low allocation bearing in mind the commitment in the Local Plan to safeguard, protect and enhance existing green infrastructure networks. The strip should be extended to 50 meters.</p> <p>Local people are very well aware of the natural treasures they have on their doorstep in EBNF area. We have gathered evidence from community consultations, which have been happening for several years; evidence gathering for our Neighbourhood Plan.</p> <ul style="list-style-type: none"> • We are required to consult with our Forum members and local residents. As a result we have discovered a great deal of new information about our Neighbourhood Forum Area. • More dialogue would be welcome between Forum representative and the authors of the Local Plan. <p>Once our natural treasures are destroyed they will not return. The sense of urgency engendered by catastrophic loss is the engine that drives the Climate Emergency movement.</p> <p>EBNF's standpoint and our community's responses are clearly in line with the government's 'Green Future' 25 Year Environment Plan (DEFRA 2018, revised 2019) to protect and enhance the environment. We are the 'stake holders' they talk about and wish to be part of their 'Nature Recovery Network'. Therefore EBNF urges STC to take heed of the clear and present danger of eroding our green belt and spaces and take note of the following... <i>'People in greener surroundings have longer and healthier lives. Green infrastructure brings wider benefits, including sequestering carbon, absorbing noise, cleansing pollutants, absorbing surface water and reducing high temperatures.'</i> (p79)</p> <p>We believe that H3.59 should be subject to a detailed site assessment to identify the wildlife and biodiversity value in advance of any proposed allocation within the Local Plan.</p> <p><u>Coastal Corridor</u></p> <p>EBNF supports protection of coastal corridor. Coastal so not applicable to EBNF area.</p>
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		<p><u>Greenbelt Corridor</u></p> <p>EBNF supports the view that the greenbelt surrounding the Boldons, although not so extensive as the Durham and Northumberland Coastal tract is equally important for wildlife locally, nationally and internationally and should therefore be recognised as part of the wildlife corridor to the south of South Tyneside.</p> <p>Birds that occur on inland sites are especially vulnerable to changes in land use. For obvious reasons –chiefly linked to coastal erosion and climate change, the building on coastal sites has been largely abandoned in recent years.</p> <p>Inland farmland, particularly ancient, wooded wetland is increasingly rare and species that need this type of habitat are under pressure as never before.</p> <p>Such land is currently abundant in EBNF area and we enjoy unusual abundance of avian visitors –not least of all because of our proximity to the internationally recognised SSSI, Boldon Flats..</p> <p>Birds seen on the greenbelt in Boldon include waxwings (from Scandinavia) skylarks, linnet, song thrush, lapwings, swallow, and house martin along with many other endangered species.</p> <p>EBNF Community Consultation Natural Environment March 16th 2019: 112 people, residents who either live or work in the Forum area (or both) responded to our survey questions.</p> <p>Responses show 100% support for protection of the existing greenbelt</p> <p>Responses (of which there were 39 written responses) include the following comments:</p> <p>Need to retain, promote and protect green belt/spaces and wildlife: “This is what makes East Boldon unique”; “Prevents merger with surrounding villages/towns”; “need to tap into research on biodiversity as we are ignorant as to its long term loss”; “need to live in harmony not conflict with nature”; “provides recreation spaces; counteracts</p>
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		<p>traffic”; “pollution”; “need to protect for future generations.”</p> <p><u>Durham Biodiversity Action Plan</u> <u>(Farmland birds action plan)</u></p> <p>East Boldon has many of the birds identified in the Farmland Birds Action Plan adopted in Northumberland and Durham biodiversity action plans for special protection. These birds are under pressure across the country and are disappearing. The BAP recognises the problem and has conferred the special protections in order to arrest the loss we are experiencing and bring about an upsurge in the health and vigour of the identified populations of at-risk species.</p> <p>All footpaths (e.g. Old North Road, Railway line to Tilesheds) (2 comments) ‘The green area alongside the metro line needs to be better managed as it provides a green corridor and also will enhance the look of the area.’ ‘All of the foot paths in and around the village linking the greenbelt and wildlife areas should be maintained to allow continued access as this is good for our wellbeing.’</p> <p><u>Parks and Gardens</u></p> <p>EBNF Community Consultation March 16th 2019:</p> <p>Grange Park (12 comments) “Provides a shared social space for the whole community to enjoy, prevents isolation, combats loneliness, a large space for children to play in and family recreation. Open up the entrance to make it more welcoming whilst being sensitive to wildlife.”</p> <p>“Promote family life, through enjoyment of areas such as Tilesheds nature reserve, old railway line, Grange and Recreation parks which allow families to get away from traffic/bustle of life and enjoy the natural environment and spending time together.”</p> <p>Mundles/Rec Park/fields around (12 comments) Recreation park - leisure and play. ‘The fields towards Mundles Lane to prevent urban sprawl’</p> <p>EBNF has nominated 19 spaces within the Forum boundary to be nominated as Local Green Space</p>
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		<p><u>Nominated Parks are:</u> Grange Park EB1 Mundles Lane Park EB2</p> <p><u>Open Spaces</u></p> <p><u>Response from Community Consultation March 16th 2019</u></p> <p>“School site needs to be retained to remain ‘open & green’, linked to the park at the heart of the village.”</p> <p>“Existing wildlife habitats are an asset & need to be protected from future developments. Could also be utilised by Nursery & School groups in a similar way to Nature Reserve in West Boldon”</p> <p>Cricket Club - Social and recreation space and wildlife habitat. (7 responses)</p> <p>“Provide social and recreation facilities – e.g. the cricket and golf clubs, they are also natural grounds for wildlife.”</p> <p><u>EBNF has nominated the following Open Spaces in the Forum area:</u></p> <p>EB 11 Junior School and Nursery School grounds, North Lane EB13 Boldon Cricket Club, Newcastle Road EB15 Boldon Lawn Tennis Club, Dipton Lane</p> <p><u>Playing Fields and Sports Facilities</u></p> <p><u>Response from Community Consultation March 16th 2019:</u></p> <p>Green space behind Burnside/Glencourse (8 respondents identified this space) Used for play and by dog walkers. ‘The green strip between metro and housing-a safe space for children & vista for residents, also for flora and fauna.’</p> <p>“Protect the character and nature of the village, prevents urban sprawl and its position in the green belt e.g. Bridle paths, cemetery, golf and cricket clubs, fields next to South Lane and the parks are essential to the character of the village and wildlife.”</p>
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		<p>Golf Course - 'Golf Club-greater security to prevent destruction of habitat.' (6 responses)</p> <p><u>EBNF Nominated Sites for Local Green Space:</u> EB4 Glencourse/ Burnside EB 12 Golf Club EB14 Archery ground</p> <p><u>Children's Play Areas</u></p> <p><u>Response from Community Consultation March 16th 2019</u></p> <p>Encourage environmental awareness - 'Our children need to be environmentally aware & our green spaces/habitats can help to teach them & allow them to become more aware.'</p> <p>Combat pollution, green spaces help to combat rising levels of pollution (caused by increased traffic).</p> <p><u>EBNF Nominated Sites for Local Green Space:</u> EB1 Grange Park EB2 Mundles Lane Park EB11 East Boldon Junior School and playing fields</p> <p><u>Natural Open Space and Wildlife Corridors</u></p> <p><u>Response from Community Consultation March 16th 2019</u></p> <p>Enhance health and well-being, e.g. for sheer pleasure! The green belt/spaces allows observation of the changing seasons;</p> <p>Education: We are all playing catch up in terms of our awareness of damaging changes to the planet brought about by human activity. We do not want to wake up in 10 years having destroyed our green spaces and regretting the damage we have done.</p> <p><u>EBNF Nominated Sites for Local Green Space:</u> EB5 Boker Lane Bridleway EB6 Railway Line EB16 Field at North Farm. The boundaries to the farm are EB5 and EB6.</p> <p>To reiterate, the Forum believes that the greenbelt</p>
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		<p>of the Boldons is part of a wildlife corridor and should be designated as such –particularly since it separates South Tyneside from Sunderland.</p> <p><u>Cemeteries and Churchyards:</u></p> <p><u>Response from Community Consultation March 16th 2019:</u></p> <p>21 responses supporting the designation of these areas as green space. Eg:</p> <p>“The village would benefit from having some kind of focal point in the vicinity of St George's Church and the War Memorial”</p> <p>“St George's Church and War memorial should be opened up and enhanced”</p> <p>Relatives still living in area or paying respects to deceased relatives have an emotional attachment to these areas.</p> <p><u>EBNF Nominated Spaces for Local Green Space:</u></p> <p>EB8 Cemetery on Dipe Lane EB9 War Memorial Front Street. EB 10 Land in front of St. George’s Church, Front Street.</p> <p><u>Blue Spaces: Rivers, streams and ponds</u></p> <p><u>Response from Community Consultation March 16th 2019</u></p> <p>In the 1980’s farmers were constantly draining fields. We lost species that were once ubiquitous across the country –particularly amphibians.</p> <p>The field which forms the eastern part of H£.59 is one such field where a tributary of the Don runs across the North East corner of the field –Tiledshed Burn. The field has been renamed site H3.59 on the 2019 Local Plan and another field to the west has been added. EBNF views about the fields are as follows:</p> <p>Housing site H3.59 and fields surrounding the village (5 specific responses about this part of the Local Plan) Contain vast array of wildlife. RSPB identified the need to protect wildlife in BC25/26.</p>
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		<p><u>EBNF Nominated Spaces for Local Green Space:</u></p> <p>EB16 Tiledshed Burn</p> <p>NB Tiledshed Burn currently disappears into a culvert at the north east corner of BC25b –currently called RG5. It re-emerges to the east of the railtrack at tiledshed and is again culverted until it re-emerges at Beggar’s Bridge.</p> <p>The current plan by South Tyneside Local Authority to expose the Burn is welcomed by EBNF.</p> <p><u>Allotments</u></p> <p><u>Response from Community Consultation March 16th 2019</u></p> <p>Co-ordinate landscaping (food productions) the green corridors esponses)</p> <p>Perpetuates relationship with nature; counteracts pollution; provides sustenance for food chain; habitat for wildlife; existing footpaths are green wildlife corridors; many ecosystems are interlinked and dependent on one another, cutting these areas off from each other could cause irreparable harm.</p> <p><u>EBNF Nominated Spaces for Local Green Space:</u></p> <p>EB7 Victoria Allotments</p> <p>EBNF believe that a case could be made for extending these allotments given the demand for plots.</p> <p><u>Green Corridors: Public rights of way, cycle routes, bridleways</u></p> <p><u>Response from Community Consultation March 16th 2019</u></p> <p>Need to retain, promote and protect green belt/spaces and wildlife (39 comments)</p> <p>This is what makes East Boldon unique; prevents merger with surrounding villages/towns; need to tap into research on biodiversity as we are ignorant as to its long term loss; need to live in harmony not conflict with nature; provides recreation spaces; counteracts traffic pollution; need to protect for future generations.</p> <p>Planning needs to be based on research (4 comments)</p>
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		<p>Policies should focus on well research to maximise protection of wildlife, protect views across the landscape and enhance the attractiveness of the village to human and wildlife inhabitants</p> <p>Benefits of natural environment on health & well being (4 comments) For walks, exercise, clean unpolluted air, mindfulness and getting in touch with nature away from everyday stress.</p> <p><u>EBNF Nominated Spaces for Local Green Space:</u></p> <p>EB3Mundles Bridelway EB5Boker Lane Bridleway (cycle route and public right of way) EB16Field at North Farm: site H3.59 (Wildlife Corridor) EB17 Fields at South Lane into fields south of Boldon Farm. EB18 Field at North Farm to the west of Boker Lane Bridleway An ancient road bisects the greenbelt at H3.59, which is now part of the South Tyneside Cycleway. Deer have been filmed in the North Farm fields beside this bridleway in the last 2 years. Stoats, hedgehogs, nesting pheasants visit the gardens at Ravensbourne and Beckenham Avenues –the properties that abut this site.</p> <p>Policy NE3,para 11.16 – Expresses a wish to maintain a well planned ...network of green infrastructure assets.</p>  <p>The arrow indicates site H3.59, which represents the largest area of greenbelt loss inside EBNF area.</p>
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		<p>The draft LP proposes to develop this area with 588 houses.</p> <p>EBNF believes that here is nothing positive in terms of a green infrastructure replacement that can mitigate the catastrophic loss of a genuinely significant wildlife corridor such as this.</p> <p>The chunk of high value wet woodland scrub in question constitutes about 20% (by eye) of the neighbourhood forum area. 588 new homes on this site represents increasing the residential stock of East Boldon (currently circa 1,800 homes) by almost 32.6% by developing this site in the way described. The total increase of 950 homes is a 53% increase and we believe this is a plan to harm the natural environment in EBNF area.</p> <p><u>Evidence from EBNF Community Consultation March 16th 2019:</u></p> <p><u>The main reasons why green spaces should be protected and enhanced are to:</u></p> <ul style="list-style-type: none"> • Protect the character and nature of the village, prevents urban sprawl and its position in the green belt e.g. Bridle paths, cemetery, golf and cricket clubs, fields next to South Lane and the parks are essential to the character of the village and wildlife. • Protect wildlife (flora and fauna), this could be achieved by surveying of sites over an extended period to identify seasonal activity e.g. RSPB identified the need to protect wildlife in proposed site H3.59. • Enhance health and well-being, e.g. for sheer pleasure! the green belt/spaces allows observation of the changing seasons; • Promote family life, through enjoyment of areas such as Tilesheds nature reserve, old railway line, Grange and Recreation parks which allow families to get away from traffic/bustle of life and enjoy the natural environment and spending time together. • Combat pollution, green spaces help to combat rising levels of pollution (caused by increased traffic). • Provide social and recreation facilities – e.g. the cricket and golf clubs, they are also natural grounds for wildlife. • Provide a focal point for the village, a community space – e.g. front of St. George's
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		<p>Church, Cenotaph; Cricket Club both spaces for wildlife too.</p> <p>Encourage environmental awareness- ‘Our children need to be environmentally aware & our green spaces/habitats can help to teach them & allow them to become more aware.’</p> <p><u>Site H3.59 is part of a wildlife corridor. Species that live here include:</u></p> <ol style="list-style-type: none"> 1. Short eared owl (Photographs available) 2. Male Sparrow Hawk 3. Female Sparrow Hawk (P) often 4. Kestrels 5. Jay Birds 6. Greater spotted Woodpeckers (Photographed) 7. Magpies 8. Nesting Pheasants (Photographs) 9. Blackbirds 10. Song Thrushes 11. Tree and house sparrows 12. Blue, Great ,Coal and Long Tailed Tits 13. Starlings 14. Wood pigeons, Collar Doves, Feral Pigeons, Stock Doves 15. Swifts, Swallows and bats – (These thrive on the food that live in the “dense Undergrowth” mentioned above) 16. Dunnocks 17. Robins 18. Bull and Goldfinches, Chaffinch, Greenfinch 19. Crows and Jackdaws 20. Goldcrest 21. Chiffchaff, Reed Bunting 22. Mistle Thrush 23. Field Fare 24. Occasionally Linnet, Siskin, Redwing, Grasshopper Warbler 2 years ago. <p>Animals that visit gardens and that have made their habitats in this area include</p> <ol style="list-style-type: none"> a. Hedgehogs b. Rabbits c. Squirrels – Grey d. Wood Mice, Bank Voles e. Fox f. Deer have been filmed on the site g. Frogs, Toads h. Newts- Smooth and Palmate i. Weasel <p>The claims made in the policy statement 11.16 are</p>
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		<p>laudable but hollow if sites such as the field at North Farm are going to be developed. There is no way that these species will remain in situ if this valuable habitat is developed. It is much more likely that they will disappear from the Forum area altogether and therefore they will be increasingly under pressure in the borough and across the country if other LA's are permitting this type of development.</p> <p>EBNF wishes to challenge the H3.59 Site assessment published in the 2019 stage 3 greenbelt review</p> <p>Policy NE3, 11.17 New developments should prioritise green infrastructure within the design.</p> <p><u>EBNF Community Consultation March 16th 2019</u></p> <p>95% of respondents to the Natural Environment section of the Community Consultation support the designation of green spaces within the plan.</p> <p>Our residents expressed concerns about the capacity of our infrastructure to support large-scale housing. The Lakes Estate and The Paddock to the south of the H3.59 site are incursions into greenbelt, which placed a significant strain on our infrastructure when they were built in the late 1980's.</p> <p>Co-ordinate landscaping the green corridors (12 comments) Perpetuates relationship with nature; counteracts pollution; provides sustenance for food chain; habitat for wildlife; existing footpaths are green wildlife corridors; many ecosystems are interlinked and dependent on one another, cutting these areas off from each other could cause irreparable harm.</p> <p>Brown field sites a priority over green field 10 comments) Incentivise use of brownfield sites; once green fields are gone they are gone forever; include Wildlife corridors, links to existing habitats; only use brown field if infra-structure is improved. Prevent erosion of greenbelt.</p>
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		<p>The destruction of wet woodland will happen despite ST Policy statements.</p> <p>This is an example of a situation where the statement describes conservation but the policy in practice does the opposite.</p> <p>The landscape buffer strip at Tiledshed Burn (8 metres) is minimal.</p> <p>EBNF Comments: In the context of the proposal, it is again difficult to ascertain what ‘performs moderately’ means. The review admits the existence of priority species on the site but does not mention the rare habitats. We don’t get one without the other in nature conservation.</p> <p>The Strategic Greenbelt Review Stage 3 mentions on pages 30-33 that there is a public right of way on site, which forms part of the green infrastructure corridor.</p> <p>The right of way is the old road to Boldon Colliery, now made wild with Hawthorn hedging to either side of the path. The hedging has been in place for over 60 years.</p> <p>All hedgerows, which contain more than 80% native species, are now classified as Priority Habitats in the UK and have their own Habitat Action Plan.</p> <p>The Western site is being promoted for development by consultants acting on behalf of the landowner. It is of less value ecologically than the Eastern site, which is in private ownership.</p> <p><u>EBNF would argue that:</u> Development of the land at North Farm is not a ‘rounding off’. We argue that development of this site is a new incursion into valuable greenbelt land.</p> <p>The Boldon Downhill site is a magnesian limestone escarpment –a rare rock type which produces alkaline soil and is associated with indicator species, rare across the country.</p> <p>HEIDI JANE ABBOTT submitted a dissertation entitled “THE BIOGEOGRAPHY OF THE MAGNESIAN LIMESTONE GRASSLAND FLORA OF EAST DURHAM AND TYNE & WEAR” in part fulfilment of the requirements for the degree of</p>
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		<p>Masters of Science in Ecology at the University of Durham September 1995. The following extract is relevant to this site:</p> <p>1.1 MAGNESIAN LIMESTONE GRASSLAND</p> <p>“Calcareous grassland supports one of the most diverse plant communities in the British Isles with over 330 characteristic species. However "huge losses among calcareous grasslands and their continuing vulnerability to either agricultural improvement or neglect have greatly enhanced the nature conservation interest of surviving stands." (Rodwell 1992). The Magnesian Limestone Grasslands (MLG) of North East England are no less vulnerable. Together with agricultural practice and myxomatosis, quarrying of the Magnesian Limestone has largely confined this vegetation community to a few intractable slopes and artificial habitats within a matrix of otherwise non-natural habitat. Dalby (1991) calculated that over 66% of the remaining MLG occurs within East Durham and Tyne&Wear. The core MLG community termed CG8 in the National Vegetation Classification occurs entirely within East Durham and Tyne & Wear with a total area of 67 hectares.</p> <p>The coincidence of Durham and Tyne & Wear's northern geographical position (55°N), climate regime (700-750 mm precipitation per annum and 3.75 average hours of bright sunshine per day) and geology facilitates the presence of a unique calcareous grassland community. The associated flora contains a mixture of species with varied overall geographical distributions within the UK and Europe. The flora demonstrates affinities to both the Arctic-Alpine grasslands (Association: Elyno-Sesleriatea) and the lowland thermophilous calcareous grasslands (Association: Festuco-Brometea) (Shimwell 1968). Therefore many of the more restricted species in the Durham MLG flora are close to either their northern or southern range limits within the British Isles.</p> <p>It is not therefore surprising that the MLG of North East England has been the focus of much scientific attention. There have been a series of reviews, starting with the that of Heslop-Harrison & Richardson (1953) and concluding with the latest Dalby (1991). These reviews stress the importance of conserving this resource.”</p>
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		<p>Para 11.18</p> <p>Supplementary Planning Document 3: Green Infrastructure Strategy (2013) sets out the green infrastructure assets (referred to in this policy) and the various partners involved in green space provision. It contains a vision, background evidence, recommendations and an action plan.</p> <p>Para 2.2 (From SP Doc 3) states:</p> <p>Green infrastructure is more than individual green spaces – it includes a wide variety of different land uses and environments, which provide a range of environmental, social and economic benefits. Green infrastructure is made up of natural assets such as beaches, rivers, natural and semi-natural green spaces, and recreational spaces, including allotments, playing pitches and cycleways. The different types of green infrastructure in South Tyneside and also the benefits that these spaces provide are set out below.</p> <p><u>EBNF Comment</u></p> <p>Building on the H3.59 site will involve destroying</p> <ul style="list-style-type: none"> • Part of the Boker Lane Bridleway –part of ST cycleway network. • Woodland scrub • Wet woodland <p>The latter 2 habitats are in decline across the UK and the species that live there are under pressure like never before. We are adding to the damage that the climate emergency was declared to prevent if we allow development on H3.59.</p> <p>Para 11.19</p> <p>To ensure our Green Infrastructure network continues to provide good quality and accessible green spaces, developer contributions will be sought to help improve the existing Green Infrastructure network and support the delivery of new projects where appropriate.</p> <p>BC 25a and b site (now H3.59)'.Greenbelt review 3.79 (the inspector agreed that) 'development in this area would reduce the gap, in terms of distance, between Boldon and South Shields still further and would increase pressure on the remainder.'</p> <p>In Para 3.80 Greenbelt Review</p> <p>The Inspector considered land at BC27/BC27a and BC25a/BC25b (now H3.59): 'if considering only the Green Belt, then I would prefer the subject site to</p>
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		<p>the south of South Lane to be allocated, as the Green Belt to the south is more substantial. However, the subject site lies in more attractive landscape and is closer to the Boldon Conservation Area, which is insulated from the northern site by relatively recent housing development. Thus in terms of the settlement and ignoring Green Belt issues I would prefer the northern site (Land south of Tiledshed Lane [BC25a/BC25b] and East of Boker Lane [BC27/BC27a]).'</p> <p><u>EBNF Comment</u></p> <p>It is clear from the inspector's comments that neither site is ideal. If it is developed, it knocks out a massive area of greenbelt in the Forum area. There are access issues and the whole site is greatly valued by East Boldon residents. Many of us regularly walk this wildlife corridor –in fact it is seldom unoccupied. It is so good for mental and physical health –there is no comparable accessible, safe bridleway in the Forum area. The wildlife is exceptional on the site –as already explained.</p>
Policy NE4: Open Space & Green Infrastructure Provision	Support but have concerns with its application to specific sites in the EBNF area	<p>EBNF Supports council Key Priorities Promote Healthy Lifestyles along with access to green infrastructure, networks and open spaces, outdoor and quality Leisure Facilities.</p> <p>Policy NE4, para 11.20</p> <p>A key priority of the Council is to promote healthy lifestyles through access to our green infrastructure network, open space, outdoor sport and leisure facilities</p> <p>EBNF comment:</p> <p>Bridleway at Boker Lane is a prime example of a site within the Forum area where walking jogging, horse riding and enjoyment of the extraordinary nature and wildlife on the site will be removed if development. The East Boldon population was found by the census to be the healthiest population in the Borough. This is in no small part to out access to green spaces. It is estimated that healthier lifestyles linked to healthier environments save the NHS a significant amount of money.</p> <p><u>Community Consultation July 15th 2017</u></p> <p>Residents showed they look upon plans to cherish</p>

		<p>the green spaces we have and take steps that involve:</p> <p>“Protecting wildlife including (creating) Nature Reserves”</p>
Policy NE5: Areas of High Landscape Value	Support but with specifies reservations.	<p>Areas of High Landscape Value are shown on the Proposals Map. They are:</p> <ul style="list-style-type: none"> . a) Cleadon Hills . b) Boldon Downhill – summit and scarp slope . c) The Coast – Trow Point to the administrative boundary with City of Sunderland . <p>The policy states in paras 11.28 and 11.29 that to be considered appropriate, proposals for development within these designated areas should:</p> <ul style="list-style-type: none"> i. Retain and enhance the open and undeveloped character of the area; ii. Ensure the views from and of key landmarks are retained and where possible enhanced; iii. Encourage accessibility and enhancement of the green infrastructure network and opportunities for habitat enhancement. iv. Provide appropriate landscape mitigation where required. <p>Proposals for development considered having a significant negatives impact on the integrity and character of the landscape will be resisted.</p> <p>EBNF response: By adding to building (a disproportionately high amount of building in the Forum area) the aim to protect and enhance Boldon Downhill, a site of high landscape value is certain to be undermined.</p> <p>The site will certainly be subject to increased traffic flow and pollution, congestion and increased likelihood of accidents.</p>
Policy NE6: Flood Risk and Water Management	Support in principle but with specified reservations.	<p>The Environment Agency is currently raising awareness of surface flooding in light of Climate Change in a promotional video circulated through South Tyneside ‘Inspire’. It makes the point that as water levels rise, planning decisions that advocate building on Greenbelt aren’t helping the worsening rise in water levels. The transpiration current through green plants helps to evaporate off groundwater and reduces flooding. Where does</p>

		<p>water go when we pave over gardens and concrete swathes of greenbelt? Furthermore the situation isn't static; globally, water levels are rising as a result of climate change.</p> <p>The Local Plan sets out proposals to massively increase development in the Forum area (950 homes). This is likely to put unsustainable pressure on the existing drainage system which does not cope with current sewage output causing terrible pollution in the North Sea at the Cutthroat Dene sewage outlet, Whitburn. Sewage from Boldon along with that of Cleadon, Whitburn, Seaburn, goes into the same system, which can spill into the sea at Whitburn. Most people are unaware of this situation although press reporting has for many years alluded to existing problems with the sewerage infrastructure. These problems have been brought to the attention of the Secretary of State for the Environment and the Europeans Courts on Environmental Standards.</p> <p>It is no coincidence that the beach at Seaburn did not allow bathing during the August Bank Holiday 2019 due to a 'brown liquid patch in the ocean that extended from Tynemouth to Hartlepool'.</p> <p>Ref Sunderland Echo, August 24th and 25th 2019:</p> <p>https://www.sunderlandecho.com/news/safety-warning-for-families-at-north-east-coast-following-pollution-incident-in-the-water-492296</p> <p><u>Site H3.61</u></p> <p>The site to the east of Natley Avenue and St. John's is on top of the same body of water that lies underneath Boldon Flats.</p> <p>It is damp and is metres away from the SSSI, Boldon Flats. It has the highest rating for potential flooding on the 2017 South Tyneside Site Assessment (Excel spread sheet ; Flood Assessment 2017s7129 v7.0)</p> <p>In 1998 the inspector turned down a development proposal for this site because 'the site is beyond the built up limit of East Boldon and that the cricket club and associated buildings are appropriate structures which coincide with the purpose of the Green Belt.'</p> <p>Sunderland and Boldon are at risk of becoming a single urban development unless incursions such as these into the greenbelt are re-considered.</p>
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<p>Policy NE7: Protecting Water Quality</p>	<p>Support in principle but with concerns over impact of proposed developments in EBNF area.</p>	<p>Ref: Para 11.38</p> <p>We support the aims of the Water Framework Directive to protect and enhance the quality of the Borough's surface freshwater areas, rivers, wetlands and groundwater and to achieve "good ecological status" in all water-bodies (including surface, ground and coastal waters)</p> <p>EBNF Community Consultation March 16th 2019:</p> <p>"Very important greenbelt isn't built on or tidied up, manage it for wildlife. Support creation of more ponds and wetlands, especially as flood alleviation, for which funding could be available."</p> <p>"Retain for future generations; provide wildlife habitat (flora and fauna); provide wildlife corridors; build ponds to aid rapid drop in UK amphibians;"</p> <p>NB, East Boldon Forum area has many amphibian species in the field at North Farm because of Tiled Burn and wet wooded scrubland found on this site.</p> <p>"We have rich, diverse wildlife habitats in & around village, these link to areas of SSSI, these must be preserved, they also contribute to unique character of village, in turn helps to create positive well being of humans who share it."</p> <p><u>EBNF states that:</u></p> <p>East Boldon has many wetland sites. Such sites are rare across the country and the species supported by such habitats are disappearing. Certainly H3.61 and H3.59 are part of the wildlife corridor supplying the SSSI, Boldon Flats. There is a reason why development in East Boldon has been resisted on the sensitive sites identified in the Local Plan.</p>
<p>Policy NE8: Coastal Change</p>	<p>Support but with concerns over the impact of proposed development in EBNF area.</p>	<p>EBNF is fully supportive of this policy statement. We do not have a coastal area inside the Forum boundary but we believe that the proposal for 950 new homes may be unintentionally negatively affecting the ecology, hygiene and fishing industry at the South Tyneside coast.</p> <p>We ask that</p> <p>(i) South Tyneside Council reviews its housing</p>

		<p>(ii) numbers allocated in the Local Plan and Urgently review the effectiveness of the existing methods for treatment of sewage that comes from housing developments in the EBNF area, Cleadon and Whitburn. There is strong evidence to suggest that a high volume of untreated sewage is being released into the North Sea at Whitburn and further development of 950 homes in the EBNF area (and more in Cleadon and Whitburn) will exacerbate the situation.</p>
Policy NE9: Contaminated Land and Ground Stability		
Policy NE10; Air Quality	<p>Support in principle but argue that the proposed development in the EBNF area will be in contravention of the policy.</p>	<p>Paragraph 181 of the NPPF states that opportunities to improve air quality or mitigate impacts should be identified, so far as possible at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. The impacts of the proposed site allocations has not been assessed and are unknown at this stage and measures to improve air quality and mitigate impacts have not been identified at the plan-making stage contrary to the NPPF.</p> <p>The following sites are proposed: RG5 (Cleadon Lane 245 homes), H3.59 (North Farm, 588 homes), H3.61 (St Johns/Nately Ave 63 homes), H3.65 (Boldon Cemetery 54 homes)</p> <p>In addition, a large flyover is planned at the Tilesheeds level crossing, in the region of H3.59, turning a semi-rural road into a busy polluting highway.</p> <p>Building 950 homes in the Forum area with many other homes scheduled for the Boldons will increase atmospheric pollution by at least one third more than is current on a daily basis in the Forum area.</p> <p>Airborne carbon particulates produced by incomplete combustion of fuels in car engines (especially diesel) are now recognised as a major health risk associated with cancers of the soft tissues including lungs, brain, stomach and liver. They are associated with asthma and other respiratory complaints</p> <p><u>EBNF Community Consultation March 16th 2019</u></p>

		<p>Response from EBNF Community</p> <p>“We need to combat pollution, develop green spaces in order to help to combat rising levels of pollution (caused by increased traffic).”</p> <p><u>EBNF States:</u></p> <p>At the time of the Community Consultation in March 2019, nobody had any idea of the scale of development being proposed for East Boldon.</p> <p>These plans - 950 homes in the Forum area when we only have 1800 homes in the whole Forum area at the moment – are wholly disproportionate and unfair.</p> <p>It will bring a doubling at least in the flow of traffic through East Boldon and a doubling of the pollution we can expect to receive.</p> <p>Our local businesses are asking “At what point does East Boldon cease to be a village?”</p> <p>EBNF Position Statement</p> <p>South Tyneside Council has produced a Local Plan at a momentous juncture in history. It can, if it chooses embrace new ideas about sustainable development and become a leader in the field of decarbonisation and combating climate change.</p> <p>Para 11.56</p> <p>“The Air Quality Annual Status Report (ASR) (2018) provides an overview of air quality in South Tyneside. We review Nitrogen Dioxide (NO₂) annually so that we can identify any changes and take action where air quality exceeds national targets.”</p> <p>Negative Impact on air quality has been used to reject planning applications:</p> <p>In 2017, the Secretary of State found in favour of a Planning Inspector’s decision that a proposed housing development of 330 houses and at Pond Farm, Newington, Sittingbourne, Kent should be refused because of “the substantial harm that the appeal proposals would cause to the character of a valued landscape and their likely significant adverse effect on human health”. In particular, on the grounds of harm to the landscape and increased air</p>
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		<p>pollution, the latter factor relating specifically to the impact on the council's Air Quality Management Areas. Richard Knox Johnston, CPRE Kent vice-chairman, said: "This is the first time air quality has been considered as a factor in determining a planning decision. It had been put forward as a reason for turning down planning permission in the first instance – and that has now been vindicated further.</p> <p>Although the developer was happy to provide mitigation, the court was not convinced that that mitigation would work."</p>
Policy: NE11 Pollution	Support in principle but with reservations about the impact of proposed development.	<p>EBNF support this policy in principle but have major concerns regarding the adverse impact which the Draft Local Plan could have on existing coastal pollution problems.</p> <p>There is long standing evidence of coastal pollution emanating from the NWL sewage pumping station adjacent to Shell Hill, Whitburn. For example, over the last Bank Holiday weekend, bathing was prohibited on two occasions at local beaches due to poor water quality.</p> <p>The addition of 950 new homes within the Forum area and a further 247 at West Boldon/Boldon Colliery, 231 at Cleadon and 397 at Whitburn will create significant further demands on the pumping station.</p> <p>Have the Council and NWL seriously considered these capacity issues (ie the public sewer network but particularly the pumping station), in order to reduce/minimise existing sea pollution and prevent additional pollution.</p> <p>Paragraph 11.63 refers to the requirement for relevant impact assessments (Environmental Protection Act 1990) – has this work been done?</p> <p>EBNF members are supportive of measures to reduce traffic on our roads and decrease pollution. We believe the best way to achieve this is to retain green spaces and build on brownfield sites.</p> <p><u>Community Consultation July 15th 2017</u></p> <p>Need to limit the amount of traffic through the village.</p> <p>EBNF Community Consultation 16th March 2019</p> <p>Need to retain, promote and protect green belt/spaces and wildlife (39 comments)</p> <p>"This is what makes East Boldon unique"; "prevents merger with surrounding villages/towns"; "need to tap into research on biodiversity as we are ignorant as to its long term loss"; "need to live in harmony</p>

		<p>not conflict with nature”; “provides recreation spaces; counteracts traffic pollution”; “need to protect for future generations”.</p> <p>Co-ordinate landscaping the green corridors (12 comments) “Perpetuates relationship with nature”; “counteracts pollution”; provides sustenance for food chain”; “habitat for wildlife”; “existing footpaths are green wildlife corridors”; “many ecosystems are interlinked and dependent on one another”, “cutting these areas off from each other could cause irreparable harm”.</p> <p><u>Forum Community Consultation July 15th 2017:</u></p> <p>Traffic flows and volumes are already a problem. How will substantially increased volumes be effectively managed?</p>
12. INFRASTRUCTURE		
Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)	Object	<p>The NPPF at paragraph 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for community facilities (such as health, education and cultural infrastructure).</p> <p>The NPPF at paragraph 94 states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools through the preparation of plans.</p> <p>The full infrastructure requirements arising from the proposed development set out in the Pre-Publication Draft Local Plan are currently unknown.</p> <p>The South Tyneside Local Infrastructure Delivery Plan (2019) states ‘the Planning for School Places team have identified that there is pressure on primary and secondary school capacity in the Whitburn, Cleadon and Boldon area’. It goes on to state the Council will be in a position to determine the education infrastructure requirements once the Department of Education Methodology for calculating pupil yield is published. When will this</p>

		<p>be published and consulted on? It is likely that the high level of proposed housing development in East Boldon will result in the need to provide additional school places. Should a new school be required the Local Plan should allocate a site for this and the community should be consulted prior to the publication of the pre-submission Local Plan.</p> <p>The South Tyneside Local Infrastructure Delivery Plan (2019) states 'South Tyneside Clinical Commissioning Group and the Council's Public Health and Spatial Planning teams are currently working in partnership to assess the potential impact of the delivery of these allocations on the provision of Primary Care in the Borough. The outcome of this work will be important in the context of determining priorities for investment in the context of health infrastructure needs arising from development'. When will this be published and consulted on? Should a new surgery be required the Local Plan should allocate a site for this and the community should be consulted prior to the publication of the pre-submission Local Plan. The South Tyneside Local Infrastructure Delivery Plan (2019) does not address the need for additional dental services which forms part of health provision.</p> <p>The South Tyneside Infrastructure Delivery Schedule (2019) only provides information on flood and transport infrastructure. It does not provide a complete assessment of the infrastructure requirements arising from the proposed development set out in the Pre-publication Draft Local Plan.</p> <p>Concerns were voiced about infra-structure to support large scale housing at EBNF consultation event March 2019 (3 comments)</p> <p>Specifically proposed housing site H3.59 and fields surrounding the village (5 comments) Contain vast array of wildlife. RSPB identified the need to protect wildlife on this site</p>
Policy IN2: Developer Contributions, Infrastructure Funding and Viability	Support subject to comments expressed.	<p>Para 12.13: "The Community Infrastructure Levy allows councils to impose a levy on new developments in order to raise funds to support development. We are considering whether it would be appropriate to introduce the Community Infrastructure Levy in South Tyneside."</p>

		Regarding the introduction of the Community Infrastructure levy in South Tyneside , we believe that this levy is essential for the implementation of Neighbourhood Plans and therefore request that it should be a requirement of the Local Plan that it be allocated to Neighbourhood Forums to determine its use in supporting local projects.
Policy IN3: Social and community infrastructure	Support	<p>Spatial Vision of LP EBNF - it is essential that residents have access to a range of Educational and Training Facilities, including choice of schools, new services community and healthcare provision, shops and services and employment and recreational facilities.</p> <p>EBNF will identify Community Assets if they arise as part of the emerging Neighbourhood Plan and we support the adherence to this NP when considering development of community and social infrastructure.</p>
Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)		
Policy IN5: Telecommunications and Utilities		
Policy IN6: Travel - New Development (Strategic Policy)	Support in principle but with reservations.	<p>EBNF support the general principles of this policy, especially with reference to paragraphs:</p> <p>a) iv) – Give first priority to pedestrian and cycle movements, and addresses public transport connectivity.</p> <p>b) ix) – Protect/enhance access to public rights of way.</p> <p>Paragraph b) does not go far enough – ALL new developments must include charging infrastructure.</p> <p>c) – Development proposals must be designed to meet the needs of public transport users, including maximising opportunities to improve access to the Metro station.</p> <p>Paragraph 12.30 – Developments that generate significant amounts of movement will need a Travel Plan. Document SPD7 Travel Plans states that these plans are required for new housing over 50 dwellings – please clarify.</p> <p>Paragraph 12.32 – Makes important reference to the provision of real travel choices.</p> <p>Paragraph 12.34 – Makes reference to the Council's Cycling and Walking Investment Strategy 2019) -</p>

		<p>where can this document be found? Inset Map 35 is not fully legible (scale is too small) – a larger map or individual area maps are required.</p> <p>South Tyneside Infrastructure Delivery Plan 2019. This document emphasises the importance of cycling and walking routes. Cycling activity (as a transport mode) has doubled in the last five years. Paragraph 4.90 states that the Council is developing a Cycling and Walking Investment Plan CWIP) – EBNF must be consulted on this document.</p> <p>Under Supplementary Planning Documents, SPD7 Travel Plans (April 2010) gives guidance about travel plan requirements. However, is this document to be revised to take into consideration the implications of the Draft local Plan?</p> <p><u>Evidence from EBNF Community Consultation July 15th 2017:</u> “Housing development needs to be proportionate in respect of the size of East Boldon village”; “Managing car parking along streets (needs to happen)” “Increase parking facilities for Metro”; “Resident parking for areas close to Metro”.</p> <p>Regarding policy IN6 a) xi “Ensure that sufficient car parking spaces will be provided having regard to the Parking Standards SPD (or its successor document)”:</p> <ul style="list-style-type: none"> • With regard to SPD Parking Standards for residential development, we have concerns that this is now not fit for purpose and that guidance in the NPPF acknowledges the need for a more pragmatic approach. We would ask that this is reviewed and updated alongside the Local Plan. • We believe that private parking provision should be proportionate to the number of bedroom spaces/size/occupancy of the property, and SPD 6 must be amended accordingly. • The proposed Cleadon Lane site (R5) next to the East Boldon Metro Station, a site where higher density is prescribed, illustrates the seriousness of the issue for the Forum. Not only will on street parking problems result from the maximum private parking levels imposed by SPD 6, but additional on street parking will result because of the site’s
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		<p>proximity to the Metro Station and the inadequate park and ride facilities that currently exist....perfect storm!</p> <ul style="list-style-type: none"> • We anticipate a much greater take up of cycle use, especially with the advent of battery assisted cycles, and consider that there should be a greater provision made in family housing. • We also think that secure storage with charging points should be a requirement and not just “considered” in areas of high density housing, flats etc. • We do not think there is a compelling reason to distinguish between private and social housing.
Policy IN7: Accessible and Sustainable Travel (Strategic Policy)	Object	<p>IN7a)ii – we note the proposals for two new metro stations. If the proposed development of 950 new houses in EBNF area, (1,828 in the Boldons and Cleadon Village combined) should consideration be given to a new metro station in the vicinity of Tilesheads crossing?</p> <p>IN7a) iii – The car park at East Boldon Metro Station has been at capacity for many years. The continuing demand has meant parking is displaced to the roads nearby , particularly Cleadon Lane, Langholm Road and St John's Terrace. This causes access problems to residents and businesses. Our community consultation has shown strong support for additional park and ride facilities at the station, and the Local Plan should commit to this.</p> <p>This is also referred to in the Transport Study Update 2010 (listed under Supporting Documents and Evidence Based Studies), paragraph 7.1 - safeguarding of land to enable additional park and ride facilities at East Boldon Metro Station by 2021.</p> <p>IN7 c) iii – the proposal is not specific enough, land should be allocated in the Local Plan. EBNF will make such proposals in its emerging Neighbourhood Plan.</p> <p>IN7h) refers to inset map 31 – this should read inset map 35. This map is not fully legible (scale is too small) – a larger map or individual area maps are required.</p> <p>IN7k) v – this improvement to the Local Highway Network is at the very early stages of assessment. The Draft Local Plan contains no further details.</p>

		<p>The Public Consultation Drop In Session included a poster titled Boldon Tiled Level Crossing Risk Reduction. This contained a statement that once investigations have been finalised, a public consultation will be undertaken.</p> <p>The Infrastructure Delivery Plan, referred to in Para 12.3, provides further detail at Paras 4.25 to 4.29. Para 4.28 states that this scheme also unlocks development sites that further the growth aspirations of South Tyneside.</p> <p>EBNF requires details discussions with the Council concerning its implications to the Neighbourhood Plan.</p> <p>Detailed alignments must be made available as soon as possible to assess the impact of the scheme on existing properties and on Tiled Nature Reserve and cycleways.</p>
Policy IN8: Airport and Aircraft Safety		
Policy IN9: Waste Facilities (Strategic Policy)		
Policy IN10 : Protection of Existing Waste Facilities (Strategic Policy)		
Policy IN11: Minerals Safeguarding and Extraction (Strategic Policy)		
13. IMPLEMENTATION AND MONITORING		
Policy IM1: Implementation and monitoring		

Appendix 1

Policies R1, R2 and R6: Retail premises to be included in the East Boldon Village Local Centre

- 1-9 Station Terrace (Linda Leary, Andrew Craig, Sainsbury, Nisa, The Coffee Station, Mandarin, Village Pharmacy, Master Debonair x 2)
- 1a) St John's Terrace (new shop/bakery – not yet occupied)
- 1-7 Langholm Road (Spruced, Hairgoals, The Boldon Practice, Blossoms and Bows)
- 11 Straun Terrace, Station Approach (Alfred Pallas)
- 1-4a St Bede's (Blacks Corner, Volare, Bathrooms Today, No 4, Premier Physio)
- 2a) & b) Grange Terrace (Boldon Upholstery and Curl up 'N' Dye)
- 44-60 Front Street (Breeze, Tribeca, L&S Irving, Daniella's, Mid-Boldon Club)
- 84 Front Street (In-House Interiors)
- 104 Front Street (Havanna Hairdressing)
- 1 & 7 Front Street (East Boldon Chop Suey and Head First)
- 49 Front Street (The Village Butchers)
- 67 Front Street (East Boldon Post Office/Convenience Store)

Site location plan map – retail premises highlighted in red

