

SOUTH TYNESIDE STAGE ONE GREEN BELT REVIEW: EXCEPTIONAL CIRCUMSTANCES

RESPONSE BY EAST BOLDON NEIGHBOURHOOD FORUM

Introduction

Para 1.4 states that the Review evidences as to whether “exceptional circumstances” exist at the Borough wide level to release land from the Green Belt for development purposes and explores opportunities to reduce any impacts to the lowest practical extent.

EBNF submits that within the Neighbourhood Plan area, the loss of 27 hectares of Green Belt is a significant impact and disproportionate. This is one third of the loss within South Tyneside for the IAMP project (63ha) and one quarter of the total loss proposed in the Draft Local Plan. The Council has published no evidence to justify this disproportionate distribution of the proposed Green Belt deletion.

The Green Belt in East Boldon Neighbourhood Forum Plan area

The Green Belt surrounding East Boldon has been established since 1968 and was last amended in 1985.

This resulted in the release of land at North Farm to the north of the village for 300 homes. The subsequent car ownership growth has seen this development make a major impact on the village.

National Planning Policy and Practice Guidance on Testing Exceptional Circumstances

Paragraph 137 of the NPPF states that “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

In response to a) EBNF consider that South Tyneside Council has not provided robust evidence that demonstrates they have maximised the use of suitable brownfield sites and underutilised land in the borough:

- The total number of homes allocated on brownfield land (1,962 (36%)) is significantly lower than the total number of homes allocated on greenfield land (3,104 (57%)).

South Tyneside Pre-Publication Local Plan Allocation Supply		
Total No. Homes	5,425	
Homes in Green Belt	2,644	48%
Greenfield	3,104	57%
Brownfield	1,962	36%
Mixed Use	359	7%

- The brownfield register on the Councils website was last updated in 2016. The register should provide an up-to-date list of suitable sites on brownfield land suitable for housing development and updated every year. The NPPF at paragraph 119 requires Councils to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. The Council has not set out what methods the Council are using to facilitate the delivery of brownfield sites.
- 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. The Council has not reviewed the oversupply of specialist employment sites for port/river related uses or considered re-allocating this land for alternative uses to meet identified needs and reduce development in the Green Belt.

In response to b) the NPPF at paragraph 123 states that “Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”

EBNF consider that there are inconsistencies in the housing densities set out in the Strategic Housing Land Availability Assessment and the Draft Local Plan. Based on the information in the Draft Local Plan it appears that some of the densities for the allocated housing sites are below those set out in the Draft Local Plan Policy H5. EBNF therefore request that the Council provide details of their analysis for establishing the density of all of the housing allocations in the Local Plan ensuring they are in accordance with Policy H5.

Paragraph 136 of the NPPF states “where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

EBNF, through evidence compiled for its emerging Neighbourhood Plan contends that the case for exceptional circumstances changing the Green Belt boundaries within the East Boldon Neighbourhood Plan area has not been demonstrated.

Learning the Lessons from Elsewhere

This section suggest that based on the limited examples given, that if the Council doesn't propose to delete areas of Green Belt then the plan will be unsound. The examples provided all refer to plans that were prepared under the previous version of the NPPF. The current NPPF provides greater guidance on exceptional circumstances. Paragraph 137 of the NPPF, in particular, provides a lot more guidance on matters that need to be considered by the Local Planning Authority, which weren't included in the original NPPF.

Do Exceptional Circumstances Exist in South Tyneside?

The sub-section entitled "the degree to which the borough can accommodate future growth" does not appear to reach any sort of conclusion. It asserts that the Green Belt represents a major constraint on future development.

However it does not consider other constraints to development such as infrastructure provision which is a major barrier to growth and matters such as flood risk.

The sub-section entitled "Determining the scale of Need" describes the Need for Homes based on the new standard method, this method uses 2014 based information. The Office for National Statistics has produced more up to date information which has not been used to date. This information when published and applied to South Tyneside showed a reduced the housing need to a level which would have meant that sites from within the Green Belt would not been required. It is likely that even more up to date information will be available next year based on 2018 data. The Council should consider this situation carefully before considering any deletions of sites from the Green Belt.

The sub-section entitled "The Supply of Land for Homes from Non Green Belt Sources" refers to the Council's Strategic Housing Land Availability Assessment (SHLAA). The assessment concludes that there is an optimal urban potential of 4,556 homes which is only 380 short of the residual need the Plan needs to provide for. However it goes on discount 65 sites that could deliver 1,500 homes for a range of factors.

EBNF considers that the Council should undertake a detailed assessment of all of these sites before considering any sites within the Green Belt.

The Nature and Extent of Harm Caused to the Green Belt

The Council uses a methodology to consider the nature and extent of harm to the Green Belt in its Stage Two Green Belt Review. This suggests that two of the sites within the Neighbourhood Plan area perform moderately and one performs relatively strongly in their contribution to the Green Belt.

EBNF contests that all three sites perform very strongly in their contribution to our Green Belt. Our community considers the Green Belt has high value. One of the fields included in site H3.59, Land at North Farm, has been re-wilded over the last 20 years and provides an important wildlife habitat and corridor.

In terms of the site at North Farm (H3.59), EBNF contests that the site has a vital role in retaining the gap, in terms of distance between Boldon and South Shields. The development of the other two sites will impact on the distinctiveness of our village. The Tyne and Wear Green Belt Local Plan identified two main aims of its policies, firstly to prevent the merging of South Tyneside and Sunderland and second to maintain the separate character of the settlements which lie between ie West and East Boldon.

The Stage Three Green Belt Review assessed each of the sites proposed for allocation against exceptional circumstances tests. This includes the acuteness / intensity of the objectively assessed need.

However EBNF believes this need is not as acute as the Draft Local Plan states, as the East Boldon Housing Needs Assessment (2019), carried out by objectively independent technical advisors, AECOM, appointed through the government's neighbourhood planning technical support programme stated that 240 homes in the Neighbourhood Plan Area would meet housing needs, not 950 homes as proposed in the Draft Local Plan.

A second test is of the inherent constraints on supply/availability of land prima facie suitable for sustainable development. EBNF considers that building on Green Belt land is not sustainable, especially at times of a Climate Emergency. The infrastructure in East Boldon, already under strain, will be put under much greater strain if the development of these sites goes ahead.

EBNF also notes that in July 2019, the Planning Practice Guidance on Green Belts introduced proposed compensatory improvements to offset the removal of land from a Green Belt. These are listed at Paragraph 3.6 of the Stage One Review document. They include new or enhanced green infrastructure, woodland planting, landscape and visual enhancements, improvements to biodiversity, habitat connectivity and natural capital, new and enhanced walking and cycling routes and improved access to new , enhanced or existing recreational and playing field provision.

EBNF considers that the Council has not provided such compensatory improvements in the Draft Local Plan. It simply states in Policy H3 that applicants should have strong regard to the key considerations listed against each allocation.

Conclusion

EBNF considers that the exceptional circumstances case has not been made in relation to the proposed sites within the Neighbourhood Plan area.