

South Tyneside

Pre-Publication Draft Local Plan Consultation

Council Responses to Representations Received

(March 2021)



South Tyneside Council

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 1: The Local Plan

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 1 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 1: The Local Plan received 59 comments of which 23 were objections, 8 were in support and 28 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 1: The Local Plan – breakdown of representations				
Theme	Number of comments			
	Total	Comment	Support	Objection
Representations on Local Plan consultation	14	0	0	14
Representations from Statutory Bodies and Neighbouring Authorities	6	3	3	0
Evidence Base	3	0	2	1
Miscellaneous	50	19	4	7

Summary of key issues raised in consultation comments by Theme:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Representations on Local Plan consultation	• Length and timing of consultation • Communication of consultation • Location and notification of drop-in events
Representations from Statutory Bodies and Neighbouring Authorities	• Representations received from Neighbouring Authorities • Representations received from Statutory Bodies
Evidence Base	• Representations made towards evidence base documents
Miscellaneous	• Representations on plan preparation and new sites submitted through the consultation. • Accessibility • General representations to the Local Plan and Sites • Next Steps in preparing a Local Plan

Theme: Representations on Local Plan consultation

Length and timing of the consultation

Comments were received criticising the fact that the consultation commenced during the school summer holidays when people are likely to be on holiday. For this reason, the consultation period should have been extended to allow more time for people to respond.

Council Response

Whilst this was not a formal stage in the process, we exceeded the minimum consultation length required by the Town and Country Planning (Local Planning) (England) Regulations 2012 which is for “no less than 6 weeks”. The Regulations do not require the granting of additional time for holiday periods. It remains the discretion of the Local Planning Authority and we took the decision to consult for 8 weeks as is common practice who consult at the Regulation 18 stage of the Plan over any holiday period.

Insufficient communication regarding the consultation

Comments criticised the perceived lack of communication regarding the consultation. Comparisons were made with 2016 Strategic Land Review Consultation when the Council sent out leaflets to every household in the Borough. Respondents noted that they hadn’t seen notices in their local area regarding drop in events or had heard about the consultation via word of mouth rather than directly from the Council. A concern was also raised regarding the perceived lack of diversity in the pictures used through the Local Plan document.

Council Response

Notification of the consultation was sent to over 600 individuals and organisations on our consultee database. We also distributed posters to libraries and notice boards around the Borough at the start of the consultation, followed by the distribution of more posters and more drop-in event dates were added. The Council also posted several notifications of the consultation on our social media channels. Comments regarding diversity noted.

Next Steps

The Council will continue to ensure Local Plan consultations are consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 as well as the Council’s Statement of Community Involvement.

Location and notification of drop-in events

Representations were received criticising the location as well as the perceived lack of communication or short notice given ahead of the drop-in events.

Council Response

The Council strived to hold drop-in events at as many locations in the Borough as possible. The events were, of course, reliant on availability of suitable venues. The Council added additional drop-in dates on top of the 11 dates scheduled at the start of the consultation. The Council deliberately did not schedule any events within the first two weeks of the consultation to give people time to review the Plan ahead of the drop-in events.

Next Steps

The Council will continue to ensure Local Plan consultations are consistent with the Town and Country Planning (Local Planning) (England) Regulations 2012 as well as the Council’s Statement of Community Involvement.

Theme: Representations from statutory bodies and neighbouring local authorities

Representations received from statutory bodies and neighbouring local authorities

The Council received representations from our neighbouring Local Authorities. These representations were in general support of the draft Local Plan and recognised the Duty to Co-operate. General representations were also received from statutory bodies.

Council Response and Next Steps

The Council welcomes support received for the draft Local Plan and will continue to work closely with neighbouring authorities on cross boundary issues and statutory bodies where necessary. Specific policy related comments from neighbouring authorities and statutory bodies have been addressed within the Council responses for those policies.

Theme: Evidence Base

Representations made towards evidence base documents

A number of representations were made towards evidence base documents supporting the draft Local Plan. These included:

- Sustainability Appraisal
- Habitat Regulations Assessment
- Playing Pitch Strategy
- Strategic Housing Market Assessment
- Site Allocations Topic Paper

Council Response

For detailed responses to comments received towards the Sustainability Appraisal and Habitat Regulations Assessment, please refer to the Consultation Summary and Response Paper: Sustainability Appraisal and Habitat Regulations Assessment.

Regarding comments and support received for the recommendations within the Playing Pitch Strategy, the Council notes the response and welcomes support for the document.

Regarding comments on the Strategic Housing Market Assessment and Site Allocations Topic Paper, please refer to the Councils Responses in Chapter 5: Planning for Homes.

Next Steps

None required.

Theme: Miscellaneous

Representations on plan preparation and new sites submitted through the consultation

The Council received general comments on plan preparation. Submissions were also received suggesting new sites for consideration as allocations for housing development and recreational purposes within the draft Local Plan.

Council Response

New sites submitted through the consultation for housing development are detailed in the Councils responses for Chapter 5: Planning for Homes. Sites submitted for other purposes will be considered through the plan preparation process. Specific policy related comments have been addressed within the Council responses for those policies.

Next Steps

None required.

Accessibility

The Council received comments criticising the lack of emphasis on accessibility within the Local Plan and the lack of consideration to meeting the needs of different groups in policy formulation, a

requirement under the Public Sector Equality Duty. The comment also states that the Equality Impact Assessment for the Emerging Local Plan is not publicly available.

Council Response

The council is aware of the need to ensure that the Local Plan and the outcomes of the plan are accessible and beneficial to all members of the community. A Sustainability Appraisal has been produced to support the development of the Local Plan, the Sustainability Appraisal framework has been designed to incorporate an Equality Impact Assessment and Health Impact Assessment. Objective 11 of the Sustainability Appraisal is 'Promote equality of opportunity and access and promote good relations between diverse communities', to support this there are a number of sustainability questions, including 'Will it impact upon people who share a protected characteristic identified in the Equality Act 2010?'. Each policy within the draft Local Plan has been subject to a Sustainability Appraisal assessment and therefore assessed to identify whether there would be any impacts on the identified characteristics of the Equality Act. The Sustainability Appraisal also includes a summary of the impacts on Health and Equality in Section 12 of the Sustainability Appraisal.

Next Steps

None required.

General representations to the Local Plan and Sites

The Council received a number of objections and comments to the Local Plan and specific sites from residents.

Council Response

The Council welcomes responses made to the Local Plan consultation. Objections to the Local Plan are noted by the Council. Council responses to specific issues can be found in the relevant chapter documents.

Next Steps

None required.

Next Steps in preparing a Local Plan

The Council received a representation querying the next steps of the Plan preparation process.

Council Response

Preparing a Local Plan involves several stages which must be undertaken before the Plan is adopted by the Council. The consultation stage which has taken place on the draft Plan is known as Regulation-18. This stage includes the consultation on draft policies and available evidence. The proposals set out in the Plan at this stage will become more fixed as the Plan moves through the process to the Publication stage.

The next stage is Regulation 19 when the Council produces a Publication draft Local Plan. At this stage another formal consultation will take place and there will be further opportunity to comment on the Local Plan.

Following Regulation 19, the Local Plan is submitted to the Planning Inspectorate in preparation of the Examination in Public. An Inspector from the Planning Inspectorate will lead an assessment on the soundness of the Plan and make recommendations. If the Plan is found to be 'sound' by the Inspector, the Local Plan can then be adopted by the Local Authority and will become the development plan for the Borough.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 3: Spatial Vision and Strategic Objectives

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 3 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 3: Spatial Vision and Strategic Objectives received 31 comments of which 4 were objections, 4 were comments and 23 were in support.

Table 1. Chapter 3: Spatial Vision and Strategic Objectives– breakdown of representations				
Theme	Number of comments			
	Total	Comment	Support	Objection
Representations on the Spatial Vision	13	3	9	1
Representations on the Strategic Objectives	18	1	14	3

Summary of key issues raised in consultation comments:

The below table provides a summary of comments and issues raised:

Table 2. Summary of comments received	
Spatial Vision	• Support/wording considerations • Objection to release of Green Belt
Strategic Objectives	• Contrary to National Policy • Climate Change

Theme: Spatial Vision

Spatial Vision: Council Response and Next Steps

Support/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the National Planning Policy Framework.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Objection to the release of Green Belt

The Council received an objection to the statement that the Green Belt will continue to protect the unique identity of the Borough, pointing to the fact that the Council intends to release land from the Green Belt elsewhere in the Plan.

Council Response

It is acknowledged that there is an unavoidable loss of openness with the release of any land from the Green Belt for development. However, the remaining Green Belt will continue to contribute towards the five purposes including 'to assist in safeguarding the countryside from encroachment'.

Next Steps

None required.

Theme Strategic Objectives

Strategic Objectives: Council Response and Next Steps

Contrary to National Policy

A number of expressions of support of the Council's Strategic Objectives were received. However, several objections were received stating that this part of the Plan is contrary to National Policy. The objectives are interlinked and should not be split into themes.

The Council also received an objection stating that the Local Plan would fail to deliver the Council's Strategic Objectives.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Climate Change

The Council received an objection to Objective 3.3 vii, particularly regarding the loss of trees.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

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Chapter 4: Delivering the Strategy

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 4 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 4: Delivering the strategy received 3850 comments of which 3702 were objections to policies, 99 were in support and 49 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 11: Planning for our Natural Environment – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy S1: Spatial Strategy (Strategic Policy)	3623	32	31	3560
Policy S2: Strategic Development Principles (Strategic Policy)	39	4	3	32
Policy S3: Promoting health and wellbeing in South Tyneside (Strategic Policy)	22	3	5	14
Policy S4: Presumption in favour of Sustainable Development (Strategic Policy)	39	9	3	27
Policy S5: Re-use of Previously Developed Land (Strategic Policy)	76	5	54	17
Policy S6: Appropriate Development within the Green Belt (Strategic Policy)	42	4	1	37
Policy S7: Extensions and Alterations to and Replacement of Buildings in the Green Belt (Strategic Policy)	4	1	1	2
Policy S8: Policy S8: Replacement of Buildings in the Green Belt (Strategic Policy)	5	2	1	2

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy S1: Spatial Strategy (Strategic Policy)	• Criticism of Spatial Strategy • Exceptional Circumstances has not been demonstrated • Use of 2014 household projection data • Local Highway Infrastructure • Air quality and pollution • Loss of agricultural land • The distribution of housing • The character and distinctiveness of the

	villages • Coalescence between settlements • Loss of biodiversity and wildlife habitat • School Places • Health Care Provision • Health and Wellbeing • Sewerage and Drainage Capacity • Flooding • Sustainable Urban Drainage Systems • Economic Growth outside of South Shields Town Centre • Land reserved for tourism, guest houses and hotels • Empty properties • The supply of brownfield sites • The Brownfield Register • The enduring permanence of the Green Belt • Climate Change • South Tyneside Council Climate Change emergency declaration • Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits • Loss of Green Belt and effects on Climate Change • Impacts of development on trees and hedgerows • Amendments/ wording considerations /support for the policy
Policy S2: Strategic Development Principles (Strategic Policy)	• Criticism of evidence used to support policy • Mapping Issues • Climate Change • Policy S2 does not address the impacts of development • Amendments/ wording considerations /support for the policy
Policy S3: Promoting health and wellbeing in South Tyneside (Strategic Policy)	• No identification of new sporting provision or facilities. • Objection to Green Belt development which would be contrary to Policy S3. • Policy S3 does not mitigate Climate Change. • Policy S3 is contrary to Policy NE9. • Policy S3 is vague and unsound • Amendments/ wording considerations /support for the policy
Policy S4: Presumption in favour of Sustainable Development (Strategic Policy)	• Not positively prepared • Not consistent with the National Planning Policy Framework • Climate Change • The Status of Neighbourhood Plans

	• Policy S2 does not address the impacts of development • Amendments/ wording considerations /support for the policy
Policy S5: Re-use of Previously Developed Land (Strategic Policy)	• Development of brownfield land should be prioritised • Policy should not limit sustainable greenfield development • Cleadon Lane Industrial Estate • Amendments/ wording considerations /support for the policy
Policy S6: Appropriate Development within the Green Belt (Strategic Policy)	• Green Belt release • Failure to comply with the National Planning Policy Framework • Amendments/ wording considerations /support for the policy
Policy S7: Extensions and Alterations to and Replacement of Buildings in the Green Belt (Strategic Policy)	• Wording considerations • Failure to comply with the National Planning Policy Framework
Policy S8: Policy S8: Replacement of Buildings in the Green Belt (Strategic Policy)	• Too prescriptive • Wording considerations

Policy S1: Spatial Strategy (Strategic Policy)

Policy S1: Council response and next steps

Criticism of Spatial Strategy

The council received representations which critiqued the spatial strategy underpinning Policy S1 and is set out in the Interim Sustainability Appraisal (2019). The main comments are:

- The Council's Interim Sustainability Appraisal methodology for the spatial strategy is procedurally flawed.
- Highways assessments and other mitigation proposals were not taken into account at spatial options stage.
- Criticism of SHLAA in assessment of a large Green Belt release i.e. site consider in smaller parcels and not as one site.
- Support for the Council's approach in identifying the most appropriate location to accommodate a larger scale development.
- The Council has not assessed all reasonable Spatial Options, notably a Spatial Option which focuses on a large-scale Green Belt release site alongside other smaller Green Belt releases or a large sale Green Belt release which goes beyond the housing need of the Local Plan.

Council Response

The Council does not support the assertion that the Sustainability Appraisal methodology is materially flawed. It welcomes the comments set out in the representations with regard to Spatial Options 1 and 2; however, the council believes that the approach to assessing Options 3 & 4 are justified at this stage. The reasons for selecting the preferred option for the spatial distribution of housing growth are summarised in Table 7.4. The findings of the appraisal work have been drawn on

to justify the selection of the preferred option (Option 4 - Sustainable Urban Area Growth and smaller multiple Green Belt releases) and the justification given for the approach selected is considered to be reasonable.

The Council acknowledges that there is a lack of evidence to support some of the SA conclusions for the spatial options, for example detailed highways assessment work that could mitigate effects, and that the appraisal is based on assumptions about scale of development and scale of effects. At the time the Interim SA for the Local Plan was undertaken, the highway modelling work was ongoing and subject to change. Furthermore, representations state that the SA has not considered the potential mitigation that would be delivered alongside the developments. The council acknowledges that the representation is supported by the developers own assessments; however, detailed site-level mitigation proposals can reasonably be left out of the SA at the Regulation 18 stage when appraising reasonable alternative site options on a consistent basis (i.e. before sites are selected for inclusion in the draft plan), as the same level of detail is not available for all site options. There is a requirement for the SA to be undertaken in a proportionate manner, and it is considered to be a reasonable approach for the appraisal of high level 'in principle' spatial options to be undertaken in a similarly high-level manner. The Council considers that the approach taken at this stage is reasonable.

With regard to the assessment of the 'Laverick Park' site within the SHLAA; the 13 sites identified within the wider site area, have been identified through the SHLAA and SLR. However, the council acknowledges that this approach has not provided a site-specific assessment of the wider Laverick Park site in the same manner as other reasonable options. This will be reviewed at the next stage of the draft Local Plan.

The council acknowledges the comments that a reasonable option which considered a large-scale Green Belt release alongside smaller Green Belt releases was not considered in the Regulation 18 SA. The Council has considered the option of a larger-scale Green Belt release alongside sustainable urban area growth (Option 3) which would continue to prioritise the development of smaller brownfield sites over the identification of alternative smaller Green Belt sites, which would limit impacts on the Green Belt.

With regard to assessing a reasonable option which goes beyond the housing need of the Local Plan; as stated in Section 6, para 6.6 – 6.14 of the SA, the Council does not consider that there are any exceptional circumstances which would support a level of growth above that of the standard methodology; and therefore does not consider an option which goes beyond Local Plan housing numbers to be a reasonable option for South Tyneside.

Next Steps

The Council will undertake a review of the reasonable spatial options to inform the next iteration of the Local Plan and Sustainability Appraisal. The next iteration will also be informed by the most up to date evidence and fully consider all site reasonable options. Policy S1 will subsequently be informed by this review.

Exceptional Circumstances

The Council received a significant number of objections based on the view that exceptional circumstances has not been demonstrated for amending Green Belt boundaries in order to address the development needs of the Borough.

Council Response

The Stage One Green Belt Review evidences whether the approach to Green Belt in the preparation of our emerging Local Plan has been appropriate, if “exceptional circumstances” exist at the Borough wide level to release land from the Green Belt for development purposes. If those circumstances exist, it explores opportunities to reduce any potential impacts on the Green Belt to the lowest practical extent. The Stage One Green Belt Review does not however, consider the Green Belt and exceptional circumstances at a site-specific level. These have been addressed through the Stage Two Green Belt Review: Site Assessments (July 2019) and the Stage Three Green Belt Review: Site Specific Exceptional Circumstances (August 2019).

The focus for the Stage One Review is in relation to the provision of new homes and jobs given that new objectively assessed development needs have been identified for these specific matters. The Stage One Review is clear that meeting the development needs for new homes and jobs constitute sufficiently exceptional circumstances to justify the release of land from the current extent of the Green Belt.

In summary, despite a thorough analysis as required by the National Planning Policy Framework, there remains an acute need for land to meet the needs for new homes and jobs. This is affected by the inherent constraints on the supply from all reasonable non-Green Belt sources to meet those minimum requirements. For housing needs in particular, the scale of under provision from non-Green Belt sources is significant and is not one that could be readily rectified.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Use of 2014 household projection data

The Council received a significant number of objections to the policy based on the grounds that the calculation used to derive the housing requirement applies the 2014-based rather than the 2016-based ONS Household Projections.

Council Response

Drawing on the 2016-Based Household projections has been debated and discounted at a national level. The Government’s Planning Practice Guidance (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>) at Paragraph: 005 Reference ID: 2a-005-20190220 confirms that The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes. Furthermore, Paragraph: 015 Reference ID: 2a-015-20190220 confirms that “Any method which relies on using the 2016-based household projections will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”

Next Steps

None required

Local Highway Infrastructure

The Council received a significant number of objections to the policy stating that the capacity of the local highway network is not adequate for the development proposed in the villages. The key concerns include:

- Traffic congestion
- The capacity of the A184
- The capacity of the A183
- Pollution
- No up to date traffic assessment

Council Response

At the time the Pre-Publication Draft Local Plan was published, highway modelling work was ongoing and subject to change but interim findings provided the basis for an indicative assessment of the potential impacts of the draft housing allocations on the strategic highway and local transport network and this was published in the Infrastructure Delivery Plan (2019).

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan. Updated highway modelling will be published when the next iteration of the Local Plan is published.

Air Quality and Pollution

The Council received a significant number of objections to the policy based on the view that the development proposed in the villages would have an unacceptable impact on air quality and/or pollution.

Council Response

Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required, and proposals will only be approved where satisfactory mitigation measures can be implemented. In line with the National Planning Policy Framework, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity. Both policies specify that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Loss of Agricultural Land

The Council received a significant number of objections relating to the loss of agricultural land as a result of development allocations.

Council Response

The effects on soils is a key consideration within the sustainability appraisal of environmental effects. The draft Local Plan is supported by a Sustainability Appraisal which considered the site-specific effects for each site.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The distribution of housing

A number of representations have questioned the proportionality of the distribution of housing in the Pre-Publication Draft Local Plan (August 2019), often with particular reference to the number of homes distributed to the villages.

Council Response

The justification of the Spatial Strategy adopted in the Local Plan is set out in the Sustainability Appraisal. An approach to the distribution of housing based purely on being proportionate to the existing level of population would not be deliverable. This is because the supply of Strategic Housing Land Availability Assessment (SHLAA) sites that are deliverable and developable does not neatly align with the distribution of population.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The character and distinctiveness of the villages

The Council received a significant number of objections to the policy based on the view that supporting growth which respects the distinctive character of each village is not realistic.

Council Response

It is acknowledged that it is important that the separate identities of the villages are preserved and that there will be harm to the Green Belt arising from achieving the sustainable development proposed in the Pre-Publication Draft Local Plan (August 2019). There are clear opportunities to minimise the harm at a site-specific level through the careful selection of sites together with the appropriate mitigation measures such as appropriate densities, the provision of open space at the edge of settlements and use of landscaping and buffers.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Coalescence between settlements

The Council received a significant number of objections based on the view that the alteration of Green Belt boundaries, particularly in relation to Cleadon, the Boldons and Whitburn, would result in settlements merging.

Council Response

The Stage Two Green Belt Review: Site Assessments (July 2019) provides an objective independent assessment of how the Green Belt contributes to the five purposes based on a defined methodology

which has been consistently applied. The method is based on a review of national policy, guidance and good practice. It is acknowledged that the Spatial Strategy requires deletions from the Green Belt but we have sought to minimise impacts as far as possible through mitigation opportunities identified in plan policies. However remaining Green Belt will continue to contribute towards the five purposes of Green Belt including ‘to prevent neighbouring towns from merging into one another’.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Loss of biodiversity and wildlife habitat

The Council received a significant number of objections on the basis that the proposed alteration to Green Belt boundaries in order to accommodate housing development, particularly around Cleadon, the Boldons and Whitburn, would result in an unacceptable loss of biodiversity and wildlife habitat.

Council Response

The governments Planning Practice Guidance: Green Belt (Paragraph: 002 Reference ID: 64-002-20190722) requires local authorities where Green Belt boundaries are to be amended to ‘set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt’. These improvements could include new and enhanced green infrastructure, woodland planting, new and enhanced cycle routes and habitat improvements. It is considered that these compensatory measures would also play an important role in mitigating the effects of climate change. Draft Plan policies NE1, NE3, NE4, NE6, H3 and S2 provide support for the provision of these compensatory measures.

In accordance with section 180(5) of the Planning Act 2008, all development plan documents have been subject to a sustainability appraisal (SA) throughout their production in order to ensure that new plans and strategies contribute towards sustainable development. The SA process outlines the sustainability credentials of each site including potential impacts on biodiversity, wildlife and the natural environment to highlight any issues which are likely to require mitigation. In addition, a Habitat Regulations Assessment (HRA) has been undertaken to ensure that the effects of growth delivered through the plan are identified and appropriately mitigated. Further information can be found in the South Tyneside Site Selection Topic Paper (2019).

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

School Places

The Council received a significant number of objections based on the view that housing development in the villages would result in unsustainable pressure on school places.

Council Response

The Spatial Planning team are working with the School Places Planning Managers to ensure that the need for additional school places arising from all the housing allocations in the Local Plan will be met.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Health Care Provision

The Council received a significant number of objections based on the view that housing development in the villages would result in unsustainable pressure on health care provision.

Council Response

The Spatial Planning team are liaising with the Council's Public Health team and the South Tyneside Clinical Commissioning group to ensure that they have as much information as possible in order to forward plan to meet the health care provision requirements arising from all the housing allocations in the Local Plan.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Health and Wellbeing

The Council received a significant number of objections based on the view that the alterations to Green Belt boundaries around the villages in order to accommodate housing development would impact negatively on the health and wellbeing of residents.

Council Response

It is acknowledged that the loss of Green Belt land is the loss of a resource that alongside other benefits can contribute towards health and well-being. Green Belt land is valued very highly. However, this must be balanced with the necessity of releasing Green Belt land in order to meet the housing needs of the Borough.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Sewerage and Drainage Capacity

The Council received a significant number of objections to the policy based on the view that housing development in the villages would result in unsustainable pressure on sewerage capacity. Key points made by respondents include:

- The sewage system cannot cope with the volumes at the moment with sewage being pumped out to sea at Whitburn at regular intervals
- An independent assessment should be made of the network
- The sewage system in Cleadon would need to be renewed

Council Response

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for

organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

To summarise and to be clear, Northumbrian Water holds an Appointment under the Water Act 1989 as a water and sewerage undertaker. South Tyneside Council does not have any legislative remit whatsoever to act as a surrogate for Northumbrian Water in its statutory role. In respect of the emerging Local Plan, Northumbrian Water has advised that the development proposed in the emerging Local Plan do not present any critical capacity issues and that any investment necessary in water and sewerage capacity will be undertaken when required to do so.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Flooding

The Council received a significant number of objections to the policy based on the view that housing development in the villages, particularly Cleadon, would be at an unacceptable risk from flooding.

Council Response

Currently surface water is falling on undeveloped land which is of high clay content in much of South Tyneside. This is largely an impermeable soil type; therefore, the infiltration rates are very low, which is the main contributor to the amount of surface water on these fields. In addition, there is no means of managing the surface water therefore the rainfall does not have anywhere to go – and will build each time it rains. The low infiltration means water can often sit on these areas for long periods of time.

Any development will help manage the surface water by conveying it to an installed drainage system. Any drainage system will allow for current rainfall events as well as planning for future climate change (40%) and any additional rainfall this may bring. This includes the use of sustainable drainage systems such as storage basins, permeable paving, upsized pipes and underground storage crates. All drainage systems are designed and approved by the department before installation through planning conditions. There is also a request for validation reports post installation to ensure that the drainage system has been installed according to the approved designs. It has been found

that development can prevent future flooding as all the water is managed appropriately whereas it may not be in open fields.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Sustainable Urban Drainage Systems

The Council received an extensive objection the policy that referenced Sustainable Urban Drainage Systems (SuDS). The objection included 'This policy does nothing to conserve or enhance biodiversity, SuDS policies put forward does nothing to enhance natural environment ... SuDS also costly and needs to be maintained, this often does not happen after developer has completed site. I understand the runoff on all sites is to river `Don however SuDS is not designed to prevent river flooding at these sites... This suggests developers are not committed to the principles of SuDS and unwilling to deliver more than just drainage'.

Council Response

The maintenance of SuDS is managed through the planning system to secure the long-term maintenance of the SuDS It is the case that SuDS are not intended to prevent river flooding, they address surface water flooding. However, they can help reduce run off from a site as without SuDS, a site may run off directly to the watercourse uncontrolled. SuDS are required for any major development and South Tyneside work closely with developers through the planning process. There are a range of sustainable drainage techniques available and we will work with the developer to ensure that the right solution is agreed for each development, so they are both compliant and viable.

Flood risk is considered as part of developments and, in the case of any development in the vicinity of the River Don, would be managed. with the installation of SuDS offering storage and treatment before entering the Don to ensure that flood risk is not passed on downstream along with any contamination of the watercourse.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Economic Growth outside of South Shields Town Centre

The Council received a representation stating that Policy S1 does not support economic growth outside of South Shields Town Centre.

Council Response

Policy S1 supports economic development on existing viable and marketable employment areas that are accessible by a range of transport modes and take advantage of the road, rail and River Tyne networks. It also provides for a new allocation at Wardley Colliery. Further it states that we will direct proposals that contribute to our tourist and cultural economy to the Main Urban Area, along the River Tyne Corridor and the Foreshore. This provides an enabling spatial planning framework to meet the economic needs of the Borough.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Land reserved for tourism, guest houses and hotels

The Council received representations that stated that land has been reserved for tourism and building of more guest houses and hotels that could be better utilised to build houses. For example, 'However this land has been reserved for tourism and building of more hotels and guest houses which are not needed as South Shields only aspires to be a tourist destination. Far better to build houses that will be occupied than hotels and guest houses and hotels which will stand empty, particularly when Green Belt land is at stake. This land in South Shields needs to be prioritised for housing rather than Green Belt sites allocated in this plan'.

Council Response

The purpose of the planning system is to balance different development needs. The promotion of tourism and meeting the housing needs of the Borough are both embodied within Policy S1. A representation has referred to land 'being reserved for tourism and building of more hotels and guest houses' within the central area and contends that this is contributing to the need to release Green Belt land for housing development. Whilst the policy does state that we will direct proposals that contribute to our tourist and cultural economy to the Main Urban Area, no land has been reserved for this purpose and no conflict is recognised regarding meeting housing needs.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Empty Properties

The Council received a significant number of objections to the policy based on the view that the empty properties in the Borough could be utilised to make a more substantive contribution to addressing the housing requirement, thereby removing or reducing the need to alter Green Belt boundaries in order to accommodate development needs.

Council Response

The homes included in the statistics for empty homes can include properties whose former residents have been decanted as they await demolition i.e. are not available for re-use, it is a normal and healthy feature of a housing market to have a certain percentage of empty homes owing to churn in the housing market, really long-term empty homes are traditionally low in South Tyneside and the reason that many empty homes are empty is that they are in areas of very low housing market demand and also are often flat accommodation and therefore unlikely to meet the primary need which is for family housing. In addition, the Government's Planning Practice Guidance states that 'to be included as a contribution to completions it would be necessary for the authority to ensure that empty homes had not already been counted as part of the existing dwelling stock'. Due to resource constraints the authority no longer has an Empty Homes Team. Some empty homes were brought back into use when more resources to do so were available to the authority. However, the numbers were very modest and it is not possible to ensure that they had not already been counted as part of the existing dwelling stock. For these reasons it is not considered feasible to plan for the meeting of housing need based on bringing empty homes back into use.

Next Steps

The Council will continue to review opportunities to bring empty properties back into use and continue working with landlords to ascertain why properties are empty.

The supply of brownfield sites

The Council received a significant number of objections to the policy based on the view that proposing to change the designation of land from Green Belt to housing is unnecessary because there is an adequate supply of brownfield sites to address the housing requirement.

Council Response

The supply of deliverable brownfield housing sites is not enough to achieve a five year supply of deliverable housing sites at the outset of the plan period. Therefore, the release of some Green Belt land early in the plan period is necessary in order to achieve a five-year supply of deliverable housing sites. The South Tyneside Council Green Belt Review: Stage One, provides a full commentary on why the total amount of deliverable and developable housing land from non-Green Belt sources including urban brownfield land is not enough to meet the Borough's total housing need. Regarding the reference to omitting '194 out of 226 brownfield sites as unsuitable without robust, up to date assessment', the Strategic Housing Land Availability Assessment (2019) reviewed 213 brownfield sites (excluding 13 completed sites) of which 142 were assessed as not deliverable or developable. Please see the Council responses to the Sustainability Appraisal and Habitat Regulations Assessment representations for further information on this issue.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The Brownfield Register

The Council received objections relating to the fact that at the time of the consultation on the Pre-Publication Draft Local Plan, the Brownfield Register had not been updated since 2016.

Council Response

Regarding the reference to the Brownfield Register, our efforts focussed on updating both our Employment Land Review (2019) and the Strategic Housing Land Availability Assessment (2019). These datasets clearly distinguish between brownfield and greenfield sites but are far more comprehensive than the existing Brownfield Register in terms of the wider range of up to date information regarding the potential land supply. So in our assessments of land supply, we have worked from a more robust baseline. For completeness, the Register will be updated prior to the preparation of the next iteration of the Local Plan.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

The enduring permanence of the Green Belt

The Council received representations from developers and agents stating that, with reference to paragraph 139 of the National Planning Policy Framework, the spatial strategy should consider deliverability beyond the plan period and consider additional allocations or safeguarding land for housing which will help address the current housing need and ensure permanence of Green Belt boundaries beyond the plan period.

Council Response

The Council is aware of the provision for Safeguarded Land contained within the National Planning Policy Framework and the circumstances in which it may be necessary.

Next Steps

The Council will review Policy S1 when preparing the next iteration of the Local Plan.

Climate Change

The Council received a significant number of objections to the policy based upon the issue of Climate Change. Objections on this topic can be categorised into three main issues which are summarised below. The Council will provide a response to each of these points:

- South Tyneside Council Climate Change emergency declaration;
- Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits;
- Loss of Green Belt and effects on climate change.

South Tyneside Council Climate Change emergency declaration

Representations were received which objected to or referenced the South Tyneside Climate Change Emergency Declaration and the absence of the commitments of the declaration within the Local Plan.

Council Response

The Council declared a Climate Emergency on the 18th July 2019. The declaration requires all council strategic decisions, policies and strategies are in line with the shift towards carbon neutral by 2030. On 7 August 2019, the Council's Cabinet considered and approved the Pre-Publication Draft Local Plan for consultation. There were practical constraints associated with updating the draft Local Plan to reflect the declaration and therefore, the Council acknowledges that the draft Local Plan did not reflect the climate change emergency declaration. It is noted that a number of representations quote the actions of the declaration. It should be noted that these actions are for South Tyneside Council as a whole and not to be specifically addressed in Local Plan policies. It is the role of the Local Plan and its policies to assist in delivering the aims of the declaration.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they are in line with the Climate Change Emergency as far as possible.

Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits

Representations were made which object to the Local Plan on the basis that it is non-compliant with national legislation, specifically, the Planning and Compulsory Purchase Act 2004, Climate Change Act 2008 and the National Planning Policy Framework (NPPF). Objections state that the Local Plan has failed to demonstrate how policies will reduce emissions in line with the Climate Change Act 2008. Objections also suggest that the Local Plan is also non-compliant as it does not set carbon emission targets and suggest the Local Plan is required to undertake an emissions/ carbon audit.

Council Response

We, as a planning authority strongly support the global, national and local imperative to mitigate the effects of climate change. We fully agree that addressing climate change is one of the core land use planning principles to be addressed and that this should underpin both plan making and decision taking. With regard to noncompliance with national policy the Council considers that the draft Local Plan policies and supporting documents comply with national legislation and section 149 of the National Planning Policy Framework by including policies which mitigate and adapt to the impacts of climate change. The Council do not agree that it is a legal requirement to include carbon emission targets within the Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 states that ‘Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change’. This section does not provide an express statutory obligation to include carbon reduction targets within Local Plans. The obligation is a much broader one — to “include policies designed to secure that the development and use of land contribute to the mitigation of, and adaption to, climate change”. Furthermore, the National Planning Policy Framework does not include a specific obligation to include a carbon reduction target which tracks national and international obligations in a local development plan. Furthermore, the Local Plan is not required through the NPPF to provide SMART targets. The Local Plan and its policies are subject to monitoring through specific performance indicators as specified in Policy IM1.

Footnote 48 of the NPPF states that local planning authorities should address rising temperatures “in line with the objectives and provisions of the Climate Change Act 2008”, those provisions do not place local planning authorities under a specific obligation in respect of carbon reduction; obligations are placed on the Secretary of State. The objectives of the Climate Change Act 2008 are plainly the reduction of greenhouse gas emissions. However, footnote 48 of the National Planning Policy Framework does not support the proposition that a specific carbon reduction target which tracks national and international obligations must be included in local development plans.

Next Steps

Many of the emerging policies in the draft Plan are “designed to secure that the development and use of land contributes to the mitigation of and adaption to climate change”. Climate Change is a cross cutting theme which is central to the sustainability of the whole Plan itself. To reflect the importance of this, the draft Local Plan will be reviewed to ensure new Climate Change policies and policies contributing to Climate Change adaptation/mitigation are clearly identified within the Local Plan. Supporting documents will also be updated and produced to demonstrate how the council has complied with national Climate Change legislation.

The next stage of the Local Plan will be informed by the most up to date baseline information in regard to Climate Change. Local Plans are supported by a Sustainability Appraisal (SA) which assesses the environmental, social and economic effects of the Local Plan; the SA includes a Scoping Report, which considers the baseline information for the Strategic Environmental Assessment (SEA) objectives which are assessed within the SA. Furthermore, the Council are undertaking a carbon audit of the strategic spatial options and reasonable options for development allocations. The

carbon audit will provide further evidence and consideration in understanding the potential effects of development sites which will contribute to the SA and inform the next iteration of the Local Plan.

Loss of Green Belt and effects on Climate Change

A number of representations argue that the loss of land from the Green Belt would be contradictory to the Local Plans commitment to mitigating and adapting the effects of climate change.

Council Response

It is acknowledged that undeveloped land within the Green Belt can contribute to mitigating the effects of climate change. It is considered that the Council has adopted a sustainable approach to development and through Plan policies seeks to mitigate and adapt to the impacts of climate change. In addition, the governments Planning Practice Guidance: Green Belt (Paragraph: 002 Reference ID: 64-002-20190722) requires local authorities where Green Belt boundaries are to be amended to 'set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt'. These improvements could include new and enhanced green infrastructure, woodland planting, new and enhanced cycle routes and habitat improvements. It is considered that these compensatory measures would also play an important role in mitigating the effects of climate change and in some cases may provide opportunities to enhance the contribution to climate change mitigation.

Next Steps

The Council will continue to review our strategic approach to development to ensure the Local Plan delivers sustainable patterns of development.

Impacts of development on trees and hedgerows

A number of comments raise the issue of trees and hedgerows being felled to facilitate development, despite the policy stating it will protect trees; and also the negative effect of losing vegetation with regard to mitigating Climate Change impacts

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S2: Strategic Development Principles (Strategic Policy)

Policy S2: Council response and next steps

Criticism of evidence used to support policy

Comments were received which stated that the landscape character areas referenced within the policy are based on the South Tyneside Landscape Character Study (2012) and should be supported by a more up to date evidence base.

Council Response

The council believes that the 2012 Landscape Character Study continues to be fit for purpose and a reliable evidence source to support the emerging Local Plan. It is considered that most areas in the Plan have not been subject to development which would significantly change the outcomes of the current report.

Next Steps

None required.

Mapping Issues

The council received comments querying why the landscape character areas were not identified on the Local Plan Proposals Map. Comments were also received querying the status of Green Belt land allocated for development and how that is represented in Inset Map 1: The Three Landscape Areas.

Council Response

The Policies map does not include the settlement boundaries identified in Policy S2. The settlement boundaries are clearly identified on inset Map 1: The Three Landscape Areas. It was considered that the addition of these layers to the Policies Map would reduce the clarity and make it difficult to identify amongst the other designations shown on the map.

Insert Map 1: The Three Landscape Areas identifies sites allocated within the Plan as Main Urban Areas and Villages. Therefore Map 1 correctly identifies areas of Green Belt land which would be deallocated through the Local Plan and have been identified for development within this category. Any development which would come forward on these sites would therefore be assessed against the principles of criterion A of Policy S2, rather than section B, which addressed development within the Green Belt as identified in the emerging Local Plan.

Next Steps

None required.

Climate Change

Representations were made highlighting that Policy S2 does not contribute to tackling Climate Change.

Council Response

It is acknowledged that Policy S2 does not directly address Climate Change, however, some of the principles of the policy could contribute to wider climate change mitigation. Please refer to the Council response to Climate Change issues provided against Policy S1 for further information.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they seek to deliver the aims of the Councils Climate Change Emergency and fulfil its legal requirements in this regard.

Policy S2 does not address the impacts of development

The council received several objections to Policy S2 stating that the policy does not address the impacts of development or provide detail of how impacts are to be mitigated. The main criticisms are set out below:

- Objection to site allocations against principles of Policy NE2
- Policy S2 does not address the conflict between development and the environment
- Policy S2 does not protect the Green Belt or preserve special character of villages
- Development in Green Belt would be harmful to views/ openness
- Policy S2 does not indicate how landscape and open space proposals will be designed or maintained or retain existing landscape features, trees etc
- Policy S2 does not conserve or enhance biodiversity or green infrastructure
- Policy S2 does not protect landscapes from increased risk of surface flooding

Council Response

Policy S2 is a strategic policy which provides development principles for new development within the borough. Policy S2 should be considered alongside other design and development management based policies within the Local Plan.

Policy S2 does not refer to the building of new houses in the borough and does not allocate sites for development. Policy S2 provides high level development principles which are applicable to all forms of development within all areas of South Tyneside. Please refer to the Site Allocations Topic Paper (2019) for further detail on the site.

Policy S2 does not allocate sites within the Green Belt; it provides guidance for developments within the Green Belt where there are very special circumstances. The National Planning Policy Framework and Policy S1 provide further protection to the Green Belt. Policy S2 provides design principles for development in South Tyneside including within the Main Urban Area and Villages; which includes brownfield sites as well as Green Belt allocations where there are very special circumstances. Policy S2 will ensure that new development in and around the villages will positively contribute to the area through the application of policies a) i - vii. Policy S2 b)i) states that development within the Green Belt will only be granted where it will preserve openness.

Policy S2 strongly advocates the enhancement of the natural environment through the retention of high-quality areas of open space, trees and hedgerows and additional woodland and hedgerow planting where appropriate. Any development will be considered alongside other Local Plan

policies, including NE1 and NE2 which protects and enhances our most sensitive sites and the wider ecological networks.

Policy S2 strongly supports the protection and enhancement of Green Infrastructure within new development. The Local Plan seeks to protect our most valuable and sensitive areas whilst providing opportunities to enhance our wider green infrastructure networks. To support the mitigation required by developments, developers will engage with the council to provide contributions towards the maintenance of mitigation measures where appropriate. This is set out in Supplementary Planning Document 5: Planning Obligations and Agreements.

The policy strongly advocates the protection of landscapes within the borough and is informed by The South Tyneside Landscape Character Study (2012). Any application would be assessed on the principles of Policy S2 and alongside Policy NE5: Areas of High Landscape Value which protects our most sensitive landscapes. The installation of SuDS features as a method of surface water management is highlighted as key in the Governments 25 Year Environment Plan. This will be strengthened through new planning guidance as well as improving existing arrangements for the management of surface water flooding and the outcomes delivered by Lead Local Flood Authorities, Risk Management Authorities and water companies. Any development allocated within the Local Plan will be required to comply with the National Planning Policy Framework, Policy NE6 and where appropriate site-specific mitigation set out in Policy H3.

With regard to increased flood risk, any proposals for development will be assessed against all relevant policies within the Local Plan. Policy S2 does not provide guidance on flood risk issues as this is covered by Local Plan Policy NE6: Flood Risk and Water Management. With regard to considering the impacts of development the Site Allocations Topic Paper (2019) which details the wider planning considerations that have been considered in the site selection process including impacts on flood risk and biodiversity.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S3: Promoting health and wellbeing in South Tyneside (Strategic Policy)

Policy S3: Council response and next steps

No identification of new sporting provision or facilities.

Comments were received against Policy S3 which question why Policy S3 does not identify new sports provision within the Borough, particularly in regard to Policy H3 which identifies existing

playing pitches for housing allocations. Comments suggest that Policy S3 or a new policy should be provided to identify new sport provision.

Council Response

Comments are noted with regard to sports provision not specifically identified within the Local Plan. At the time of preparing the Local Plan there were no identified plans to provide new sports provision and therefore policies within the Local Plan reflect this. The Local Plan does however support the retention and enhancement of our existing leisure provision through Local Plan policies. Policy IN3: Social and community infrastructure: criterion k) supports 'proposals which widen the Borough's cultural, sport, recreation and leisure offer'. Therefore, should suitable leisure facilities be brought forward through the plan period, they would be supported by this policy.

The Council notes Sport England guidance which states that Local Authorities should support new provision and where possible allocating new sites for sport and physical activity which meets identified needs; and, the National Planning Policy Framework which requires mitigation for playing pitches which are lost to development.

Next Steps

The Council continues to work with our partners to identify playing pitch mitigation to support the emerging Local Plan and to also meet the sporting needs of the Borough. This work will inform the next iteration of the Local Plan.

Objection to Green Belt development which would be contrary to Policy S3

Objections were received to Policy S3 which referred to the Local Plans proposals for Green Belt deletions. Comments highlighted the potential negative effects on health and wellbeing Green Belt deletions and wider impacts on green infrastructure networks may cause. Comments also referred to negative impact upon biodiversity and air pollution/ quality.

Council Response

Policy S3 is a strategic policy which sets out the principles for supporting healthy communities and development through the Local Plan. Policy S3 is intended to be read alongside other Local Plan policies.

With regard to the loss of Green Belt and Policy S3; the Council acknowledges the role of the natural environment, the Green Belt and open spaces contribution to health and wellbeing. It also acknowledges the impacts of the loss of Green Belt on existing communities; however, Criterion c) of Policy S3 seeks to support proposals which enhance the quality of the natural environment, this is in addition to other Local Plan policies which seek to retain, enhance and provide opportunities for natural environment and green infrastructure which will contribute towards providing natural spaces which can contribute to healthy communities.

Policy S3 supports proposals which seek to support health and wellbeing of the community; it does not directly seek to conserve or enhance biodiversity as this is addressed in other Plan policies. As stated above, criteria c) does support proposals which will enhance the quality of the natural environment and green infrastructure.

With regard to comments raised relating to air quality; part g) of Policy S3 states: 'ensuring that pollutants, including noise, and air pollution, and hazards detrimental to public health and residential amenity are addressed prior to development'. Furthermore, Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required, and proposals will only be approved where satisfactory mitigation measures can be implemented. In line with the National Planning Policy Framework paragraph, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity. Each policy specifies that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Next Steps

None required.

Policy S3 does not mitigate Climate Change

The Council received several objections to Policy S3 stating that the policy was unsound as it did not contribute to mitigating Climate Change.

Council Response

Policy S3 does not directly refer to climate change. However, the council acknowledges the health impacts which can arise from the effects of climate change. Please refer to the Council response to Climate Change issues provided against Policy S1 for further information.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they seek to deliver the aims of the Council's Climate Change Emergency and fulfil its legal requirements in this regard.

Policy S3 conflicts with Policy NE9: Contaminated Land

Objections were received which stated that Policy S3 conflicts with Policy NE9 which deals with contaminated land. In addition, the proposed development of Cleadon Lane Industrial Estate (RG 5 SBC010) will also have a negative impact on health and wellbeing as this land is contaminated.

Council Response

Policy S3 does not conflict with Policy NE9. Any outstanding contamination issues would be addressed by Policy NE9; furthermore, criteria g) also states the 'hazards detrimental to public health and residential amenity are addressed prior to development'. The above policies will be applicable to any proposed development at Cleadon Lane Industrial Estate.

Next Steps

None required.

Policy S3 is vague and unsound

Comments were received which claim that Policy S3 as currently worded is 'unnecessarily vague' and unsound as it hints that new development should provide towards open space and playing fields

without evidence to support the requirements. Furthermore, comments questioned the inclusion of 'affordable housing' in Part D of the policy.

Council Response

The Council does not agree that this policy is ineffective and unsound. The health of South Tyneside's residents is generally worse than the national average and it is a strategic aim of the council to improve health and wellbeing.

With regard to comments on open space provision; it is widely acknowledged that access to open space has benefits for the health and wellbeing of residents. This policy does not provide any requirements for the delivery of open space or playing fields. This policy should be read alongside other Plan policies which set out the requirements for open space and green infrastructure delivery and mitigation.

With regard to Part D, the inclusion of affordable housing this policy relates to the links between housing and health and wellbeing. Unaffordable and poor-quality housing contribute to the wider detriments of health which can result in unhealthy lifestyles choices and poor mental wellbeing. The council acknowledges that the affordable housing is addressed in other policies within the Local Plan and therefore this policy should be read in conjunction with those.

Next Steps

The Council will review the wording of the policy to ensure clarification with regard to the development contributions to open space provision.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S4: Presumption in Favour of Sustainable Development (Strategic Policy)

Policy S4: Council response and next steps

Not positively prepared

The Council received a number of objections stating that the policy is not sustainable and has not been positively prepared and that the adverse impacts of building on any of the Green Belt allocations would significantly and demonstrably outweigh any benefits.

Council Response

A presumption in favour of sustainable development is at the heart of the National Planning Policy Framework. Securing sustainable development is therefore the central theme which runs through the draft Local Plan. The draft Local Plan is positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework.

Next Steps

The Council will continue to prioritise the presumption in favour of sustainable development.

Not consistent with the National Planning Policy Framework

A number of objections to the policy were received stating that the policy is not justified, nor is it consistent with National Policy, which makes it clear that Green Belt deletion is a last resort.

Council Response

The draft Local Plan is positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework. Policy H1[a] sets out the Borough's overall minimum housing requirement of 7,000 new homes over the period 2016 to 2036. The Stage 1 Green Belt Review: Exceptional Circumstances (2019) and its update (2020) have tested all potential sources of land from non-Green Belt sources in accordance with the NPPF (2019). These conclude there are inherent constraints on the supply of land from reasonable non Green Belt sources (including brownfield land) to meet both the need for homes and jobs in full.

Next Steps

None required

Climate Change

The Council received criticism that Policy S4 does not adapt to and mitigate climate change.

Council Response

The Council declared a Climate Emergency on the 18th July 2019. The declaration requires all council strategic decisions, policies and strategies are in line with the shift towards carbon neutral by 2030. On 7 August 2019, the Council's Cabinet considered and approved the Pre-Publication Draft Local Plan for consultation. There were practical constraints associated with updating the draft Local Plan to reflect the declaration and therefore, the Council acknowledges that the draft Local Plan did not reflect the climate change emergency declaration. It is noted that a number of representations quote the actions of the declaration. It should be noted that these actions are for South Tyneside Council as a whole and not to be specifically addressed in Local Plan policies. It is the role of the Local Plan and its policies to assist in delivering the aims of the declaration.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they are in line with the Climate Change Emergency as far as possible.

The Status of Neighbourhood Plans

The Council received several objections regarding the status of Neighbourhood Plans in the planning system. It was suggested that the policies contained within Neighbourhood Plans ought to be considered first and foremost when housing is allocated.

Council Response

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development.

Whilst neighbourhood planning cannot be used to block the building of the homes and businesses considered to be necessary to meet the borough's current and future needs, they can be used to influence the type, design, location and mix of new development. Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development. They should be about local rather than strategic issues. If adopted, they will form part of the development plan for the Borough and used to assist in the determination of all planning applications in that area.

When the Pre-Publication Draft Local Plan was prepared, the emerging Whitburn and East Boldon Neighbourhood Plans had not been published.

Next Steps

The Council will continue to work with the Neighbourhood Forums.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S5: Re-use of Previously Developed Land (Strategic Policy)

Policy S5: Council response and next steps

Development of brownfield land should be prioritised

Objections were received stating that the Plan should prioritise the re-use of brownfield land for residential development over greenfield and Green Belt land. Questions were raised over what the Council is doing to facilitate brownfield development and concerns were raised that brownfield sites have been overlooked and the Brownfield Register is out of date meaning there is no compelling evidence for developing Green Belt sites.

Comments were received stating that Policy S5 doesn't protect the Green Belt as the supporting text acknowledges that new brownfield sites will inevitably become available over the Plan period and this information should be used to mitigate the loss of Green Belt sites.

Council Response

The supply of deliverable brownfield housing sites is not enough to achieve a five year supply of deliverable housing sites at the outset of the plan period. Therefore, the release of some Green Belt land early in the plan period is necessary in order to achieve a five-year supply of deliverable housing sites. The South Tyneside Council Green Belt Review: Stage One, provides a full commentary on why the total amount of deliverable and developable housing land from non-Green Belt sources including urban brownfield land is not enough to meet the Borough's total housing need. Please see the Council responses to the Sustainability Appraisal and Habitat Regulations Assessment representations for further information on this issue.

Regarding the reference to the Brownfield Register, our efforts focussed on updating both our Employment Land Review (2019) and the Strategic Housing Land Availability Assessment (2019). These datasets clearly distinguish between brownfield and greenfield sites but are far more comprehensive than the existing Brownfield Register in terms of the wider range of up to date information regarding the potential land supply. So in our assessments of land supply, we have worked from a more robust baseline. For completeness, the Register will be updated prior to the preparation of the next iteration of the Local Plan.

Next Steps

The Local Plan's evidence base will be kept under review and updated as necessary, this includes the Brownfield Register which will be updated ahead of the next draft of the Plan. However, it is considered that the Strategic Housing Land Availability Assessment is a comprehensive assessment of available sites in the Borough, including brownfield sites.

Policy should not limit sustainable greenfield development

Several comments were received raising concerns that the current wording of the policy, 'we will prioritise the re-use of brownfield land', is not consistent with the National Planning Policy Framework which does not prioritise the use of brownfield land over greenfield. Comments claim that the current wording of the policy would limit sustainable greenfield development and it would be illogical to prioritise unsustainable brownfield sites over more sustainable greenfield sites.

Council Response

The Council welcomes support for the policy and comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Cleadon Lane Industrial Estate

The Council received several comments in support of the principal of the policy however objecting to the allocation of a brownfield site, land at Cleadon Lane Industrial Estate, for housing. The comments perceived the allocation of this site to be an unsound application of Policy S5 for the following reasons:

- Development of the site will have a negative impact on climate change as this land is contaminated;
- Allocation of the site does not encourage development in the most sustainable locations as development of the site will increase traffic;
- Development of the site would not enhance biodiversity as there is contamination on the site;
- Allocation of the site doesn't promote healthier communities as there is contamination on the site.

Council Response

Policy S5 does not allocate specific sites for development. Policy S5 provides high level development principles which are applicable to all forms of development within all areas of South Tyneside. Policy

S5 should be considered against other development policies within the Plan such as Policy NE9 which deals with contaminated land.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S6: Appropriate Development Within the Green Belt (Strategic Policy)

Policy S6: Council response and next steps

Green Belt Release

A significant number of objections to Policy S6 were received in relation to the proposed release of land in the Green Belt. It was felt that exceptional circumstances had not been demonstrated.

Council Response

Strategic Policy S1 is the overarching policy that sets out that the Green Belt boundary will be amended to facilitate sustainable growth and the site allocations are clearly identified on the Policies Map. Policy S6 is not intended to list the site allocations but rather to assist in ensuring that any future development proposals within the Green Belt are appropriate.

Next Steps

None required.

Failure to Comply with the National Planning Policy Framework

The Council received a number of objections stating that Policy S6 was not positively prepared. It was suggested that the policy instead focuses on what is inappropriate, and that the policy repeated what was already contained within the National Planning Policy Framework.

Concerns were also raised about the lack of clarity within the suite of policies that would effectively apply to proposals relating to major development sites.

Council Response

National policy is effectively clear on those parameters by which development would be considered appropriate within the Green Belt and the implementation of Green Belt policy through S6 would direct applicants to apply the National Planning Policy Framework. The exceptions to that are Policies S7 and S8 which provide further detailed guidance. The purpose of a local plan is not to regurgitate what is in the National Planning Policy Framework. S6 ensures that the policy remains consistent with national policy should there be any changes in approach at the national level. Policy

S6 is consistent with the National Planning Policy Framework, positively worded, clear and therefore effective.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy S7: Extensions and Alterations to and Replacement of Buildings in the Green Belt (Strategic Policy)

Policy S7: Council response and next steps

Wording Considerations.

An objection to the wording of the policy was received.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Failure to comply with the National Planning Policy Framework

Several objections were received stating that policies S6, S7 and S8 should be comprehensively reconsidered in order to avoid ambiguity surrounding the decision-making of proposals in the Green Belt.

Council Response

Policies S6, S7 and S8 serve a clear purpose regarding common proposals for new development in the Green Belt and they provide greater clarity to those types of proposals to which they relate. They are consistent with the National Planning Policy Framework, positively worded, clear and therefore effective.

Next Steps

None required.

Policy S8: Replacement of Buildings in the Green Belt (Strategic Policy)

Policy S8: Council response and next steps

Too Prescriptive

The Council received an objection to the use of a percentage limit for replacement buildings in the Green Belt. This figure is not set out in the National Planning Policy Framework and whilst it is often used as a broad guide this should only be expressed within the supporting text to the policy not as an explicit rule.

Council Response

The National Planning Policy Framework states that replacement of buildings in the Green Belt is not inappropriate provided that the replacement building is not materially larger than the existing building. It is considered that a limit of 30% is generous.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Wording Considerations.

An objection to the wording of the policy was received.

Council Response

The Council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Chapter 5: Planning for Homes

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 5 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 5: Planning for Homes received 11215 comments of which 10883 were objections to policies, 95 were in support and 237 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 5: Planning for Homes – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
H1: The Number of Homes Needed by 2035 (Strategic Policy)	2067	14	7	2046
Policy H2: Ensuring a sufficient supply of deliverable and developable housing land	16	3	2	11
Policy H3: Housing Allocations and Commitments (Strategic Policy)	9035	199	62	8774
Policy H4: Windfall Housing Proposals (Strategic Policy)	6	0	2	4
Policy H5: Efficient use of Land and Housing Density	20	6	1	13
Policy H6: Our Existing Stock	5	3	2	0
Policy H7: Houses in Multiple Occupation	1	0	1	0
Policy H8: Specialist Housing- Extra Care & Supported Housing (Strategic Policy)	3	0	3	0
Policy H9: Affordable Housing	21	7	4	10
Policy H10: Housing Mix	24	3	8	13
Policy H11: Technical Design Standards for New Homes	14	1	2	11
Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)	3	1	1	1

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy H1{a}: The Number of Homes Needed by 2035 (Strategic Policy)	• The use of 2014 household projection data • Does Policy H1[a] build in assumptions about economic growth e.g. for the Strategic Economic Plan (SEP) and IAMP? • Does Policy H1[a] make allowance for contingencies such as a no deal Brexit? • Should Policy H1[a] have a higher housing requirement than 7,000 new homes? • Should Policy H1[a] incorporate a higher buffer than 10%?
Policy H1{b}: The Number of Homes Needed by 2035 (Strategic Policy)	• The distribution of housing to the villages • The Minimum Number of Homes Required within the Neighbourhood Forum Areas • Impacts of development on trees and hedgerows
Policy H2: Ensuring a sufficient supply of deliverable and developable housing land	• Does Policy H2 protect the Green Belt? • Concerns about the effectiveness of the policy
Policy H3: Housing Allocations and Commitments (Strategic Policy)	• The Local Plan will not control the pace of development in East Boldon • The distribution of housing is disproportionate in respect of the villages • The distinctiveness and character of the villages will not be respected • Brownfield land should be used in preference to Green Belt land • The Local Plan does not reference the tree numbers that will be lost.
Policy H4: Windfall Housing Proposals (Strategic Policy)	• Concerns that the policy is too limiting and not positively prepared
Policy H5: Efficient use of Land and Housing Density	• Policy should include more flexibility taking into account other policies in the Plan • Wording of the Policy is too ambiguous • Although the policy promotes a standard density approach, the indicative dwelling yields (policy H3) shows higher densities in some areas.
Policy H6: Our Existing Stock	• Representations raised questions about what the Council is currently doing to bring empty properties back into use. • Queries over when the Enforced Sale Policy will be introduced.
Policy H7: Houses in Multiple Occupation	• One comment in support of the Policy was received.

Policy H8: Specialist Housing- Extra Care & Supported Housing (Strategic Policy)	• The policy doesn't specify how much accommodation is required to meet the needs of the elderly. • One site was put forward for the development of an elderly care village.
Policy H9: Affordable Housing	• Comments in support of the Policy recognised the need for more affordable housing in the Borough • Vagueness of the term 'affordable' • Concerns over the evidence used to support the Policy and impacts of the Policy on viability
Policy H10: Housing Mix	• Support for the flexibility in the policy and the need to increase the supply of detached homes in the Borough. • Concerns over the inclusion of 'executive homes' • There is a need for affordable housing and housing for the elderly population
Policy H11: Technical Design Standards for New Homes	• Lack of evidence to support the policy • Comments pointed towards a shortage of suitable housing in the Borough for the elderly
Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)	• Policy should require a Transport Assessment ahead of the release of the safeguarded site at Whitemare Pool. • GTAA shows a need which is not being met by the policy.

Policy H1[a]: The Number of Homes Needed by 2035 (Strategic Policy)

Policy H1[a]: Council response and next steps

The use of 2014 household projection data

The Council received a significant number of objections to the policy based on the grounds that the calculation used to derive the housing requirement applies the 2014-based rather than the 2016-based ONS Household Projections.

Council Response

Drawing on the 2016-Based Household projections has been debated and discounted at a national level. The Government's Planning Practice Guidance (<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>) at Paragraph: 005 Reference ID: 2a-005-20190220 confirms that The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Furthermore, Paragraph: 015 Reference ID: 2a-015-20190220 confirms that "Any method which relies on using the 2016-based household projections

will not be considered to be following the standard method as set out in paragraph 60 of the National Planning Policy Framework. As explained above, it is not considered that these projections provide an appropriate basis for use in the standard method.”

Next Steps

None required

Does Policy H1[a] build in assumptions about economic growth e.g. for the Strategic Economic Plan (SEP) and IAMP?

The Council has received objections to Policy H1[a] based on the view that it builds in economic assumptions about growth that are unrealistic.

Council Response

As part of the preparation of the IAMP Area Action Plan, work has been undertaken to assess the potential impact of housing growth. It is common ground between South Tyneside Council and Sunderland City Council to review that work. The Planning Practice Guidance does indicate that it is permissible for Plans to go above their minimum requirements and cites examples to support this may include:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

However, our application of the standard method makes no allowance for economic growth (e.g. IAMP) to determine the minimum number of homes required. There is therefore no requirement to evidence significant job creation that is not accounted for in ONS projections. Also for the benefit of absolute clarity, the standard method is not linked to economic strategies, including any which it is contended are predicated on ‘pass the parcel’ assumptions about economic growth and the Local Planning Authority has not placed any reliance on ‘NELEP Strategic Economic Plan SEP and IAMP’ in determining the housing requirement.

With regard to considering a spatial option greater than the housing need for the Local Plan, as stated in Section 6, para 6.6 – 6.14 of the Interim Sustainability Appraisal, the Council does not consider that there are any exceptional circumstances which would support a level of growth above that of the standard methodology; and therefore does not consider an option which goes beyond Local Plan housing numbers to be a reasonable option for South Tyneside.

Next Steps

None required

Does Policy H1[a] make allowance for contingencies such as a no deal Brexit?

The Council has received objections to the policy based on the view that it does not make allowance for contingencies such as a no deal Brexit.

Council Response

The Plan relies upon the Government's Standard Method to calculate the minimum number of homes required which does not include any potential uncertainties associated with Brexit.

Next Steps

None required

Should Policy H1[a] have a higher housing requirement than 7,000 new homes?

The Council received representations from the development industry which contended that the housing need is higher than the standard method indicates, and that a higher housing requirement should be included in the Plan, in order to make allowance for economic growth.

Council Response

It is acknowledged that the National Planning Practice Guidance provides the flexibility for local planning authorities to plan for a higher housing requirement than the housing figure provided by the Standard Method. However it does not provide an explicit duty for them to do so. We are committed to meeting in full the housing need figure of 7,000 new homes produced by the Standard Method and, as stated in Policy H1[a], that figure will not be applied as a maximum. Policy H1[a] explicitly refers to 'the delivery of at least' [emphasis added] 7,000 new homes'. With regards to the contention that we should examine the needs of specific age cohorts with a view to uplifting from the figure produced by the Standard Method, this is not required by the National Planning Practice Guidance. The Pre-Publication draft Local Plan (August 2019) includes an allowance for flexibility so in reality, it proposes to deliver 7,489 homes over the plan period which equates to an annual average of 374 homes per year.

Next Steps

The Council will review Policy H1[a] when preparing the next iteration of the Local Plan.

Should Policy H1[a] incorporate a higher buffer than 10%?

Through the supply of housing land, the Pre-Publication Draft Local Plan proposes an overprovision of 10% above the minimum number of homes required. This is intended to provide a contingency buffer in the event of housing under-delivery. The Council has received several representations which have contended that the buffer is not sufficient. In this context it has also been referenced that Appendix 1: Housing Trajectory, 'demonstrates a strong period of delivery as expected in the middle of the plan period, however there is a significant decline in housing delivery towards the back end of the plan period'.

Council Response

The need for flexibility is acknowledged. It was considered that the provision of a 10% buffer provides adequate flexibility in the event of under-delivery and that, together with the opportunity to review the Local Plan five years after adoption, provides adequate contingency for the declining curve in the housing trajectory at the end of the plan period. The level of buffer considered appropriate will be kept under review.

Next Steps

The Council will review Policy H1[a] when preparing the next iteration of the Local Plan.

Support for the Policy

The Council received expressions of support for the policy as it is supportive of the National Planning Policy Framework at paragraph 59 which sets out the Government's objective significantly boosting the supply of homes.

Council Response

Support for the policy welcomed.

Next Steps

The Council will review Policy H1[a] when preparing the next iteration of the Local Plan.

Policy H1[b]: The Number of Homes Needed by 2035 (Strategic Policy)

Policy H1[b]: Council response and next steps

The distribution of housing to the villages

A number of representations have questioned the proportionality of the distribution of housing in the Pre-Publication Draft Local Plan (August 2019), often with particular reference to the number of homes distributed to the villages.

Council Response

The justification of the Spatial Strategy adopted in the Local Plan is set out in the Sustainability Appraisal. An approach to the distribution of housing based purely on being proportionate to the existing level of population would not be deliverable. This is because the supply of Strategic Housing Land Availability Assessment (SHLAA) sites that are deliverable and developable does not neatly align with the distribution of population.

Next Steps

The Council will review Policy H1[b] when preparing the next iteration of the Local Plan.

The Minimum Number of Homes Required within the Neighbourhood Forum Areas

Policy H1[b] states that to ensure that the Borough's overall housing requirement is met; provision is made for the provision of at least 950 new homes within the designated East Boldon Neighbourhood Forum Area and 397 new homes within the designated Whitburn Neighbourhood Forum Area. Both Neighbourhood Forums have commissioned their own assessments of the housing need for their respective Forum Areas. These studies, which were undertaken by AECOM, suggest that lower levels of growth would be appropriate for the Forum Areas (240 new homes for the East Boldon Forum Area and 120 new homes for the Whitburn Forum Area respectively). The Council has received representations to Policy H1[b] from local residents and both Forums with a common theme being that Policy H1b should be based on the evidence provided by the AECOM studies. Representations have also queried why these studies did not form part of the evidence base for the preparation of the draft Local Plan.

Council Response

The National Planning Policy Framework states that within the overall housing requirement, 'strategic policies should also set a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations'

(Paragraph 65). The National Planning Practice Guidance elaborates on this by stating that, while there is no set method for doing this, the general policy making process already undertaken by local authorities can continue to be used to direct development requirements and balance needs and protections by taking into consideration relevant policies such as the spatial strategy, evidence such as the housing and economic land availability assessment, and the characteristics of the neighbourhood area, including its population and role in providing services (Paragraph: 101 Reference ID: 41-101-20190509). It also adds that 'In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area.'

In order to determine overall scale of development required the Local Planning Authority applied the Standard Method for determining housing need. The overall strategy for the pattern and scale of development was determined through the Sustainability Appraisal process.

Four reasonable spatial options were considered to deliver the housing need in the Borough. Each assessment showed that there would be an impact on sustainability which could require mitigation through the Plan process; the degree of mitigation which would be required would vary depending on each of the spatial options. Option 4 'Sustainable Urban Area Growth and smaller multiple Green Belt releases' was considered to be on balance an appropriate option and the one that was taken forward into the South Tyneside Pre-Publication draft Local Plan. The sustainability appraisal process that informed the preferred spatial option in Policy S1 of the Pre-Publication Draft Local Plan is set out in full at South Tyneside Draft Local Plan Interim Sustainability Appraisal (August 2019) (<https://www.southtyneside.gov.uk/article/36012/Emerging-Local-Plan>). The Sustainability Appraisal process took into consideration those assets of particular importance set out within the footnote 6 of the National Planning Policy Framework that are applicable to the Borough.

In parallel with the Sustainability Appraisal process, the Strategic Housing Land Availability Assessment and Employment Land Review were undertaken. The Strategic Housing Land Availability Assessment informed the initial assessment of the overall supply of available land that is suitable, deliverable and developable. This was from the starting point of looking at brownfield, then greenfield and finally once it was demonstrated there was an insufficient supply, from Green Belt sources. The Green Belt Review determined whether exceptional circumstances exist both to justify at a strategic level the release of land from the Green Belt and on a site-specific basis.

In due course, the East Boldon Neighbourhood Forum and the Whitburn Neighbourhood Forum must each demonstrate that their respective Plans passes the 'Basic Conditions' test which requires the neighbourhood plan to be in general conformity with the strategic policies of the development plan for the area. The above National Planning Practice Guidance (Paragraph: 105 Reference ID: 41-105-20190509), also requires the neighbourhood planning body to take into account 'the existing and emerging spatial strategy' if they are looking to determine a housing requirement. In this context, the East Boldon Housing Needs Assessment notes at Para 49 that 'where Local Authorities are still developing new policies which could affect the strategy for the neighbourhood area, there is a consequent need for the neighbourhood group to continue to engage with the LPA to agree and/or update the need figure for the Neighbourhood Plan'.

It has been contended that the Housing Need Assessments commissioned by the East Boldon and Whitburn Forums should have formed part of South Tyneside Council's evidence base to inform Policy H1. Whilst Officers have read both studies, they necessarily cannot form part of the Council's evidence in support of Policy H1[a]. This has been based on the application of the Government's Standard Method to determine a Borough-wide housing requirement. The Assessments do not form part of the evidence base to determine Policy H1[b] as this was determined using the process/evidence set out above.

Next Steps

The Council will review Policy H1(b) when preparing the next iteration of the Local Plan.

Impacts of development on trees and hedgerows

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the NPPF, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Policy H2: Ensuring a Sufficient Supply of deliverable and developable housing land.

Policy H2: Council Response and next Steps

Does Policy H2 protect the Green Belt?

The Council received several objections to Policy H2 stating that the policy does nothing protect the Green Belt.

Council Response

The Pre-Publication draft Local Plan needs to be read as a whole. It is not the role and function of Policy H2 to protect the Green Belt. However, policies S1[h], S6, S7 and S8 all protect the openness and permanence of the Green Belt.

Next Steps

The Council will review Policy H2 when preparing the next iteration of the Local Plan.

Concerns about the effectiveness of the policy

The Council received several objections to the policy from the development industry stating that, although they supported the principle of the policy, they had concerns about its effectiveness.

Council Response

The Council will maintain an open dialogue with the development industry regarding the implementation the policy.

Next Steps

The Council will review Policy H2 when preparing the next iteration of the Local Plan.

Policy H3: Housing Allocations and Commitments (Strategic Policy)

Policy H3: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The Local Plan will not control the pace of development in East Boldon
- The distribution of housing is disproportionate in respect of the villages
- The distinctiveness and character of the villages will not be respected
- Brownfield land should be used in preference to Green Belt land
- The Local Plan does not reference the tree numbers that will be lost.

Council Response

Please see Council responses for Policy S1 (the Spatial Strategy) regarding the distribution of housing, the priority given to brownfield sites and the impact of the distribution proposed in the Pre-Publication draft Local Plan on the distinctiveness and character of the villages.

Next Steps

The Council will review Policy H3 when preparing the next iteration of the Local Plan.

The pace of development in East Boldon

The Council received a significant number of representations stating that the Local Plan remains silent on whether the pace of development in East Boldon is to be controlled i.e. phased so as to mitigate the impact on village life.

Council Response

It is essential that the Plan is able to remain responsive and flexible to housing market conditions and needs, so it is not considered appropriate to introduce specific phasing requirements within the Plan over the release of land. The role of the Infrastructure Delivery Plan is to identify both the scale of infrastructure required as well as the trigger points for its delivery. Timely delivery of the supporting infrastructure would be secured through a Section 106 Agreement that could require the delivery of advanced infrastructure items and/or linked to the completion of a specified number of homes.

Next Steps

The Council will review Policy H3 when preparing the next iteration of the Local Plan.

The Local Plan does not document the number of trees that will be lost

The Council received a representation which stated that no numbers of trees at risk are available from South Tyneside Council.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the NPPF, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

None required

Policy H3.1: Land at Benton Road

Policy H3.1: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- It will cause harm to the Green Belt;
- The perceived lack of demand for the development;
- Objection to the Level Crossing Scheme
- The impact on trees;
- the perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt; and
- The perceived loss of biodiversity and wildlife.

Council Response and Next Steps

The Council will review Policy H3.1 when preparing the next iteration of the Local Plan. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiledshed Level Crossing Closure Scheme.

Policy H3.2: Land south of Cleadon Park

Policy H3.2: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- the perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding
- the perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;

- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived potential for air, light and noise pollution.

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiled Level Crossing Closure Scheme. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.2 when preparing the next iteration of the Local Plan.

Policy H3.3: Land west of Sunnyside Farm

Policy H3.3: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- the perceived potential for air, light and noise pollution.

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to

brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiledshed Level Crossing Closure Scheme. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.3 when preparing the next iteration of the Local Plan.

Policy H3.4: Land at Robinson Street

The Council received no objections to this policy.

Policy H3.5: Land adjacent to Ocean Road

The Council received no objections to this policy.

Policy H3.6: Land at Chatsworth Court

Policy H3.6: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.6 when preparing the next iteration of the Local Plan.

Policy H3.7: Former Woodhave House (Site B)

Policy H3.7: Council Response and Next Steps

Policy H3.8: South Shields Westoe Sports Club and playing fields

Policy H3.8 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential implications of developing this site for Temple Park;
- The potential impact on trees; and
- The South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.8 when preparing the next iteration of the Local Plan.

Policy H3.9: South Tyneside College - South Shields Campus (playing fields)

Policy H3.9 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision; and
- The potential impact on the local highway network.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.9 when preparing the next iteration of the Local Plan.

Policy H3.10: Former Brinkburn Comprehensive School

Policy H3.10 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees; and
- The South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.10 when preparing the next iteration of the Local Plan.

Policy H3.11: Land to the rear of Simonside Arms Public House

Policy H3.11 Council Response and Next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response and Next Steps

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.11 when preparing the next iteration of the Local Plan.

Policy H3.12: Land at Chuter Ede Education Centre

Policy H3.12 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees
- Objection to the Level Crossing Scheme;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- the use of 2014 household projection data to inform the housing requirement;
- the perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- the South Tyneside Playing Pitch Strategy does not show that there is a surplus of playing pitch provision;
- The perceived risk from flooding;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiled Level Crossing Closure Scheme.

Next Steps

The Council will review Policy H3.12 when preparing the next iteration of the Local Plan.

Policy H3.13 Former Temple Park Infant School

Policy H3.13 Council Response and Next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.13 when preparing the next iteration of the Local Plan.

Policy H3.14 Connolly House, Reynolds Avenue

Policy H3.14 Council Response and Next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.14 when preparing the next iteration of the Local Plan.

Policy H.15: Temple Park Junior School (west)

Policy H3.15 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- Local children play on the field; and
- The potential impact on the local highway network.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of playing pitches.

Next Steps

The Council will review Policy H3.15 when preparing the next iteration of the Local Plan.

Policy 3.16 Land at Bradley Avenue

Policy H3.16 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- Loss of open space; and
- The potential impact on the local highway network.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.16 when preparing the next iteration of the Local Plan.

Policy H3.17 Land at Farding Square

Policy H3.17 Council Response and Next Steps

The Council received objections to the policy which included the following grounds:

- Traffic will increase on an already busy road.
- Unclear how access will be achieved
- Local children play on the field
- The site is listed as open space in the Council's Open Space Addendum (2019)

Council Response

The site now has planning permission for residential development. Therefore it is no longer available for allocation.

Next Steps

None required

Policy H3.18 Landreth House, Boldon Lane/South Dene

The Council received no objections to this policy.

Policy H3.19 Demolished nursery school, Wharfdale Road

Policy H3.19: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.19 when preparing the next iteration of the Local Plan.

Policy H3.20 Land at Orchard Close

The Council received no objections to this policy.

Policy H3.21 Land south of Bedale Court / Heworth Court

Policy H3.21: Council Response and next Steps

The Council received an objection to the policy which included the following grounds:

- The potential impact on trees; and
- Loss of open space;

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space.

Next Steps

The Council will review Policy H3.21 when preparing the next iteration of the Local Plan

Policy H3.22 Land behind Ryedale Court

Policy H3.22: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.22 when preparing the next iteration of the Local Plan.

Policy H3.23 Land at Lizard Lane

Policy H3.23: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.23 when preparing the next iteration of the Local Plan.

Policy H3.24 Land at Dean Road

The Council received no objections to this policy.

Policy H3.25 Land adjacent Lakeside Inn

Policy H3.25: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- Loss of agricultural land;
- The boundary includes the farms car park and one of the access roads into the farm.
- The perceived risk from flooding;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on air quality.

Next Steps

The Council will review Policy H3.25 when preparing the next iteration of the Local Plan.

Policy H3.26: Land at Hedworthfield Community Association Car Park

Policy H3.26: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The perceived risk from flooding;
- The site is actively used for community activities e.g. sport
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the impact on air quality and the impact on the social infrastructure. See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.26 when preparing the next iteration of the Local Plan.

Policy H3.27 Land to east of Lakeside Inn

Policy H3.27: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The perceived risk from flooding;
- The site is actively used for community activities e.g. sport
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on biodiversity and wildlife;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on air quality.

Next Steps

The Council will review Policy H3.27 when preparing the next iteration of the Local Plan.

Policy H3.28 Land at Heathway, Hedworth

Policy H3.28: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Change to the character of the estate
- It is green space;

- the perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for Policy S1 regarding the impact on social infrastructure and the impact on air quality. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.28 when preparing the next iteration of the Local Plan.

Policy H3.29 Land at Heathway/Greenlands, Hedworth

Policy H3.29: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Change to the character of the estate;
- The perceived risk from flooding;
- The perceived impact on biodiversity and wildlife;
- The site is listed as high value open space in the Council's Open Space Addendum (2019);
- the perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on health and wellbeing;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on air quality. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.29 when preparing the next iteration of the Local Plan.

Policy H3.30 Land at Kings Meadow, Hedworth

Policy H3.30: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- It is a green space;

- The perceived risk from flooding;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for Policy S1 regarding the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.30 when preparing the next iteration of the Local Plan.

Policy H3.31 Land at Calf Close Walk

Policy H3.31: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The perceived impact on biodiversity and wildlife;
- It is green space and promotes community cohesion;
- The perceived risk from flooding;
- The site has value as an archaeological site;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure and the impact on air quality. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.31 when preparing the next iteration of the Local Plan.

Policy H3.32: Land at Wark Crescent/Pathside, Primrose

Policy H3.32: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Potential impact on trees;
- The potential for noise pollution;
- It is greenspace;
- The perceived impact on biodiversity and wildlife;

- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The perceived inability for the site to be satisfactorily accessed;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife, the impact on social infrastructure and the impact on noise pollution. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.32 when preparing the next iteration of the Local Plan.

Policy H3.33 Land to North and East of Holland Park Drive

Policy H3.33: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The perceived risk from flooding;
- It is greenspace;
- The perceived impact on biodiversity and wildlife;
- the perceived impact on schools;
- The perceived inability for the site to be satisfactorily accessed;
- The perceived impact on the local road network; and
- The added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.33 when preparing the next iteration of the Local Plan.

Policy H3.34 Land at Grange Road/Monkton Road

The Council received no objections to this policy.

Policy H3.35 Land at Salcombe Avenue

Policy H3.35: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The site is listed as open space in the Council's Open Space Addendum (2019);
- The perceived impact on biodiversity and wildlife;
- The perceived impact on schools;
- The perceived impact on health and wellbeing;
- The perceived potential for air, light and noise pollution;
- The perceived inability for the site to be satisfactorily accessed;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.35 when preparing the next iteration of the Local Plan.

Support for the policy

The Council also received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.35 when preparing the next iteration of the Local Plan.

Policy H3.36 Neon Social Club, Perth Avenue

The site now has planning permission for residential development

Policy H3.37 Perth Green Youth Centre, Perth Avenue

Policy H3.37: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- 'The potential impact on trees
- The site is listed as open space in the Council's Open Space Addendum (2019);

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space.

Next Steps

The Council will review Policy H3.37 when preparing the next iteration of the Local Plan.

Support for the policy

The Council also received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.37 when preparing the next iteration of the Local Plan.

Policy H3.38 Land at Kirkstone Avenue / Coniston Road

Policy H3.38: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- It functions as a roundabout for the local bus service; and
- It has been identified as potential parking for the parents taking their children to the two local schools;

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.38 when preparing the next iteration of the Local Plan.

Policy H3.39 Land previously Martin Hall, Prince Consort Road

Policy H3.39: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.39 when preparing the next iteration of the Local Plan.

Policy H3.40 Land at previously Nolan Hall, Prince Consort Road

Policy H3.40: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.40 when preparing the next iteration of the Local Plan.

Policy H3.41 Land at Falmouth Drive

Policy H3.41: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Loss of trees;
- The site is listed as open space in the Council's Open Space Addendum (2019);
- The perceived impact on biodiversity and wildlife;
- The perceived risk from flooding;
- The perceived impact on health and wellbeing;
- the perceived potential for air and noise pollution;
- Access/egress from the estate;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.41 when preparing the next iteration of the Local Plan.

Policy H3.42 Land at rear of Shaftesbury Avenue

Policy H3.42: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- Loss of trees;
- The site is listed as open space in the Council's Open Space Addendum (2019);
- The perceived impact on biodiversity and wildlife;
- The perceived risk from flooding;
- The perceived impact on health and wellbeing;

- The perceived potential for air, light and noise pollution;
- Access/egress from the estate;
- The perceived impact on the local road network; and
- The added pressure on parking spaces.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.42 when preparing the next iteration of the Local Plan.

Policy H3.43 Land at Ayrey Avenue

Policy H3.43: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The perceived impact on biodiversity and wildlife;
- The perceived impact on health and wellbeing;
- The perceived potential for air pollution; and
- The perceived impact on the local road network.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the loss of biodiversity and wildlife and air pollution.

Next Steps

The Council will review Policy H3.43 when preparing the next iteration of the Local Plan. See Council responses for Policy D2 regarding loss of trees.

Policy H3.44 Phase 2- Eskdale Drive, Primrose

The Council received no objections to this policy.

Policy H3.45 Land off Glen Street (Hebburn New Town)

Policy H3.45: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.45 when preparing the next iteration of the Local Plan.

Policy H3.46 Land at Westmoreland Court

Policy H3.46: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.46 when preparing the next iteration of the Local Plan.

Policy H3.47 Former Roadhouse Public House, Victoria Road West

The Council received no objections to this policy.

Policy H3.48 Ashworth Frazer Industrial Estate and Hebburn Community Centre

Policy H3.48: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The potential impact on trees;
- The site is in active employment use; and
- The proposed allocation omits land southwest of Bell Street currently in use as a car park.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. It is acknowledged that the allocation represents a loss of employment land.

Next Steps

The Council will review Policy H3.48 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.48 when preparing the next iteration of the Local Plan.

Policy H3.49 Land to the north of former day care centre

Policy H3.49: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The perceived impact on the local social infrastructure i.e. schools and primary healthcare provision;
- It is green space;
- The site would be classified by Sport England as a playing field and/or pitch;
- The potential impact on trees;
- Road safety concerns;
- The perceived impact on the local road network; and
- the added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.49 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.49 when preparing the next iteration of the Local Plan.

Policy H3.50 The Clock playing field, Victoria Road East

Policy H3.50: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The local area has already undergone (or has ongoing) a significant amount of development;
- The perceived impact on the local social infrastructure i.e. schools and primary healthcare provision;
- The perceived risk from subsidence;
- It is green space;
- The site would be classified by Sport England as a playing field and/or pitch;
- The potential impact on trees;
- The perceived impact on the local road network;
- Road safety concerns; and

- The added pressure on parking spaces

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for Policy S1 regarding the impact on social infrastructure. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.50 when preparing the next iteration of the Local Plan.

Policy H3.51 Campbell Park Road Civic Site / Hebburn Police Station

Policy H3.51: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.51 when preparing the next iteration of the Local Plan.

Policy H3.52 Storage building and land at Quarry Road

Policy H3.52: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.52 when preparing the next iteration of the Local Plan.

Policy H3.53 Land at Campbell Park Road

Policy H3.53: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.53 when preparing the next iteration of the Local Plan.

Policy H3.54 Land at Beresford Avenue

Policy H3.54: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.54 when preparing the next iteration of the Local Plan.

Policy H3.55 Land at South Tyneside College, Hebburn Campus

Policy H3.55: Council Response and next Steps

The Council received objections to the policy which included the following grounds:

- The site would be classified by Sport England as a playing field and/or pitch; and
- The potential impact on trees;

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space.

Next Steps

The Council will review Policy H3.55 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy

Council Response

Support noted.

Next Steps

The Council will review Policy H3.55 when preparing the next iteration of the Local Plan.

Policy H3.56 Land south-west of Prince Consort Road

Policy H3.56: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.56 when preparing the next iteration of the Local Plan.

Policy H3.57 Father James Walsh Day Centre, Hedgeley Rd

Policy H3.57: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.57 when preparing the next iteration of the Local Plan.

Policy H3.58 Land at Southend Parade

Policy H3.58: Council Response and next Steps

The Council received an objection to the policy based on the potential impact on trees.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

The Council will review Policy H3.58 when preparing the next iteration of the Local Plan.

Policy H3.59 Land at North Farm

Policy H3.59: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- It is green space;
- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- the site is within an area for further investigation in relation to contamination due to it being a former landfill site;
- The perceived loss of biodiversity and wildlife;
- Loss of mature trees and hedgerows;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;

- The perceived blurring of boundaries between neighbouring towns and villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- Objection to the Level Crossing Scheme;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response and Next Steps

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for Policy IN7 regarding the Boldon and Tiledshed Level Crossing Closure Scheme. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.59 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted

Next Steps

The Council will review Policy H3.59 when preparing the next iteration of the Local Plan.

Policy H3.60 The Disco Field, Henley Way

Policy H3.60: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- It is green space;
- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- the perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and

- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.60 when preparing the next iteration of the Local Plan.

Policy H3.61 Land south of St. John's Terrace and Natley Avenue

Policy H3.61: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived blurring of boundaries between neighbouring towns and villages
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.61 when preparing the next iteration of the Local Plan.

Policy H3.62 Land to North of Town end Farm

Policy H3.62: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived blurring of boundaries between neighbouring towns and villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.62 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.62 when preparing the next iteration of the Local Plan.

Policy H3.63 Former CE Primary School

Policy H3.63: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- the loss of trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;

- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.63 when preparing the next iteration of the Local Plan.

Policy H3.64 The Paddock, Glebe Farm, Newcastle Road

Policy H3.64: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently greenfield;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.64 when preparing the next iteration of the Local Plan.

Policy H3.65 Land West of Boldon Cemetery

Policy H3.65: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.65 when preparing the next iteration of the Local Plan

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted

Next Steps

The Council will review Policy H3.65 when preparing the next iteration of the Local Plan.

Policy H3.66 Former storage yard Hardie Drive

Policy H3.66: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;
- The perceived impact on the character and distinctiveness of the villages;

- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.66 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support noted

Next Steps

The Council will review Policy H3.66 when preparing the next iteration of the Local Plan.

Policy H3.67 Former garage site Hindmarch Drive

Policy H3.67: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.67 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.67 when preparing the next iteration of the Local Plan.

Policy H3.68 Land to the North of New Road

Policy H3.68: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The perceived risk from flooding;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived potential for air, light and noise pollution;

Council Response

See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.68 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Next Steps

The Council will review Policy H3.68 when preparing the next iteration of the Local Plan.

Policy H3.69 Open space at Dipe Lane/Avondale Gardens

Policy H3.69: Council Response and next Steps

- It is currently a children's play park;
- The perceived conflict with Policy NE4: Open Space and Green Infrastructure;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- It is listed in the Council's Open Space Addendum as high value open space;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality and the impact on the social infrastructure. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.69 when preparing the next iteration of the Local Plan.

Policy H3.70 Land at West Hall Farm

Policy H3.70: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The use of 2014 household projection data to inform the housing requirement;
- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived risk from flooding;
- The perceived availability of brownfield land as an alternative to the proposed development of land for housing that is currently in the Green Belt;
- The land is in agricultural use;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- the perceived potential for air, light and noise pollution

Council Response

See Council responses to Policy H1 regarding the use of 2014 household projection data to inform the housing requirement. See Council responses for Policy S1 regarding the priority given to brownfield sites, loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.70 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Next Steps

The Council will review Policy H3.70 when preparing the next iteration of the Local Plan.

Policy H3.71 Land at Wellands Farm

Policy H3.71: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The land is in agricultural use;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife
- The housing will be of an 'executive type' which is not required within Whitburn;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.71 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Next Steps

The Council will review Policy H3.71 when preparing the next iteration of the Local Plan.

Policy H3.72 Land north of Cleadon Lane

Policy H3.72: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The site would be classified by Sport England as a playing field and/or pitch;
- The impact on trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.72 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.72 when preparing the next iteration of the Local Plan.

Policy H3.73 Land at Whitburn Lodge

Policy H3.73: Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The impact on trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.73 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.73 when preparing the next iteration of the Local Plan.

Policy H3.74 Land to North of Shearwater

Policy H3.74 Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The impact on trees;
- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- the perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.74 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.74 when preparing the next iteration of the Local Plan.

Policy H3.75 Land to North of Shearwater and East of Mill Lane

Policy H3.75 Council Response and next Steps

The Council received a significant number of objections to the policy. Grounds of objection included:

- The perceived failure to demonstrate exceptional circumstances for proposed alterations to Green Belt boundaries;
- The perceived disproportionate housing allocation to the villages;
- The perceived loss of biodiversity and wildlife;
- The loss of trees;

- The perceived impact on mental health and wellbeing;
- The perceived impact on the character and distinctiveness of the villages;
- The perceived impact on local social infrastructure i.e. school and primary health care provision;
- The additional pressure on parking spaces;
- The perceived impact on the local road network; and
- The perceived impact on air quality.

Council Response

See Council responses for Policy S1 regarding the loss of wildlife habitat and biodiversity, the distribution of housing to the villages, the impact on health and wellbeing, the impact on air quality, the impact on the social infrastructure and the exceptional circumstances for changing the designation of land from Green Belt to development land. See Council responses for Policy D2 and NE1 regarding loss of trees. See Council responses for policies S3 and NE4 regarding the loss of open space. The Council acknowledges that there are parking issues in certain areas of the Borough. The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

Next Steps

The Council will review Policy H3.75 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received expressions of support for the policy.

Council Response

Support noted.

Next Steps

The Council will review Policy H3.75 when preparing the next iteration of the Local Plan.

Policy H4: Windfall Housing Proposals (Strategic Policy)

Policy H4: Council Response and next Steps

Lack of flexibility

The Council received a handful of responses based on the perceived lack of flexibility in the policy. Concerns were raised of the wording of the policy which seemingly limits windfall opportunities to small sites and infill sites and that the policy should focus on a site's overall sustainability of sites rather than size. There were also 2 comments in support of the Policy.

Council response

The Council recognises the need for policies to include a degree of flexibility and to be positively prepared and that Policy H4 should include more flexibility to ensure sustainable sites can come forward for development.

Next Steps

The Council welcomes comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan and the Policy will be reviewed to ensure it is positively prepared and allows for flexibility.

Policy H5: Efficient use of Land and Housing Density

Policy H5: Council Response and next Steps

Flexibility of the Policy

The Council received a number of comments which objected to the limited flexibility within the policy. Objections state that the policy should consider the impact of other policies within the Plan including consideration of the local and site characteristics, market demand and aspirations and viability.

Council Response

It is considered that the policy is consistent with the NPPF, paragraph 123 b) which encourages the use of minimum density standards in planning policies.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan and the Policy will be reviewed to ensure it is adequately flexible to allow high quality developments which meet all the relevant policies within the Plan.

Wording of the Policy

Concerns were raised over the wording of the policy particularly the use of the phrase 'optimum densities' which is perceived to be ambiguous. Comments also found the policy to be generally unclearly worded.

Council Response & Next Steps

The council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Indicative dwelling yields

Some comments raised concerns that densities in the Borough are already seemingly high and concerns whether or not the new proposed developments take into account flood risk. There were also concerns that the Plan deviates from the standard densities in certain areas, such as sites close to the metro station in East Boldon.

Council Response

The evidence base for the draft Local Plan comprises of a number of different studies and reports that have been produced to support and justify the policies and proposals. Part of the evidence base is the Strategic Flood Risk Assessment which assesses the flood risk across all potential development sites in the Borough.

Policy NE6 requires applicants to submit a site-specific flood risk assessment to demonstrate that the development is not at risk from flooding and does not increase flood risk elsewhere. As set out in Policy H5, the density applied to sites depends on their proximity to town, district or local centres or metro stations. It is considered that this is consistent with the National Planning Policy Framework, Paragraph 123 which encourages setting minimum density standards for town and city centres and other locations that are well served by public transport.

Next Steps

None required.

Policy H6: Our Existing Stock

Policy H6: Council Response and next Steps

Comments queried what the Council is doing to bring empty properties back into use given that long term empty properties account for around 0.7% of the Borough's housing stock. Comments also questioned when the Council's Enforced Sale Policy would be adopted.

Council Response

The homes included in the statistics for empty homes can include properties whose former residents have been decanted as they await demolition i.e. are not available for re-use, it is a normal and healthy feature of a housing market to have a certain percentage of empty home sowing to churn in the housing market, really long-term empty homes are traditionally low in South Tyneside and the reason that many empty homes are empty is that they are in areas of very low housing market demand and also are often flatted accommodation and therefore unlikely to meet the primary need which is for family housing. In addition, the Government's Planning Practice Guidance states that 'to be included as a contribution to completions it would be necessary for the authority to ensure that empty homes had not already been counted as part of the existing dwelling stock'. Due to resource constraints the authority no longer has an Empty Homes Team. Some empty homes were brought back into use when more resources to do so were available to the authority. However, the numbers were very modest and it is not possible to ensure that they had not already been counted as part of the existing dwelling stock. For these reasons it is not considered feasible to plan for the meeting of housing need based on bringing empty homes back into use.

The Enforced Sale Policy has been approved and the Council can now use the policy as a mechanism for bringing long term empty properties and land back into use.

Next Steps

The Council will continue to review opportunities to bring empty properties back into use and continue working with landlords to ascertain why properties are empty.

Policy H7: Houses in Multiple Occupation

Policy H7: Council Response and next Steps

Council response

The Council welcomes the support for this policy.

Next steps

None required.

Policy H8: Specialist Housing- Extra Care & Supported Housing (Strategic Policy)

Policy H8: Council Response and next Steps

Wording of the Policy

Comments received objecting to the policy wording which does not clarify exactly how much accommodation is required to meet the needs of the elderly and which sites allocated in the Plan are for elderly/specialist accommodation.

Council Response

Policy H10 promotes a mix of housing, including affordable housing, housing that meets the needs of the elderly population as well as housing that meets household aspirations. The Policy provides flexibility by requiring proposals to have regard to the SHMA, its successor documents or other appropriate evidence as requirements will change over the life of the Plan. The evidence base will be kept under review so proposals will have up to date evidence to draw from and should reflect the most up to date evidence. Several sites in the Draft Local Plan are allocated for supported accommodation however it is considered that Policy H10 will ensure proposals address the identified need for different house types.

Next steps

The Council will update the Strategic Housing Market Assessment which will provide more up to date evidence on the need for extra care and supported housing.

New site

One response put forward a currently unallocated site, outlining its potential suitability for Extra Care/Supported Housing

Council Response

The Council will be reviewing sites as part of the SHLAA process including the site put forward for an elderly care village.

Next steps

Review all sites put forward through the Local Plan process for their development potential.

Policy H9: Affordable Housing

Policy H9: Council Response and next Steps

Definition of Affordable Housing.

Comments were raised regarding the perceived vagueness of the term 'affordable' and, given this, how would the Council ensure that affordable housing units are genuinely affordable.

Council Response

'Affordable housing' is defined in the National Planning Policy Framework as 'housing for sale or rent, for those whose needs are not met by the market' and defines the various types of affordable housing product that exists. Based on evidence of need and viability, the Plan would secure up to 18% of affordable homes from new developments above 10 homes. Proposals would be judged against this definition.

Next Steps

The Council will review Policy H9 when preparing the next iteration of the Local Plan.

Viability and the Strategic Housing Market Assessment.

Most comments support the need to address affordable housing requirements of the Borough as well as supporting the flexibility provided in relation to tenure mix. However concerns were raised over the evidence base which supports the policy, namely the Strategic Housing Market Assessment (2015) and lack of a viability report. In line with the NPPF, affordable housing provision should not undermine the deliverability and viability of the Plan. Comments were received suggesting a range of affordable housing requirements may be more appropriate given the different market characteristics across the Borough.

Council response

Support for the flexibility with regards to tenure mix welcomed. The Council is undertaking a viability assessment which will accompany the next iteration of the Plan. The Council is also updating the Strategic Housing Market Assessment to provide a more up to date evidence base for the policy. The policy will be reviewed in line with new evidence.

Next Steps

Review the policy when new evidence is available to ensure the policy does not undermine deliverability of the Plan and to ensure the affordable housing requirement is justified.

Policy H10: Housing Mix

Policy H10: Council Response and next Steps

Support for the Policy

Several comments were received in support of the Policy, welcoming the flexibility that the Policy provides particularly in respect of increasing the number of detached/ 'executive' homes.

Council Response

Support for the policy welcomed

Next Steps

The Council will review Policy H9 when preparing the next iteration of the Local Plan.

Concerns over the inclusion of 'executive homes' and the need for affordable housing/housing for the elderly

In contrast to the representations outlined above, the Council received objections to the reference to 'executive homes' in the Policy. Objections raised concerns that this would lead to the provision of homes which do not meet local needs and that the Plan should focus on delivering affordable homes and homes for the elderly. Objections were also concerned that the policy doesn't recognise that housing needs vary around the Borough.

Council Response

It is considered that Policy H10 is flexible and promotes a mix of housing, including affordable housing, housing that meets the needs of the elderly population as well as housing that meets household aspirations. The Policy provides flexibility by requiring proposals to have regard to the Strategic Housing Market Assessment, its successor documents or other appropriate evidence as requirements will change over the life of the Plan. The evidence base will be kept under review so proposals will have up to date evidence to draw from and should reflect the most up to date evidence.

Next steps

Review the Policy to ensure it is clear that proposals should reflect the housing needs identified in the most up to date evidence available.

Policy H11: Technical Design Standards for New Homes

Policy H11: Council Response and next Steps

Lack of evidence to support the policy

Comments were received which pointed to a lack of appropriate evidence to support the Policy. Comments stated that the Policy should acknowledge Planning Practice Guidance which identifies the type of evidence required to introduce a Policy like this. Concerns were raised about the potential impact of the Policy on build costs, affordability and viability.

Council response

It is acknowledged that the Policy is ambitious and currently exceeds the policy approach in other parts of the region.

Next Steps

The Council will review Policy H11 when preparing the next iteration of the Local Plan.

Shortage of housing for the elderly

Comments were also received pointing to a shortage of housing suitable for the elderly, using the London Plan as an example of how to address this.

Council Response

The Policy currently goes beyond the requirements in the London Plan and requires all new dwellings to be compliant with M4(2) and 15% of new build housing to be compliant with M4(3). However this will be reviewed when the new SHMA data is available.

Next Steps

The Council will review Policy H11 when preparing the next iteration of the Local Plan.

Policy H12: Gypsies, Travellers and Travelling Showpeople (Strategic Policy)

Policy H12: Council Response and next Steps

Transport Assessment

A comment was received requesting that Policy includes a requirement for a Transport Assessment to be undertaken ahead of the release of the site at Whitemare Pool to ensure the continued safe and efficient operation of the Strategic Route Network.

Council Response

The policy will be reviewed regarding the requirement for a Transport Assessment

Outdated Gypsy and Traveller Accommodation Assessment

Concerns were raised that the Gypsy and Traveller Accommodation Assessment is out of date and predates the latest planning policy for Traveller Sites. The Gypsy and Traveller Accommodation Assessment shows a need which is not currently being met by the policy.

Council Response

The Gypsy and Traveller Accommodation Assessment will be updated alongside the Strategic Housing Market Assessment and the policy will be updated accordingly.

Next Steps

The Council will review Policy H9 when preparing the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 6: Planning for Jobs

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 6 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 6 Planning for Jobs received 51 comments of which 20 were objections to policies, 16 were in support and 15 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 6: Planning For Jobs				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy ED1: Strategic Economic Development (Strategic Policy)	10	4	4	2
Policy ED2: Provision of Land for General Economic Development (Strategic Policy)	10	4	2	4
Policy ED2.1 Wardley Colliery (Strategic Policy)	5	1	1	3
Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)	15	4	1	10
Policy ED4: Protecting Employment Uses (Strategic Policy)	3	0	2	1
Policy ED5: Employment Development Beyond Our Employment Allocations	2	1	1	0
Policy ED6: Leisure and Tourism	4	1	3	0
Policy ED7: Tourist and Visitor Accommodation	2	0	2	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy ED1: Strategic Economic Development (Strategic Policy)	- Is the need to release land in the Green Belt driven by an unrealistic employment land requirement? - Job creation and the number of houses required - Future proofing for environmental and technological targets

	• Amendments/ wording considerations /support for the policy
Policy ED2: Provision of Land for General Economic Development (Strategic Policy)	• The potential of the Wardley Colliery site • Support for the policy
Policy ED2.1 Wardley Colliery (Strategic Policy)	• Local Wildlife Site • Re-opening the Leamside line • The Sustainability Appraisal of the policy does not support the allocation • Flexibility regarding the Wardley Colliery allocation
Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)	• There is no need for employment land to be protected for specialist uses • The housing potential of the employment allocations should be assessed • Land allocated for employment is heavily 'forested' • Amendments/ wording considerations /support for the policy
Policy ED4: Protecting Employment Uses (Strategic Policy)	• Amendments/ wording considerations /support for the policy
Policy ED5: Employment Development Beyond Our Employment Allocations	• Support for the policy
Policy ED6: Leisure and Tourism	• Support for the policy
Policy ED7: Tourist and Visitor Accommodation	• Support for the policy

Policy ED1: Strategic Economic Development (Strategic Policy)

Policy ED1: Council response and next steps

Is the need to release land in the Green Belt driven by an unrealistic employment land requirement?

There are two aspects to the representations; firstly whether the extent of employment land need, particularly specialist employment need, identified in Policy ED1[ai] is realistic and robust. Secondly whether there is an opportunity to re-allocate employment land for housing, with the Former Hawthorne Leslie Shipyard and the Rohm and Hass sites both being specifically referenced, and thereby reducing the need to release land from the Green Belt for housing.

Council Response

The North East Local Enterprise Partnership's Strategic Economic Plan sets out a clear vision to increase the number of jobs in the North East by 100,000 between 2014 and 2024. However, this target has not been disaggregated to the local authority level.

The Employment Land Review (2019) set out a range of options regarding the scale of need for employment land. These options were Baseline Labour Demand, Policy-On Labour Demand and Past (Net) Completions. For more information on these options see the Employment Land Review. Our preferred approach uses an Experian (an independent information services company) forecast of jobs growth over the period 2020 to 2035 as a baseline and then adds in an allowance for the potential impact of the IAMP proposals. To be clear, the Employment Land Review does not assess the need for the IAMP as it came forward separately through the Adopted Area Action Plan. Also to be clear, although the Experian jobs growth forecasts provided a baseline for assessing the scale of need for employment land in the Local Plan, no jobs target has been set in the Local Plan.

Policy ED1[a] distinguishes between land for general economic development and land for specialist port and marine economic development. The distinction is a qualitative one based on the assessment that River Tyne is well placed to take advantage of future growth in the offshore energy sector, including offshore wind, oil and gas. This has the potential to present considerable inward investment opportunities for South Tyneside - a key element of the River Tyne offer to the offshore energy sector are four riverside sites located on the south bank of the Tyne. These key riverside assets should be protected for future employment / industrial uses over the longer term, ultimately resulting in local investment and job creation. This assessment has been informed by the Employment Land Review. It includes a section 'Demand for sites with river access' which states 'There is clear evidence that demand for riverside sites is increasing and importantly will strengthen further over the period of the Local Plan' (Paragraph 6.52).

Regarding the Former Hawthorne Leslie Shipyard, the previous South Tyneside Employment Land Review (2013) stated 'The site adjoins A&P Tyne which makes the introduction of alternative uses such as housing problematic' and that the site includes rare intertidal mudflat and saltmarsh habitats. The industrial legacy of the site would also be a very challenging obstacle to overcome in the context of the economic viability of any proposed residential development. Property particulars advertising the availability of the Rohm and Hass site were published in 2016. They stated, 'No housing development will be permitted on the site.' The Local Planning Authority has verified with representatives of the site owners that this remains the case. The site is therefore categorically unavailable for housing development.

Next Steps

The Council will review policies S1, H1[a], ED1 and ED3 when preparing the next iteration of the Local Plan.

Job creation and the number of houses required

The Council has received a representation stating that North East Local Enterprise Partnership Strategic Economic Plan is underperforming and that Local Plan is based on overambitious policies which are not delivering jobs in South Tyneside.

Council Response

The North East Local Enterprise Partnership's Strategic Economic Plan sets out a clear vision to increase the number of jobs in the North East by 100,000 between 2014 and 2024. However, this target has not been disaggregated to the local authority level.

The Employment Land Review (ELR) (2019) set out a range of options regarding the scale of need for employment land. These options were Baseline Labour Demand, Policy-On Labour Demand and Past (Net) Completions. For more information on these options see the ELR. Our preferred approach uses an Experian (an independent information services company) forecast of jobs growth over the period 2020 to 2035 as a baseline and then adds in an allowance for the potential impact of the IAMP proposals. To be clear, the ELR does not assess the need for the IAMP as it came forward separately through the Adopted Area Action Plan. Also to be clear, although the Experian jobs growth forecasts provided a baseline for assessing the scale of need for employment land in the Local Plan, no jobs target has been set in the Local Plan.

Next Steps

None required.

Future proofing for environmental and technological targets

The Council received a representation asking how the Borough will be future proofed for environmental and technological targets.

Council Response

Please refer to the Council's Economic Recovery Plan (September 2020)
<https://www.southtyneside.gov.uk/article/71042/Economic-Recovery-Plan>

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy ED2: Provision of Land for General Economic Development (Strategic Policy)

Policy ED2: Council response and next steps

The potential of the Wardley Colliery site

The Council received a representation stating that Policy ED2 should make provision for a larger employment allocation at Wardley.

Council Response

The Council is in discussions with the owners regarding the development potential of the site and how this can best be balanced with constraints such as the Local Wildlife Site designation.

Next Steps

The Council will review Policy ED2 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received a representation supporting the reference to 2.1 ha at Cleadon Industrial Estate.

Council Response

Support for the reference noted

Next Steps

The Council will review Policy ED2 when preparing the next iteration of the Local Plan.

ED2.1 Wardley Colliery (Strategic Policy)

Policy ED2.1: Council response and next steps

Local Wildlife Site

The Council received a representation which stated that the site is of important biodiversity importance and it is adjacent to a Local Wildlife Site and that this cannot be reconciled with the allocation.

Council Response

It is acknowledged that the allocated site includes some land that is within the Local Wildlife Site. However, this land is also within the boundary of planning application ST/1051/12/FUL which granted planning permission on 01/12/2014 for change of use from coal disposal point including the demolition of mechanised rail loading bunker and associated structures, retention of rail loading head and alteration/extension of rail loading pad to use of the site for transportation and storage of coal and minerals, and continued use of the site for the storage of containers. The wider Local Wildlife Site is not allocated for economic development. It should also be noted that criteria [c] of Policy ED2.1 state 'Ensure that, in accordance with Policy NE2, adverse ecological impacts are dealt with through the mitigation hierarchy, and any compensation measures and measurable net gain is delivered within Wardley Colliery Wildlife Site'.

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Re-opening the Leamside Line

The Council received a representation which stated the existing use of the line as a cycle path should be protected.

Council Response

Regarding the Council's in-principle support for the re-opening of the Leamside Lane, discussions are ongoing.

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

The Sustainability Appraisal of the policy does not support the allocation

The Council received a representation which stated that the allocation of Wardley Colliery (ED2.1) is not supported by the Sustainability Appraisal.

Council Response

Regarding the Sustainability Appraisal, Policy ED2.1 was positively assessed within the South Tyneside Sustainability Appraisal – Draft Local Plan Policies Draft Local Plan Interim Sustainability Appraisal: Appendix J (August 2019).

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Flexibility regarding the Wardley Colliery allocation

The Council received a representation regarding the Wardley Colliery allocation which stated that flexibility is required in the approach to the protection of areas of ecological value as a rigid approach would damage the ability to deliver employment land.

Council Response

The Council is in discussions with the owners regarding the development potential of the site and how this can best be balanced with constraints such as the Local Wildlife Site designation

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received a representation that welcomed the retention of most of the Local Wildlife Site within the Green Belt.

Council Response

Support for the retention of most of the Local Wildlife Site within the Green Belt noted.

Next Steps

The Council will review Policy ED2.1 when preparing the next iteration of the Local Plan.

Policy ED3: Provision of Land for Port and Marine Uses (Strategic Policy)

Policy ED3: Council response and next steps

There is no need for employment land to be protected for specialist uses

The Council received a representation stating that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries.

Council Response

The comments are based on a report commissioned by the objector. The objection will therefore be referred to in this response as the Report.

The Report appears to dismiss South Tyneside as a location for offshore businesses and suggests we do not have a strong manufacturing base. The Borough has a cluster of offshore businesses and a large number of our 3,000+ businesses are involved in the manufacturing/ engineering sectors.

The River Tyne is well placed to take advantage of future growth in the offshore energy sector, including offshore wind, oil and gas. This has the potential to present considerable inward investment opportunities for South Tyneside - a key element of the River Tyne offer to the offshore energy sector are four riverside sites located on the south bank of the Tyne. These key riverside assets should be protected for future employment / industrial uses over the longer term, ultimately resulting in local investment and job creation. It is acknowledged that some of these sites could require gap funding or incentives from the public sector to enable end users in the offshore energy sector to invest in them.

The Borough is home to a deep water Port which has available land and matching ambitions to develop the offshore sector in South Tyneside. Equinor and SSE Renewables, the two companies behind the Dogger Bank offshore wind farm, have recently (May 2020) announced plans to build a new Operations and Maintenance Base at the Port of Tyne .

The Tyne Dock Enterprise Park is situated only 2km from the harbour entrance into the North Sea. It has a river frontage of 550m and a 250m quay with a water depth at the quayside varying between 8.6 to 11.2m LAT to a maximum of 13.5m to 15.5m. This provides deep water access for larger vessels that cannot be accommodated elsewhere on the North East coast.

With a heritage for engineering excellence, South Tyneside is home to a highly skilled, available workforce, benefitting from labour costs for an engineer almost 15% lower than that of Aberdeen. For the reasons stated, it is not accepted that there is no need for employment land in South Tyneside to be specifically protected for employment uses that relate to riverside and offshore industries.

With specific regard to the Hawthorne Leslie site, Appendix 3: Site Assessment Matrix to the South Tyneside Employment Land Review - Final Report (July 2019) recommends that with regard to the Hawthorne Leslie site there is 'substantial investment required to bring the site back into use. Past demand for riverside sites weak but during the plan period this demand to grow strongly as offshore sectors expand e.g. vessel fabrication and maintenance of turbines. This recommendation, together with the relevant sections of the Employment Land Review - Final Report, supports the decision to allocate the site for port and marine use in the Pre-Publication Draft Local Plan.

Next Steps

The Council will review Policy ED3 when preparing the next iteration of the Local Plan.

The housing potential of the employment allocations should be assessed

The Council received a representation which stated the sites allocated for economic development in the policy should be assessed to see if they are suitable for housing.

Council Response

The Strategic Housing Land Availability Assessment (2019) assesses the suitability of sites for housing and is comprehensive in its scope. This will be updated for the next iteration of the emerging Local Plan.

Next Steps

Continue to update the Strategic Housing Land Availability Assessment.

Land allocated for employment is heavily 'forested'

The Council received a representation which stated 'Objection to the site 'nearest the River Don and Bedes World. Touching the Nissan car storage yard at the Port of Tyne) This site is heavily forested and must be protected'

Council Response

It is acknowledged that the land designated ED3.2 includes trees and vegetation. However, the land within the allocation that is available for development is not forested.

Next Steps

The Council will review Policy ED3.2 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy ED4: Protecting Employment Uses (Strategic Policy)

Policy ED4: Council response and next steps

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy ED5: Employment Development Beyond Our Employment Allocations, Policy ED6: Leisure and Tourism and Policy ED7: Tourist and Visitor Accommodation

Policies ED5, ED6 & ED7: Council response and next steps

Support for the policy

The Council received an expression of support for Policy ED5 and expressions of support for policies ED6 and ED7.

Council Response

Support for the policies welcomed

Next Steps

The Council will review policies ED5, ED6 and ED7 when preparing the next iteration of the Local Plan.

Chapter 7: Planning for our Town Centres

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 7 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 7: Planning for our Town Centres received 27 comments of which 6 were objections to policies, 17 were in support and 4 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 7: Planning for our Town centres				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy R1: The Hierarchy of our Centres (Strategic Policy)	9	3	3	3
Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)	4	1	2	1
Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)	2	0	1	1
Policy R4: South Shields Market	1	0	1	0
Policy R5: Prioritising Centres Sequentially	3	0	2	1
Policy R6: Proposals Requiring an Impact Assessment	2	0	2	0
Policy R7: Evening and Night-time Economy in South Shields Town Centre	3	0	3	0
Policy R8: Hot Food Takeaways	2	0	2	0
Policy R9: Local Neighbourhood Hubs	1	0	1	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy R1: The Hierarchy of our Centres (Strategic Policy)	• The definition of Cleadon and East Boldon Local Centres • The units at Calf Close Lane and Lincoln Way/Leicester Way • The status of Jarrow and Hebburn in the retail hierarchy • Support for the policy

Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)	• Re-use of empty retail premises in South Shields Town Centre • Inclusion of certain properties within the Primary Shopping Area of South Shields • Support for the policy
Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)	• Impact of Phase 3 of the South Shields 365 Town Centre Vision • Support for the policy
Policy R4: South Shields Market	• Support for the policy
Policy R5: Prioritising Centres Sequentially	• Evidence should be provided of discussion with owners • Support for the policy
Policy R6: Proposals Requiring an Impact Assessment	• Support for the policy
Policy R7: Evening and Night-time Economy in South Shields Town Centre	• Support for the policy
Policy R8: Hot Food Takeaways	• Support for the policy
Policy R9: Local Neighbourhood Hubs	• Support for the policy

Policy R1: The Hierarchy of our Centres (Strategic Policy)

Policy R1: Council response and next steps

The definition of Cleadon and East Boldon Local Centres

The Council received representations stating that the definition of Cleadon Local Centre should be expanded to include the shops on the south side of Front Street in Cleadon and those on Langholm Road, Station Road, Front Street and Grange Terrace in East Boldon.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy R1 when preparing the next iteration of the Local Plan.

The units at Calf Close Lane and Lincoln Way/Leicester Way

The Council received a representation stating that the units at Calf Close Lane and Lincoln Way/Leicester Way should be recognised in the policy.

Council Response

Local Centres have a specific role in the retail hierarchy. It is considered that the units referenced in the representation do not warrant inclusion in a Local Centre. Whilst Local Neighbourhood Hubs do not form part of the retail hierarchy, the Town and District Use Needs Study (2018) did not consider that the units referenced in the representation should be identified as Local Neighbourhood Hubs.

Next Steps

None required.

The status of Jarrow and Hebburn in the retail hierarchy

The Council received a representation stating that the Council is focused on South Shields and that Jarrow and Hebburn are neglected by the Council for investment.

Council Response

It is considered that the role and function of the respective town centres as identified in Policy R1 is appropriate.

Next Steps

None required.

Support for the policy

The Council received representations supporting the policy.

Council Response

Support welcomed

Next Steps

None required.

Policy R2: Ensuring Vitality and Viability in our Retail Centres (Strategic Policy)

Policy R2: Council response and next steps

Re-use of empty retail premises in South Shields Town Centre

The Council received representations including stating that the upper stories of many retail premises in South Shields Town Centre have been empty, unused or underutilised and that the Local Plan provides an opportunity to bring these upper floors back into use, for residential purposes.

Council Response

The policy is supportive of proposals for upper floor mixed-use development including residential development. The Council is supportive in principle of residential development forming one of the options for the re-use of empty, unused or underutilised upper stories of retail premises in King Street, but the Council does not own the properties.

Next Steps

None required

Inclusion of certain properties within the Primary Shopping Area of South Shields

The Council received an objection to inclusion of certain properties in King Street, South Shields within the primary shopping area of South Shields Town Centre.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy R2 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support for the policy welcomed

Next Steps

None required

Policy R3: Mixed Use Opportunities in South Shields Town Centre (Strategic Policy)

Policy R3: Council response and next steps

Impact of Phase 3 of the South Shields 365 Town Centre Vision

The Council received a representation expressing concern as to the impact of Phase 3 of the South Shields 365 Town centre Vision on the wider town centre in terms of these long-term vacant retail units and their potential to find end users.

Council Response

Phase 3 of the South Shields 365 Town Centre Vision is intended to deliver modern purpose build floorplates which will represent a new offer in the Town Centre and therefore not directly comparable with the current situation regarding vacant units. Comment questioning that a small requirement for additional convenience retail floorspace will occur by 2033 noted. However, the policy is not predicated on this.

Next Steps

The Council will review Policy R3 when preparing the next iteration of the Local Plan.

None required

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support for the policy welcomed

Next Steps

None required

Policy R4: South Shields Market

Policy R4: Council response and next steps

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support for the policy welcomed.

Next Steps

None required

Policy R5: Prioritising Centres Sequentially

Policy R5: Council response and next steps

Evidence should be provided of discussion with owners

The Council received a representation stating that any applications should provide the necessary evidence that discussions have been held with the owners of properties in town centre to demonstrate that properties are not available.

Council Response

The supporting text to the policy includes that consideration will be given as to whether the suitability, availability and viability of sites has been considered, with regard to the need to be addressed (paragraph 7.26).

Next Steps

None required

Support for the policy

The Council has received expressions of support for the policy.

Council Response

Support for the policy welcomed

Policy R6: Proposals Requiring an Impact Assessment, Policy R7: Evening and Night-time Economy in South Shields Town Centre, Policy R8: Hot Food Takeaways and Policy R9: Local Neighbourhood Hubs

Policies R6, R7, R8 and R9: Council Response and Next Steps

Support for the policies

The Council has received an expression of support for policies R6, R7 and R9 and expressions of support for Policy R8.

Council Response

Support welcomed

Next Steps

None required

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 8: Regeneration

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 8 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 8: Regeneration received 77 comments of which 29 were objections to policies, 22 were in support and 26 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 8: Regeneration				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy RG1: South Shields Riverside (Strategic Policy)	10	3	1	6
Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)	4	0	1	3
Policy RG3 Winchester Street Housing-led Regeneration Site (Strategic Policy)	3	3	0	0
Policy RG4: Argyle Street Housing-led Regeneration Site (Strategic Policy)	3	3	0	0
Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)	54	16	18	20
Policy RG6: Fowler Street Improvement Area	1	0	1	0
Policy RG7: Foreshore Improvement Area	2	1	1	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy RG1: South Shields Riverside (Strategic Policy)	• The deliverability of the Holborn allocation • Amendments/ wording considerations /support for the policy
Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)	• Conflict with validation checklist • Protection for the trees on the site • Amendments/ wording considerations /support for the policy
Policy RG3 Winchester Street Housing-led Regeneration Site (Strategic Policy)	• Conflict with validation checklist • Support for the policy

Policy RG4: Argyle Street Housing-led Regeneration Site (Strategic Policy)	• The site is not suitable for development • Support for the policy
Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)	• Ground Conditions and Contamination • Flood Risk and Water Management • Priority for local housing needs • The need for comprehensive master planning • The deliverability of the allocation • Amendments/ wording considerations /support for the policy
Policy RG6: Fowler Street Improvement Area	• Support for the policy
Policy RG7: Foreshore Improvement Area	• The need for more explicit guidance • Support for the policy

Policy RG1: South Shields Riverside (Strategic Policy)

Policy RG1: Council response and next steps

The deliverability of the Holborn allocation

The Council has received representations questioning the deliverability of the Holborn site.

Council Response & Next Steps

It is accepted that the projected delivery of housing on the site needs to be realistic. The projected delivery has been informed by the Council's Regeneration Team and is based on up-to-date and robust information.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy RG2: Tyne Dock Estate Housing-led Regeneration Site (Strategic Policy)

Policy RG2: Council response and next steps

Conflict with validation checklist

The Council received a representation which states 'This policy requires the submission of a Transport Assessment for a scheme of 65 and 48 dwellings. This conflicts with the South Tyneside Council Validation Checklist which suggests that a scheme of this size should only submit a Transport Statement.'

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy RG2 when preparing the next iteration of the Plan.

Protection for the trees on the site

The Council received a representation stating that mature trees on the site must be offered protection from developers.

Council Response

See Council responses for policies D2 and NE1 regarding loss of trees.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy RG3 Winchester Street Housing-led Regeneration Site (Strategic Policy)

Policy RG3: Council response and next steps

Conflict with validation checklist

The Council received a representation which states 'This policy requires the submission of a Transport Assessment for a scheme of 65 and 48 dwellings. This conflicts with the South Tyneside Council Validation Checklist which suggests that a scheme of this size should only submit a Transport Statement.'

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy RG3 when preparing the next iteration of the Plan.

Support for the policy

The Council has received an expression of support for the policy

Council Response

Support welcomed

Next Steps

The Council will review Policy RG3 when preparing the next iteration of the Local Plan

Policy RG4: Argyle Street Housing-led Regeneration Site (Strategic Policy)

Policy RG4: Council response and next steps

The site is not suitable for development

The Council received a representation which stated that the site is not suitable for development. Reasons stated include that it has a good mix of tree species and the area has rich bird and insect life.

Council Response

Whilst it is accepted that the site includes significant wildlife value, the policy states that we will support development proposals that demonstrate how the impact of development on local wildlife will be mitigated. See Council responses for policies D2 and NE1 regarding loss of trees.

Support for the policy

The Council has received an expression of support for the policy.

Council Response

Support welcomed

Next Steps

None required

Policy RG5: Cleadon Lane Mixed-Use Regeneration Site (Strategic Policy)

Policy RG5: Council response and next steps

Ground Conditions and Contamination

The Council received representations stating that developing the site for housing conflicts with Policy NE9 which focuses on contaminated land and ground stability.

Council Response

It is acknowledged that there is the potential for significant constraints due to ground conditions from the historic industrial uses. However, any development proposal in relation to Policy RG5: Cleadon Lane Mixed-Use Regeneration Site will need to be in accordance with Policy NE9: Contaminated Land and Ground Stability. The land is only suspected to contain contamination and without testing, there is no way of knowing the level of potential contamination. The site would

undergo a full intrusive site investigation which would look at potential organic and inorganic contaminants as well as metals and asbestos. Any de-culverting which is done at the site would take into consideration the ground conditions and determine whether or not the option is viable. It should be noted that there is the possibility to line channels as part of de-culverting works which would protect the river from any potential contamination in the area.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

Flood Risk and Water Management

The Council received representations stating that developing the site for housing conflicts with Policy NE6 which is concerned with flood risk and water management.

Council Response

Any planning application to develop the site will need to accord with policies NE6: Flood Risk and Water Management and Policy, NE7: Protecting Water Quality and NE11 Pollution. The levels of potential contaminants are unknown. Watercourse channels can be lined as part of remediation works which will prevent potential contamination from entering the river Don. There are also a range of remediation techniques available for “cleaning” contaminated soils which could be considered for the site should they be suitable and viable.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

The amount of employment land

The Council received a representation stating that in order to achieve the most appropriate masterplan, the amount of employment land should be referred to as ‘approximate’.

Council Response

It is important to retain local employment opportunities as part of the mix of uses and for this reason it is appropriate that 2.1 ha of employment land is a minimum.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

Priority for local housing needs

The Council received a representation expressing support for the allocation of some of the brown field land for housing with the proviso that the number and type of homes provided should be to meet local needs only.

Council Response

Policy H10 states that developments should include an appropriate mix of dwelling types and sizes to address measured needs over the long term considering the nature of the development and the character of the location.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

The need for comprehensive master planning

The Council received a representation which stated there should be a site-specific policy in the Local Plan for this site which requires development to be comprehensively masterplanned, a design code and the range, size, type and tenure of housing expected on site to meet housing needs.

Council Response

A comprehensive masterplan would not normally be required for a site of this size.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

The deliverability of the allocation

The Council has received a representation questioning the deliverability of the Cleadon Industrial Estate allocation. The representation includes the following points:

- There is no evidence on how the existing jobs will be relocated, if at all, when and to where.
- There is no evidence presented that all the land has been assembled
- There are known significant viability constraints due to ground conditions

Council Response

It is acknowledged that the housing-led development of the site would result in a reduction in employment land in the Borough. The site is available and there is active developer interest in the site.

Next Steps

The Council will review Policy RG5 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy RG6: Fowler Street Improvement Area

Policy RG6: Council response and next steps

Support for the policy

The Council received an expression of support for the policy

Council Response & Next Steps

The Council welcomes support for the policy

Next Steps

The Council will review Policy RG6 when preparing the next iteration of the Local Plan.

Policy RG7: Foreshore Improvement Area

Policy RG7: Council response and next steps

The need for more explicit guidance

The Council received a representation stating that more explicit guidance should be included in the policy.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy RG6 when preparing the next iteration of the Local Plan.

Support for the policy

The Council received an expression of support for the principle of the allocation.

Council Response

The Council welcomes support for the policy

Next Steps

The Council will review Policy RG7 when preparing the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 9: Planning for our Built Environment

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 9 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 9: Planning for our Built Environment received 60 comments of which 47 were objections to policies, 9 were in support and 4 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 9: Planning for our Built Environment – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy D1: Our Strategic Approach for the Built Environment (Strategic Policy)	2	0	2	0
Policy D2 General Design Principles (Strategic Policy)	41	2	2	37
Policy D3: Promoting Good Design with new Residential Developments (Strategic Policy)	10	1	1	8
Policy D4: Alterations and Extensions to Residential Buildings	2	0	1	1
Policy D5: Shopfronts	3	0	3	0
Policy D6: Advertisements	2	1	0	1

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy:

Table 2. Summary of comments received	
Policy D1: Our Strategic Approach for the Built Environment (Strategic Policy)	Support for the policy
Policy D2 General Design Principles (Strategic Policy)	- BREEAM requirements - The Policy does not go far enough - Carbon emissions - Loss of trees - Wording considerations
Policy D3: Promoting Good Design with new Residential Developments (Strategic Policy)	- Lifetime Homes/Building for Life - Support for the policy/Wording considerations
Policy D4: Alterations and Extensions to Residential Buildings	Wording amendments/Support for the policy
Policy D5: Shopfronts	Support for the policy
Policy D6: Advertisements	Support for the policy/Wording Considerations

Policy D1: Our Strategic Approach to the Built Environment

Policy D1: Council response and next steps

Support for policy

Representations were received in support for the policy

Next Steps

Whilst no objections were received, the Council will review Policy D5 when preparing the next iteration of the Local Plan.

Policy D2: General Design Principles

Policy D2: Council response and next steps

BREEAM requirements

The Council received a number of objections to the policy based on the view that the BREEAM requirements are too demanding.

Council Response

The BREEAM Family is a suite of certification schemes which drive sustainability within the built environment, including the use of more resource efficient and responsible construction practices, protection and enhancements of our natural world, mitigating the impacts of climate change. BREEAM provides confidence in the delivery of sustainable outcomes and better quality places through the use of independently assessed certification models and assessment frameworks. The Council feels it is important that any requirements for BREEAM schemes are clearly outlined in at the strategic level. It is acknowledged that viability assessments will have a bearing on individual cases. Establishing a local evidence base and undertaking an assessment of viability can ensure that that potential targets can be achieved.

Next Steps

The Council will review Policy D2 when preparing the next iteration of the Local Plan.

The policy does not go far enough

The Council received criticism that the policy should be more detailed, specifically in terms of the introduction of design codes.

Council Response

The council welcomes comments regarding policy wording. More detailed design guidance is contained within the Council's suite of Supplementary Planning Documents.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Carbon emissions

The Council received a representation calling for the inclusion of carbon emission analysis throughout the Plan making process. The policy is insufficiently detailed to enable the council to secure any improvement over a business as usual construction approach and will not secure the radical reduction in carbon emissions demanded by national legislation and planning policy.

Council Response

The Council strongly supports the global, national and local imperative to mitigate the effects of climate change. Many of the emerging policies in the draft Plan are “designed to secure that the development and use of land contributes to the mitigation of and adaption to climate change”. Climate Change is a cross cutting theme which is central to the sustainability of the whole Plan itself. However, the Council does not agree that the Local Plan is required to include carbon emission targets. Please refer to the Council’s response to Policy S1 and NE1 for further information on this subject.

To ensure the consideration of carbon emissions is considered within the Plan preparation, the Council is undertaking a carbon audit of the strategic spatial options and reasonable options for development allocations. The carbon audit will provide further evidence and consideration in understanding the potential effects of development sites which will contribute to the SA and inform the next iteration of the Local Plan.

Next Steps

The draft Local Plan will be reviewed to ensure new Climate Change policies and policies contributing to Climate Change adaptation/mitigation are clearly identified within the Local Plan. Supporting documents will also be updated and produced to demonstrate how the council has complied with national Climate Change legislation.

Loss of Trees

The Council received an objection to the policy stating that development being a priority over trees is not acceptable.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

Wording Considerations.

The Council generally received support for the policy but there is concern that the flow of the supporting information is not ideal.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy D3: Promoting Good Design with new Residential Developments

Policy D3: Council response and next steps

Lifetime Homes/Building for Life

The Council received several objections to the policy in terms of cost implications to developers. Conversely a number of representations were received suggesting that the policy does not go far enough.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

The Council will review Policy D3 when preparing the next iteration of the Local Plan.

Support for the Policy/Wording Considerations

The Council generally received support for the policy but there is concern that the flow of the supporting information is not ideal.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy D4: Alterations and Extensions to Residential Buildings

Policy D4: Council response and next steps

Support for the Policy/Wording Considerations

The Council generally received support for the policy but there is concern that the flow of the supporting information is not ideal.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy D5: Shopfronts

Policy D5: Council response and next steps

The policy was well received.

Next Steps

Whilst no objections were received, the Council will review Policy D5 when preparing the next iteration of the Local Plan.

Policy D6: Advertising

Support for policy and wording considerations.

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 10: Planning for our Heritage Assets

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 10 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 10: Planning for our Heritage Assets received 32 comments of which 19 were objections to policies and 13 were in support. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 10: Planning for our Heritage Assets – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy HE1: Our Strategic Approach for our Heritage Assets (Strategic Policy)	12	0	4	8
Policy HE2: World Heritage Sites	5	0	2	1
Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)	0	0	2	0
Policy HE4: Archaeology	6	0	1	5
Policy HE5: Development Affecting Non-Designated Heritage Assets	7	0	2	5
Policy HE6: Heritage At Risk	2	0	2	0

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy:

Table 2. Summary of comments received	
Policy HE1: Our Strategic Approach for our Heritage Assets (Strategic Policy)	• Support for the policy/ Wording considerations • Lack of Clarity
Policy HE2: World Heritage Sites	• Support for the policy
Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)	• Support for the policy/Wording considerations.
Policy HE4: Archaeology	• Support for the policy • Objection to Historic Environment Record requirements
Policy HE5: Development Affecting Non-Designated Heritage Assets	• Support for the policy/Wording considerations.
Policy HE6: Heritage At Risk	• Support for the policy

Policy HE1: Our Strategic Approach for our Heritage Assets (Strategic Policy)

Policy HE1: Council response and next steps

Support for the policy/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the NPPF.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Lack of clarity

The Council received a representation in relation to the how the policy would be applied in relation to strengthening links between culture and the historic environment.

Council Response

Policy H1 is a Strategic Policy that should not be read in isolation but in conjunction with other policies within the emerging Local Plan as well as the Council's Cultural Strategy.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy HE2: World Heritage Sites

Policy HE2: Council response and next steps

Support for the policy/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the NPPF.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy HE3: Development Affecting Designated Heritage Assets (Strategic Policy)

Policy HE3: Council response and next steps

Support for the policy/Wording considerations

The Council received support for the policy. However, it was noted that the Council's East Boldon Conservation Area Character Appraisal and Management Plan are in need of review.

Council Response

It is acknowledged that a number of the Council's Supplementary Planning Documents could benefit from being reviewed.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan. A review of Supplementary Planning Documents will be undertaken in due course.

Policy HE4: Archaeology

Policy HE4: Council response and next steps

Support for the policy/Wording considerations

The Council received support for the policy. However, it was noted that the Council's East Boldon Conservation Area Character Appraisal and Management Plan are in need of review.

Council Response

It is acknowledged that a number of the Council's Supplementary Planning Documents could benefit from being reviewed.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan. A review of Supplementary Planning Documents will be undertaken in due course.

Objection to Historic Environment Record requirements

The Council received objections to the policy stating that it is more onerous than National Policy.

Council Response

The inclusion of investigations in the Historic Environment Record should be a blanket requirement of archaeological investigations as it is a vital step involved in keeping the Historic Environment Record up-to-date, allowing the significance of heritage assets to be assessed and to predict the archaeological potential of sites. Sites where nothing is found are as important in assessing archaeological potential as sites where archaeology is found. The policy does not suggest that all archaeological sites require publication. However, including all archaeological investigations in the Historic Environment Record assists the Local Planning Authority in adhering to National Planning Policy Framework paragraphs 187 and 188.

Next Steps

None required

Policy HE5: Development Affecting Non-Designated Heritage Assets

Policy HE5: Council response and next steps

Support for the policy/Wording considerations

The Council received several representations in support of the policy, although it was suggested that the wording be amended to be consistent with the NPPF. It was noted that the Council's East Boldon Conservation Area Character Appraisal and Management Plan are in need of review.

Council Response

The council welcomes comments regarding policy wording. It is acknowledged that a number of the Council's Supplementary Planning Documents could benefit from being reviewed.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan. A review of Supplementary Planning Documents will be undertaken in due course.

Policy HE6: Heritage At Risk

Policy HE6: Council response and next steps

Support for the policy

The Council received several representations in support of the policy.

Council Response

The council welcomes comments in support of the policy.

Next Steps

None required.

SOUTH TYNESIDE LOCAL PLAN PRE-PUBLICATION DRAFT (REGULATION 18) – AUGUST 2019 – CONSULTATION SUMMARY AND RESPONSE

Chapter 11: Planning for our Natural Environment

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 11 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 11: Planning for the Natural Environment received 422 comments of which 349 were objections to policies, 62 were in support and 11 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 11: Planning for our Natural Environment – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)	253	4	3	246
Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)	22	1	6	15
Policy NE3: Green Infrastructure (Strategic Policy)	58	0	35	23
Policy NE4: Open Space & Green Infrastructure Provision	17	0	1	16
Policy NE5: Areas of High Landscape Value	13	1	7	5
Policy NE6: Flood Risk and Water Management	22	4	3	15
Policy NE7: Protecting Water Quality	4	1	2	1
Policy NE8: Coastal Change	2	0	1	1
Policy NE9: Contaminated Land and Ground Stability	2	0	1	1
Policy NE10: Air Quality	18	0	1	17
Policy NE11: Pollution	11	0	2	9

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)	• Climate Change • Impacts of development on trees and hedgerows • Implementation of Biodiversity Net Gain
Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)	• Inappropriate level of protection afforded to designated sites • Loss of Green Belt is contrary to Policy NE2 • Habitat Regulations Assessment /

	Appropriate Assessment requirements • Inappropriate policy requirement to consider alternative sites • Amendments/ wording considerations /Support for the policy
Policy NE3: Green Infrastructure (Strategic Policy)	• Impacts of the loss of Green Belt on green infrastructure corridors and Climate Change • Amendments/ wording considerations /Support for the policy
Policy NE4: Open Space & Green Infrastructure Provision	• Loss of Green Belt and open space is contrary to Policy NE4 • Uncertainty with regard to requirements for developer contributions and viability concerns. • Amendments/ wording considerations /Support for the policy
Policy NE5: Areas of High Landscape Value	• Support for Policy NE5 and designation of the coastal area of High Landscape Value. • Evidence for landscape designations is out of date and amendments to designation boundaries suggested.
Policy NE6: Flood Risk and Water Management	• Impacts of development on flood risk within villages and concerns regarding flood risk evidence base. • Concerns with the proposed use of Sustainable urban drainage systems (SUDs) as mitigation. • Sequential and Exception Test not undertaken. • Policy NE6 does not promote a coordinated approach to managing flood risk. • Support for policy and wording considerations.
Policy NE7: Protecting Water Quality	• Support for policy
Policy NE8: Coastal Change	• Support for policy • Concern on impacts on number of housing development and sewage treatment from villages effecting the coast.
Policy NE9: Contaminated Land and Ground Stability	• Support for the policy • How does the Policy fit with South Tyneside's Validation checklist
Policy NE10: Air Quality	• Proposed developments in the Local Plan will have a negative impact on Air Quality • Proposed change of wording to NE10g
Policy NE11: Pollution	• Support for the Policy • Impacts of traffic and congestion as a result of proposals in the Draft Local Plan • Adverse impact the Draft Local Plan could have on coastal pollution

Policy NE1: Our Strategic Approach for the Natural Environment (Strategic Policy)

Policy NE1: Council response and next steps

South Tyneside Council Climate Change emergency declaration

Representations were received which objected to or referenced the South Tyneside Climate Change Emergency Declaration and the absence of the commitments of the declaration within the Local Plan.

Council Response

The Council declared a Climate Emergency on the 18th July 2019. The declaration requires all council strategic decisions, policies and strategies are in line with the shift towards carbon neutral by 2030. On 7 August 2019, the Council's Cabinet considered and approved the Pre-Publication Draft Local Plan for consultation. There were practical constraints associated with updating the draft Local Plan to reflect the declaration and therefore, the council acknowledges that the draft Local Plan did not reflect the climate change emergency declaration. It is noted that a number of representations quote the actions of the declaration. It should be noted that these actions are for South Tyneside Council as a whole and not to be specifically addressed in Local Plan policies. It is the role of the Local Plan and its policies to assist in delivering the aims of the declaration.

Next Steps

The Council is committed to tackling Climate Change and will be undertaking a review of draft Local Plan policies to ensure they are in line with the Climate Change Emergency as far as possible.

Non-compliance with national legislation (Climate Change Act 2008), carbon reduction targets and carbon audits

Representations were made which object to the Local Plan on the basis that it is non-compliant with national legislation, specifically, the Planning and Compulsory Purchase Act 2004, Climate Change Act 2008 and the National Planning Policy Framework (NPPF). Objections state that the Local Plan has failed to demonstrate how policies will reduce emissions in line with the Climate Change Act 2008. Objections also suggest that the Local Plan is also non-compliant as it does not set carbon emission targets and suggest the Local Plan is required to undertake an emissions/ carbon audit.

Council Response

The Council strongly supports the global, national and local imperative to mitigate the effects of climate change. The Council fully agrees that addressing climate change is one of the core land use planning principles to be addressed and that this should underpin both plan making and decision taking. With regard to noncompliance with national policy the council considers that the draft Local Plan policies and supporting documents comply with national legislation and section 149 of the National Planning Policy Framework by including policies which mitigate and adapt to the impacts of climate change. The council do not agree that it is a legal requirement to include carbon emission targets within the Plan.

Section 19 of the Planning and Compulsory Purchase Act 2004 states that 'Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to,

climate change'. This section does not provide an express statutory obligation to include carbon reduction targets within Local Plans. The obligation is a much broader one — to “include policies designed to secure that the development and use of land contribute to the mitigation of, and adaption to, climate change”. Furthermore, the National Planning Policy Framework does not include a specific obligation to include a carbon reduction target which tracks national and international obligations in a local development plan. Furthermore, the Local Plan is not required through the National Planning Policy Framework to provide SMART targets. The Local Plan and its policies are subject to monitoring through specific performance indicators as specified in Policy IM1.

Footnote 48 of the National Planning Policy Framework states that local planning authorities should address rising temperatures “in line with the objectives and provisions of the Climate Change Act 2008”, those provisions do not place local planning authorities under a specific obligation in respect of carbon reduction; obligations are placed on the Secretary of State. The objectives of the Climate Change Act 2008 are plainly the reduction of greenhouse gas emissions. However, footnote 48 of the National Planning Policy Framework does not support the proposition that a specific carbon reduction target which tracks national and international obligations must be included in local development plans.

Next Steps

Many of the emerging policies in the draft Plan are “designed to secure that the development and use of land contributes to the mitigation of and adaption to climate change”. Climate Change is a cross cutting theme which is central to the sustainability of the whole Plan itself. To reflect the importance of this, the draft Local Plan will be reviewed to ensure new Climate Change policies and policies contributing to Climate Change adaptation/mitigation are clearly identified within the Local Plan. Supporting documents will also be updated and produced to demonstrate how the council has complied with national Climate Change legislation.

The next stage of the Local Plan will be informed by the most up to date baseline information in regard to Climate Change. Local Plans are supported by a Sustainability Appraisal which assesses the environmental, social and economic effects of the Local Plan; the Sustainability Appraisal includes a Scoping Report, which considers the baseline information for the Strategic Environmental Assessment (SEA) objectives which are assessed within the Sustainability Appraisal. The Council are also undertaking a carbon audit of the strategic spatial options and reasonable options for development allocations. The carbon audit will provide further evidence and consideration in understanding the potential effects of development sites which will contribute to the Sustainability Appraisal and inform the next iteration of the Local Plan.

Loss of Green Belt and effects on Climate Change

A number of representations argue that the loss of land from the Green Belt would be contradictory to the Local Plans commitment to mitigating and adapting the effects of climate change.

Council Response

It is acknowledged that undeveloped land within the Green Belt can contribute to mitigating the effects of climate change. It is considered that the Council has adopted a sustainable approach to development and through Plan policies seeks to mitigate and adapt to the impacts of climate change. In addition, the governments Planning Practice Guidance: Green Belt (Paragraph: 002

Reference ID: 64-002-20190722) requires local authorities where Green Belt boundaries are to be amended to 'set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt'. These improvements could include new and enhanced green infrastructure, woodland planting, new and enhanced cycle routes and habitat improvements. It is considered that these compensatory measures would also play an important role in mitigating the effects of climate change and in some cases may provide opportunities to enhance the contribution to climate change mitigation. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The Council will continue to review our strategic approach to development to ensure the Local Plan delivers sustainable patterns of development.

Impacts of development on trees and hedgerows

A number of comments raise the issue of trees and hedgerows being felled to facilitate development, despite the policy stating it will protect trees; and also the negative effect of losing vegetation with regard to mitigating Climate Change impacts.

Council Response

The Council recognises the importance of trees and hedgerows within the Borough and their role in the natural environment and tackling climate change. Policy NE1 section c) is in support of section 170 of the National Planning Policy Framework, as it seeks to contribute to and enhance the local environment through the protection of trees. The protection of trees is supported through a number of policies within the Local Plan including housing policy H3. Policy H3 identifies where mitigation would be required to protect and retain existing trees on sites allocated for development and support new onsite tree planting.

Next Steps

The Council will review opportunities for the protection of trees and hedgerows through the next iteration of the Local Plan.

Implementation of Biodiversity Net Gain

Comments received called for greater emphasis regarding Biodiversity Net Gain within policy NE1 and questioned the methodology and delivery of Net Gain for development sites within the Green Belt.

Council Response

The concept of Biodiversity Net Gain is set out in the Governments 'Environment Bill' which requires developments to deliver a mandatory, minimum 10% improvement in biodiversity value. The Environment Bill is yet to gain Royal Assent and therefore there are no mandatory requirements for Net Gain at this time. However, the Council is preparing for the introduction of the requirement and any allocation in the Local Plan brought forward for development would be subject to delivering mandatory net gain in accordance with the Environment Bill once it becomes law. The National Planning Policy Framework (2019) encourages net gains for biodiversity to be sought through planning policies and decisions. Policy NE2 sets out the requirement for measurable net gain in

accordance with the National Planning Policy Framework. Biodiversity net gain can be achieved by creating or enhancing habitats in association with development. Biodiversity net gain can be achieved on-site, off-site or through a combination of on-site and off-site measures. Off-site measures can have significant benefits in the delivery of strategic biodiversity net gain; it can include areas of enhanced or created habitats which could have wider benefits to the ecological networks in the area.

Next Steps

The concept of Biodiversity Net Gain is addressed in Local Plan Policy NE2 rather than NE1. The Council will review NE1 and consider the contents of the policy. The Council will also continue to prepare for the introduction of the Environment Bill and mandatory 10% Biodiversity Net Gain.

Policy NE2: Biodiversity, Geodiversity and Ecological Networks (Strategic Policy)

Policy NE2: Council Response and next Steps

Inappropriate level of protection afforded to designated sites

Comments were received which suggested that policy wording in NE2 weakens or offers too much protection to different levels of designated sites (local sites, national sites and international sites).

Council Response

The Council does not agree that the policy weakens protection for designated sites within the Borough and Policy NE2 provides adequate protection to all our designated assets. Planning proposals effecting national designations would be required to fully comply with criteria G-I.

Furthermore, the Council is confident that the use of term 'likely to have an adverse impact' will not result in more protection being given to national sites than to international sites. The term 'likely to have an adverse impact' is derived from the National Planning Policy Framework. The term 'likely significant effects' is derived from national and European legislation in regard to the Habitat Regulations Assessment; this legislation also endorses the application of the 'precautionary principle' in the assessment of effects on Natura 2000 sites, therefore, where a potentially negative effect may arise and the impacts on the protected site cannot be ruled out, an Appropriate Assessment would be required.

Comments were received which suggest that locally important sites are afforded the same level of protection as nationally important sites as the policy requires consideration of alternative sites and mitigation. The PPG states that Local Wildlife Sites are 'areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery'. It also states that local planning authorities should 'include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks' (Paragraph: 013 Reference ID: 8-013-20190721). The Council believes that Policy NE2 offers adequate protection for these sites.

Next Steps

Where appropriate, review policy wording to ensure clarity in levels of protection required for each designation.

Loss of Green Belt is contrary to Policy NE2

Comments were received which argued that the loss of Green Belt areas would be contrary to Policy NE2 due to negative impacts on designated sites and the wider wildlife corridor.

Council Response

Please see the Council's responses to Chapter 4: Delivering the Strategy which sets out how 'exceptional circumstances' has been demonstrated for alterations to Green Belt boundaries in order to meet the development needs of the Borough.

The Council acknowledges the role open space and the Green Belt in contributing to wider aspects of biodiversity and ecological networks within South Tyneside and is committed to protecting our most valuable assets and improving the networks in the Borough. Impacts on the ecological designations have been considered through the site-selection process and documented in the Site-Selection Topic Paper (2019). Policy NE2 is in accordance with the National Planning Policy Framework and the government's Planning Practice Guidance mitigation hierarchy which seeks to protect the natural environment from the harmful effects of development. The policy states that appropriate mitigation should be incorporated into the design of development at an early stage and also provide measurable net gains for biodiversity; with specific mitigation measures set out for the most valuable designations. Any development proposed through the draft Local Plan should be in accordance with policy NE2 and any specific policies setting out mitigation measures, which will contribute to and enhance the ecological networks in South Tyneside.

Next Steps

None required.

Habitat Regulation Assessment/ Appropriate Assessment

Comments were raised which suggest that Policy NE2 only refers to the need for an appropriate assessment at the design stage and questions the suitability and requirements of the existing Mitigation Strategy (SPD 23).

Council Response

The Council does not agree that the policy only refers to the need for appropriate assessment at the design stage. The policy clearly states that development which is 'considered to result in a likely significant effect' on internationally important sites, will be subject to an Appropriate Assessment in accordance with the Conservation of Habitats and Species Regulations (2017). The policy references that 'development will only be allowed' where individual proposals would not result in adverse effects on the site's integrity, when this can be 'determined through Appropriate Assessment at the design stage'. This section of the policy is to ensure that all proposed development (allocations within the Local Plan and speculative development proposals), which may impact upon the internationally protected sites are considered appropriately with regard to their potential impacts on the integrity of these sites.

Comments relating to the validity and application of the exiting interim Mitigation Strategy SPD: 23 are noted by the Council. It is the intention of the Council to update the SPD to support the mitigation requirements of the forthcoming Local Plan and for it to be informed by the next iteration of the Local Plan HRA.

Next Steps

The Council will review and update the Mitigation Strategy to support the emerging Local Plan.

Inappropriate policy requirement to consider alternative sites

Comments were received that Policy NE2 requires that proposals which will have an impact on a habitat comply with various criteria, including that there are no reasonable alternatives.

Representation stated that the National Planning Policy Framework (para. 175) does not refer to the need to consider alternatives, instead it seeks adequate mitigation, or, as a last resort, compensation.

Council Response

Policy NE2 requires applications which could impact upon designated sites to consider whether reasonable alternatives are available. With regard to internationally protected sites, Section 6(4) of the Habitats Directive requires the identification of alternative sites through Appropriate Assessment (AA) where negative effects have been identified and are unable to be mitigated.

Therefore, the identification of alternatives is a requirement of the AA process.

Paragraph 175 of the National Planning Policy Framework, states:

‘When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;’. Furthermore, the ‘mitigation hierarchy’ as identified in Paragraph: 019 Reference ID: 8-019-20190721 of the PPG, relates to Para 175 of the National Planning Policy Framework. The Para 019, states ‘Avoidance: Can significant harm to wildlife species and habitats be avoided; for example by locating on an alternative site with less harmful impacts?’ The Council considers that applicants demonstrating that there are no reasonable alternatives is an application of the ‘mitigation hierarchy’ and in accordance with Para 019 of the PPG and Para 174 of the National Planning Policy Framework.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE3: Green Infrastructure (Strategic Policy)

Policy NE3: Council Response and next Steps

Impacts of the loss of Green Belt on green infrastructure corridors and Climate Change

Comments were received which stated that the loss of Green Belt land would be contrary to the principles of NE3 and would be harmful to green infrastructure corridors. Furthermore, development within the Green Belt would contribute to Climate Change impacts.

Council Response

Please see the Council's responses to Chapter 4: Delivering the Strategy which sets out how 'exceptional circumstances' has been demonstrated for alterations to Green Belt boundaries in order to meet the development needs of the Borough.

The Council acknowledges that the Green Belt contributes to the green infrastructure network and has identified the Green Belt corridor within the policy. The Green Belt deletions within the draft Local Plan do not compromise the Green Belt corridor. Furthermore, mitigation opportunities from development will help to strengthen the Green Belt corridor and the wider green infrastructure network. Please refer to the Climate Change response for Policy NE1 with regard to concerns on Climate Change impacts.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE4: Green Infrastructure (Strategic Policy) (Strategic Policy)

Policy NE4: Council Response and next Steps

Loss of Green Belt and open space is contrary to Policy NE4

Comments were received which stated that developing sites with currently within the Green Belt would result in the loss of green infrastructure assets would be contrary to Policy NE4

Council Response

Please see the Council's responses to Chapter 4: Delivering the Strategy which sets out how 'exceptional circumstances' has been demonstrated for alterations to Green Belt boundaries in order to meet the development needs of the Borough.

The principle of Policy NE4 is to protect designated areas of open space and the wider green infrastructure network and is in line with the requirements of Paragraph 97 of the National Planning Policy Framework. The Council acknowledges that the Green Belt forms a green infrastructure corridor and that the Green Belt and the natural environment can have in encouraging healthy lifestyle choices and supporting physical and mental wellbeing. Where sites are allocated for development in the Green Belt, they would be assessed against policy NE4 which would require the development contribute to enhancing the green infrastructure network and provide new areas of open space on new developments or through contributions to existing green infrastructure assets. Furthermore, should any site specific mitigation be required i.e. rerouting public footpaths, this would be addressed at the planning application stage and in accordance with local and national policies.

Next Steps

None required.

Uncertainty with developer contributions requirement and viability concerns.

Several comments were received which called for amendments to the wording of Policy NE4 to provide greater clarity as to what developers would be expected to provide financial contributions and for greater flexibility in the policy wording. Further comments noted that Policy NE4 makes reference to an existing SPD, this raised concern that the policy was giving additional weight to SPD guidance. In addition, concerns were raised that the SPD and or its successor documents would not be fully considered in the Local Plan viability assessment.

Councils Response

Open space and green infrastructure provision is integral to ensuring that major housing developments provide sustainable communities. Viability work has been undertaken which includes site specific assessments and which takes into account open space provision. Whilst successor SPD documents have obviously not been prepared at this stage, in order to be consistent with the role of SPDs, they will need to amplify existing policy in the Local Plan rather than introduce new policy requirements and the documents will be subject to a statutory consultation exercise whilst still in draft form. It is considered therefore that the policy is consistent with the National Planning Policy Framework. Comments noted with regard to clarity over contribution requirements.

Next Steps

Review Policy NE4 with to further clarifying wording and contribution requirements.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE5: Areas of High Landscape Value

Support for Policy NE5 and designation of the coastal Area of High Landscape Value.

Comments were received which supported Policy NE5 and the designation of the coastal area of High Landscape Value.

Council Response

The Council welcomes support for the policy.

Next Steps

None required

Evidence for landscape designations is out of date and amendments to designation boundaries suggested.

Comments were received which suggested that the Landscape Character Study (2012) which underpins NE5 and the Area of High Landscape Value (AHLV) designations is out of date. Furthermore, some comments suggested amendments to the boundaries of the AHLV.

Council Response

The Council believes that the 2012 Landscape Character Study continues to be fit for purpose and a reliable evidence source to support the emerging Local Plan. It is considered that most areas in the Plan have not been subject to development which would significantly change the outcomes of the current report. The AHLV as proposed in the draft Local Plan have been informed by the 2012 Landscape Character Study: Part III: Application of the Character Assessment. The study provides reasoning for the amended boundaries for the designations, which are to provide more recognisable and robust boundaries. The Council supports the reasoning for the proposed boundaries.

Next Steps

None required

Policy NE6: Flood Risk and Water Management

Impacts of development on flood risk within villages and concerns regarding flood risk evidence base.

Concerns regarding the impact of housing development proposed within the Local Plan on flood risk were raised during the consultation. There was concern that development would exacerbate existing flood risk problems within the villages. Comments also suggested that sites H3.59 and H3.61 are located within recognised flood risk zones and that flood risk had not been fully considered in identifying sites for development.

Council Response

The Council are aware of existing flooding concerns and has an active programme to address flood risk issues within the Borough including the installation of SUDS ponds and detention basins. The Council has considered flood risk issues throughout the plan preparation. The Local Plan is supported by a Strategic Flood Risk Assessment (SFRA) (2018) and the consideration of flood risk issues is documented in the Site Selection Topic Paper and Sustainability Appraisal. The SFRA identifies that a small area of sites H3.59 and H3.61 do fall within Flood Risk Zone 3b. The SFRA recommends that these issues can be overcome through considering site layout and design, therefore, the site have not been discounted on flood risk concerns. Policy NE6 provides detailed guidance to assess flood risk from new developments and seeks to reduce flood risk within the Borough. Any development proposal will be subject to assessment against Policy NE6. Policy NE6 states that flood risk will be considered at all stages of the planning process to avoid inappropriate development. Policy NE6 requires applicants to submit site specific flood risk assessments to demonstrate that proposals are not at risk or does not increase flood risk elsewhere. Where flood risk measures are required the appropriate mitigation will be agreed with the Council.

Next Steps

None required

Concerns with the proposed use of Sustainable urban drainage systems (SuDs) as mitigation.

Several comments were received relating the use of SuDs as set out in Policy NE6. Concerns included:

- SuDs implementation and maintenance;
- SuDs do not prevent river (fluvial) flooding;

- Health and safety concerns.

Council Response

The installation of SuDS features as a method of surface water management is highlighted as key in the Government's 25 Year Environment Plan. This will be strengthened through new planning guidance as well as improving existing arrangements for the management of surface water flooding and the outcomes delivered by Lead Local Flood Authorities (LLFA), Risk Management Authorities and water companies.

The implementation of SuDS is managed through the stringent development control process. Developers are encouraged to engage to discuss drainage plans at an early stage. This means that we have an opportunity to discuss the design and raise any concerns or queries during the design phase. The application will be reviewed by the relevant consultee within the LLFA and adequate conditions attached. This not only provides assurance that the development will be carried out in accordance with the approved designs, it also provides detail on the maintenance regime and verification of installation of the SuDS feature.

With regards to fluvial flooding, we do understand in some circumstances SuDS within a new development can help return the site to its pre-development state through a reduction in discharge rates. For example, there may be a site which is currently hard standing and close to a river. Development of that site to include SuDS could slow the flow through utilising these features as well as offering some small improvements to watercourses and preventing them from being inundated with run off from impermeable areas. They also have the added benefit of providing a level of water treatment and helping remove some pollutants. On a site by site basis these improvements may offer small improvements which can overall have a larger positive impact. In addition, the River Don is a main river and maintained by the Environment Agency therefore any methods of preventing fluvial flooding to this watercourse directly, would be the responsibility of the EA.

South Tyneside Council do have SuDS ponds/detention basins which have been installed within the last few years and although there were initial concerns from residents with regards to water safety, following detailed consultation prior to and during construction they have been widely accepted by local residents. Awareness of water safety will continue for future SuDS installations where appropriate.

Next Steps

None required

Sequential and Exception Test not undertaken.

Comments were received which identified that the Sequential and Exception Test had not been undertaken to support the draft Local Plan.

Council Response

The Council acknowledges that the Sequential and Exception tests were not carried out in time to support the draft Local Plan. This work is ongoing and will be produced to support the next iteration of the Local Plan.

Next Steps

Produce a Sequential and Exception test to support the Local Plan.

Policy NE6 does not promote a coordinated approach to managing flood risk.

Representations were made which stated that Policy NE6 does not promote a co-ordinated approach in managing flood risk from numerous sites and SuDs. The policy leaves this consideration for each developer to adopt their own approach.

Council Response

Criterion F of Policy NE6 states:

‘Taking, where appropriate, a coordinated approach to flood risk management as this can increase the viability of creating new infrastructure to a surface water body or existing surface water sewer to avoid discharge to a combined sewer’.

The above statement sets out the principle of coordinating water management mitigation. This is applicable to individual development site and existing water management schemes as well as multiple development sites. The Council will work with developers to achieve a strategic approach to flood risk management.

Next Steps

Amend wording to ensure clarity regarding principles of criteria F.

Support for policy and wording considerations.

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE7: Protecting Water Quality

Support for policy and wording considerations.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording.

Policy NE8: Coastal Change

Support for policy.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording.

Concern on impacts on number of housing development and sewage treatment from villages effecting the coast.

Concern was raised regarding the impact for 950 new homes in the villages could have upon the South Tyneside coast. The issue of sewage treatment capacity was also raised amid concerns that untreated sewage is being released into the North Sea at Whitburn.

Council Response

Policy NE6 identifies the Coastal Change Management Area, as defined on the Proposals Map, and sets considerations for development within this area. There are no allocations identified within the Local Plan which fall within this area. Impacts from increased recreational pressure on the coast, within the context the European designations; from new housing, is considered in the Habitat Regulations Assessment (HRA) of the Local Plan.

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

Next Steps

Continue to work with Northumbrian Water in the preparation of the Local Plan.

Policy NE9: Contaminated Land and Ground Stability

Support for policy.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy

Validation Checklist

A comment queried how Part A of the policy, a requirement to carry out investigations to assess the nature and extent of contamination, would correspond with South Tyneside's Validation Checklist.

Council Response and Next Steps

The Policy will be reviewed to ensure consistency with the Validation Checklist.

Policy NE10: Air Quality

Impacts from the Local Plan on Air Quality

Comments were received outlining the perception that air quality is already poor and close to exceeding Government recommended high levels in congested areas like Boldon and Cleadon and that proposals in the Plan will exacerbate air quality issues and the associated health and wellbeing issues.

The Policy allows for proposals which may increase pollution to be approved where satisfactory mitigation measures are implemented. Responses describe this as a 'get out clause' for striving for good air quality.

Council Response

Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required and proposals will only be approved where satisfactory mitigation measures can be implemented.

In line with the National Planning Policy Framework, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity.

Both policies specify that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Any developments proposed in the Plan would have to adhere to the Policies within the Plan.

Next Steps

None Required

Proposed change of wording to NE10g

The wording of the policy should also be flexible to ensure that mitigation measures are only suggested where appropriate.

Council Response and next steps

The Council welcomes comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy NE11: Pollution

Support for policy.

Representations were received in support for the policy.

Council Response & Next Steps

The Council welcomes support for the policy.

Impacts from the Local Plan on Air Quality

Concerns were raised regarding traffic levels in East Boldon which are perceived to be high already. Comments raised concerns about the impacts of traffic and congestion on air quality and how this can negatively effect residents and children attending East Boldon Infants School. Comments recognised the intention of the Policy to ensure air quality is not worsened; however the Plan should strive to improve air quality rather than maintain current levels.

Council Response

Air Quality assessments will be required as part of the planning application process as and when proposals come forward. A Traffic assessment will form part of the evidence base for the next draft of the Local Plan.

Policy NE10 ensures proposals will only be supported where they do lead to further deterioration of air quality. Where significant air quality impacts are likely, air quality assessments will be required and proposals will only be approved where satisfactory mitigation measures can be implemented.

In line with the National Planning Policy Framework paragraph, Policy NE11 seeks to ensure that development proposals that may cause any form of pollution must incorporate measures to prevent or reduce their pollution to an acceptable standard to avoid negative impacts on people, the environment or biodiversity.

Both policies specify that proposals must consider the cumulative air quality and pollution impacts from other permitted developments in the area as well as the impact of the proposed development.

Coastal Pollution

Comments were received regarding potential adverse impacts from the Draft Local Plan on existing coastal pollution problems. Local evidence suggests overflow events from Northumbrian Water's pumping station at Whitburn has resulted in coastal pollution; concerns were raised how additional housing development might exacerbate this issue.

Council Response

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were

introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

Next Steps

Continue to work with Northumbrian Water in the preparation of the Local Plan.

Chapter 12: Infrastructure

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 12 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 12: Infrastructure received 188 comments of which 116 were objections to policies, 35 were in support and 37 were comments. The following table provides a breakdown for each policy within the chapter:

Table 1. Chapter 12: Infrastructure – breakdown of representations				
Policy	Number of comments			
	Total	Comment	Support	Objection
Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)	27	6	6	15
Policy IN2: Developer Contributions, Infrastructure Funding and Viability	18	1	5	12
Policy IN3: Social and Community Infrastructure	34	10	7	17
Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)	26	4	1	21
Policy IN5: Telecommunication and Utilities	4	0	1	3
Policy IN6: Travel - New Development (Strategic Policy)	16	2	5	9
Policy IN7: Accessible and Sustainable Travel (Strategic Policy)	47	8	4	35
Policy IN8: Airport and Aircraft Safety	1	0	1	0
Policy IN9: Waste Facilities (Strategic Policy)	3	2	1	0
Policy IN10: Protection of Existing Waste Facilities (Strategic Policy)	2	0	2	0
Policy IN11: Minerals Safeguarding and Extraction (Strategic Policy)	10	4	2	4

Summary of key issues raised in consultation comments by Policy:

The below table provides a summary of comments and issues raised against each policy

Table 2. Summary of comments received	
Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)	• The policy refers to deficiencies in existing provision. It would be unreasonable to expect a developer to rectify this. • The policy refers to world class digital infrastructure the cost and implications of which are unclear. • Comments that the level of detail in the Infrastructure Delivery Plan is not sufficient • Comments that sewerage and drainage provision is not adequate.
Policy IN2: Developer Contributions, Infrastructure Funding and Viability	• Lack of detail for highway impacts in Whitburn • Viability evidence should be published • Phasing developer contributions through the development period • The Community Infrastructure Levy is essential for the implementation of Neighbourhood Plans • Amendments/ wording considerations /support for the policy
Policy IN3: Social and Community Infrastructure	• The Status of Neighbourhood Plans • Provision for surgeries and schools • Amendments/ wording considerations /support for the policy
Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)	• Renewable energy / Onshore wind development - policy should be more ambitious • Amendments/ wording considerations /support for the policy
Policy IN5: Telecommunication and Utilities	• The policy is not deliverable • Support for the policy
Policy IN6: Travel - New Development (Strategic Policy)	• Charging infrastructure for low-emission vehicles • Parking in the villages • The Parking Standards Supplementary Planning Document • Secure storage with charging points should be a requirement • Amendments/ wording considerations /support for the policy
Policy IN7: Accessible and Sustainable Travel (Strategic Policy)	• The Boldon and Tilesdeds proposed Level Crossings Scheme • Proposed new Metro Station at East Boldon • The Parking Capacity at the existing East Boldon Metro Station • Modal Shift

	• Potential conflict between equestrian and cycle use • Protecting strategically significant land at sites where new Metro stations may be developed • Application of a 5m buffer to each side of alignments proposed in Policy IN7 • Highways Deliverability • Amendments/ wording considerations /support for the policy
Policy IN8: Airport and Aircraft Safety	• Support for the policy
Policy IN9: Waste Facilities (Strategic Policy)	• Comments generally support the Policy. Some amendments to supporting text suggested.
Policy IN10: Protection of Existing Waste Facilities (Strategic Policy)	• Two comments were received in support of the Policy.
Policy IN11: Minerals Safeguarding and Extraction (Strategic Policy)	• Minerals and minerals infrastructure safeguarding should be addressed in a dedicated policy • Amendments/ wording considerations /support for the policy

Policy IN1: Our Strategic Approach to Infrastructure (Strategic Policy)

Policy IN1: Council response and next steps

The policy refers to deficiencies in existing provision

Representations were received that contended that it would be unreasonable for a development to have to rectify / improve existing deficiencies in provision in an area. Such an approach would conflict with the tests for planning obligations as set out in the Community Infrastructure Regulations (Regulation 122(2)) and the NPPF (para. 56). To ensure a sound Plan that is consistent with national legislation and policy, it is requested that this text is deleted from the policy.

Council response

The requirement to improve any deficiencies in existing provision is only 'where appropriate'. This is considered to be consistent with the tests for planning obligations as set out in the Community Infrastructure Regulations (Regulation 122(2)) and the NPPF (para. 56).

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

The policy refers to world class digital infrastructure

Representations were received contending that the exact definition and the cost implications of providing 'world class' infrastructure is unclear. It is therefore suggested that this word is deleted from the policy.

Council response

Whilst it is acknowledged that 'world class' does not have an exact definition, it is considered that it conveys the Council's aspiration for high-quality digital infrastructure which is integral to achieving economic prosperity, ensuring that communities are fully able to benefit from the opportunities offered by digital connectivity and reducing the need to travel.

Next Steps

None required.

The link between infrastructure and viability / publication of viability evidence

Representations were received contending that the link between infrastructure and viability needs to be much clearer in order for Policy IN1 to be found sound.

Council Response

It is intended to publish the South Tyneside Council Local Plan Viability Evidence Base: Final Report as part of the evidence base for the next consultation stage for the Local Plan. This will make the link between infrastructure and viability clearer

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

Comment regarding the Infrastructure Delivery Plan (IDP)

The Council received representations that the level of detail in the IDP is not sufficient.

Council Response

At the time the Pre-Publication Draft Local Plan was published, highway modelling work was ongoing and subject to change but interim findings provided the basis for an indicative assessment of the potential impacts of the draft housing allocations on the strategic highway and local transport network and this was published in the Infrastructure Delivery Plan.

It is intended that information regarding health and education provision will be available when the next iteration of the Local Plan is published and that this will include reference to dental provision.

The Infrastructure Delivery Plan is a summary document. It is considered that the level of detail provided is appropriate in this context. It is also a live document; that is to say that it will be updated in due course and more detail will be available as it progresses.

Next Steps

Update the Infrastructure Delivery Plan as appropriate.

Sewerage and drainage provision

The Council received a representation which can be summarised as below. The Council will respond to each of these points.

- The foul pumping station at Whitburn serves 4 communities. If the proposed release of a further 1,871 houses in the STC draft local plan for Whitburn, Cleadon and Boldon is approved it will increase the serving population by a further 27%.

- Recent case law demonstrating the duty of planning authorities is outlined in Barratt Homes Limited v Dwr Cymru Cyfyngedig (Welsh Water) [2009] UKSC13
- Decisions on the viability of the sewerage system should not be left to Northumbrian Water
- Any new developments in South Tyneside should be subject to independent scrutiny regarding sewerage and drainage systems.

Council Response

The position of Northumbrian Water is that they have the capacity within their network to support the development outlined in the Pre-Publication Draft (Regulation 18) Local Plan (August 2019). They have informed us that In the Sunderland area alone their investment amounts to many tens of millions of pounds including around £10 million in the recent investment which has seen an upgrade to the sewer network and improvements to the Whitburn and Roker area. They will continue to monitor capacity through their Drainage and Wastewater Management Plans, the new way for organisations to work together to improve drainage and environmental water quality to focus investment, ensuring capacity continues to be available to support growth. The result of their programme of investment is that 33 of our 34 bathing beaches in the north east reached good or excellent status in 2019, which is the highest percentage nationally. In particular, the beaches at Whitburn and Roker have achieved 'excellent' status each year since the new guidelines were introduced in 2015. The 'excellent' status is awarded based on samples taken independently by the Environment Agency to assess the bathing waters against strict regulations.

The pumping station at Whitburn has the necessary planning permissions. The discharge permit for the Whitburn Storm Interceptor system has been determined by the Environment Agency and is linked to either precipitation or snowmelt within the catchment. The Council's Environmental Protection Team are satisfied that both organisations are managing this process within their legislative remit and, in relation to the discharge to sea, storm flows which contains diluted sewage is pumped 1.5 kilometres out to the sea outfall which discharges into a recognised High Natural Dispersion Area (HNDA) – when necessary and as agreed through the conditions of the permit.

Regarding the reference to the grant of planning permission by Sunderland City Council for 64 homes in South Bents, we are advised by Northumbrian Water that an error was made in naming the manhole that this development could make a foul connection to. Northumbrian Water's sewer records were coloured up wrongly after some capital works had been carried out on the network, which meant they had to find an alternative connection point to the one named in the Flood Risk Assessment. This had nothing to do with any capacity issues in Northumbrian Water's existing sewerage network to support this development.

In respect of the reference to Barratt Homes Limited (Respondents) v Dwr Cymru Cyfyngedig (Welsh Water) (Appellants), the key point in this context is that it confirmed that development cannot be refused a sewer connection by a sewerage undertaker on capacity issues and if any upgrades are required to ensure that the undertaker will still be complying to their legal duties under Sec94 of the Water Industry Act 1991 then they have to deliver these at their expense in a timely manner. In the context therefore of the emerging South Tyneside Local Plan, Northumbrian Water cannot refuse connections and would have to upgrade the existing sewerage network and treatment facilities to ensure that they continue to remain in compliance with the measures imposed on them by their regulators (the Environment Agency and Ofwat). Northumbrian Water has advised that for this

catchment they can accommodate all the development without the need for any significant investment.

To summarise and to be absolutely clear, Northumbrian Water holds an Appointment under the Water Act 1989 as a water and sewerage undertaker. South Tyneside Council does not have any legislative remit whatsoever to act as a surrogate for Northumbrian Water in its statutory role. Nor is it the responsibility of South Tyneside Council to comment on how Northumbrian Water responds to requests for information. In respect of the emerging Local Plan, Northumbrian Water has advised that the development proposed in the emerging Local Plan do not present any critical capacity issues and that any investment necessary in water and sewerage capacity will be undertaken when required to do so.

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

Policy IN2: Developer Contributions, Infrastructure Funding and Viability

Policy IN2: Council response and next steps

Lack of detail for highway impacts in Whitburn

The Council received an objection regarding highway impacts and viability. This can be summarised as follows:

- Junctions in Whitburn are all currently facing high levels of congestion without the added stresses that more development in Whitburn will provide but no further details are available in the Local Plan.
- To rely on the costs of these required improvements to be borne by developers would make the developments no longer viable. No other solutions have been provided in the draft Local Plan.

Council Response

Allocations establish the principle of development but they do not provide the same level of detail regarding the mitigation of highway impacts that would be required for a planning application when mitigation is required. Our Infrastructure Delivery Plan (August 2019) and the Infrastructure Delivery Schedule which are available on-line at www.southtyneside.gov.uk/localplan details the position as to what the transport modelling told us at the time the Pre-Publication draft Local Plan (August 2019) was consulted on. The Infrastructure Delivery Plan is in draft format and subject to change. The next iteration of the Infrastructure Delivery Plan will be published alongside the next iteration of the Local Plan.

Viability is a key consideration for the Local Plan process which has informed and will continue to inform both draft policies and development allocations.

Next Steps

None required

Viability evidence should be published

The Council received a number of objections stating that viability evidence should be published.

Council Response

It is intended to publish the South Tyneside Council Local Plan Viability Evidence Base: Final Report as part of the evidence base for the next consultation stage for the Local Plan.

Next Steps

The Council will review Policy IN1 when preparing the next iteration of the Local Plan.

Phasing developer contributions through the development period

The Council received a number of objections stating that part 2(b) of this policy which advises that the council may “consider alternative phasing, through the development period, of any contributions where to do so would sufficiently improve the viability of the scheme to enable payment” is not sound.

Council Response

The intention of Policy IN2.2 [b] is to enable the mitigation of viability through phasing where the developer is contending that the development would not otherwise be viable. It is considered that this is consistent with national policy and is effective as currently worded.

Next Steps

None required

The Community Infrastructure Levy is essential for the implementation of Neighbourhood Plans

The Council has received a representation stating this levy is essential for the implementation of Neighbourhood Plans.

Council Response

The introduction of the Community Infrastructure Levy (CIL) would need to be supported by viability evidence i.e. evidence that there is sufficient ‘headroom’ for CIL as well as policy requirements. The Council is therefore considering whether viability evidence would support the introduction of the Community Infrastructure Levy.

Next Steps

Determine whether viability evidence would support the introduction of the Community Infrastructure Levy.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN3: Social and Community Infrastructure

Policy IN3: Council response and next steps

The Status of Neighbourhood Plans

The Council received several objections regarding the status of Neighbourhood Plans in the planning system. It was suggested that the policies contained within Neighbourhood Plans ought to be considered first and foremost when housing is allocated.

Council Response

Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development. Whilst neighbourhood planning cannot be used to block the building of the homes and businesses considered to be necessary to meet the borough's current and future needs, they can be used to influence the type, design, location and mix of new development. Neighbourhood Plans can establish a vision for an area, include general planning policies for the development and use of land in a neighbourhood and they can allocate sites for development. They should be about local rather than strategic issues. If adopted, they will form part of the development plan for the Borough and used to assist in the determination of all planning applications in that area.

When the Pre-Publication Draft Local Plan was prepared, the emerging Whitburn and East Boldon Neighbourhood Plans had not been published.

Next Steps

The Council will continue to work with the Neighbourhood Forums.

Provision for surgeries and schools

The Council received a representation stating that more surgeries and schools will be needed to accommodate growth.

Council Response

The Spatial Planning team liaises with the South Tyneside Clinical Commissioning Group, the Council's Public Health team and with the Council's school places planning managers regarding all proposed housing allocations in the Borough and will continue to do so.

Next Steps

The Council will review Policy IN3 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN4: Renewables and Low Carbon Energy Generation (Strategic Policy)

Policy IN4: Council response and next steps

Renewable energy / Onshore wind development

The Council received representations questioning whether Policy IN4 could be extended in ambition to identify suitable areas for onshore wind development. Similarly representations were received calling for surveying work to be done to determine renewable energy capacity in the Borough / the regeneration capacity of different renewable technologies in the Borough in order to facilitate identifying suitable sites for energy generation to be identified in the plan.

Council Response

With regard to renewable energy, the Council supports the use of renewable and low energy carbon within the Borough. Policy IN4 is in support of section 148 of the NPPF as it supports renewable and low carbon energy and associated infrastructure provision. The policy has been informed by a recent heat mapping exercise, identifying three locations for district energy schemes supported in the Local Plan and also the 'South Tyneside Landscape Character Study Part III: Application of the Character Assessment' (2012), assess landscape sensitivity of wind energy within the Borough, but identifies constraints within the Borough. The Council will continue to support opportunities for low carbon energy production through the Local Plan, particularly in response to the Climate Change emergency declaration.

Next Steps

The Council will review Policy IN4 and the associated evidence to support renewable energy when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN5: Telecommunication and Utilities

Policy IN5: Council response and next steps

The policy is not deliverable

The Council received a representation which stated that the policy as currently worded is overly onerous and inflexible. To ensure a sound Plan that accords with the NPPF (paragraphs 35 and 112), it is requested that this policy is diluted to be more flexible and to recognise that seeking such the

submission of an ultrafast/gigabit-capable Statement as part of any application with evidence of consultation with a number of broadband providers/networks, requires not only the buy in of developers but utility companies as well.

Similarly, the Council also received 2 representations highlighting that the ability to provide fibre to the premises connectivity is not in the direct control of housebuilders. These 2 representations also stated that it is not considered appropriate for the Council to seek additional local technical standards over and above Part R of the Building Regulations.

Council Response

The policy is considered to be effective as written and consistent with national planning policy. Paragraph 12.27 of the supporting text states 'Policy IN5 does not require developers to deliver ultrafast/gigabit-capable solutions themselves. Instead it focuses on the need to conduct early dialogue with telecom providers in order to best understand what their infrastructure specifications are and how these can be accommodated as part of the development'.

This approach is consistent with Part R of the Building Regulations. In respect of the comment that NPPF paragraph 112 does not seek to prevent development that does not have access to such networks, point 3 of the policy states 'Exceptions to the approach outlined above could be justified in circumstances where it is not practical, viable, or feasible to deliver ultrafast/gigabit-capable connectivity. In such cases evidence will be needed from the applicant to demonstrate that a departure from the policy is justified'.

Regarding the comment that 'securing the Statement pre-application would require third party input much earlier than providers would normally engage with us' and that the policy 'as currently worded is overly onerous and inflexible', we worked with a provider when drafting the policy and they were wholly supportive of it.

Next Steps

The Council will review Policy IN5 when preparing the next iteration of the Local Plan.

Support for the Policy

The Council received a representation supporting the policy.

Council Response

The Council welcomes support for the policy

Next Steps

The Council will review Policy IN5 when preparing the next iteration of the Local Plan.

Policy IN6: Travel - New Development (Strategic Policy)

Policy IN6: Council response and next steps

Charging infrastructure for low-emission vehicles

The Council received a representation regarding this topic which can be summarised as follows:

Has the Council have been in discussion with the National Grid to determine if the policy requirement all major developments to incorporate charging infrastructure for ultra-low emission vehicles is achievable and can be supported?

Has viability testing been carried out to ensure that the implementation of this policy would not overly burden developments and potentially render them unviable?

The Council also received representations stating the requirement to provide charging facilities for vehicles in all major developments requires justification as to whether there is need without which this element of the policy is unsound. Such requirements should also be tested in terms of viability.

Conversely, the Council also received a representation stating, 'by not quantifying requirements for the installation of charging infrastructure, within the Emerging Local Plan, the policy can be adhered to by installing the minimal amount of charging points that developers can get away with'.

Council Response

The Council's Highway and Transport department have worked pro-actively with the National Grid to assess future demand and ensure that it can be met. The South Tyneside Local Plan Viability Evidence Base: Final Report will be published as part of the evidence base documents for the next iteration of the Local Plan.

NPPF Paragraph 105 states that 'if setting local parking standards for residential and non-residential development, policies should take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles'. This is consistent with the policy.

Next Steps

The Council will review Policy IN6 when preparing the next iteration of the Local Plan.

Parking in the villages

The Council received a representation stating that the scale of the proposals set out within the Draft Local Plan exacerbate the pressures on parking capacity in the villages.

Council Response

The Council acknowledges that there are parking issues in certain areas of the Borough

Next Steps

The Council's Highway and Transport department will continue to work to manage parking issues in the Borough.

The Parking Standards Supplementary Planning Document

The Council received representations challenging the validity of the reference to an SPD in the policy stating that 'it effectively gives the SPD development plan status. Reference to this SPD should therefore be removed from the policy text.'

Council Response

Whilst successor SPD documents have obviously not been prepared at this stage, in order to be consistent with the role of SPDs, they will need to amplify existing policy in the Local Plan rather than introduce new policy requirements and the documents will be subject to a statutory consultation exercise whilst still in draft form. It is considered therefore that the policy is consistent with the NPPF.

Next Steps

The Council will review Policy IN6 when preparing the next iteration of the Local Plan.

Secure storage with charging points should be a requirement

The Council received a representation stating that secure storage with charging points should be a requirement and not just “considered” in areas of high density housing, flats etc.

Council Response

Comments regarding secure storage for cycles appear to be a reference to the Parking Standards SPD. This is in the Parking Standards SPD which is in the process of being reviewed and updated. This will be the subject of public consultation in due course.

Next Steps

None required.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN7: Accessible and Sustainable Travel (Strategic Policy)

Policy IN7: Council response and next steps

The Boldon and Tilesheds proposed Level Crossings Scheme

A significant number of representations have raised concerns over the proposed Boldon and Tilesheds Level Crossings Scheme. This is referenced in policies H3.1, H3.12, H3.59, RG5 and IN7k. Grounds of objection include the following:

- The impact of the proposal on the Green Belt, visual amenity and the natural environment. Similarly the relationship of the proposal to flood risk issues and to the Council’s Climate Change Strategy has also been referenced;
- Whether the proposal is needed in a highway safety context;
- The lack of public consultation / detailed information in the draft Local Plan about the proposal;

- The impact of the proposal on the operation of the highway network.; and
- How will the proposal be funded?

Council Response

The Council will continue to work with partners such as Network Rail in considering the options for addressing this highway safety issue.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan

Proposed new Metro Station at East Boldon

A number of representations have raised concerns over the inclusion of a new Metro station for East Boldon in the delivery schedule for the Infrastructure Delivery Plan.

Council Response

These representations will be considered in the preparation of the next iterations of the Infrastructure Delivery Plan and the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

The Parking Capacity at the existing East Boldon Metro Station

The Council received representations expressing concerns regarding the parking capacity at the existing East Boldon Metro Station.

Council Response

These representations will be considered in the preparation of the next iterations of the Infrastructure Delivery Plan and the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Modal Shift

The Council received a representation stating that the policies contained in the Emerging Local Plan are not detailed enough nor large enough in scope to trigger and support a modal shift on the scale National Policy requires. The representation also stated that the pedestrian, cyclist and horse-riders section of the policy should be strengthened.

Council Response

The Local Plan is one tool to contribute towards the attainment of modal shift objectives. It is considered that the appropriate location for the level of detail requested is the Cycling and Walking Strategy.

Next Steps

None required

Protecting strategically significant land at sites where new Metro stations may be developed

The Council received a representation which stated the policy should commit to protecting strategically significant land at sites where new Metro stations may be developed on alignments identified as potential network extensions.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Application of a 5m buffer to each side of alignments

The Council received a representation which stated that a 5m buffer should be applied to each side of the alignments proposed in point “a” of Policy IN7 to restrict any development that may inhibit the future expansion of the Metro network including the construction of the line and any new stations.

Council Response

These comments will be considered when preparing the next iteration of the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Highways Deliverability

The Council received a representation stating that cumulative impact assessment work will determine whether improvements may be required to junctions that are additional to those identified in Policy IN7 and that the feasibility of the widening of the northbound approach to the White Mare Pool junction to 3 lanes will require further appraisal.

Council Response

The Council will continue to work with Highways England to ensure the deliverability of the Local Plan.

Next Steps

The Council will review Policy IN7 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Policy IN8: Airport and Aircraft Safety

Policy IN7: Council response and next steps

Support for the policy

The Council received a representation expressing support for the policy.

Council Response

Support for the policy welcomed

Next Steps

None required

Policy IN9 Waste Facilities (Strategic Policy)

Policy IN9: Council response and next steps

Comments were generally in support of the Policy and some minor amendments to the supporting text were suggested. This included reference to the regionally important role of Marsden Quarry in accommodating inert/construction and demolition waste and reference to the Model of Waste Arisings and Waste Management Capacity 2012 by Urban Mines and Production and Disposal of Low-Level Radioactive Waste in the North East of England in 2013 by Urban Mines.

Council Response

Comments accepted.

Next Steps

Amend the supporting text of the Policy to include reference to Marsden Quarry and the two Urban Mines studies.

Policy IN10 Protection of Existing Waste Facilities (Strategic Policy)

Policy IN10: Council response and next steps

Support for the policy

The Council received an expression of support for the policy.

Council Response

Support welcomed.

Next Steps

None required.

Policy IN11 Minerals Safeguarding and Extraction (Strategic Policy)

Policy IN11: Council response and next steps

Minerals and minerals infrastructure safeguarding

It was suggested that this should be a standalone policy. Consideration should be given to the actual mechanism to safeguard sites/infrastructure.

Council Response

The Council will consider whether to Separate the Policy into two policies; Minerals and Minerals Infrastructure Safeguarding and Proposals for Minerals Extraction.

Next Steps

The Council will review Policy IN11 when preparing the next iteration of the Local Plan.

Amendments/ wording considerations /support for the policy

Representations were received in support for the policy and recommended amendments and changes to wording.

Council Response & Next Steps

The Council welcomes support for the policy and comments regarding policy wording. These comments will be considered in the preparation of the next iteration of the Local Plan.

Chapter 13: Implementation and Monitoring

This document provides an overview of the responses submitted as part of the Regulation 18 consultation to policies within Chapter 3 of the draft Local Plan (August 2019). Due to the high number of responses the Council has summarised the key issues for each policy and sought to provide responses and details of next steps to inform the preparation of the Local Plan.

Overview of Consultation Responses

Chapter 13 Implementation and Monitoring received one objection.

Table 1. Chapter 3: Spatial Vision and Strategic Objectives– breakdown of representations				
	Number of comments			
	Total	Comment	Support	Objection
Representations	1	0	0	1

Implementation and Monitoring: Council Response and Next Steps

Objection/Wording considerations

Whilst the only representation received was generally supportive in terms of the Council's position on ensuring housing delivery over the Plan period, it was suggested that the provision of annual monitoring ought to be more explicit. In addition, the methodology used to calculate the Council's housing land supply position ought to be included in this section.

Council Response

The council welcomes comments regarding policy wording.

Next Steps

These comments will be considered in the preparation of the next iteration of the Local Plan.