

006	Gillian Johnston	STEP (South Tyneside Environmental Protection)	I am writing on behalf of South Tyneside Environmental Protection (STEP) campaign group to express our support for Whitburn Forum's neighbourhood plan. We are pleased to note that this plan has taken into consideration climate change, air quality and sewage pollution and has provided evidence to support these draft policies. STEP is deeply concerned about the level of sewage pollution in South Tyneside, so we are delighted to find a well written policy, backed up with evidence from years of research, in Whitburn's neighbourhood plan. Their Community Action plan to protect the wider area from sewage pollution which is blighting our local waterways is commendable. We hope these sound policies will inform South Tyneside Council's emerging local plan to protect South Tyneside from the effects of climate change, air quality and sewage pollution both now and in the future.
007	Kevin Johnson		I have the following comments; WNP 5 Non-Designated Heritage Assets Whilst High Croft Allotments is covered in WNP10 the original limestone walls are not specifically mentioned. These along with other stone walls in the Conservation Area and throughout the area of the Plan (e.g. farmers fields and cemetery) are not given any specific status. If there was a policy for them then perhaps their sympathetic maintenance and where required alteration, could be encouraged? The old walls of the area contribute greatly to the overall character. WNP 15 Air Quality I was interested to read the figures for the Jolly Sailor junction. I live near the junction of Cleadon Lane and Central Avenue where in certain weather conditions one can smell a build up of exhaust emissions on the road next to the school which sits in a hollow. I would be very interested to know what level of pollution is occurring here and what effect more traffic might have?
008	Sarah Smith-Voysey	Environment Agency	Thank you for consulting us on your Neighbourhood Plan. The Environment Agency is a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We received your documents in the planning team on 11 October 2021. 9ΩΦ00ŰΨ\$ΩŰ ! °\$ΩŌbl σ t Űσ00ŰŰΩ

We have reviewed the documents and looked again in detail at the neighbourhood area. Our previous comments are still relevant and so these are included below. In addition, we have the following comments to make about biodiversity.

Biodiversity Comments

While there are very few watercourses in the area, considering these where present as important 'green-blue' corridors and areas to consider for enhancement and restoration would be a positive inclusion in the plan and important for biodiversity gains.

In reference to section 5.80, it is stated in the plan that 'Environment Agency consents would need to be applied

010	Robyn Peat	George F. White	A great deal of work went into this project. The village was consulted at every stage. Whitburn is under serious threat from many arenas (pollution, traffic density, un-checked development). It is vital that the needs of the village are understood before any future development is pushed through. The traffic and associated parking issues in the village are at a critical state. I live at 17 Lizard Ln, SR6 7AH and see the impact of increased traffic and unchecked speeding everyday. Neighbours have lost dear pets because of inconsiderate speeding. My driveway is regularly blocked by cars visiting the area. I have been heartened to see the level of commitment from the neighbourhood forum. Whitburn is a vibrant community and deserves to be considered as something worth preserving. The plan is the first step in encouraging that to happen. We welcome the opportunity to be involved in the Whitburn Neighbourhood Plan. We value the exercise in establishing local policies to ensure high quality sustainable developments are delivered in the Neighbourhood Plan area. We look forward to working collaboratively with the Neighbourhood Forum as the Neighbourhood Plan progresses. Consistency with local planning policy The current development plan is The South Tyneside Local Development Framework which was adopted in 2007. The LDF was adopted prior to the National Planning Policy Framework (NPPF) being originally published in 2012 (subsequently updated) and is therefore not consistent with national planning policy. Due to the adopted plan not being consistent with national planning policy, it is vitally important that consideration is given to the emerging local plan as set out in the Planning Practice Guidance. There are numerous references to the Neighbourhood Plan working alongside the emerging South Tyneside
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			example of up to date housing needs evidence that would be relevant to housing supply policy in a neighbourhood plan. ‘ IŠo\$ † Ω\$ŋ° 1öŮŋ°1ŮŮ\$ μ†Ω ŋσ öoŮŋ° 1Ů ŮŮoX †o\$ ö\$ŮŮo\$ †Ω ŋμ-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in; The emerging neighbourhood plan The emerging local plan (or spatial development strategy) £1\$ †ŠŮμŮ\$Š Š\$Φ\$PŮμΨ\$ΩŮ μ†Ω The Neighbourhood Plan should be consistent with emerging local plan policies and the evidence that underpins the local plan, particularly when is supersedes the date of background reports that have been undertaken to inform the formulation of the Neighbourhood Plan. Housing A Housing Needs Assessment was undertaken in February 2018 for the Neighbourhood Plan area. The assessment was based on background evidence that has been superseded, the implementation of the standard method for calculating local housing need and the overall housing requirement for the Borough being set out in the South Tyneside Draft Local Plan (at least 7,000 new homes) and for the Whitburn Neighbourhood Plan Area (397 new homes). South Tyneside has one housing market area and the housing need figure for the Whitburn Neighbourhood Plan Area reflects the overall strategy for the pattern and scale of development across the Borough. It is important to note that the current LDF is based on an urban/regeneration strategy and focused new housing development in South Shields, Hebburn and Jarrow. Due to significant levels of housing delivery over the past 15 years in such settlements, there is an even greater need for new housing growth to be delivered in settlements where housing delivery has been limited to small windfall sites in the urban area as opposed to planned housing growth. Whilst the Neighbourhood Plan does not appear to set a housing target for Whitburn, the references to only supporting housing on brownfield sites in policy NWP1:Housing are contrary to the emerging local plan which will require Green Belt releases in Whitburn to meet housing needs. The policy should be amended to state; I Ůŋσŋ° μoŮμŮσ †Pσ ŮΩ öoŮXΩŮŋ\$P\$ σŋŮ\$σ †Ω\$ 1Ůŋσŋ° †PPŮŮ†ŮŮŮΩσ ŋΩ †Ω †ŠŮμŮ\$Š {ŮŋŮ1 £bŋΩ\$σŋ\$Š [ŮŮal Plan will be σŋμμŮŮŮ\$Š X1\$ŋ\$ Ů1\$bŋ ŮŮΨμPbŋ XŋŮ1 μŮPŋŮŮŮ\$σ \$Pσ\$X1\$ŋ\$ ŋΩ Ů1\$ Š\$Φ\$PŮμΨ\$ΩŮ μ†Ω If the Neighbourhood Plan is unwilling to allocate housing sites to meet the housing need from the emerging local plan, the supporting text should acknowledge that housing proposals on sites allocated in a subsequent local plan will be supported in principle. Housing Mix Whilst housing mix has been considered at the Neighbourhood Plan level, it is important to recognise that South Tyneside is one housing market †o\$† †Ω\$ Ů1†Ů Ů1\$. ŮöŮŋ° 1 σ Ω\$Š\$Šσ ΨŋσŮ ö\$ Ψ\$Ů †ŮŮŮσ Ů1\$ PŮŮ†P μ†Ω †o\$† £1\$
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			views of existing residents have been considered, however, the needs of prospective residents relocating to Whitburn does not appear to have been taken into account. We acknowledge the perceived need for small-medium sized family homes and smaller dwellings for first time buyers and older people in Whitburn but suggest that PolicyNWP1:Housing acknowledges the wider housing mix that must be met across South Tyneside. We suggest the following amended wording; bSX '1ŭŭσΩ° μoŭμŭσ†Pσ ΧΩPP ō\$ σŭμμŭŭ\$S ŭ'1†ŭ μoŭΦŭ\$S † Ψŭŭ ŭŭ '1ŭŭσΩ° ŭŭ Ψ\$Sŭ '1ŭŭσΩ° Ω\$S\$σ ΩΩ ŭ'1\$ {ŭŭŭ'1 Tyneside and the Neighbourhood Plan Area. Housing proposals should include a range of family homes of different sizes anS σΨ†PP\$ŭ \$X\$PPΩΩ°σ ŭŭŭ ŭŭŭσŭ ŭŭΨ\$ ōŭŭŭ\$ŭσ †ΩS ŭP\$Sŭ μ\$ŭμP\$ Affordable Housing The local plan considers all of the infrastructure requirements that need to be borne by new development in the form of viability assessments and infrastructure delivery plans. It also considers in detail affordable housing requirements for the Borough. Local plans are able to set different thresholds for different localities and we believe it is for the local plan to set the level of affordable housing not a Neighbourhood Plan. The Neighbourhood Plan setting an affordable housing target would not be consistent with affordable housing targets in the current and emerging local plan and should be omitted. The Neighbourhood Forum are required to seek changes to the emerging affordable housing policy in the local plan should such an approach be justified rather than setting different levels of provision in the Neighbourhood Plan. Sustainable Design and Construction The supporting text acknowledges that the measures included within Policy WNP3 cannot insist on such measures and that the changing Building Regulations will set minimum requirements for new housing proposals. Many new technologies are still in the design phase and successful incorporation into new development must be considered on a case by case basis. Factors that need to be taken into account include; scale of the site, adjacent land uses, proximity to high users of energy/heat and access to sustainable transport. As such, different technologies will be better suited to particular sites and not all of the criteria listed in the policy are likely to be achievable for all proposed development sites. The policy wording should be made clearer that the requirements are aspirational as set out in the supporting text. POLICY WNP13: Sewage and Drainage Infrastructure It is the role of the Lead Local Flood Authority (LLFA) and the Environment Agency to consider whether proposed foul and surface water proposals are acceptable or not in accordance with the infrastructure protocol, which states that the designer should consider the following in order of preference before finalising a surface water drainage strategy for a development; a) Discharge to a SuDS device,
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- b) Discharge to a watercourse, or where this is not reasonably practicable,
- c) Discharge to a public sewer network.

This protocol is set out in Policy NE6: Flood Risk and Water Management in the Draft South Tyneside Local Plan. The LLFA, Northumbrian Water and Environment Agency have been consulted on the South Tyneside Local Plan

and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Please do not hesitate to contact me should you wish to discuss this further.

Our Client acknowledged the intention for new development and alterations to meet high levels of sustainable design and construction. However it is unclear how this policy will be applied in practice. The policy affords some discretion to the Client (to f). However, our Client has concerns that some of the requirements set out will not be feasible on each specific development. For example the incorporation of on-site energy from renewable sources such as solar PV and air / ground source pumps or community energy generation is not all of the criterion not just for electric charging points.

Paragraph 5.23 sets out that all new housing needs to be carbon neutral and designed to be energy efficient enough to emit no carbon dioxide. This paragraph of the supporting text sets a significantly high bar for new development. Whilst our Client agrees with the principle of this, they question the ambiguity, practicality and viability of this paragraph in the context of national policy and therefore suggests it fails Basic Condition 1.

5. Policy WN7: Green Infrastructure Enhancement and Connectivity

Our Client acknowledges that the vast majority of the unbuilt area of Whitburn is identified as a green infrastructure enhancement and connectivity area. It is unclear how this policy would be applied should a development site come forward within an area identified for green infrastructure enhancement and

Cleadon Lane benefits from a draft allocation (Reference H3.72) through the emerging South Tyneside Local Plan and extends to approximately 3.9 hectares. The additional site of interest, Land at Lizard Lane, does not benefit from a draft allocation but is being actively promoted through the emerging Local Plan, it extends to approximately 10.65 hectares.

Story Homes have previously been involved in the preparation of the Whitburn Neighbourhood Plan and have

Neighbourhood Plans across its three operational Regions and recognises that they are helpful tools for communities looking to shape their surroundings. The below text provides additional commentary for the policies included within the emerging Neighbourhood Plan which wou

Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development
The Whitburn Neighbourhood Plan, as written, could undermine the delivery of housing within the settlement due to unduly restrictive landscape-based policy.

viability issues within a scheme and limit sustainable development. This could negatively affect development in the Borough. Recommendation: Story Homes would encourage the Neighbourhood Plan Forum to consider the viability implications of including policy which seeks the replacement of protected and significant trees at a ratio of 2:1. Should the Neighbourhood Plan Forum fail to adequately address this point; Story Homes would ask that this be removed from Policy WNP4.

The effectiveness of the policy is constrained by the lack of detail surrounding the ways in which these Key Views are to be protected. There is also a lack of detail surrounding the monitoring provision for this policy. Without this, it is difficult to understand how Policy WNP8 will be upheld and long-lasting.

Basic Conditions Test:

Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: d) the making of the order contributes to the achievement of sustainable development

The Whitburn Neighbourhood Plan, as written, could undermine the delivery of housing within the settlement due to unduly restrictive landscape-based policy.

Recommendation:

Story Homes recommend that the Neighbourhood Plan Forum remove references to Key Views as they are not clearly evidenced or justified. The inclusion of reference to the Key Views undermines both the effectiveness of Policy WNP3 and the Policies Map.

Policy WNP14: Transportation Infrastructure

Story Homes acknowledges that the Neighbourhood Forum has made amendments to Policy WNP14 and has removed reference to the use of Community Infrastructure Levy. Story Homes appreciates that this has now been removed and clarity has been improved.

Story Homes notes that the policy now includes a section of text which requires all new major residential schemes to ensure pedestrian and cycle access to Whitburn village centre. Story Homes agree with the

Recommendation:

was illustrated by the 2019 draft Local Plan proposing a housing requirement of 397 new homes for the Whitburn Neighbourhood Plan area.

East Boldon Forum endorses the vision set out in Section 4 of the document.

East Boldon Neighbourhood Forum also supports the Whitburn Neighbourhood Plan in its aim of supporting new housing where it meets identified local needs, supporting the use of brownfield sites and the conversion of existing buildings.

The plan places emphasis on policies relating to Biodiversity and Geo-diversity, Green Infrastructure and Connectivity, Local Landscapes and Se

The sewage policy is one of the most important policies in any plan and for that reason the current rather inadequate policy should be withdrawn and rewritten: -

It is a policy that is not based on a proper assessment of the current situation and the future needs of the community. It is a policy that is not based on a proper assessment of the current situation and the future needs of the community.

The Whitburn sewerage goes beyond the boundaries of Whitburn South Tyneside. I am old enough to remember before the boundary changes that South Bents was part of Whitburn now part of Sunderland. The situation is that the sewage from South Bents is still connected to the Whitburn South Tyneside. The sewage flows from South Bents flow to the north to Whitburn PS and then are pumped to the south. In 2018 a development at South Bents of 62 houses was added to the Whitburn system and as a result of incapacity in the sewerage system a direct connection was made via manhole 5609 from the South Bents foul sewer to the storm interceptor which discharges to sea on many occasions.

AECOM say they stand by their EBPD yet I see no mention of these inadequacies in their advice or their evidence to the Forum that has allowed this plan to go forward.

The Whitburn system is still subject to an ECJ judgement Ms Liz Parkes Deputy Director Climate Change & Business Services at The Environment Agency on the 30 July stated: -

"We are working with Northumbrian Water to regularise that situation and we will continue to engage with the community through the Whitburn Forum and encourage the operator to do the same. In relation to the adequacy of the permit, we are awaiting the judgement of the ECJ, and we will review and if necessary update

1. WNP1 Housing.

- a. 5.7 Like most of the community, I am strongly opposed to land being removed from the Green Belt.
to the Green Belt. The Green Belt is a key part of the local planning framework and its removal would be a significant loss to the community. The Green Belt was established in the Second World War and these protections should be respected.
- b.

facilities at its own expense to ensure it continues to comply with the measures set down by the Environment Agency and Ofwat.

With respect to paragraph 4 of the policy, it would be very difficult to disallow any surface water into the sewer system. There is an automatic right to discharge surface water into the public sewerage network.

Question three's answer is £1.5 million