EAST BOLDON

11 January 2021

Peter Mennell, Head of Regeneration & Housing

Cc: George Mansbridge, Councillor Tracey Dixon Councillor Joan Atkinson

Dear Peter,

Thank you for meeting us via Zoom on 21 December 2020. We fully understand that this is a difficult period for Council staff and appreciate that you were able to make time for us. The meeting was very positive and I thought it would be useful to follow up our conversation in the context of your comments on the Draft Local Plan.

It is now 15 months since the consultation on the Pre-Publication Local Plan draft closed. The Forum has had to prepare our Neighbourhood Plan without the benefit of seeing the overall responses to that consultation and without any discussion over the very detailed submission made by East Boldon Forum. I think it worth pointing out that since the formal establishment of the East Boldon Forum in September 2017 and subsequent formal recognition by South Tyneside Council in January 2018, including the period since the consultation on the Pre-Publication draft closed, we have met regularly with Council Officers and made ourselves available to enter into discussions over all aspects of policy in relation to the Pre-Publication Draft Local Plan and the emerging Neighbourhood Plan. I hope that we can work more pro-actively in the future and that the Forum can provide a valuable input into the Local Plan process, including the preparation of relevant Supplementary Planning Documents

We informed you that since our recent consultation in respect of the Pre-Submission Draft Neighbourhood Plan which closed on the 7th December 2020, we had received representations on behalf of the Church Commissioners to include two further sites within the EBNP area for another 215 houses. This would seem to have been lodged with the Council in October 2019 in response to the presubmission Draft Local Plan, although we were not made aware of this proposal at any of our subsequent meetings. This was very disappointing given the Forum had requested information on representations received.

The Forum is fully aware that NPPG requires that in preparing a neighbourhood plan, neighbourhood planning bodies must consider an emerging local plan and its evidence base. However, the Forum believe it would not be appropriate for the Neighbourhood Plan to be based on the housing growth and spatial strategy identified within the emerging local plan. As you are aware, there are significant unresolved objections to the approach taken in the pre-publication draft Local Plan, and there is no guarantee, particularly as a result of the strong national support for the protection of the Green Belt and the high level of opposition from the local community, that the proposals for East Boldon contained within the draft local plan, will remain following independent examination. We believe that the evidence base supporting our plan is proportionate and justifies the policy approach, including the proposed settlement boundary.

I note that you stated that if spatial options change within the Draft Local Plan, that the Council may have to repeat its Regulation 18 Consultation. In view of this, I think it is worth restating the Forum's objections to the Draft Local Plan housing allocations within the EBNP area which will see an additional 950 houses in a village comprising approximately 2,200 dwellings, and also to the Council's Stage 1 Green Belt Review: Exceptional Circumstances document. In response to this document, which would mean a drastic incursion into the green belt in the Forum area, we urged the Council to make full use of suitable Brownfield sites and underutilised land in the Borough. The Forum considers that the level of development proposed for East Boldon is disproportionate. The Forum and local residents are not anti-development, but consider that any new development should be proportionate to the current size of East Boldon and focused on previously developed land, which is clearly available. You explained that some additional Brownfield sites elsewhere in the Borough were being promoted to the Council for housing. Two examples were given as the Former Hawthorn Leslie Shipyard (ED 3.6) and Land adjoining Monkton Business Park (ED2.7).

We also pointed out that new parcels of land had also become available at Bede Industrial Estate and you confirmed that there had been interest in housing development on that estate.

The Forum would be very keen to work with the council openly and constructively to discuss options for these sites.

The Forum had previously also pointed to the disproportionate allocation of sites by the Draft Local Plan within the EBNP area compared to other parts of the Borough. You acknowledged the Garden Village proposal; South of Fellgate had been submitted as part of the response to the Pre-Publication draft. The Council is yet to publish its response to this proposal for 3,000 houses.

We discussed the Government's recent response on Housing Requirement Figures and its implications for the Borough. We both acknowledged that the fact that the Green Belt occupies one third of the area of the Borough was an important constraint that the Government should acknowledge. We both agreed that the issue of promoting more residential developments in our town centres was important in the next draft of the Local Plan, especially now that the Government is actively encouraging this through new planning policy.

Given the potential impact of the proposed 950 new houses within the EBNF area, we would urge the Council to give full consideration to the alternative sites mentioned above in the next draft of the Local Plan, in order to achieve a more equitable allocation of new housing across the Borough.

I look forward to continuing our meetings to facilitate the sharing of information to support the adoption of our Neighbourhood Plan and discussions on how the Council will progress its Draft Local Plan. As we stated, we intend to submit the Draft Neighbourhood Plan to the Council early in 2021 in order for you to carry out further consultation and arrange examination.

Yours sincerely

Kirstin Richardson Forum Chair