

Ref	Name	Organisation	Comments Made
001	John Shield		As a member of the Whitburn forum, I endorse the report's contents and recommend it's acceptance to direct the Council in formulating their Local Plan.
002	Nick Lightfoot	Natural England	<p>Thank you for your consultation on the above dated 11 October 2021.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England supports the inclusion of policies WNP6 (Biodiversity and Geodiversity) and WNP7 (Green Infrastructure Enhancement and Connectivity), and does not have any other specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p><b>NOTE: Please also see Appendix 1</b></p>
003	Belinda Gibbs		Hi. I think these proposals are very adequate. I agree with them. The forum has done a great job and put a lot of thought into this. It's very important to our community that these plans are beneficial to us.
004	Jules Brown	Historic England	<p>Thank you for consulting Historic England on the publication draft of the above neighbourhood plan. We are the public body that advises on England's historic environment.</p> <p>Historic England made a number of comments in relation to the pre-submission draft plan in our letter of 21 January 2021. We are pleased that these have largely been taken into account and we have no further comments to make.</p> <p>Thank you once again for the opportunity to comment. Please contact me should you require any clarification.</p>
005	Cllr Stan Wildhirt		<p>I support the Whitburn Forum Neighbourhood Plan.</p> <p>I share their concern about inadequate Sewage treatment from existing development and particularly adding to the quantity of untreated sewage flowing into The Sea at Whitburn and Marsden from any proposed new development, not only from the Whitburn area but also surrounding areas which share the same system of disposal.</p>

006	Gillian Johnston	STEP (South Tyneside Environmental Protection)	<p>I am writing on behalf of South Tyneside Environmental Protection (STEP) campaign group to express our support for Whitburn Forum's neighbourhood plan.</p> <p>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.</p> <p>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.</p> <p>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.</p>
007	Kevin Johnson		<p>I have the following comments;</p> <p><b>WNP 5 Non-Designated Heritage Assets</b>          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.</p> <p><b>WNP 15 Air Quality</b>          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?</p>
008	Sarah Smith-Voysey	Environment Agency	<p>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.</p> <p>Environment Agency's Position</p>

			<p>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.</p> <p><b>Biodiversity Comments</b></p> <p>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.</p> <p>In reference to section 5.80, it is stated in the plan that 'Environment Agency consents would need to be applied for if new outfalls to ordinary watercourses are proposed. The Environment Agency will likely require consultation and possibly permits applied for if new outfalls to main rivers are proposed.' It may be useful to know that the Local Lead Flood Authority would be the main authority for construction on an ordinary watercourse, however any discharge permits would need to be applied for to the Environment Agency.</p> <p><b>Our Previous Comments</b></p> <p>We have previously submitted the following comments which are still relevant to this submission. We welcome the overall vision in the plan and specifically the policies on net gain and the inclusion of the green objective which is consistent with both the Government's 25 Year Plan for the Environment and the Water Framework Directive (WFD). The WFD seeks to improve water quality in all our waterbodies. It sets a target for all waterbodies to achieve 'good ecological status'. In this regard, specific reference to the 25 Year Plan and the WFD would be useful to put the environmental policies into context for Whitburn. These were our comments previously, and this submission version does not reference either.</p> <p>We do not offer detailed bespoke advice on policy but advise you ensure conformity with the local plan and refer to guidance within our proforma guidance.</p> <p>As there is no site allocation in your neighbourhood plan, there is no flood risk for us to comment on. If there were to be any allocations in flood zone 3 we may seek to advise further upon the draft being formally consulted upon.</p> <p>From our perspective at the Environment Agency we have no further comments to make.</p> <p>Finally, you may find it useful to know that together with Natural England, English Heritage and the Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:  <a href="http://webarchive.nationalarchives.gov.uk/20140328084622">http://webarchive.nationalarchives.gov.uk/20140328084622</a></p>
009	Sandra Larke-Walsh		<p>My name is Sandra M Larke-Walsh and I am writing in support of the neighbourhood plan produced and submitted to you by the Whitburn Neighbourhood Forum.</p>

			<p>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.</p> <p>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.</p> <p>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.</p>
010	Robyn Peat	George F. White	<p>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.</p> <p>Consistency with local planning policy</p> <p>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.</p> <p>There are numerous references to the Neighbourhood Plan working alongside the emerging South Tyneside Local Plan “to ensure consistency in policy making throughout the process.” (paragraph 2.4). The neighbourhood plan acknowledges the housing target set in the emerging local plan for Whitburn but chooses to disregard meeting the housing target resulting in a Neighbourhood Plan which is not compliant with the emerging local plan, contrary to national planning policy.</p> <p>The National Planning Practice Guidance (PPG) was published in 2014 to add further context to the National Planning Policy Framework and it is intended that the two documents are read together. The PPG is set out with different topic areas and is updated regularly.</p> <p>Although a draft neighbourhood plan is not required to be tested against the policies in an emerging local plan the PPG confirms that the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. The PPG provides an</p>

			<p>example of up to date housing needs evidence that would be relevant to housing supply policy in a neighbourhood plan.</p> <p>“Where a neighbourhood plan is brought forward before an up-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;</p> <ul style="list-style-type: none"> <li>• The emerging neighbourhood plan</li> <li>• The emerging local plan (or spatial development strategy)</li> <li>• The adopted development plan”</li> </ul> <p>The Neighbourhood Plan should be consistent with emerging local plan policies and the evidence that underpins the local plan, particularly when it supersedes the date of background reports that have been undertaken to inform the formulation of the Neighbourhood Plan.</p> <p>Housing</p> <p>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).</p> <p>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.</p> <p>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; “Housing proposals on brownfield sites and housing allocations in an adopted South Tyneside Local Plan will be supported where they comply with policies elsewhere in the development plan.”</p> <p>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.</p> <p>Housing Mix</p> <p>Whilst housing mix has been considered at the Neighbourhood Plan level, it is important to recognise that South Tyneside is one housing market area and that the Borough’s needs must be met across the local plan area. The</p>
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			<p>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;</p> <p>“New housing proposals will be supported that provide a mix of housing to meet housing needs in the South Tyneside and the Neighbourhood Plan Area. Housing proposals should include a range of family homes of different sizes and smaller dwellings for first time buyers and older people.”</p> <p><b>Affordable Housing</b></p> <p>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.</p> <p>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.</p> <p><b>Sustainable Design and Construction</b></p> <p>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.</p> <p>The policy wording should be made clearer that the requirements are aspirational as set out in the supporting text.</p> <p><b>POLICY WNP13: Sewage and Drainage Infrastructure</b></p> <p>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;</p> <p>a) Discharge to a SuDS device,</p>
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			<p>b) Discharge to a watercourse, or where this is not reasonably practicable,</p> <p>c) Discharge to a public sewer network.</p> <p>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 by developers promoting sites in Whitburn. They have confirmed in principle that there is the capacity for housing development in the Neighbourhood Plan Area and have not objected to draft housing allocations in Whitburn.</p> <p>Policy WNP13 is not consistent with the current and emerging local plan policy or the infrastructure protocol by seeking to remove the ability for surface water drainage to be discharged into the sewer system. Whilst it is acknowledged that such an option should only be considered once all other options have been exhausted, it is allowed subject to detailed assessments being undertaken.</p> <p>The alleged capacity issues at the waste-water treatment works are not referenced in the emerging local plan and upgrades have not been requested to facilitate new housing developments. There appears to be a difference of opinion between the local community and the local planning authority, the lead local flood authority and the Environment Agency.</p> <p>To ensure consistency with the emerging local plan policy and the infrastructure protocol used by the LLFA and Environment Agency, we suggest that the policy re-affirms the hierarchy for drainage as set out by the LLFA.</p> <p><b>Policy WNP14: Transport Infrastructure</b></p> <p>The Neighbourhood Plan acknowledges the need to assess the transportation impacts as a result of development and identifies three additional links to support sustainable modes. Policy WNP14 and supporting sustainable modes is welcomed in principle however one scheme (Bullet point 2 'Providing a cycleway to connect Whitburn to Cleadon through Moor Lane and Cleadon Lane') extends beyond the boundary of Neighbourhood Plan area. As a result, there may other matters beyond the boundary of the Neighbourhood Plan that need to be considered. It is suggested that the wording of bullet point two in Policy WNP14 is revisited to ensure the policy is aligned with the Neighbourhood Plan area.</p> <p><b>Air Quality</b></p> <p>National planning policy requires local authorities to meet national air quality objectives. Where this is not likely to be achieved, Air Quality Management Area's are designated with action plans setting out steps for how air quality can be improved.</p> <p>There are no designated Air Quality Management Areas in the Whitburn Neighbourhood Plan area, suggesting that air quality current meets national objectives in the village. The PPG states that where air quality is an issue, the local planning and environmental health departments will inform the neighbourhood plan area on how this</p>
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			<p>might affect potential policies and proposals being considered. We are not aware that any such request has been made by the local authority.</p> <p>To ensure consistency with the emerging local plan policy we would suggest that the policy removes the reference to all development being at least 'air quality neutral' to replicate the wording of the local plan policy; "Proposals will be supported where they can demonstrate that the development does not lead to further deterioration of air quality."</p> <p>Monitoring</p> <p>The Neighbourhood Plan acknowledges that it may be necessary to review the Neighbourhood Plan considering any policy shifts in the emerging South Tyneside Local Plan. However, it is stated that the plan has been developed in partnership with South Tyneside Council and that it is anticipated that the emerging Local Plan will be well aligned with the Neighbourhood Plan.</p> <p>As set out in this response, there are a number of areas where the Draft Neighbourhood Plan conflicts with national policy and emerging local plan policies particularly regarding meeting housing needs and more onerous policies covering drainage and air quality. As set out in the PPG, it is vitally important that the Neighbourhood Plan discusses policy conflicts with the Local Planning Authority to ensure the Neighbourhood Plan does not become out of date when the new local plan is adopted.</p> <p>Summary</p> <p>The comments contained within this response are aimed to assist in the drafting of the Neighbourhood plan to ensure consistency with national planning policy and the latest evidence that has been undertaken to inform the emerging South Tyneside Local Plan.</p> <p>We can provide further information or clarification on any of the matters raised in this response if required and look forward to working collaboratively with the Neighbourhood Forum as the Neighbourhood Plan progresses.</p>
011	Hannah Gray	Avison Young OBO National Grid	<p>National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p>



			<p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate 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.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets:</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Grid provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></li> </ul> <p>Please also see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below: <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Information regarding the gas distribution network is available by contacting: <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p>Further Advice</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.</p> <p><b>NOTE: Please also see Appendix 2</b></p>
012	Melanie Lindsley	Coal Authority	<p>Thank you for your notification received on the 11th October 2021 in respect of the above consultation.</p> <p>The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy &amp; Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features at surface and shallow depth, in the form of 6 mine entries. Any development proposals within areas where these features are present would need to take account of the risks they pose to surface stability and public safety.</p> <p>It is noted however, that the Neighbourhood Plan does not propose to allocate any sites for future development. On this basis we have no specific comments to make.</p>

			Please do not hesitate to contact me should you wish to discuss this further.
013	Michelle Robinson	Barton Willmore OBO Church Commissioners	<p>On behalf of our Client, the Church Commissioners, we write in response to the Submission Draft Whitburn Neighbourhood Plan which is currently out for consultation until 19th November 2021.</p> <p>1. Background</p> <p>Our Client has land interests within South Tyneside and are actively engaged in the preparation of the Local Plan for the area. As part of the emerging local plan for South Tyneside, our Client is promoting land north of Shearwater and east of Mill Lane which is a draft allocation in the Regulation 18 draft of the South Tyneside Local Plan (August 2019). The Regulation 19 draft is anticipated for consultation early 2022.</p> <p>As a major landowner in South Tyneside, the Church Commissioners are keen to engage with the Whitburn Forum Committee on the preparation of their Neighbourhood Plan to ensure that it meets the basic conditions and is capable of being 'made' and becoming part of the development plan for South Tyneside. In preparation of this response, our Client has had regard to the Basic Conditions Statement dated August 2021.</p> <p>2. Policy WNP1: Housing</p> <p>Our Client is aware that at its Regulation 18 consultation stage, South Tyneside's emerging local plan (policy H9) proposed a requirement of 18% of new homes to be affordable. The submission draft Neighbourhood Plan sets a target for 20%.</p> <p>It is our Client's understanding that South Tyneside Council have commissioned CP Viability to undertake the Local Plan Viability testing for their emerging plan. Our Client raises concerns regarding the affordable housing targets set out within Policy WNP1 and in this regard Basic Condition 1 regarding the general conformity of the Neighbourhood Plan with strategic local planning policy.</p> <p>3. Policy WP2: Whitburn Design Guidelines</p> <p>Our Client acknowledges the role of key views into and from Whitburn village. There are two key views identified in proximity of their their land north of Shearwater and east of Mill Lane. Whilst it is understood that these views were identified as being most valued by residents during community consultation, further justification regarding the importance and what is 'valued' about these views is required. Our Client is concerned that these views are being identified in an attempt to prevent development coming forward on this site, should exceptional circumstances be demonstrated for the release of this land from the Green Belt as part of the emerging local plan.</p> <p>Basic condition 3 requires general conformity with strategic local policy. Whilst the local plan is still emerging, this needs to be considered carefully by the Examiner. The Regulation 18 draft of the South Tyneside Local Plan proposed this site as a draft allocation H3.75. Currently, our Client believes the emerging Neighbourhood Plan fails basic condition 3.</p> <p>4. Policy WP3: Sustainable Design</p>

			<p>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 ‘significant weight’ to the incorporation of elements a) – 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 schemes may not be feasible. Our Client proposes that ‘where feasible’ or similar wording should be applied to all of the criterion not just for electric charging points.</p> <p>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.</p> <p>5. Policy WN7: Green Infrastructure Enhancement and Connectivity</p> <p>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 connectivity.</p> <p>Our Client does raise concerns regarding the policy wording which suggests that the Green Belt surrounding Whitburn Village has the potential for expansion and improvement. Basic condition 1 requires the appropriate regard to national policy and advice. Any expansion of the Green Belt needs to be subject to exceptional circumstances and the provision of NPPF paragraph 139 to be met. Our Client suggests that the current wording fails Basic Condition 3.</p> <p>6. Policy WNP14: Transport Infrastructure</p> <p>Our Client supports the recognition of the importance of the cycleway along Mill Lane.</p> <p>7. Conclusion and Summary</p> <p>As a major landowner in South Tyneside, the Church Commissioners are keen to engage with the Whitburn Forum Committee on the preparation of their Neighbourhood Plan to ensure that it meets the basic conditions and is capable of being ‘made’ and becoming part of the development plan for South Tyneside.</p> <p>We trust that our Client’s comments will be duly considered. We would like to express our interest in being part of the examination of the Neighbourhood Plan.</p>
014	Hannah Richins	Story Homes	<p>The following representations have been made by Story Homes in relation to the Whitburn Neighbourhood Plan Submission version (‘the Neighbourhood Plan’).</p> <p>These representations are made in the context of Story Homes’ land interests within Whitburn; Land at Lizard Lane and Land at Cleadon Lane, both of which are shown in the attached Location Plans (Appendix 1). Land at</p>

			<p>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.</p> <p>Story Homes have previously been involved in the preparation of the Whitburn Neighbourhood Plan and have submitted representations to the Pre-Submission Version Neighborhood Plan consultation held in December 2020. Story Homes are committed to active engagement in the plan-making process wherever it is suitable and relevant to do so. It is noted that involvement at this stage is of importance given the emerging South Tyneside Local Plan, currently at Pre-Publication Version. As such, this Neighbourhood Plan should be made in accordance with said emerging Local Plan and should not be made prematurely.</p> <p>Story Homes is generally supportive of the proposals set out in the Submission draft Neighbourhood Plan and acknowledge the changes made to the Neighbourhood Plan following the previous consultation. However, we have some concerns relating to the content of the Neighbourhood Plan and supporting documents. These representations seek to clearly outline said concerns and recommendations to align the Neighbourhood Plan with adopted national policy. Story Homes would also like to ensure that the Neighbourhood Plan is produced in an appropriate manner which aligns with the emerging South Tyneside Local Plan given the stage the plan preparation is at (Pre-Publication draft).</p> <p>It should be noted that for a Neighbourhood Plan to be put to a referendum, and subsequently made, it needs to meet all of the basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990, this is then applied to Neighbourhood Plans through section 38(a) of the Planning and Compulsory Purchase Act 2004. These basic conditions are set out below: a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order, b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order, c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order, d) the making of the order contributes to the achievement of sustainable development, e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area), f) the making of the order does not breach, and is otherwise compatible with, EU obligations, and g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p> <p>Story Homes has produced these representations to provide continued support to the Whitburn Neighbourhood Forum and the production of the emerging Neighbourhood Plan. Story Homes is involved in a number of</p>
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			<p>Neighbourhood Plans across its three operational Regions and recognises that they are helpful tools for communities looking to shape their surroundings.</p> <p>The below text provides additional commentary for the policies included within the emerging Neighbourhood Plan which would align it more closely with both the basic conditions tests set out above, the National Planning Policy Framework (NPPF 2021) and also the emerging and adopted South Tyneside Local Plan.</p> <p>Policy WNP1: Housing</p> <p>Story Homes continues to provide support to the Neighbourhood Forum in their request to see future housing come forward in a scale and mix which is reflective of need in the settlement. It is noted that the same Housing Needs Assessment, dated February 2018, is being referenced in the Submission Version and the pre-Submission Version Neighbourhood Plan. The Neighbourhood Plan Forum had previously commissioned this document which continues to form part of the evidence base of the emerging Neighbourhood Plan. Story Homes reiterates the same point made in the Pre-Submission Consultation, that should the Neighbourhood Plan Forum wish to create its own evidence base this should be based on up-to-date data.</p> <p>The emerging South Tyneside Local Plan uses the Strategic Housing Market Assessment (SHMA) to form the basis for any indicative housing mixes. Whilst Story Homes acknowledge that the most recent SHMA which underpins the South Tyneside Pre-Publication Version Local Plan is dated 2015 and could be considered out-of-date. It nonetheless provides a robust and consistent basis for a housing mix policy to be provided. Story Homes considers that Policy WNP1 should align with the most recent SHMA as opposed to the Whitburn Housing Needs Assessment.</p> <p>Story Homes encourage alignment with the South Tyneside SHMA as opposed to the Neighbourhood Plans Housing Needs Assessment given that the former represents the needs of the wider Borough and is not limited to Whitburn alone. The South Tyneside SHMA takes into account in-migration across South Tyneside settlements, whereas the Neighbourhood Plan evidence base allows for only the needs of the current residents within the settlement. Story Homes consider the Councils evidence base to be more robust and realistic.</p> <p>Story Homes continues to provide support to the Neighbourhood Plan Forum in its intention to bring forward affordable housing. However, notices that the Neighbourhood Plan is continuing to advocate for a provision of affordable housing which is higher than the emerging South Tyneside Local Plan provision. There needs to be consistency between the figures cited in both documents.</p> <p>The emerging South Tyneside Local Plan calls for 18% of new homes on schemes of 11 or more homes to be brought forward as affordable, whereas the Whitburn Neighbourhood Plan calls for 20% of new homes on schemes of 10 or more dwellings. Story Homes asks that the Neighbourhood Plan provides clear evidence as to the increase in affordable provision which differs from the emerging Local Plan, this will need to include viability evidence to ensure that the delivery of homes in the Borough is not stifled.</p>
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			<p>Finally, Story Homes would like to draw the Neighbourhood Forums attention to the recently adopted East Boldon Neighbourhoods Plan (adopted 28th October 2021). In the Examiners report (dated 21st July 2021) the Independent Examiner ('Examiner') notes that the Neighbourhood Plan group has assessed the housing need for the settlement noting a figure of 12 dwellings per annum. In addition, the Neighbourhood Plan Group has aligned the settlement boundary with that of the Green Belt boundary, which effectively shrink-wraps the settlement. Thus limiting the amount of development which can come forward in a sustainable manner to meet the 12 dpa housing requirement identified.</p> <p>Within the Examiners Report, the Examiner has called for an amendment to be made to Policy EB13: The Delivery of New Housing to ensure residential development is not limited:</p> <p>"Recommendation 15: Revise Policy EB13 as follows:</p> <p>Delete the second part of the policy "All new development proposals..... impacting on the development."</p> <p>Revise the third part of the policy to read: "Where appropriate and relevant to the site, a masterplan should be prepared as part of the development proposals and should include details of:"</p> <p>Revise criterion g) to read: The provision of adequate vehicle and cycle parking provision taking account of the guidance set out in the Annex to the East Boldon Design Code;"</p> <p>Revise criterion k) to read: "....key considerations should include...."</p> <p>Add a new paragraph to the justification: "There may be limited opportunities for housing development in the Green Belt and Policy EB2 makes it clear that any such development will be considered against national policy on Green Belts."</p> <p>Add a new paragraph to the justification after paragraph 8.6: "Developers of new and replacement housing are encouraged to consult the East Boldon Neighbourhood Forum, the local community and other key stakeholders prior to submitting their proposals to the local authority for planning permission.""<sup>1</sup></p> <p>Story Homes note that whilst Whitburn Neighbourhood Plan Forum have not included an explicit housing requirement for the settlement, they have made reference to the emerging South Tyneside Local Plan which disaggregates 397 dwellings across the Local Plan Period. Like the East Boldon Neighbourhood Plan, the settlement boundary to Whitburn has also followed the existing Green Belt boundary making it difficult for future development to come forward in a sustainable manner.</p> <p>Story Homes would like to encourage the Neighbourhood Plan Forum to consider the addition of text similar to that shown in bold above. This would alleviate any concerns that the Neighbourhood Plan is unduly restrictive in its approach to future housing requirement which could ultimately undermine the delivery of housing through the emerging South Tyneside Neighbourhood Plan.</p>
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			<p>Story Homes seeks to ensure that the neighbourhood Plan is clearly evidenced, justified and consistent with the emerging South Tyneside Local Plan, this may undermine the Neighbourhood Plans ability to conform to the basic condition test e).</p> <p>asic Conditions Test:</p> <p>Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area): The Whitburn Neighbourhoods Plan, as written, could undermine the effectiveness of the emerging South Tyneside Local Plan with respect to housing mix and its approach to affordable housing. This may impact upon delivery within both Whitburn and the wider borough.</p> <p>Recommendation:</p> <p>In order to ensure that the Whitburn Neighbourhood Plan can continue to referendum, and aligns with the basic conditions, the Plan should be updated to reflect and align with the approach taken in the emerging South Tyneside Local Plan evidence base. Regard can still be made to the Neighbourhood Plans Housing Need Assessment; however, Story Homes would encourage the Neighborhood Plan to update this document to reflect current need. The Neighbourhood Plan should have regard to clear evidence in order to be considered robust and effective.</p> <p>Story Homes would also encourage the Neighbourhood Plan Forum to consider the comments and amendments made to the East Boldon Neighbourhood Plan in order to avoid the unduly restriction of future housing in the settlement when considered against the tightly drawn settlement boundary.</p> <p>WNP2: Whitburn Design Guidelines</p> <p>Story Homes has not previously made comments regarding Policy WNP2, however, has noticed that locations and directions of Key Views have been added to the Policies Map and reference to these has been made in Policy WNP3.</p> <p>Story Homes notes that Key Views have been identified at the boundary of its asset on Lizard Lane (please see location plans at Appendix 1). Whilst Story Homes agrees with the provision and enhancement of landscape characteristics, especially those linked to assets of heritage value, the evidence underpinning the Key Views identified does not seem to be robust. In addition, there seems to be limited indication of how this policy will be monitored and enforced given that the Key Views identified are not subject to any designation or protection. The Key View locations are underpinned by a document entitled ‘Whitburn’s most valued views – survey results June 2020’. This indicates that the locations of said Key Views are based upon anecdotal evidence. Story Homes considers that the Key View locations should be removed as they are not justified or evidenced.</p> <p>Basic Conditions Test:</p>
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			<p>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.</p> <p>Policy WNP6: Biodiversity and Geodiversity</p> <p>Story Homes have not previously provided comments on Policy WNP6. Story Homes acknowledge that the Neighbourhood Plan Forum are seeking to ensure the protection and enhancement of geodiversity and biodiversity within the settlement. However, the introduction of a percentage associated with Biodiversity Net Gain causes concern.</p> <p>Whilst the 10% net gain, aligns with the Environment Bill which has recently been passed, Story Homes would once again encourage the Neighbourhood Plan to align with the emerging South Tyneside Local Plan. The amount of net gain to be pursued in the emerging South Tyneside Plan may align with the Neighbourhood Plans assumptions in the upcoming Pre-Publication version. However, the emerging Local Plan will provide a detailed framework for this percentage to be achieved. The Neighbourhood Plan currently lacks the detail associated with Biodiversity Net Gain such as the metric used for calculation or the ways in which it can be achieved both on and off-site.</p> <p>Story Homes would encourage the Neighbourhood Plan to align with the emerging South Tyneside Local Plan to ensure the detail is consistent and effective. Given that Net Gain will be a consideration within decision-making it may be preferable to exclude this portion of Policy WNP6 and allow it to be dealt with through the emerging South Tyneside Local Plan. Story Homes would encourage the Neighbourhood Plan Forum to align with the Environmental Bills transitional arrangements in the first instance.</p> <p>Basic Conditions Test:</p> <p>Story Homes considers that the Neighbourhood Plan fails to meet the basic conditions test because: e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area): The Whitburn Neighbourhoods Plan, as written, could undermine the effectiveness of the emerging South Tyneside Local Plan with respect to Biodiversity Net Gain. This may impact upon the protection and enhancement of geodiversity and biodiversity within the Borough.</p> <p>Recommendation:</p> <p>In order to ensure that the Whitburn Neighbourhood Plan can continue to referendum, and aligns with the basic conditions, the Plan should be updated to reflect and align with the emerging South Tyneside Local Plan. Regard can still be made to Biodiversity Net Gain, however, Story Homes would encourage the Neighborhood Plan to either reflect the emerging South Tyneside Local Plan or remove the percentage requirement altogether in order</p>
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		<p>to make the Neighbourhood Plan effective. At the very least Story Homes would encourage the Neighbourhood Forum to echo the Environment Bills Transitional arrangements.</p> <p>WNP7: Green infrastructure Enhancement and Connectivity</p> <p>Likewise with the comments made surrounding WNP6, Story Homes supports the Neighbourhood Forum in its endeavour to maintain and enhance connectivity to green infrastructure. However, Story Homes is concerned with the inclusion of Part b) in this policy. Whilst the sentiment behind this part of the policy is acknowledged, it is unreasonable for the Neighbourhood Plan to mandate that a wildlife corridor be created in every new development within Whitburn.</p> <p>The creation or enhancement of such infrastructure needs to be supported by clear evidence of need in order to ensure the habitats created are useable and suitable. Story Homes would also encourage the Neighbourhood Forum to consider the implications of this policy wording with respect to viability. Additional policy burden, such as this, may affect the deliverability for residential development in the settlement.</p> <p>Story Homes would encourage the Neighbourhood Forum to remove reference to Part b) or should the Neighbourhood Forum wish to produce evidence that this can be delivered, Story Homes would seek the amendment of the policy to include the wording 'where practicable'.</p> <p>Basic Conditions Test:</p> <p>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</p> <p>The inclusion of a policy requirement for the creation or enhancement of wildlife corridors in any new development will affect the delivery of sustainable development through overly restrictive policy.</p> <p>Recommendation:</p> <p>Story Homes recommends that part b) of Policy WNP6 be removed in order to ensure that sustainable forms of development can come forward in Whitburn. Should the Neighbourhood Forum wish to retain the policy wording, Story Homes would encourage this to be evidence-led with respect to the ecological need in the area but also the impact upon viability.</p> <p>WNP8: Local Landscapes and Seascapes</p> <p>Story Homes reiterates the points made in relation to WNP2, the inclusion of Key Views within the Submission Version Neighbourhood Plan is not justified or evidenced.</p> <p>The Key View locations are underpinned by a document entitled 'Whitburn's most valued views – survey results June 2020'. This indicates that the locations of said Key Views are based upon anecdotal evidence. Story Homes considers that the Key View locations should be removed as they are not justified or evidenced.</p> <p>Whilst Story Homes understand the reasoning for Policy WNP8 in its protection of locally important views, it emphasises that this must be evidence base led as opposed to anecdotally informed.</p>
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			<p>Recommendation:  Story Homes suggests that the Neighbourhood Forum amend the wording of Policy WNP14 to allow for a pragmatic and sensible application of the guidance. .</p> <p>Conclusion  Story Homes appreciates the opportunity to provide further representations to the Whitburn Submission draft Neighbourhood Plan. Our representations note that whilst Story Homes are generally supportive of the principles set out in the Neighbourhood Plan and are welcoming of the amendments made to the Neighbourhood Plan, there remain some concerns over the content of said Plan.</p> <p>Above all else, Story Homes considers that the Neighbourhood Plan, in its current form, does not align with the emerging South Tyneside Local Plan and as such cannot be considered in accordance. As a result, the Neighbourhood Plan fails to meet the basic conditions set out paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990, this is then applied to Neighbourhood Plans through section 38(a) of the Planning and Compulsory Purchase Act 2004. Throughout our representations, recommendations have been made which, if implemented, should align the Neighbourhood Plan more closely with these basic conditions.</p> <p>Story Homes welcomes the opportunity to make comments on the Whitburn Neighbourhood Plan and looks forward to engaging further with the Neighbourhood Forum.</p>
015	Robert Crooks		<p>I see that the Whitburn Neighbourhood Forum have submitted the draft Neighbourhood Plan to the council. The amount of work that has gone into this plan is enormous so I would like to say thankyou to the Forum for their hard work.</p> <p>The plan gives a full picture of the village of Whitburn and of the needs of its population. I covered some of these areas in my letter to the planning dept. on 9.10.2019 when the intention of the planning dept. seemed to be to develop Whitburn's green field sites into housing estates. I received no confirmation that you had received my letter even though it was asked for, so whether my letter was read or thrown away I do not know.</p> <p>I can only hope that the planning dept. takes notice of the Draft Neighbourhood Plan from the Forum.</p> <p>I request to be notified of the Councils decision under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.</p>
016	Dave Hutchinson	East Boldon Neighbourhood Forum	<p>East Boldon Forum welcomes the publication of the Whitburn Neighbourhood Plan Submission Draft as it brings forward a second neighbourhood plan in the Borough for examination.</p> <p>East Boldon and Whitburn have many connections and similarities. Many students from East Boldon travel to Whitburn for secondary education and many East Boldon residents visit the coast line at Whitburn. Both villages sit within the Tyne and Wear Green Belt, which protects their special characters and both villages have Conservation Areas at their centre. Both villages have experienced development pressures in recent years, which</p>

			<p>was illustrated by the 2019 draft Local Plan proposing a housing requirement of 397 new homes for the Whitburn Neighbourhood Plan area.</p> <ul style="list-style-type: none"> <li>• East Boldon Forum endorses the vision set out in Section 4 of the document.</li> <li>• 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.</li> </ul> <p>The plan places emphasis on policies relating to Biodiversity and Geo-diversity, Green Infrastructure and Connectivity, Local Landscapes and Seascapes and Local Green Spaces. All of these complement the Green Belt and strengthen the protection of the rural and coastal setting of the village.</p> <p>The Plan places particular importance on the discharge of sewage and its impact on the foreshore of the Whitburn coastline and the bathing waters at Marsden.</p> <p>East Boldon Forum notes the evidence provided to support the Sewage and Drainage Infrastructure Policy and the evidence provided in the Community Action Plan - Reducing Sewage Pollution at Whitburn. East Boldon Forum notes that the evidence base shows spills from two Combined Sewer Outflows (CSOs) within our Neighbourhood Forum Area. It is believed that these spills would flow into Tiled Burn, a tributary of the River Don.</p> <ul style="list-style-type: none"> <li>• East Boldon Forum shares the concern of Whitburn Forum about sewage pollution within South Tyneside and has formulated a Community Action to work with others to encourage greater transparency and understanding of these issues.</li> </ul> <p>It is noted that Policy WNP 14 supports providing a cycleway to connect Whitburn to Cleadon through Moor Lane and Cleadon Lane.</p> <ul style="list-style-type: none"> <li>• East Boldon Forum supports this proposal as it will provide greater linkage to the cycleways within our Neighbourhood Area.</li> </ul>
017	Bob Latimer		<p>On reading what a Neighbourhood Plan was intended to achieve I joined the Whitburn Neighbourhood Forum. I am a retired engineer living 50m from the sea and I thought I would like to help future generations who live in Whitburn to have a clean environment unlike the situation now. Being aware that housing developments were being added to the Whitburn sewerage network without the damage this was causing being assessed, I believed the statements such as those below, and felt if I joined the Forum this would allow me to give something back to the place I was born.</p> <p>“Neighbourhood planning is a right for communities to shape the way their local area is developed through the use of Neighbourhood Development Plans”</p> <p>“The neighbourhood plan will set a vision for the future. It can be detailed, or general, depending on what local people want”</p>

			<p>I am not against further houses being built in Whitburn but with the Local Plan being from 2012 along with all the land surrounding Whitburn being green belt it is very difficult, if not impossible, with no up to date Local Plan being in place, to have a shared vision to shape the development and growth of the local area.</p> <p>While areas in the green belt have been put forward as potential development sites, nothing in the Neighbourhood Plan indicates which sites will be used and for what type of housing. It is common knowledge that a developer wants to build high value housing on the Charley Hurley and Marsden School site, but is this the type of development that is needed. Is this really what is called: -</p> <p>“Neighbourhood planning provides for communities to set out a positive vision for how they want their community to develop over the next 10 years”</p> <p>Surely that vision has to be that people born in Whitburn can get married and continue to live in Whitburn and bring up their children, the next generation, in houses that are affordable. Alongside this the type of housing should be provided to allow older people to downsize. I know that this was a major requirement suggested by local consultation.</p> <p>What I have found with this neighbourhood plan process is that although land has been allocated for potential development with no Local Plan in place, then how could a neighbourhood plan be valid? To agree to this neighbourhood plan is like signing a blank check and giving it to a stranger, something I think none of us would do.</p> <p>I believe that a major factor in assessing new development is the lack of infrastructure capacity and the Neighbourhood Plan has not been allowed to contain stringent policies about this. Although I must praise the efforts of the Whitburn Forum, Steve Lavelle in particular, in drawing up this neighbourhood plan it cannot, and should not be accepted, as Policy WNP13 is like signing a blank check and worse.</p> <p>“Planning proposals will not be supported unless it can be shown by ‘rigorous analysis’ that there is sufficient capacity in the local sewerage system and that any new connections will not increase the risk of system back up/flooding or cause any adverse impact to the neighbourhood area environment”</p> <p>There can be no more rigorous analysis than that produced by Steve Lavelle, his investigations, reports and analysis show that the capacity of the local sewage system was exceeded years ago and the evidence overwhelmingly supports that view.</p> <p>It is rather ironic where the Policy WNF refers to ‘rigorous analysis’ when it was found by ‘rigorous analysis’ during a Public Inquiry that the Whitburn system was found not fit for purpose and a new permit was issued that is not being complied with although it is still valid today. It is further rather ironic that the South Tyneside Local Plan goes back to 2012, this was the same year that the European Court of Justice found following ‘rigorous analysis’ that the Whitburn system was not complying with the Urban Waste Water Treatment Directive and this judgement EC Case C -301/10 still stands today.</p>
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			<p>I have found the following comments made by a water company in relation to another plan, these comments express my views precisely and for that reason I include them in my objection: -</p> <p>“Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external flooding and pollution of land and water courses and/or low water pressure”</p> <p>“A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: ‘Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for infrastructure for waste management, water supply and wastewater’</p> <p>“Paragraph 28 relates to non-strategic policies and states ‘Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure’</p> <p>Paragraph 26 of the revised NPPF goes on to state: Effective and on-going joint working between strategic policy-making authorities and relevant bodies (such as Whitburn Forum) is integral to the production of a positively prepared and justified strategy. In particular joint working should help to determine where additional infrastructure is necessary....</p> <p>In the absence of a Local Plan, I believe it is essential that the Neighbourhood Plan is allowed to be detailed and precise in setting out a Sewage Policy which can be adopted into the new Local Plan and which is independently verified to make our people and our environment safer than they are now. If this is not included – then the question has to be asked why not?</p> <p>If the assessment of this Neighbourhood Plan is to go before the Councillors I would like to ask if I could attend and speak to the Councillors.</p> <p><b>NOTE: Please also see Appendix 3</b></p>
018	Lynne Jones		<p>Thank you for the opportunity to comment on the plan.</p> <p>Firstly, I must congratulate the Whitburn Neighbourhood Forum on the comprehensive nature of the plan and the extensive consultation and hard work that has clearly gone into it. Frankly, Whitburn Neighbourhood Plan is a spectacular document covering all the key areas of residents concerns and I sincerely hope South Tyneside Council take its contents to heart when preparing the Local Plan for the area.</p> <p>I am in full support of all of the Neighbourhood Plan. My support is strongest for the Plan’s proposals for:</p>



			<p>1. WNP1 Housing.</p> <p>a. 5.7 Like most of the community, I am strongly opposed to land being removed from the Green Belt. Protections for Green Belt designated land have kept Britain a 'green and pleasant land' ever since the end of the Second World War and these protections should be respected.</p> <p>b. I would question the requirement for 397 new homes in Whitburn. The UK birth rate is at an all time low so where is the need coming from? Agree more affordable housing is needed and fewer executive homes, but I believe protections are needed to ensure such affordable homes are bought by South Tyneside residents. The last thing Whitburn needs is to have the same problems as Cornwall have where affordable homes are bought as second homes to be let out as Air BnB or holiday homes.</p> <p>2. WNP2. b) reflects, respects and reinforces local architecture and local distinctiveness, including through the use of sustainable modern design where appropriate; and c) respects surrounding buildings in terms of scale, height, form, materials and massing; This is very important. I note that these guidelines have already been ignored by South Tyneside council in allowing the development of a large dwelling on a small plot of land at the entrance to the Shearwater estate. The dwelling is completely out of proportion to all the houses on both the Shearwater and Whiterocks estate. It has already blocked out the seascape view shown on the Policies map from Mill Lane out to sea across LGS4 and LGS3. This is a disappointing current development by South Tyneside council so I would strongly support WNP2.</p> <p>3. WNP6 and 7. Strong support from me for this policy. This is a stunning coastline with specific endangered biodiversity and must be protected at all costs.</p> <p>4. WNP8. I would strongly agree with this policy and the comment at 5.55 that the community greatly values the rural and coastal character of the area and want to ensure that Whitburn remains a village with its own unique identity within the local authority and wider region.</p> <p>5. WNP13. Strong support from me here. It is appalling to think that half a million tons of sewage a year is being dumped into the North Sea right on our coast. It may be beyond South Tyneside's council's remit to enforce this but surely Northumbrian Water must be shamed into improving their infrastructure. It's clear that all the private water companies in the UK are happy to borrow money to pay dividends to their shareholders rather than spend it on improving infrastructure. Pressure needs to be brought to bear on the national government to act on this. Its 2021 – disgusting!</p> <p>6. WNP14 . Traffic and cycleways. The pandemic brought into focus the lack of pedestrian routes and well maintained cycleways in the area. I would strongly support all the measures suggested. Something must be done about the traffic on the A183, although I know there are no easy solutions. On a warm sunny day in summer traffic backs up from Whitburn centre past the Coast Road garage on Mill Lane.</p> <p>7. Finally, I would lend my wholehearted support to the 5 suggested Community Projects in Section 7.</p>
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			<p>In short, this plan is well thought out and certainly reflects my concerns as a resident of Whitburn.</p>
019		South Tyneside Council	<p>Before commenting on the Plan, the Council would like to take this opportunity to commend the hard work that has clearly been undertaken on the part of the Forum to produce the document.</p> <p>One over-arching question / comment relates to what the plan defines as ‘development’ are there any scale parameters to this and the policies applicable? - a householder extension is very different to a major development.</p> <p><b><u>Chapter 2</u></b></p> <p>Paragraphs 2.4 and 2.5 are not up to date and are therefore factually incorrect. The Council is preparing a new Regulation 18 pre-publication Local Plan.</p> <p><b><u>Chapter 4</u></b></p> <p>There is no reference within the objectives and few within the Policies as to how this NP would contribute to addressing climate change through mitigation or adaptation. This is in conflict with the NPPF.</p> <p>Housing:</p> <p>It is unclear whether the objective refers to number of homes required or type and mix of homes.</p> <p>Whitburn Community:</p> <p>Amending ‘Whitburn Village Centre’ to ‘Whitburn Local Centre’ would ensure consistency with the development plan.</p> <p>Infrastructure:</p> <p>Northumbrian Water Ltd cannot refuse connections – necessary infrastructure identified by point of connection application to NWL.</p> <p><b><u>Chapter 5 Planning Policies</u></b></p> <p><b><u>Housing</u></b></p> <p><b><u>Para 5.4</u></b> If the supply of brownfield land is limited then the objectives of securing more affordable homes and homes for older people could be at risk of not being met unless any assessment of the potential supply from brownfield sites has been undertaken and specific brownfield sites are identified within this Plan.</p> <p><b><u>Para 5.5 – 5.7</u></b> There is no obligation for the NP to contain policies on housing need nor is there an obligation to justify why there is no such policy.</p> <p><b><u>Para 5.9</u></b> How would you define smaller schemes – WNP1 does not distinguish between larger and smaller schemes – only to housing proposals on brownfield sites. What if suitable larger brownfield sites become available which can happen?</p> <p><b><u>Para 5.16</u></b> NWL cannot refuse connections – correct use of drainage hierarchy will be applied but not always possible to avoid discharging to sewer network.</p>

			<p><b><u>Policy WNP1</u></b>  If no assessment is undertaken to determine whether there is brownfield capacity it is questionable as to whether the WNP1 can be delivered with regards to the identified need for the mix of homes and affordable homes required given that no sites are specifically identified. It then remains unclear as the degree to which the Policy can then be monitored.</p> <p><b>Affordable housing:</b> The use of the word “must” will effect proposals in terms of their viability. As with affordable, the policy states ‘all new homes <b>must</b> be built to meet Lifetime Homes Standards’. It is questioned whether this would impact viability.</p> <p>The final paragraph refers to major housing developments, ‘major’ should be defined.</p> <p><b><u>WNP2 Built Environment and Whitburn Village</u></b>  Parts of this policy might not be relevant or achievable on small scale developments, such as house extensions.</p> <p><b><u>WNP3 Sustainable Design</u></b>  <b>Criterion (a):</b> this could cause overheating of a room requiring manual or mechanical ventilation.  <b>Criterion (b):</b> this refers to building regulations rather than planning requirements, it is unclear how this would be assessed through a planning application.  <b>Criterion (d):</b> could use (where practicable) added to reflect hierarchy of preference as not always achievable. Reference to scale of development also a factor in delivery of SuDs / hierarchy. Reduction of impacts on the local drainage network would have to be in accordance with drainage hierarchy - ie where practicable. It is not always possible to avoid discharging to local sewer network.  <b>Criterion (e/f):</b> Clarity is required as to the number of cycle parking and electric vehicle charging points that would be required by the type of development and how would these differ from the current standards already in place at the Borough wide level. Note the Council is in the process of updating its own parking standards. Criterion e refers to ‘larger developments’, it is unclear what the threshold is for this. Is it referring to major applications?</p> <p><b><u>WNP4 Whitburn Conservation Area</u></b>  In the final limb, it would be necessary to outline those circumstances, where the loss of trees might be acceptable and the mitigation that would be sought. It is considered that the reference to the planting of two trees to replace each tree lost may be too prescriptive and not always achievable. I.e. what if there is a scenario where there would not be sufficient space for two trees, would a heavier standard tree to be planted not be an acceptable option. A tree afforded protection by virtue of being in the conservation area may have very little or no amenity due to age, condition or health.</p> <p><b><u>Para 5.25</u></b> It is a false assumption to assume the Trust would never bring forward proposals that conflict with WNP5.</p>
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			<p>facilities at its own expense to ensure it continues to comply with the measures set down by the Environment Agency and Ofwat.</p> <p>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.</p> <p><b><u>WNP14 Transport Infrastructure</u></b></p> <p>Question thresholds for TA / TP's – not all 'major's would need both.</p> <p>The policy states, 'Where required, these measures will be secured through a legal agreement' –however this would always be necessary / appropriate.</p> <p>"major development" should be defined.</p> <p><b><u>WNP15 Air Quality</u></b></p> <p>It is currently unclear what evidence the policy and supporting text is based on.</p> <p>The Tyneside validation publication sets out specific triggers with regards to when an air quality assessment is needed, but this policy might be effectively needing them for all development.</p> <p>The potential for contaminated land will be addressed through the planning application but it may be worth having a paragraph within the plan which details this as well as the use of the YAPLAG guidance (Yorkshire and Lincolnshire Pollution Advisory Group) This is the guidance which we would recommend developers look at when assessing land and the potential for any contamination.</p>
020		Doris Bowles	<p>I think the Neighbourhood Plan does not have enough details about what and where new building should be encouraged according to what local people said at the meetings etc.</p> <p>I am told that any building here must be on green belt land and that only the Council can decide on this, so what is the point of our neighbourhood plan?</p> <p>People like my family who want to live in Whitburn , cannot afford the new houses being built, and which will be built according to Story Homes for example. Older people's homes like my own are not being properly used for local people.</p> <p>I do not think there is enough capacity for more traffic, or for the Doctors Surgery , or the schools or even the sewage systems for more houses so I expected the Forum's Plan to have much more power to control this, or at least to be able to suggest suitable house sites with new capacity for the above. I think the plan must be enlarged, not restricted by adviser's rules, or by the planners.</p>