

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

**Introduction: This is the Save the Fellgate Green Belt Group response which includes responses to the following Main Modifications: -**

**MM-10: MM-15: MM-17: MM-18: MM-19: MM-20: MM-25: MM-26:MM-27: MM-35: MM-37: MM-39: MM-45: MM-46: MM-48: MM-49: MM-50: MM-51: MM-52: MM-53:**

This response includes 2 Pdf's which contain signatures and personal details of those that share the same views as the group, and who have confirmed that they wanted to have their response to the MM STDLP as part of the Group response.

These PDF's have been emailed to STC and are Titled as follows:

- 1) 2 SFGB 120 Written Signatures and Details for Group Response to MM STDLP (120 signatures).
- 2) 3 SFGB 91 Website Signatures and Details for Group Response to MM STDLP (120 signatures)

In addition, the response also includes 11 Pdf Appendices added as part of the response and which have also been forwarded to STC Titled:

- SFGB App 1/2/3/4/5/6/7/8/8a/9/10.

## **Save the Fellgate Green Belt Group response**

**NPPF Paragraph 16 b) Clearly states that 'Plans should be prepared positively, in a way that is aspirational but deliverable.**

The South Tyneside Local Plan (STLP) in its current form and including the Main Modifications, I believe in many areas is aspirational but, in many areas, it continues to be undeliverable. This therefore in my opinion makes the plan unsound.

I have endeavoured to respond to various Main Modifications (MM) highlighted by South Tyneside Council (STC) during this Consultation in a constructive manner and will attempt to state why I feel that the STLP in relation to Legal Compliance remains unsound.

### **Policy SP8: Fellgate Sustainable Growth Area: MM-10**

**P18:MM-10: LPP48-49: SP8: Section A- Criterion 1:** Modifications to Criterion 1

- Map 10 is unreadable and therefore is not positively prepared.

**P18:MM-10: LPP 48-49: SP8: Section A-Criterion 2:** Modifications to Criterion 2:

- I believe that this Modification should not be included and that the FSGA Supplementary Planning Document (SPD) however flawed should continue to be prepared by South Tyneside Council. I believe this for the following reasons.
- The Infrastructure that the MM it refers to is primarily to be funded by **Potential** S106/External Funding.
- During the Stage 2 hearings the Developers and National Highways clearly stated that they were unwilling to fund the majority of IDP requirements, yet there are £10's of millions clearly identified in the IDP which they would then be accountable for.
- Many of these are Critical requirements and some as early as 2030. **They are all unfunded.**
- The SRN Infrastructure around SP8 is already over capacity and daily vehicle use-age data provided by STC based on 2022 figures with the official data, showing high increases, being initially not disclosed and/or withheld during the entire EiM process.
- I believe that Grampian conditions need to be applied with STC ultimately responsible, ensuring that funding for critical infrastructure is in place **prior** to any development. There are too many cases of development commencing and then developers 'pulling out' of Infrastructure commitments.

**P19:MM-10: LPP 48-49: SP8: Section A-Criterion 3-4:** Deletion of Criterion 3 & 4

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- I firmly believe that Criteria 3 & 4 should remain within Policy SP8 FSGA SPD as it would continue to ensure that STC as the Statutory Authority, would have a greater influence on the Planning of any development ensuring that the necessary local and strategic infrastructure is in place at the appropriate times throughout the entire development process.
- Developers continually stated throughout the hearings that they would not fund the majority of the infrastructure that SP8 would require. I believe therefore that Grampian conditions should be imposed on STC.
- **NPPF Paragraph 16 b) Clearly states that 'Plans should be prepared positively, in a way that is aspirational but deliverable.'**
- If this criterion is removed then it risks allowing Developers the opportunity 'on paper' to aspire towards achieving their Master Plan, but then when the time comes, failing to deliver the required infrastructure that goes hand in hand with those very same aspirations.

**P19:MM-10: LPP 48 - 49 SP8: Section A-Criterion 5 (i):** Modification to renumber criterion 5 (i) as 3 (i)

I agree with the minimum of 25% affordable housing however:-

- The Viability Appraisal [Viability Report and Appendices 2023 - South Tyneside Council Appendix 4 Fellgate Appraisal](#): does not concur with MM Policy 19 in that it has no provision for 'increasing the choice of suitable accommodation for the elderly provision and those with special housing needs including bungalows'.

**P19:MM-10: LPP 48-49: SP8: Section A-Criterion 5(ii):** Modification to renumber criterion 5(ii) as 3 (iii)

- I note that this Modification now states Developers will now **Provide** a well-located local centre which will include a) Primary School provision b) Opportunities for **Primary** health Care Provision **and** c) Local retail facilities.
- The way this is worded however indicates that this may well be in 'a well-located local centre'. There is no clear definition of how many separate buildings the local centre will provide.

The Infrastructure Delivery Plan 2026 Appendix 4 – FSGA delivery requirements P92 (88) clearly states that:

- There is a requirement for a Primary School – 1x1FE school or 1.5FE school – Critical – Delivered by 2032 /33 – Funding from S106 – Delivery Responsibility: STC/Developer
- Local Centre – Includes Opportunities for Health Care and Local Provision – Critical- Funding from Developer. **This does not appear in the Viability Report; Fellgate Appraisal (VRFA) as I believe it would reduce the viability of the development.**
- This indicates that there will be **at least** 2 buildings.
- The VRFA however only includes Education (average Allowance) £6,000,000 which I believe, having attended the Stage 2 hearings, is related to the School provision and which **must adhere to current Safeguarding and Site security guidance in an around School buildings.** [Site security guidance - GOV.UK](#) I believe that the School should be a separate entity due to Safeguarding.

**P19:MM-10: LPP 48-49: SP8: Section A-Criterion 5 (iii):** Modification to renumber criterion 5 (iii) as 3 (iii)

- This modification would change Criterion 5 to Criterion 3. As it is not yet adopted I will continue to refer to it as 5:
- 5 iii) Relates directly to a Vision Led Approach (VLA) to transport planning. Evidence suggests that recent local developments similar to the type of housing that is planned for SP8 are and will remain, car dependant.
- 5 iii) a) Enhancing pedestrian/cycle access: Durham Drive is mostly single lane along the majority of the SP8 development due to resident parking. The cycle land will be S106 funded and will affect the Viability of the site.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- 5 iii) b) I welcome the addition of convenient high quality bus routes within the site and through the remaining Green Belt which connects to existing sustainable travel where possible. Having participated in the recent hearings, developers I believe will not make this possible.
- Laverick Hall Farm and Durham Cathedral state in their response 1.4 [Microsoft Word - Matter 11 - Securing sustainable and viable growth including coordinated infrastructure provision and planning for minerals and waste](#) 'We therefore recommend that the wording of Policy SP26 should be amended as follows, for consistency with NPPF (amended text in bold italics font) and that the supporting text at § 14.13 refers to a distance of 'approximately 400m from a bus stop' to give sufficient flexibility to respond to the individual needs and circumstances of each site: 4.iii All new homes and commercial development are located to facilitate access to high quality public transport no more than 400m from a bus stop.

**P20:MM-10: LPP 48-49: SP8: Section A-Criterion 5 (iv):** Modification to renumber criterion 5 (iv) as 3 (iv)

- This Modification clearly identifies one primary access point and two secondary access points onto roads that are already struggling with traffic congestion.

{The majority of this response is also applicable to **P20: MM-10: LPP 48-49: SP8: Section A-Criterion 5 (v):** Deletion of criterion5(v)}

I apologise for the extent of my response to this Modification, but the evidence is from a variety of sources and is damning towards the fact that I believe STC were fully aware of the extent of the increase in traffic within this area and may have intentionally failed to disclose it prior to and during the majority of the EiP of the STLP: It will give an explanation as to my reasoning why at this time no additional access points should be added to these either the A194 Mill Lane roundabout or Durham Drive. This has serious Safety and Health Implications to many residents and anyone commuting through the area.

I was also uncertain whether this should form part of a Modification further in this response.

- I believe that STC may have throughout the entire EiP intentionally withheld up to date traffic data that they have had regular access to via the TADU and TRADS Data Bases, and which was not shared with the Inspector Mr Spencer. The appendices to this response will highlight the reasoning for my beliefs.

Please refer to [Infrastructure Delivery Plan 2026.pdf](#)

- 2.1 bullet point 2: [Infrastructure Delivery Schedule](#): *Provides a detailed breakdown of the items of infrastructure needed to deliver the Local Plan including the estimated timeframe for delivery, possible funding sources and whether the item is essential or desirable in the context of the policies and allocations in the Local Plan. The IDP is a 'living' document and will be kept under review and updated when appropriate. A Living Document!! Why were the correct data figures not updated on a regular basis when I believe it can be proven that they were available to STC?*
- I believe that the Critical Infrastructure may have been intentionally based on inaccurate data due to the additional cost implications should it have been based on the correct up to date Data figures.

a) **Mill Lane roundabout on the A194 (Primary Access)** This roundabout is already heavily congested and there is an abundance of evidence to highlight why there cannot be an access road added from the development.

- **SFGB App 1 MM-10 SP8 Mill Lane Data** clearly shows that Mill Lane B1306 leading onto this roundabout is already over capacity.

Traffic Data used in STC assessments is based on 2022 figures with STC indicating that **'average traffic flows within the vicinity of the A194 have not materially changed since 2022**. This is not the case and STC are well aware of this.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- **SFGB: App 2 MM-10 SP8 A194 figures 2024 – 2025** was taken from **Traffic Counter 3501** which is situated on the A194 between the Mill Lane and Whitemare Pool roundabouts. It clearly shows that there has been a substantial increase in traffic between 2022 and 2025.
- **SFGB App 3: MM-10 SP8 TADU and TRADS Data Base Email Trails:**

- **Email 1 AC:** dated 25/02/2026 is an FOI response from AC confirming dates of Data Input and that STC as a partner agency had full access to this data as soon as it was uploaded to the Gateshead Council inhouse data base.

- **Email 2 PS:** dated 3/03/2026 10:50 mentions a TADU (TRADS) data base that STC as a partner agency had full access to as soon as it was uploaded to the Gateshead Council inhouse data base

- **Email 3 PS:** dated 3/03/2026 14:58 mentions that STC as a partner agency had full access to the TRADS data Base as soon as it was uploaded to the Gateshead Council inhouse data base

- **SFGB App4 MM-10 SP8 TC 3501 TRADS Data Base** [DG Site DATA 3501 ^J 2025-26.xlsx](#)
- **SFGB App 5 MM-10 Screen Shots of TRADS Data Base:** In the event that the above link cannot be accessed I have added a word document showing traffic figures that STC could have easily accessed the up-to-date Data prior to all Hearing Statement deadlines and Verbal hearings related to SP8.
- STC had full access to these figures from the Traffic Accident Data Unit (TADU) which were inputted on 78 occasions between 3/01/24 and 5/02/2026 by Gateshead Council on a regular basis.
- **SFGB App 6: MM-10 SP8 DL Email Trail** STC clearly stated during the Stage 2 hearings that they were unaware of a substantial increase in traffic in this area. This is confirmed in the email trail dated 12/02/26 related to A194 Data where Deborah Lamb (Operations Manager- Spatial Planning) states that the Council was only made aware of TADU data updates on **13<sup>th</sup> January 2026**.
- **SFGB APP 9:** Is an FOI request that clearly indicates on Highlighted Pages 1 and 2 that **‘The Council does hold basic technical logs showing when users visited the relevant websites. However, these logs only show that the website was accessed and do not show whether an officer actually logged into the database after reaching the site. Why would they access the website and not log into the database?’**
- I believe that these figures may have been intentionally withheld from the EiP until such a time that they could not be used effectively to prove STC were aware of substantial increase in traffic thereby allowing them to ‘water down’ Critical Infrastructure requirements which now form part of the Modifications to the STLP.
- **NPPF Paragraph 111** clearly states that *‘Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’*. I believe that in relation to SP8 this would indeed be the case should a primary access road be added to the Mill Lane roundabout

**b) Durham Drive (Secondary access):** This is a 20mph residential road which has three Schools in Close proximity, a thriving Gymnastics Centre and a residential road that already suffers from congestion. It is mostly single lane along the stretch of Durham Drive running adjacent to SP8.

- **NPPF Paragraph 110 b)** clearly states that **‘safe and suitable access to the site can be achieved for all users’**. I believe that this cannot be achieved due to the width of Durham Drive and the fact that the majority of road identified is most of the time single lane.
- **NPPF Paragraph 112 d)** clearly states that **‘Application for development allow for the efficient delivery of goods, and access by service and emergency vehicles’**. I believe that this cannot be achieved due to the reasons given above.

**P20: MM-10: LPP 48-49: SP8: Section A-Criterion 5 (v):** Deletion of criterion5(v)

(The evidence provided in **P20:MM-10: LPP 48-49: SP8: Section A-Criterion 5 (iv): is also highly applicable)**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

This criterion I believe is being removed from the plan due to the fact that:-

- STC **cannot** due to all of the reasons given in 5 (iv) '*Ensure that there are no unacceptable impacts on highway safety or residual impacts on the wider strategic road network in terms of capacity and congestion*' including *mitigating the impact of the development at the Whitemare Pool roundabout*.  
**Please read Appendix 7**
- STC have intentionally based all Critical Strategic Infrastructure requirements on 2022 data and are failing in their duty to base the requirements on up-to-date data that has been easily available to them at all times during the entire Local Plan process. I believe that it may intentionally not been disclosed.
- I also note also that the above criterion has actually been added to Policy SP14 Wardley Colliery.

**P20:MM-10: SP8: LPP 48-49: Section A-Criterion 5 (vii):** Modification to renumber criterion 5 (vii) as 3 (v)

This modification states that the development would 'Be Landscape led'. I state the opposite: -

- It will destroy the stunning Fellgate Green Belt Landscape which sits in a Wildlife Corridor, with an abundance of wildlife living in its bio-diverse natural habitat and is also home to the 5<sup>th</sup> Generation West Fellgate working farm with 52 stabled horses.
- This is a landscape that residents and commuters admire on a daily basis and does so much to support their Mental health and Wellbeing. This development will wipe out the working farm and stunning landscape and replace it with a housing development that will create building filth for decades to come.
- **NPPF Paragraph 124 d) highlights the 'Desirability of maintaining an areas prevailing character and setting' e) the importance of securing well designed, attractive and healthy places.**
- This development would have the totally opposite effect on the current residents living close to and beyond the planned development.

**P21:MM-10: SP8: LPP48-49: Section A-Criterion 5 (viii):** Modification to renumber criterion 5 (viii) as 3 (Vii)

This Modification I believe is nonsensical in that the SP8 would have a severe detrimental effect on the entire Fellgate Green Belt.

- To add '*Avoid wherever possible, an adverse impact*' leaves the door wide open to the developers to make whatever impact they so wish, regardless of the impact it will have on the Green Belt.
- SP8 will destroy 25% of the Biodiverse Natural Habitat that currently exists on the Fellgate Green Belt Wildlife Corridor. ¼ of it will be wiped out forever! Would this not be classed as an 'adverse effect'?

In addition to add '*where necessary*' *mitigate the impact of the development on biodiversity, wildlife corridors and ecological designations and where possible enhance 'these interests'*.

- I believe that this will intentionally not be achieved by the developers as it will seriously effect the Viability Appraisal of the FSGA:

Biodiversity Net Gain (BNG) is mandatory under **Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)**. It states that developers must deliver BNG of +10% leaving the natural habitat 10% better than was there before development.

#### **NPPF Paragraph 180**

a) States that '*If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts) adequately mitigate, or, as a last resort, compensated for, then planning permission should be refused*'.

c) States '*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused .....*': SP8 has ancient hedgerows which will be destroyed should the development go ahead.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- The wording of this modification should be removed from the Local Plan and any BNG requirements should be clearly identified prior to any development being approved and not left to 'Avoid wherever possible' and 'Where necessary'. BNG is Mandatory!

**P21:MM-10: SP8: LPP 48-49: Section A-Criterion 5 (x):** Modification to renumber criterion 5(x) as criterion 3 (ix)

The majority of this his modification as it stands, I believe :-

- Can never be achieved due to the short and long-term consequences it will impose on the existing Community of Fellgate and the entire local area.
- It highlights the fact that STC and the developers pay no attention to the concerns raised by the current Community and again clearly identifies why Policy SP8 must be removed from the Local Plan.

**a)** How can '*connectivity with the existing community at Fellgate Shall be full considered to create a sensitive and positive relationship between the existing and new developments*' be achieved when the current campaign against it remains strong. Developers and STC have totally ignored the concerns of the current Community.

**c)** It is stated that '*Building scale should be limited to 2 storeys at the site adjacent to the existing Fellgate estate*', which would be along the entire stretch of Durham drive that runs parallel to the development. **YET**

**d)** Then states that '*A variety of densities shall be provided throughout with higher densities provided closest to local services, public transport connection .....*'

- To my knowledge the proposed shop and health care provision and possibly the school will be close to the entrance of the estate and would therefore include Town Houses which would be higher than 2 stories. Does this not totally contradict point **c**).

In summing up Modification 5 ix) the Planned development will never be accepted by the Current Community as it would bring with it:

- Substantial Traffic issues
- Flooding issues
- Sewage issues
- Noise Pollution
- Vibration from Building Work
- Dust particles
- Light Pollution
- Loss of privacy due to Town houses within an estimated 20 metres overlooking current family homes
- Loss of the Fellgate Green Belt Landscape to the entire current Community along with the Working farm which is home to 52 horses .

**World Health Organisation (1948) 'Health is a state of complete physical, Mental and Social Wellbeing and not merely the absence of disease or infirmity'.**

- Does this not apply to the current residents living in the current and surrounding Communities of Fellgate????

**P21:MM-10: SP8: LPP 48-49: Section B- New Criteria: Additional Criteria**

- Strategic Highway Improvements and enhancements. **This is one of many reasons for SP8 to be removed for the STLP.**

**Point B1**

- The Infrastructure Delivery Plan and especially those associated with SP8 are entirely based on the statement from STC that **that average daily traffic flows within the vicinity of the A194(M) / A184 White Mare Pool roundabout have not materially changed since 2022.**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- I believe that this is not the case and the **SFGB: Apps 1-6** that were added in the previous response to **MM-10: LPP 48-49: SP8: Section A-Criterion 5 (iv)**: totally support the fact that there has been a significant increase in traffic figures around the entire area of SP8. **PLEASE REFER TO THESE APPENDICES.**
- I also believe that there is a strong case that STC may have intentionally withheld this data during the entire Local Plan process including the EiP of the Local Plan. If this is proven to be the case, then the question needs to be asked as to the Legalities and consequences of doing so.

**NPPF Paragraph 111** clearly states that *'Development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*

The initial IDP presented during the Stage 1 hearings highlighted the Critical Infrastructure requirements associated with Policy SP8. This included: -

- [Whitemare Pool Threshold Testing \(2025\) - South Tyneside Council](#) which clearly shows:-  
-East South and North Arm Widening with 4 Arm Circulatory with an Indicative cost of £40 m S106/External Funding: **It was highlighted during the Stage 1 Hearings as Unfunded**
- [Infrastructure Delivery Plan \(2025\) - South Tyneside Council](#)
- P5 (63) 59 A194(M)/ A194/A184 (T) Whitemare Pool Junction enhancement /realignment: Identified in the SRN Forecast report (2023) (INV2) **as required to enable satisfactory operation of the Network** Indicative Cost £ 40m: S106/External Funding / **CRITICAL - It was highlighted during the Stage 1 Hearings as Unfunded**
- Following the Stage 1 hearings STC then indicated that the initial Whitemare Pool Threshold Testing was based on 'over robust' traffic data and the initial Infrastructure requirements were no longer required.
- I believe that this is based on the fact that STC continually state that average daily traffic flows within the vicinity of the A194(M) / A184 White Mare Pool roundabout have not materially changed since 2022. **They are fully aware that this is untrue!**

I again challenge this statement and believe that STC have based the current IDP on inaccurate Data in order to reduce the initial costs of development in and around Whitemare Pool. Much of the Infrastructure is also based on S106/ External funding which if delivered, would seriously decrease the Viability of the site.

- **I believe that Grampian conditions should be applied to ensure deliverability of critical Infrastructure**

**Point B 2** of this Modification details a Vision Led Approach, the exact form, nature and timing of necessary improvements shall be agreed with National highways from time to time, as necessary.

- This is totally unfunded Critical Infrastructure based on inaccurate data and related to a 1200+ housing development in close proximity to Whitemare Pool.
- Yet the Modification states that it will be agreed with NH **from time to time.**
- This Infrastructure I believe may have been given a timescale but I firmly believe that developers and STC cannot achieve this

**NPPF Paragraph 111** *'Development should be prevented or refused on highway grounds as there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*. T

- The impact of SP8 will indeed be severe

**P22:MM-10: SP8: LPP 48-49: Section C- New Criteria:** Additional Criteria

**C. Implementation**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- I believe that any development should not be allowed to progress under the guise of a Master plan that would be prepared and submitted by developers whose sole aim is to make it as profitable (Viable) as possible by promising what I believe may never be delivered.
- This was brought to the forefront during the Stage 2 hearings when Developers reversed their initial commitment to pay for relevant Infrastructure via S106 payments, but subsequently then refusing to commit to.
- EG: IDP Update 2026: P70: Fellgate: Policy 51: - A194 Mill Lane Improvements: £1m which they indicated they would commit to during Stage 1 Hearings but subsequently would then not commit to during Stage 2 hearings.
- This I believe would be the case throughout the entire development process resulting in Critical Infrastructure not being delivered at the appropriate stages of development until funding can be sought.
- I believe that if SP8 went ahead it would be too late to prevent the loss of West Fellgate Farm and 25% of the Fellgate Green Belt.
- The sheer amount of Funding required via S106/ External funding amounts to many £10's millions
- Should all regulations be applied such as Future Homes Legislation, BNG requirements etc be adhered to, it would I believe make SP8 totally unviable to any developer.
- This will in my opinion, as happens on many occasions with other developments, result in developers simply pulling out of any commitment to fund required Infrastructure, BNG; Affordable Housing etal:

This is highlighted in the FSGA Viability Appraisal:

- [Viability Report and Appendices 2023 - South Tyneside Council](#) Appendix 4 Fellgate Appraisal which does not even include Health care Provision or any type of retail facility which forms part of the plans for SP8;

**P23:MM-10- LPP 49: Supporting Text:** Supporting Text

Due to the sheer amount of changes with this Modifications I will go through them in the order that they are written and highlight any identified issues.

- I firmly believe that Policy SP8 FSGA SPD should it go ahead, remain the responsibility of the Council in relation to Master Planning. I believe that Development proposals should not purely be approved by the Council but actually planned by the Council, instead of Developers whose sole purpose is to make profit regardless of the consequences.

### **Housing Provision:**

- I believe that the 25% Affordable Housing needs to be clearly defined so as not to include self-build or custom-built housing.

### **Social and Community Infrastructure.**

It is seriously concerning having read the FSGA Fellgate Viability Appraisal: -

- Whether the Master Plan for SP8 includes or will actually deliver everything that it promises.
- The statement in paragraph one indicates 'Opportunities for Primary Health Care Provision' which is concerning as it fails to state categorically that it is actually going to be delivered. It is not mentioned in the Viability Appraisal of FSGA.

During the Stage 2 Hearings whilst discussing the Viability Appraisal for SP8 it was stated by the STC representative that **'developers will assess the need for Health Care provision'**.

- Surely the scale of SP8 indicates that there is a automatic need for Health Care Provision.
- The fact that the modification indicates that the Health Care Provision will be delivered directly by the developer **or** through a payment of a financial contribution sufficient to ensure its delivery is also concerning.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- It should indeed be built directly by the developer as SP8 progresses
- I believe that Grampian conditions should be applied to SP8.

In relation to provision to accommodate additional School places:

- SP8 sits in Jarrow but also borders Hebburn.
- Attention needs to be placed on the sheer amount of housebuilding carried within a 2 -3 mile radius of SP8 over the past 10 years or so.
- I believe it has the largest amount of house builds in the entire Borough of South Tyneside.
- This has resulted in local Schools having very little or no capacity.
- There is additional Housing of 115 Homes on the Old Hebburn College: 144 at Birchwood Manor and 446 at the Old Hawthorn Leslie site.

**INV1 clearly indicates that:**

- **P52 (48) Area 4 – Jarrow: 358 additional Primary places will be required**
- **P53 (48) Area 5 – Hebburn: 191 additional Primary Places will be required**
- **P55 (51) Area 8 – Hebburn Jarrow: Because of the pressure on places in this planning area, with all three schools having no, or little capacity in the lower year groups and all three having limited capacity in most other groups, it is necessary to plan for the combined pressure of 290 additional places**

Yet the only provision made in the Modification is that ‘The school will be delivered to a specification agreed with the LA and either delivered directly by the developer or through payment of a financial contribution sufficient to ensure its delivery.

This raises the questions as to: \_

- When in the development phases will it actually be built’?
- Will the developer honour the S106 commitment will be made by the developer and with building costs spiralling, will this cover the cost of the school when it is eventually built?
- Surely it should be the responsibility of the developers to build the school at the appropriate stage of development and not through payment of a financial contribution which **may** ensure its delivery in time to accommodate new residents.
- Making a financial contribution does not ensure delivery.
- **Grampian conditions should be applied.**

**NPPF Paragraph 94** states ‘*It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education’.*

I believe that in relation to SP8 this is not the case!

### **Active Travel and Transport:**

Can I please initially point out that SP8 would built be on Green Belt Land which is highly protected, and **not** Green Field Land. There is a significant difference, and I would like this point adjusted.

The Vision Led Approach I believe is to promote active travel and reduce the use of private vehicles. Access [Strategic road network and the delivery of sustainable development - GOV.UK](#)

Can I please point out the following: -

- Historically within this area, housing developments such as the one proposed for SP8 tend to be car dependant due to a reluctance to travel by public transport. This can be confirmed by merely looking at the new development of Monkton Gardens which is currently being developed and which sits opposite the Fellgate estate.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- Placed in comparison with recent housing developments the trend continues. This has created excessive traffic in and around the areas of Fellgate and in particular the A194/Mill Lane roundabout leading up to Whitemare Pool.
- Where are they going to put the cycle lanes? The Stretch of Durham Drive that runs parallel to SP8 is at most times single lane due to resident parking with at times very little pavement.
- **Paragraph 25 of the [Strategic road network and the delivery of sustainable development - GOV.UK](#)** states that 'Moreover, a Walking, Cycling & Horse-Riding Assessment and Review in compliance with GG 142 must be completed during the options or concept stage of a development that proposes modifications to the SRN, which enables opportunities for new or improved facilities for pedestrians, **cyclists and horse-riders** to be identified'.
- SP8 would wipe out the Livery Community of 52 horses based at the 5<sup>th</sup> Generation West Fellgate Working Farm
- Where are the safety of the current residents of Fellgate and it's local areas taken into consideration?

**Paragraph 92 of the NPPF clearly states that Planning Policies and decisions should aim to achieve healthy, inclusive and safe places which b) as safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.**

- There is the potential for thousands of additional residents walking through the current Fellgate estates Does Paragraph 92 not apply them?
- In the event that Fellgate Metro station is the preferred choice then it would not be able to accommodate residents from such a large development.
- Bus services are regularly held up in traffic congestion as well as on Durham Drive which is mostly single lane along it's stretch with the planned development. The Fellgate Avenue / Hedworth Lane junction struggles daily and is brought to a total standstill when there are problems on the A19 and or Local Road Network.

**NPPF Paragraph 113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.**

**NPPF 11d) ii) Clearly states 'Granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits**

- I believe that the Active Travel and Transport Modification cannot be met due to the layout of the current Fellgate Estates, the road structure of Durham Drive and the fact that the current Community will be severely affected. **SP8 must be removed from the Local Plan**

### **Green Belt Compensatory Improvements and Green-Blue Infrastructure**

- The fact that the SPD master planning is being taken out of the plan is concerning.
- There is in effect no master plan and as previously stated the planning of the development would be at the discretion of the developers who are profit driven.

**NPPF Paragraph 137** states that 'The fundamental aim of Green Belt Policy is to prevent Urban Sprawl by keeping land permanently open: the essential characteristics of Green Belts are their openness and their permanence'.

- Yet STC state that SP8 Modification would create a new well defined and robust boundary.
- This would join South Tyneside to Gateshead and remove any right that the current Fellgate Community would have to the openness and permanence that the green Belt currently affords to them.
- **Where are the Current Communities rights?**

**NPPF 147.** Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. **Have very special circumstances actually been proven?**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

**NPPF 148.** When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- I believe that the harm that SP8 would inflict on Fellgate Green Belt along with the harm to the Community resulting from the proposed development, clearly does outweigh the need for this development.
- **25% of the Fellgate Green Belt will cease to exist if SP8 remains in the Local Plan. SP8 must be removed from the Local Plan**

### **Natural Environment:**

- It is seriously concerning that the term ‘**where possible**’ is mentioned in this paragraph.
- This I believe leaves the door wide open to the discretion of the developer to destroy 25% of the Fellgate Green Belt.
- SP8 sits in a Wildlife corridor and provides a biodiverse natural habitat for many forms of wildlife. 25% of this would be destroyed.
- Yet the paragraph states ‘*Environmental enhancements to the wildlife corridor should be sought to minimise impacts from the development*’.
- How can this be achieved? SP8 would not only wipe out 25% of the Wildlife corridor but it would also have a severe detrimental effect on the entirety of the Green Belt due to the various sources of pollution that would come with the building filth that the development would inflict for decades.
- How can BNG be achieved on SP8 or within Green Belt ie: 10 % Improvement. 25% of GB removed so how can you end up with +10%?
- Will BNG actually be delivered as doing so in my opinion would decrease the Viability of the development

### **Sustainable Urban Drainage-SUDS**

- The fact that Fellgate is prone to flooding appears to have been totally overlooked in the Local Plan. This is despite the fact that SP8 is defined in the Official report provided by STC itself as FZ 3A or 3B [South Tyneside Local Plan Sustainability Appraisal Report\\_Reg 19.pdf](#) **P64 (60)**
- Reports are contradictory the [Sequential\\_Test\\_Report\\_2023.pdf](#) states that the entire zone is 0% Flood Risk and 0% surface water risk.

### **Design Principles**

Many of the Design Principles provided in this Paragraph can only be described as Fictitious

- STC plan to remove the initial SPD Master Plan that was set out in SP8 FSGA.
- They state that Development proposals should be informed by the surrounding context and relationship with the existing Fellgate Estate and the surrounding Green Belt.
- How can this be achieved when the Fellgate Estates and surrounding areas are totally against this development.
- How can this be achieved when 25% of the Fellgate Green Belt which is the entirety of the Green belt Landscape that runs parallel to Durham Drive will be lost forever.
- This area has been walked daily for over ½ century by local residents along a gravel path that is currently subject to a Public Bridleway application
- It states that the most appropriate areas for higher density will be close to the local services which are planned to be close to the Durham Drive entrances
- This is a direct contradiction to the fact that it also states ‘However, building height and form should consider impacts on existing residential properties which are two storey semi-detached houses’
- It is again contradicted by the fact that **MM-10 SP8 Section A Criterion 5 (x) c)** clearly states that ‘Design for new buildings should be undertaken with consideration for the context of the surrounding

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

area, including that building scale should be limited to 2 storeys at the site boundary adjacent to the existing Fellgate Estate.

- Building height is then left to the discretion of the developer in that it clearly states in the final paragraph on page 28 that **‘There may be instances where it is appropriate to vary from recommended building heights. This could be due to site constraints, functional requirements, or the desire to create a landmark building.**
- I believe that the landmark building will be as Paragraph 2 states **‘with lower density housing 20-30dph located on the Green Belt edge to help the built form blend into the adjacent landscape’.**
- This I believe is where the higher value executive homes will be and there will therefore as detailed in paragraph 1, ‘No relationship whatsoever with the existing Fellgate Estate’
- In addition the properties to the areas of the East, South and west could be increased to 2.5 and three storeys to help define the estate boundary and enhance views across the countryside .....’.
- The design principle also mentions Care Homes 2 and 3 Storey – At no time during the entire process of the STLP has there been a mention of Care Home provision in Policy SP8
- During the hearings the developers were even avoiding having to accommodate accessible housing due to Viability concerns.

If the SPD is removed then there is no masterplan and when profit driven developers do eventually put forward a master plan, evidence suggests that it will totally take away the existing landscape from existing residents and have town houses and local facilities totally overlooking the current semi-detached family homes on Durham Drive. **Where are the rights of the current residents?**

- The Modification also highlights the fact that existing pylons which were originally going to be undergrounded will now be ‘above driveways, footpaths and local access roads. This space would be appropriate to provide recreational open space and children’s playing areas on the site’. This is surely a risk to the Health and Safety of local residents. Don’t children fly kites???? Also, the consensus is that a 30-40M clearance needs to be allowed to minimise the impact of electro-magnetic fields, which may contribute to childhood leukaemia.

**The design principles for the entirety of SP8 are contradictory to one another with some presenting a serious danger to life. It is totally based on profitability regardless of the consequences on future and current residents. Policy SP8 must be removed from the South Tyneside Local Plan.**

### **Strategic Road Network**

The Modification related to Whitemare Pool Roundabout I believe is seriously flawed.

- WMP is a roundabout and wording should not be changed to Junction
- I have serious concerns in relation to the ‘watering down’ of Infrastructure requirements at Whitemare Pool roundabout between the Stage One and the Stage 2 Hearings.
- The modelling produced by STC and validated by NH is based on inaccurate Data from 2022
- I believe STC are wilfully withholding accurate data,
- Infrastructure identified in the IDP 2026 related to SP8 is seriously flawed due to inaccurate data and therefore must be removed from the Modified Draft Local Plan.
- I believe that **NPPF Paragraph 111 ‘Development should be prevented or refused on highway grounds as there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’** should be applied and that SP8 should therefore be removed from the Local Plan

**I base this on the following:**

**As evidenced previously in MM-10: Lpp48-49: SP8 Section A Criterion 5(iv) I have serious concerns over the fact that STC are basing all of the modelling on the assumption that Traffic flows with this area have not materially changed since 2022.**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- Current more up-to-date data which shows a significant increase in traffic leading up to WMP roundabout has been readily available throughout the entire Local Plan Consultations and the current EiP. I believe that it may have been deliberately withheld until such a time that it could not be considered by the Inspector Mr Spencer. I highlight the following evidence to prove that Whitmare Pool roundabout has been considered over Capacity since 2022
- **SFGB App 7 MM-10 SP8 National Highways Report for Hawthorn Leslie Site Hebburn dated 8th March 2022:** Which clearly shows that both National Highways and STC were aware that WMP roundabout was Over Capacity on the majority of approaches at that time.
- Additional housing has since been built and more is planned within 2-3 miles of SP8

**The following Appendices have been copied from MM-10: LPP 48-49: SP8: Section A-Criterion 5 (iv):**

- **SFGB App 1 MM-10 SP8 Mill Lane Data:** Clearly shows that Mill Lane, leading onto Mill Lane roundabout and then the A194 up to WMP is already over capacity
- **SFGB App 2 MM-10 SP8 A194 figures 2024 – 2025** was taken from **Traffic Counter 3501** which is situated on the A194 between the Mill Lane and Whitmare Pool roundabouts. It clearly shows that there has been a substantial increase in traffic between 2022 and 2025.
- **SFGB App 3: MM-10 SP8 TADU and TRADS Data Base Email Trails:**
  - **Email 1 AC:** dated 25/02/2026 is an FOI response from AC confirming dates of Data Input and that STC as a partner agency had full access to this data as soon as it was uploaded to the Gateshead Council inhouse data base.
  - **Email 2 PS:** dated 3/03/2026 10:50 mentions a TADU (TRADS) data base that STC as a partner agency had full access to as soon as it was uploaded to the Gateshead Council inhouse data base
  - **Email 3 PS:** dated 3/03/2026 14:58 mentions that STC as a partner agency had full access to the TRADS data Base as soon as it was uploaded to the Gateshead Council inhouse data base
- **SFGB App 4 MM-10 SP8 TC 3501 TRADS Data Base [DG Site DATA 3501^J 2025-26.xlsx](#)**
- **SFGB App 5 MM-10 Screen Shots of TRADS Data Base:** In the event that the above link cannot be accessed I have added a word document showing traffic figures that STC could have easily accessed the day prior to all Hearing Statement deadlines and Verbal hearings related to SP8.

STC had full access to these figures from the Traffic Accident Data Unit (TADU) which were inputted on 78 occasions between 3/01/24 and 5/02/2026 by Gateshead Council on a regular basis.

- **SFGB App 6: MM-10 SP8 DL Email Trail** STC clearly stated during the Stage 2 hearings that they were unaware of a substantial increase in traffic in this area. This is confirmed in the email trail dated 12/02/26 related to A194 Data where Deborah Lamb (Operations Manager- Spatial Planning) states that the Council was only made aware of TADU data updates on **13<sup>th</sup> January 2026**.
- **SFGB APP 9:** Is an FOI request that clearly indicates on Highlighted Pages 1 and 2 that **‘The Council does hold basic technical logs showing when users visited the relevant websites. However, these logs only show that the website was accessed and do not show whether an officer actually logged into the database after reaching the site. Why would they access the website and not log into the database?’**

I apologise for the length of my response to MM-10 but this is due to the complexity of the identified Modifications and as previously stated it contains Information from a variety of sources.

**I believe that Main Modification MM-10 totally fails the soundness test in that it is not Positively prepared, Justified, Effective or Consistent with National Policy and that Policy SP8 must be removed from the Plan**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

## **Policy SP14: Wardley Colliery MM-15**

**P32:MM-15: LPP 59: Policy SP14:** Insert a new Criterion 1 (iv)

I agree that the additional Criterion 1 (iv) should be added but **I must also highlight the fact that it should not be removed from MM-10 SP8**

**P32: Policy SP14:** Modification to supporting text Paragraph 5.66

I agree with this Modification and note that it is the '*restoration, enhancement and creating more of the existing Habitats*' and not the destruction of existing Habitat as is the case in Policy SP8.

## **Policy 5: Reducing Energy Consumption and Carbon Emissions MM-17**

**P33:MM-17: LPP 70: Policy 5:** Supporting Text: Modification to Policy 5: Supporting text

Paragraph 4: Development proposals should **seek to adopt** holistic approach to sustainability through their design, construction and efficiency. Schemes should use sustainable construction materials where possible, such as materials with low embodied carbon or renewable materials.

**I believe that MM-17 fails the soundness test is not Positively prepared.**

- I believe that **seek to adopt** should be replaced with **actively adopt**)

## **Policy 6 - Renewables and Low Carbon Energy Generation MM-18**

**P38:MM-18: LPP 75: Policy 6: Supporting text- Paragraph 7.26: Inclusion of additional supporting text Paragraph 7.26:**

- Local planning authorities **exercise discretion in determining whether** these circumstances exist, and the decision maker must consider the overall planning balance in accordance with national policy.

I believe that **exercise discretion in determining whether** be replaced with **provide adequate evidence to prove that**. This would ensure openness and fairness for all areas regardless of where they are situated within the Borough

## **Policy 7 – Flood Risk and Water Management MM-19**

**P39:MM-19: LPP 76: Policy 7: Criterion 6:** Modification to Criterion 6:

I believe that this **Modification should not be allowed as it allows developers the opportunity to 'sidestep' current regulations and historical occurrences in areas susceptible to flooding and surface water problems.**

- For example: The land required for Policy SP8 is renowned for flooding and surface water problems. It has been evident throughout the entire Consultation that residents have expressed concerns.
- This is confirmed in the FZ 3A or 3B [South Tyneside Local Plan Sustainability Appraisal Report Reg 19.pdf](#) P64 (60).
- The area contains hidden culverts and watercourses which was confirmed in the [Fellgate Surface Water Management Solution](#) which highlighted that '**Fellgate estate in Jarrow, Tyne and Wear has a history of flooding, and it had suffered extensive flooding in 2012, affecting 175 properties. Surface water flooding originates from sewers, highway drainage, run off from land, small local water courses, and ditches during heavy rainfall**'.
- There should be no exceptions related to culverting or building over watercourses especially in an area that sits within Flood Zone 3a and 3B. SP8 is one such area.

**P39:MM-19: LPP 77: Policy 7: Criterion 9:** Modification to Criterion 9:

- 'Where appropriate' leaves this to the discretion of the developers whose sole purpose is Profit.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- I believe that 'Where appropriate should not be added and this Criterion should be changed to '**Any development must** make greater use .....

**P39:MM-19: LPP 77: Policy 7: Supporting Text – New Paragraph:** Inclusion of additional supporting text paragraph:

- I believe that the words '*However we accept there may be instances where access may be required*' **should be removed**, otherwise it will allow developers the opportunity to culvert and build over watercourses at their discretion, increasing the possibility of additional flooding in known Flood risk areas such as SP8.

**NPPF Paragraph 164** States that to pass an exception test a) 'the development would provide wider sustainability benefits to the Community that outweigh the flood risk'- I believe that in some areas such as SP8 this cannot be the case. In addition

**NPPF Paragraph 167** States that 'When determining any planning applications, LPA's should ensure that flood risk is not increased elsewhere'. In areas such as SP8 flooding is increased downstream.

**I believe that Main Modification MM- 19 fails the soundness test in that it is not Positively prepared, or Consistent with National Policy.**

## **Policy 10 – Disposal of Foul Water MM-20**

**P39:MM-20: LPP 80: Policy 10: Criterion1:** Modification to criterion 1:

I believe that this paragraph cannot be achieved and therefore makes the ST Local Plan unsound

- I believe that it has been shown that the sewage treatment works that serve South Tyneside are already struggling to cope. These include Hendon and Howdon STW:
- **SFGB App 8** which evidences a Combined Sewage Discharge at Wagon Way in Hebburn (Served by Howdon Sewage treatment Works) for 655 hrs and 24 minutes between 21/01/26 and 18/02/2026 : **I believe in this case Grampian conditions should be applied**
- **SFGB App 8a** also highlights a Protest against the Current Sewage issue at South Shields Little Haven Beach on May 2<sup>nd</sup> 2026:

**I believe that this modification fails the soundness test in that it is not Positively prepared. This Modification confirms that the STLP remains unsound.**

**P40:MM-20: LPP 80: Policy 10: Modification to supporting:** Modification to supporting text:

I believe that the '**Applicants are strongly encouraged to engage** with NWL's .....

is not a strongly enough instruction. I believe that it should state **Applicants must engage** with NWL's ....., and agree what requirements will be imposed , together with suitable recourse should performance fail.

## **Policy 18: Affordable Housing MM-25**

**P52:MM-25: LPP 92: Policy 18: Criterion 4:** Modification to Criterion 4

- A clearer explanation is required

**P53:MM-25: LPP 93: Policy 18: Criterion 3:** Modification to Criterion 3:

- Inset Map 22 is totally unreadable
- **There is no mention of the 25% minimum affordable housing on Policy SP8.** This must be added to this Modification to ensure that it is delivered by the developer. During the Hearings related to viability the developers were reluctant to commit to this as well as the additional 15% that I believe will be coming into force very soon

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

**NPPF Paragraph 34 clearly states that plans should set out the contributions from development. It appears Fellgate SP8 is failing to be mentioned in this modification**

**P53:MM-25: LPP 94: Policy 18: Supporting Text: 8.53**

Once again there is no mention of Fellgate Policy SP8 which sits on Green Belt Land:

Please refer to [MM-10 SP8: Sec on A – Criterion 5 \(i\) Modification to renumber criterion 5 \(i\) as 3 \(i\): 5.3. Development of this new sustainable community shall: i. Provide a mix of house types, tenures and sizes, including a minimum of 25% affordable housing and self/custom build housing opportunities, in accordance with Policies 19 and 20., with higher densities being close to the public transport network and local centre.](#)

**NPPF Paragraph 58** clearly states that ‘Where up to date policies have set out contributions from development, planning applications that comply with them should be assumed to be viable’.

I believe that the 25% Affordable Housing criteria is intentionally not being included as it will make the project unviable when placed in context with the additional S106 requirements of SP8.

**I believe that Main Modification MM-25 totally fails the soundness test in that it is not Positively prepared, Effective or Consistent with National Policy. This makes the STLP totally unsound**

### **Policy 19: Housing Mix: MM-26**

**P55:MM-26: LPP 95: Policy 19: Criterion 2 (iv)** Modification of Criterion 2 (iv)

- Viability assessment for SP8 does not include Ensuring new homes meet the needs of older people and this was highlighted during the recent Stage 2 Hearings

**P55:MM-26: LPP 95: Policy 19: Criterion 2 (iii)** : Modification of 2 (iii)

- Viability where it is an identified need leaves it wide open to developers discretion. There is a need for this within South Tyneside.

**P55:MM-26: LPP 95: Policy 19: Criterion 3:** Insert a new Point 3:

- This Criterion is totally inappropriate for South Tyneside as it states ‘**particularly encouraged on major sites**’. There is a high need for this type of accommodation within South Tyneside and I believe therefore that it is essential that this be **reworded to ‘Must be provided on major sites’**.

**In relation to Policy Sp8: NPPF Paragraph 65 b)** Provides specialist accommodation for a group of people with specific need (such as purpose-built accommodation for the elderly or students). Yet there is no mention of this in the [Viability Report and Appendices 2023 - South Tyneside Council](#) Appendix 4

This therefore makes the ST Local Plan unsound

**P55:MM-26: LPP 95: Policy 19: Supporting Text:** Modification of supporting text Paragraph 8>58

- The wording ‘**Could provide an opportunity to deliver older persons accommodation in sustainable locations .....**’ leaves the provision of such a housing mix to the discretion of the developers who are profit orientated.
- In order to ensure the soundness of the plan and in line with the SHMA 2023 it should have been worded ‘**Must deliver older persons accommodation in suitable locations.....**’
- This is particularly relevant to SP8 as this housing mix is not mentioned in the site viability appraisal and during the Stage 2 hearings the lack of even adapted provision was highlighted by concerned parties.

**I believe that Main Modification MM-26 fails the soundness test in that it is not Positively prepared, or Consistent with National Policy**

### **Policy 20: Technical Design Standards for New Homes: MM-27**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

**P56:MM-27: LPP 96: Policy 20: Supporting Text: Modification to supporting text. New Paragraph 8.69**

- New paragraph 8.69 is not enforceable if there is no actual wheelchair accessible homes built on sites. It is therefore essential therefore that sites '**Must deliver older persons accommodation**' as detailed above. I believe however that there is a reluctance to do so due to Viability concerns.

**Policy 34: Internationally, Nationally and Locally Important Sites MM-35**

**P62:MM-35 LPP 121: Policy 34: Supporting Text Paragraph 11.29;** Reordering of supporting text.

- This text cannot be adhered to particularly in respect to Policy SP8 which entails a planned development of 1200+ houses directly on a wildlife corridor and a biodiverse natural habitat for many form of plants and wildlife. 25% of the Fellgate Green Bet would be lost!
- BNG will never be achieved as it states that Developers must deliver a BNG of + 10%. This means a development will result in more or better quality natural habitat than there was before development.
- This modification also states that 'Where significant harm cannot be avoided, suitable locations must be considered'. Quite clearly this is highly applicable to SP8 and therefore makes the Local Plan continue to be unsound.
- The inset maps for this policy are also totally unreadable

**I believe that Main Modification MM-35 fails the soundness test in that it is not Positively prepared, Justified, Effective or Consistent with National Policy**

**Policy 36: Protecting Trees, Woodland and Hedgerows MM-37**

**P65:MM-37: LPP 25: Policy 36: Criterion 4 (i)** Modification to Criterion 4 (i)

The Landscape of the Fellgate Green Belt is stunning and would be lost forever. I believe therefore that the modification 'Enhance the landscape quality and character of the development site and local area cannot be achieved especially in relation to SP8

**Policy 37: Protecting and enhancing Open Space: MM-39**

**P65:MM-39 LPP 128 Policy 37 Criterion 4:** Modification of Criterion 4:

Highlights '**Providing new or improved open space provision**'. How and where can provision be made for the loss of the 52 horses Livery stables that are based at West Fellgate Farm which includes an indoor arena.

**NPPF Policy 99** clearly states that '*Existing open Space, sports and recreational buildings and land, including playing fields should not be built on unless a) an assessment has been undertaken which has clearly shown the open space, buildings or and to be surplus to requirements*'. **This is not the case!**

**Policy 47: Design Principles MM-45**

**P70:MM-45: LPP 145: Policy 47: Supporting Text: Inclusion of Supporting Text**

- This Supporting text is totally the opposite to the situation on Policy SP8 where development will wipe out 25% of the Bio-diverse Natu-ral Habitat on the Fellgate Green Belt and which also sits within a Wildlife Corridor.
- The very fields that the development would be built on already deliver a high-quality environment and provide for soil and water sequestration thereby supporting climate change.

**I believe that Main Modification MM-45 fails the soundness test in that it is not Positively prepared, or Consistent with National Policy**

**Policy SP25: Infrastructure MM-46**

**P71:MM-46: LPP 150: Policy SP25: Criterion 2:** Modification to Criterion 2:

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- Essential Infrastructure has not been fairly and reasonably assessed in relation to the scale of some developments.
- In some areas it has been seriously underestimated and will therefore be totally inadequate for the amount of housing to be built.
- A prime example of this is Policy Sp8.

**P71:MM-46: LPP 150: Policy SP25: Criterion 6:** New Criterion 6:

- This criterion is seriously inaccurate as the new revised IDP includes Critical Infrastructure is based on traffic data from 2022. Up-to-date figures I believe were intentionally with-held.

**P71:MM-46: LPP 150: Policy SP25: Supporting Text:** New supporting text paragraph 14.8

- This indicates that ‘Some developments will have cross boundary impacts, and that it is important that these are mitigated. Subject to them being robustly evidenced’.
- As of 19/04/2026 there is **no new Statement of Common Ground with Gateshead Council** indicating that they agree with the Modified Local Plan and the changes in Infrastructure Planning. The previous SoCG was signed in March 2025.

When applied to Policy SP14 (Wardley Colliery) and Policy SP8 (FSGA) the following has been applied to SP14 yet withdrawn from Policy SP8:

- ***‘Ensure that there are no unacceptable impacts on highway safety or residual impacts on the wider strategic road network in terms of capacity and congestion’ including mitigating the impact of the development at the Whitemare Pool roundabout’.***
- Both sites however will be subject to severe additional traffic based around the Whitemare Pool roundabout.
- This therefore makes the plan unsound as **NPPF Paragraph 111 clearly states that ‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on Highway safety, or the residual cumulative impacts on the road network would be severe’** is being applied differently to both sites, without taking into consideration the fact that both have been robustly evidenced.

**I believe that Main Modification MM-46 totally fails the soundness test in that it is not Positively prepared, Effective or Consistent with National Policy.**

### **Policy SP26: Delivering Sustainable Transport MM-48**

**P72:MM-48 LPP 152 Policy SP26: Criterion 3(iii) Modification to Criterion 3 (iii)**

- I believe that the identified Criteria should not be removed, and it should be strengthened to include ‘Especially in areas where the predicted number of additional trips will lead to a cumulative increase in car trips’.

**P72:MM-48: LPP 153: Policy SP26-Supporting Text: Paragraph 14.14:** Modification of supporting text paragraph:

I total agree with STC in that Transport implications must be addressed but I also believe that in some areas of South Tyneside it is far too late.

- Excessive development has already taken place over previous decades, and the transport system is already struggling to cope resulting in commuters being car dependant. This is particularly evident in and around the A194, A185, Jarrow/Tyne Tunnel and the A19
- Current Transport implications need to be addressed NOW!
- Additional development will generate significant additional of movements resulting in additional car dependency

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

- In essence I believe that the manner in which the Criterion is written stating '**could include**' is a get out clause.
- In addition MM-10 Policy SP8 has been highlighted as having the following text removed 'can be safely accommodated on the local and strategic highway network and does not cause an unacceptable increase in congestion. Evidence provided during the entire EiP of the ST LP indicates otherwise.
- This MM mentions Air Pollution. **Please refer to SFGB App 10 Air Quality** in relation to current communication with STC related to Air Pollution particularly in and around SP8. **To date there is still no AQM on Fellgate or Durham Drive** and despite the traffic levels, there **hasn't been since 2013** (mentioned in Stage 2 hearings). The Diffuser tubes mentioned are situated in cul-de-sacs away from the traffic areas.

**P72:MM-48: LPP 153: Policy SP26- Supporting Text:** New supporting text paragraph after 14.14

- I agree with this in that it highlights the need to have bus stops within 400 but I believe that it should be embedded within the additional text.
- It has to be highlighted that during the Stage 2 hearings developers were against this proposal Particularly in relation to SP8:
- I believe that STC are aware of their stance which is why they have stipulated 'Should development be more than 400m from an existing bus stop the Council will, in Consultation with Nexus, **consider the potential for the development for the development to provide new bus stop Infrastructure linked to either an existing bus service or the potential for a new diverted service.**
- I again state that developers were against this proposal, and I firmly believe that they will not fund it. I believe that S106 should be put in place prior to any development being approved.
- I continue to state that the type of housing that will be built on SP8 will continue to be car dependant

## **Policy 51: Improving Capacity on the Road Network MM-49**

**P73:MM-49: LPP 154: Policy 51: Criterion 1:** Modification to criterion 1 of the policy:

The fact that many points are to be removed in itself makes the LP unsound. All previously identified points: -

- 1i) Junction Improvements A19/A185/Tyne Tunnel should remain
- 1ii) A19 Lane Gain/Lane Drop Scheme (A185 to A194) – South Bound should remain
- 1iii) Whitemare Pool Junction (A194M/A194/A184 should remain due to the statement below

As previously identified in my responses I believe that up-to-date current data related to daily vehicle trips in and around the area has been intentionally overlooked /ignored/denied. As such, the Infrastructure Delivery Plan particularly in and around SP8; has been intentionally watered down' in order to accommodate the total lack of funding required.

**NPPF Paragraph 111 states: - 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'**

I believe that this should be applied to Policy SP8 and strongly believe that it should be removed from the Local Plan.

In addition, Whitemare Pool should be clearly identified as a roundabout and NOT a Junction

**P73:MM-49: LPP 154: Policy 51: Criterion 2:** Modification to criterion 2 (ii)

- I continue to state that the Lane Gain scheme described in Point 1ii) above should remain and if required, an additional Point added to Criterion 2 to state A185 Improvements between the Gateshead Boundary (A185) and A19 Tyne Tunnel.
- As of 19<sup>th</sup> April 2026, there is no updated Statement of Common Ground with Gateshead Council, the previous one being signed in March 2025.

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

## **Policy 52: Safeguarding Land for Metro and Rail Development MM-50**

**P73:MM-50: LPP 155: Policy 52.** Modification to Supporting text paragraph 14.27

I believe that it is correct in that funding has been allocated from the Transport Plan for the North East 2021 – 2035 for the Leamside Lane

- I am aware that Green Belt land also needs to be released for this close to Follingsby which has not been officially accounted for. I believe that this was described by the Inspector during the hearings as a case for exceptional circumstances yet there is no mention of it in the Modifications.
- There has been no allocation for funding for the Mill Lane Metro Station which is estimated at £25m: It is UNFUNDED. Is this an aspiration rather than being actually deliverable?

## **Policy 58: Implementation and Monitoring MM-51**

**P74:MM-51: LPP 164: Policy 58: Supporting Text – New Paragraphs:**

- I believe that this wording is not strong enough in that it only states ‘Where there is evidence that the Local Plan is not delivering action will be taken in accordance with Policy 58 and the contingency measures identified in Appendix 3.’
- I believe that this is a ‘toothless statement’ in that once development has begun and the Infrastructure commitments are not adhered to due to lack of funding from S106/External Funding, it is then too late to act as housing has already begun.
- **I believe that Grampian conditions should be applied and that Infrastructure should be put in place before development proceeds.**

## **Policy 59: Delivering Infrastructure MM-52**

**P74:MM-52: LPP 164: Policy 59:** Deletion of Policy 59

- **It is essential that Policy 59 remains as was written within the Local Plan. The fact that STC is even suggesting removing this Policy is highly questionable in that the majority of Infrastructure Requirements identified in the MMC-06 Infrastructure Development Plan 2026 is S106 based.**
- **The removal of Policy 59 in itself makes the entire South Tyneside Local Plan totally unsound as there is no financial foundation whatsoever for the Plan to be built on.**

**P75:MM-52: LPP 164/165: Policy 59- Supporting Text:** Deletion of Policy 59 – Supporting text

- Policy 59 should not be removed from the Local Plan as it at least highlights Infrastructure requirements, who makes the financial contributions and the fact that the Local Plan sets out policies and allocations to meet the Boroughs development needs until 2024.

## **Policy 60: Developer Contribution, Infrastructure Funding and Viability MM-53**

**P75:MM-53: LPP 165: Policy 60:** Renumber Policy 60 to Policy 59

- I Believe that Policy 59 should not be removed and therefore Policy 60 left as Policy 60.

**P75:MM-53: LPP 165: Policy 60 Criterion 3:** Modification of Criterion 3:

- I believe that **Proportionate** should not be added to Developer contributions as this would enable the developer to minimise the amount of S106 payments that are highlighted in the IDP 2026 at their own discretion.
- This would make the Viability Appraisals provided as part of the Local Plan irrelevant as developers would simply not contribute if their profit margin was seen to be dwindling away

**NPPF Paragraph 34 clearly states that; Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision**

Dave Green: Save the Fellgate Green Belt (SFGB) Group response to Main Modification to ST Local Plan:

**required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.**

- I firmly believe that this policy is being removed as a direct consequence of the infrastructure requirements related to Policy SP8 Fellgate Sustainability Growth Area and the fact that during the Stage 2 hearings Developers were reluctant to commit to any S106 payments whatsoever.
- This was evident during the Stage 2 hearings when developers did not even participate in the [Wed 21 Jan, 10am - Matter 11, issues 3 to 5: Plan wide viability, minerals, implementation and monitoring \(and administrative session\)](#)
- At 1.48.35 of the recording the Inspector Mr Spencer stated that ' I did think that there would be a few more people around the table from the development sector but no, we are where we are!
- At 1.49.04 Mr Spencer then mentions Policy 60 and that the Council mentions 'Circumstances where developer contributions could be secured retrospectively by something that that has been forward funded. **I urge Mr Spencer to listen once again to this recording**

**P76:MM-53: LPP 165: Policy 60: Supporting Text Paragraph 16:11:** Modification to supporting text paragraph 16.11

- AS ABOVE
- Nothing in the IDP 2026 indicates that any Infrastructure is forward funded.

**NPPF Paragraph 34** clearly states 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan'.

**NPPF Paragraph 58** also applies in that 'Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable'.....

- I believe that in respect of Policy SP8, when taking into account all requirements for the site including BNG, Affordable Housing, S106 agreements, Future Homes standards et al; Developers know that the site will be unviable, which is exactly why I believe STC are mentioning forward funding.
- South Tyneside Planning I believe cannot assume that Full Council will 'rubber stamp' the sheer amount of Infrastructure that developers are unwilling to commit to.
- Appendix 4 of the [Infrastructure Delivery Plan 2026.pdf](#) Fellgate Sustainable Growth Area Delivery requirements, highlights Commitments by S106/s278/ Developer on 17 occasions amounting to tens of millions of pounds with many described as Critical. **Viability of the site is therefore not guaranteed resulting I believe in developers reneging on their initial funding commitments.**
- These costs are also questionable as the Initial funding for Whitemare Pool alone amounted to £40m which has now been 'watered down', I believe regardless of road safety, and more to make the development appear to be viable.

**I believe that Main Modification MM-53 fails the soundness test in that it is not Positively prepared, or Consistent with National Policy.**

**I also believe that the Modified Local Plan in its current written form, remains unsound.**