

Newcastle City Council Local Development Framework

Core Strategy Preferred Options Report Consultation Responses (sorted by Organisation or Name)

Compiled on 18 August 2006

Type of Response	Policy / Heading	Comment
ADM Milling (1467)		
Supporting part of the Core Strategy	PH3	Support Policy PH3 relating to Windfall Housing, which allows housing to come forward outside these areas where certain criteria can be met, including where the proposal would provide exceptional planning benefits. These exceptional planning benefits should include regeneration and the policy should be amended accordingly.
	PH4	Support the proposal to encourage 80% of all new housing on Brownfield sites. However, in respect of residential densities, the Council should apply density standards on a site by site basis. In general higher density development, which can be supported by high quality design, should be supported.
Objecting to part of the Core Strategy	PH5	Policy PH5 also refers to affordable housing and requires that affordable housing should be provided on developments on 25 units or more (or on sites of one hectare). This policy is ridged and does not provide any flexibility to be applied to sites that would be difficult to bring forward or where development would be financially unviable if the total affordable housing provision were to be accommodated. The policy should be amended to provide more flexibility to take into account guidance set out in PPG3 and should also set out the type of housing which will be considered as affordable housing, e.g. student housing.
	PH5	Policy PH5 relates to the housing mix to be provided within developments. It should reinforce the need to provide a broad range of housing sizes in order to provide sustainable communities. The priority for houses of three or more bedrooms to meet the needs of families is recognised, but it is unrealistic to require this form of housing within a development, where sites are more appropriate for flatted developments due to site constraints. The policy should therefore be amended to reflect this point.
Making any other comment on the Core Strategy	Local Economy	The supporting text in the employment section identifies that there may be surplus employment land in Newcastle, but this will not become clear until an employment land survey is undertaken. As part of that review we recommend that Tyne Mill is released from its employment allocation for residential led mixed use development, in accordance with new paragraph 42 (a) of PPG3. The release of Tyne Mill for a residential led mixed use development would comply with policies in the LDF, which seeks to encourage mixed use development on the Quayside and with general policies within the Core Strategy which encourage mix use development within the Ouseburn area. This proposal should be inter-related with the Site Specific Land Allocations DPD.
Mrs Carol Anne Allsopp (1181)		
Supporting part of the Core Strategy	Local Economy	I totally agree with your intent to supply land for workspace and good transport links. I also believe more works based training needs to be a priority, or too many skills will be lost. Nothing enhances learning more than "hands on". We cannot learn everything from books and computers.
	Environment and Sustainable Development	More, more, more is the answer. Preserve existing green spaces and create more. It is essential for the well being of everyone to be able to walk in open spaces. Using Hadrian's Wall as an example, look how popular it has recently become. Suddenly non indigenous people realise how beautiful Newcastle and Northumberland are. Not a cloth cap or whippet in sight.
Objecting to part of the Core Strategy	Environment and Sustainable Development	I advocate recycling at every level and whole heartedly believe in alternative energy research, but I feel this country does not do enough. When I asked about a small wind powered generator for my home no-one at Council level could answer my enquiries regarding planning permission, putting electricity back in the grid etc. Also, no one can tell me why we have little black boxes for recycling. They are useless, especially in the rain.
Making any other comment on the Core Strategy	Population and Housing	I have seen many areas "re-generated" and then wrecked, even by the tenants themselves. Would it be feasible to organise regular property inspections as the private sector do to stop this problem in it's tracks, thereby preventing the need for future re-generation? Surely this would sustain pride and deter crimes, as areas would not be run down. Quality of life should be paramount.

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Strategy	Transport and Access	I deplore our transport system. The metro does not venture near Throckley and we cannot even get a direct bus to the Metrocentre, which I can see from my bedroom window. The A1 by the Metrocentre is constantly at a standstill, and despite what Government says, we do need to dual the A1. I also feel a bus service to take all children to school would be such an asset. Have you seen how empty the roads are on school holidays? I am sure this is logistically possible. The cost would be balanced by the savings to the environment and congestion. It makes so much sense.
	Town Centres, Shopping and Leisure	I support development of vacant buildings in the City Centre without reservation whether for housing, leisure or business, but parking in the City is overcharged, especially if you work unsocial hours in the City and cannot use public transport or taxis 5 nights a week. I also believe that more should be done to make older people attracted to the City Centre. At the moment I feel that the city is given over to young drinkers after 9pm.
	Misc.	As space is at a premium and there are many beautiful old buildings lying empty, more conversion could be undertaken for housing or business, whilst retaining the facades for aesthetics as well as the character of our beautiful city. Is this not true conservation?
Ashdale Land and Property Co Ltd (559)		
Supporting part of the Core Strategy	Vision and Objectives	The Core Strategy's Spatial Vision should be both clear and succinct and should be focused upon the principles of spatial planning, relating primarily to land use and development. The statement in the first bullet point (Para. 3.3), which aims to build strong "sustainable housing markets, providing a full range of housing to meet all needs", is supported. Providing a range of housing that is accessible and in close proximity to local services is an essential component of the City of Newcastle developing in a sustainable manner. The statement of "a city with a strong, sustainable, flexible and globally competitive economy offering a highly desirable place in which to do business.. ..and excellent communications" (4th bullet point, Para. 3.3) is supported, as excellent communications, for example areas which can easily access the A1 are an essential element for building a strong and competitive economy.
	PH1	Supports Policy PH1 2b which states the completion of Newcastle Great Park urban extension as one of two areas the City Council has identified for focusing its house building capacity.
	TC2	TC2 sets out the locations where the local shopping service should be maintained and enhanced and sets out locations for proposals to regenerate or replace declining centres, or create new ones. The identification of Newcastle Great Park Urban Extension for providing a local community focus of neighbourhood centre status, which could provide additional local facilities for residents within the North Brunton area of Newcastle, is supported.
	EN5	Support the approach of EN5 being taken forward and it is noted that any assessment should be worded in accordance with current legislation and national planning policy. EN5c sets out the context of contributions of additional open space and recreational needs arising from development and this approach is accepted, it is considered that this should not be worded in such a way as places unnecessary burdens on developers. Any policy seeking contributions from developers should be worded in accordance with current legislation and national planning policy.
	Objecting to part of the Core Strategy	Vision and Objectives
Spatial Objective 3 fails Test of Soundness vi (Coherence, consistency and effectiveness) as the statement of seeking high standards of energy efficiency is unclear and could be interpreted in a number of different ways. There is a need to ensure that these high standards are realistic and implementable as the broad objectives that are not clearly defined could be used by third parties to seek to prevent appropriate and sustainable development. A re-wording of these aspects of the Spatial Objective is recommended that takes into account these concerns.		

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	Population and Housing	In order for the city to maintain and enhance its role as the regional capital of the North East (as outlined in Draft RSS), a more appropriate strategy is for the Council to take forward is Scenario A (Optimistic Growth). This would realise the potential of Newcastle by ensuring that sufficient land is identified and brought forward to meet the needs of the growth in population. In view of this, the plan does not conform with Draft RSS and therefore fails Test of Soundness iv (Conformity).
	PH1	PH1 2c fails Test of Soundness ix (Coherence, consistency and effectiveness) because the plan does not allow for flexibility in the housing market and the changing dynamics and needs of the City's population. PH1 2c could potentially undermine sites, which are located outside areas a and b, including land located in close proximity to Newcastle Great Park, which are highly accessible, close to local amenities and can be delivered in a comprehensive and sustainable manner.
	PH2	PH2 fails Test of Soundness vi (Coherence, consistency and effectiveness) as, to build on the strategy of Policy PH1 of focusing development towards Newcastle Great Park urban extension, North Brunton should also be identified under the heading of North Newcastle. By identifying North Brunton under the heading of North Newcastle there would be consistency between the PH1 and PH2. It would also reflect the role of North Brunton in terms of its proximity to Newcastle Great Park and as a potential location for meeting housing need.
	PH3	PH3 fails Test of Soundness ix (Coherence, consistency and effectiveness), as the approach is not flexible enough to reflect changes in circumstances within the City that may occur during the plan period. It is essential that any windfall sites policy includes sufficient flexibility so that well-located, sustainable greenfield sites can be brought forward. Greenfield windfall proposals should also be considered in cases where the site's sustainability merits are greater than those of other identified sites. There may be cases where the development of a greenfield site is considerably more sustainable than either a brownfield windfall site or an allocated site.
	PH4	PH4 fails Test of Soundness ix (Coherence, consistency and effectiveness) because despite there being a need for the efficient use of land within the City, the statement "Greenfield housing developments should only be brought forward through Area Action Plans and the Site Specific Land Allocations, as part of a balanced approach to green space provision" is not flexible enough to reflect changes in circumstances within the City that may occur during the plan period. It is essential that any windfall sites policy includes sufficient flexibility so that well-located and sustainable greenfield sites that are not allocated in the LDF can be brought forward for development. Greenfield windfall proposals should also be considered in cases where the site's sustainability merits are greater than those of other identified sites. There may be cases where the development of a greenfield site is considerably more sustainable than either a brownfield windfall site or an allocated site. PH4 should be re-worded to reflect this level of flexibility.
	PH5	<p>As currently drafted, PH5 (d) fails Test of Soundness vi (Coherence, consistency and effectiveness) as it could be interpreted as including lifetime homes in all developments, but there is no identified threshold or provision outlined. Therefore there could be discrepancies in how this is applied.</p> <p>Support the provision of a mix of housing sizes and types to meet a range of needs and aspirations, but suggest that the reference to PH5a of priority for provision of houses of 3 or more bedrooms in suitable locations with a good environment and access to local services should be clarified so that developers know where the Council considers are "suitable locations." As currently drafted PH5 fails Test of Soundness ix (Coherence, consistency and effectiveness).</p> <p>PH5 (b) fails Test of Soundness v (Coherence, consistency and effectiveness), as it is inappropriate for developments above the threshold for a level of affordable housing "at a level of 25% or more." Para A27 states that the Council should negotiate for 25% of new units on large sites to be affordable. The policy as currently drafted therefore does not accord with the evidence gathered and it is questionable why a figure of at least 25 affordable houses is being sought when the evidence suggests a level of 25% should be sought.</p> <p>PH5 (c and d), which sets out the councils approach for the provision of housing for special needs and lifetime homes, fails Test of Soundness vi (Coherence, consistency and effectiveness) as the provision of a suitable element of housing is not clear.</p>

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	PH6	PH6 fails Test of Soundness vi (Coherence, consistency and effectiveness), as, in order to achieve a high standard of design in all development proposals, including outdoor amenity space for all dwelling and an appropriate mix of housing type in developments, it may not be possible to achieve outdoor amenity space for all dwellings and to accord with the density requirements for residential development, as set out in Draft PPS3. There should be more flexible in meeting density, housing mix and amenity objectives.
	LE1	There is a need for a supply of land and premises to be maintained to meet the needs of businesses and industry, with respect to size, location and quality and the identification of suitable and highly accessible locations in LE1c is supported. The A1 (T) is also of significant importance to the City, providing a strategic road link to the north and south, and LE1c should be amended for clarity as follows: "c. mixed use areas in the City Centre and other suitable and highly accessible locations, including the A1(T) and Ouseburn Regeneration Area; and." The requirements for office development within the City should be primarily focused in areas with a high level of accessibility.
	LE2	An additional bullet point should be inserted at LE2 (d), which should read: "d. areas within close proximity to the A1 (T) and provide links to the strategic road network, with a choice and variety of sites in terms of size, quality and location."
	EN1	EN1 fails Test of Soundness iv (Conformity) as the aim of the policy is to protect and enhance green space, but there is a need to re-consider the Green Belt boundary, where areas do not meet the purposes of including land within it, as outlined in PPG2 (Green Belt). We will be making more detailed comments on the Site Specific Land Allocations DPD.
Making any other comment on the Core Strategy	Whole Document	Paragraph 2.15 states that outside Newcastle Great Park there are very few planning permissions for houses with gardens suitable for family use and few alternative sites are available until regeneration programmes start on the ground. "Room to move - Reconciling Housing Consumption Aspirations and Land-use Planning" (March 2005) is research, published by Professor Dave King, who was commissioned by the House Builders Federation to research the links between household formation and dwelling requirements to inform the policy debate. Based on past trends, Professor King considers the national projections show a steady rise in demand for larger homes, alongside a decline in demand for smaller dwellings (4 or less rooms). This is contrary to the key policy assumption that demographic trends will require many more smaller dwellings. The research concludes that restrictions on the provision of larger homes will widen the wealth divide and there appears to be a conflict between current policies, which have been heavily influenced by land-use considerations. In the context of Newcastle, the City Council needs to consider other strategically located sites, with good accessibility and proximity to services, to reflect housing needs.
The Bell Partnership (1312)		
Making any other comment on the Core Strategy	Misc.	The 'Great Park' goes on - why not the old brownfield land east and west of city centre? I am happy to elaborate on this. Otherwise this product is of no use. There is no comprehensive strategy for long term access to the city centre. What happened to the tram/metro links? Restrict car access by all means, but replace it with frequent buses and relate buses to Metro Stations and car parks on city perimeter.
Bellway Homes (North East) Ltd (352)		
Supporting part of the Core Strategy	PH6	Support Policy PH6 for high standards of design in all development proposals involving new or existing dwellings.
Objecting to part of the Core Strategy	PH1	Support sub-section 1 of Policy PH1, which proposes a population target based on moderate population growth, but the second part of the policy, which identifies the priority locations for new housing to be constructed to meet the population growth targets, faces objection. The policy is too restrictive of the locations for new housing development, so whilst housing market renewal objectives are supported, the priority locations for new housing as set out in Policy PH1 would stifle development elsewhere in the City and would not provide a range and choice of housing in locations where people want to live. Instead it would prioritise new housing development in the specific areas of Newcastle/Gateshead Pathfinder and Newcastle Great Park, leaving significant parts of Newcastle that will not be a focus for major development. If the Council are seeking to increase population to 285,500 people by the year 2021, there needs to be sufficient housing in the right locations, so Policy PH1 will not see the moderate increases in population growth that the Council are seeking. It will only result in further people relocating to neighbouring authorities where there is a wider range and choice of new housing.

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	PH2	The provision for 18,000 new homes to be built over the plan period is supported, but the City Centre AAP DPD has not been afforded sufficient of the housing numbers, particularly in the period 2004-2011, where the availability of existing and future sites, including a high number of sites that already benefit from planning permission, and the sustainable location of such sites is not acknowledged. The City Centre Area already has in place the necessary infrastructure in terms of employment, services and public transport for a sustainable lifestyle for its residents. Therefore, to concentrate a high proportion of new housing to the City Centre Area would see the most sustainable development in the City and would also allow the regeneration of a number of key sites, which are currently derelict or significantly underused. Bellway Homes' site benefits from outline planning permission granted in 2002 and once the reserved matters application is approved, the site will provide for in excess of 650 residential units before the year 2011. It is therefore requested that the distribution of new housing be amended to acknowledge that this site should be developed before the year 2011 by increasing the housing numbers to be developed in the City Centre Action Plan Area for the period 2004-11 to at least 2,300. The housing numbers for Site Specific Land Allocations DPD plus windfalls be reduced for the period 2004-11 to take account of the increases in the City Centre Area.
	PH3	The wording of PH3 does not comply with national planning guidance on housing (PPG3). It unnecessarily restricts certain types of windfall sites from coming forward even where they would be highly sustainable, located on previously developed land and in accordance with the sequential tests of PPG3. The current policy proposed would in essence prevent any new windfall housing development of greater than 10 units from coming forward unless it directly supports the renewal of housing markets, is on one of the single regeneration budget sites, provides 100% affordable housing, is in the Central Conservation or Ouseburn Conservation Area or provides other exceptional planning benefits that would outweigh any harm to housing market renewal objectives. Under this policy there would be significant areas of Newcastle within which no new housing would come forward and that would have significant economic implications for the City and would not provide for the needs of the entire population in the locations that they would choose to live. This unnecessary restriction on development is in our view likely to drive developers away from Newcastle to other areas of the North East and will not result in the population increases that the Council are seeking. Whilst it is acknowledged that the Council has a restricted RSS housing allocation, PH3 would not allow for an appropriate distribution of that housing. The Council's current policy would not be in accordance with the ministerial statement of Keith Hill of 17 July 2003, or PPG3, and would not be in accordance with the emerging PPS3 on housing. PH3 should be amended to afford greater flexibility for windfall housing sites to come forward.
	PH5	The content of PH5 is generally supported, but if it is a priority within the City for the provision of houses of three or more bedrooms, then the Council needs to provide suitable sites to accommodate such development. Under Policy PH3 there will be limited sites upon which new windfall housing can be constructed and there will be a requirement for an average of 40 dwellings per hectare with higher densities on more sustainable sites. If the Council are seeking to achieve larger family housing, then there needs to be relaxation in the density of housing and the most appropriate sites for such housing need to be made available. The way in which PH3 is worded will direct windfall housing to specific areas of the City where there is already a supply of affordably priced housing. To require 25% affordable housing on any new housing development over 25 units would seem inappropriate in such locations where the housing being provided is already likely to be at an affordable level due to the market position in those areas. The policy should be re-worded so that affordable housing is only required on sites where there is a proven need as demonstrated by the Council.
Making any other comment on the Core Strategy	PH4	PH4 is generally supported in seeking to develop 80% of all new housing on previously developed land and through conversion of existing buildings over the period 2004-2021. The proposed minimum net density figure of at least 40 dwellings per hectare is questioned as we do not consider it would deliver the sort of housing that would be attractive to families which the City wishes to retain. Nevertheless, a net density above 50 dwellings per hectare in locations where a wide range of services are highly accessible by walking and cycling or public transport is supported. Notwithstanding this support, PH4 should be amended to include reference to the provision of limited sites of lower density housing for which there is a demand but not a supply within Newcastle. It would be appropriate for the Council to identify that specific sites, to be identified in the housing allocations DPD, would be acceptable for lower density housing, but under the current policy no such housing would be likely to come forward.

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Supporting part of the Core Strategy	PH1	Strongly support the proposed population target for 2021.
Objecting to part of the Core Strategy	PH3	Restricting the provision of new housing in the Ouseburn Conservation Area is nonsensical, as the Conservation Area was determined by an analysis of conservation issues, rather than regeneration issues. These are not the same. The former Ouseburn Regeneration Area would make a far more logical boundary.
Making any other comment on the Core Strategy	Population and Housing	The policy analysis underpinning the planned distribution and mix of new housing (PH2/3/4/5) is weak, failing to appreciate the different segments of the housing market and taking an overly prescriptive approach. Whilst appreciating the desire to see regeneration in the Pathfinder areas, the analysis fails to examine the nature of the existing housing supply and fails to relate this to the new demands arising from the growing and changing economy. In simple terms, Newcastle's current housing provision is the legacy of it's historic demands for low grade working class housing. The economy has changed quickly and as it has become more 'typical', with more professional and skilled workers, the existing housing supply has become more outmoded, hence abandonment. The City therefore has to adopt clear policies that will enable it to develop a more balanced housing stock that is more in line with the aspirations of a higher paid and more skilled workforce. As long it fails to do this, we shall continue to see extreme housing inflation in those parts of the city that currently provide the type of housing that residents can now afford to aspire to; housing abandonment in areas dominated by terraces, social housing stock and Tyneside flats; and a continuing 'flight to the suburbs and countryside'.
	PH2	The figures presented in PH2 are confusing. It should make clear that the City Centre is not in the BNG Pathfinder area and should provide a timescale for the production of DPDs for the remaining parts of the Pathfinder area.
	LE1	The policy is broadly supported, but needs to be sharpened, by making clearer policy distinctions between the supply of office space (and indeed other forms of employment land) for major corporates and the public sector, and the supply needed for indigenous Small and Medium Enterprises. By giving priority to major strategic employment sites, which will be marketed to and occupied by large businesses (largely due to their covenant strength), there is the danger that smaller, less strategic but less expensive 'windfall' sites will be prohibited from being developed, on the grounds of there being a sufficient 'pipeline' of development to meet foreseeable take-up rates. Policy LE1 also fails to ensure that private sector employment is protected from being 'crowded out' by the public sector, particularly in regeneration areas. There is anecdotal evidence that this is now happening and it will be to the long term detriment of regeneration planning and is therefore imperative that a distinction is drawn between public and private sector use to protect small, but scarce employment sites in such areas. There must be clear policy support for the development of smaller windfall sites to meet the needs of the private sector SMEs.
	EN2	Overall this policy section is weak, in 2 ways. Firstly, the minimum standard under the Code for Sustainable Buildings only requires the relevant Building Regulation to be met. The Code's 5 level hierarchy is due to be published next year and it is likely that the 'Eco-homes' standard will disappear at the same time, so the policy needs to reflect the new levels, as and when they are published. The policy should require the new Code's equivalent to the Eco-homes 'Very Good' standard. Secondly, there should be some opportunity to allow very innovative sustainable housing, perhaps just 'carbon neutral' housing, in developments of up to say, 10 units, on sites that might otherwise not meet the strict criteria normally adopted for housing development. Most residential development land is owned by the volume house builders, allowing very little scope for smaller innovators. A new 'Carbon Neutral' land allocation would give some scope for innovation, allowing a developer or self-builder to compensate for the additional costs of going 'Carbon Neutral' by purchasing land at less than open-market residential values.
Supporting part of the Core Strategy	PH1	Agree with the proposed policy but request that the plan and policy make earlier reference to Byker and Elswick at p8. These two areas are part of BNG and need to have the same priority within the policy as the AAP and North Central Areas. If not, there is a danger that developers will by-pass these neighbourhoods situated between the City Centre and the AAP areas. In addition, there is no reference to the Byker Wall on p10 when it is subject to potential listing. If this is the case then the scale and profile of the development warrants specific mention in 2.22-2.23.

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	PH2	Support the general focus of this policy, but the text in the strategy leading up to it does not clarify that Byker and Elswick, though not covered via AAPs, are priority areas (i.e. they should carry the same priority, if not more, as North Central). Also, Byker and Elswick should come above North Central in policy PH2 as a regeneration plan is only just starting for this area whereas the Byker and Elswick plans are well underway and nearing completion. It would also be useful to provide an idea of the scale of new development for each of the "site specific land allocations DPDs". There should be a footnote (in addition to the text in the strategy) stating that the large number of additional housing in "rest of city" and not BNG in 2004-11 is due to the number of outstanding permissions and that it is aimed to control this by 2011.
	PH3	PH3a should specify "...areas of low demand or market failure in BNG neighbourhoods." Sub policies PH3b and d name the areas and this should be the case for 'a'. The policy must be as clear as possible and not be open to misinterpretation.
	PH4	Support this policy but it could be clearer as to whether 'exceptional' cases would be considered for lower densities than 30 dwellings per hectare in the areas covered by Area Action Plans and/or site specific DPDs - e.g.. it may be appropriate in certain, smaller sites in Scotswood.
	PH5	This policy needs to be clearer. 1) There should be a definition of affordable housing - does this include shared equity as well as rent? We would suggest the PPS 3 definition. 2) The requirement for special needs housing only on sites over 50 units seems low given the level of special needs in the City, for which a figure should be stated in the document (Housing Requirements Study?). 3) It may be useful to add Building for Life standards as well as Lifetime Homes in policy PH5d or policy PH6. Although mentioned in the text the Building for Life standard should be stated within one of these policies.
	EN1	Policy EN1a could be referred to in PH2 to support development in the BNG and other sustainable areas, close to the majority of the jobs.
	EN2	Welcome policy EN2, especially 1 and 3 around minimising energy needs from users' travel patterns and that new developments and conversions meet relevant standards.
	EN4	A consideration of the heritage and character of areas is an essential part of regeneration. English Heritage should be involved in the city wide character assessment, at least in its early stages.
	EN5	Support EN5, especially (c) in relation to new developments. It will be essential that new development within the BNG area includes planning for good quality open space as identified in the North East Housing Aspirations study.
	ST1	Support ST1, especially schemes identified for Discovery Quarter, Scotswood Road/St James Boulevard and the bus corridor improvements in West End and Walker Riverside. Connectivity to potential employment for local people is essential to underpin housing market renewal.
	ST2	Support ST2, especially in relation to the regeneration or replacement of declining centres linked to wider regeneration in the West End and Walker Riverside. Careful consideration should be given to the suggested merger of the Benwell, Scotswood and Elswick study areas for this purpose.
Making any other comment on the Core Strategy	Whole Document	Rather than the use of the pathfinder or housing market renewal pathfinder/area used at times, it is requested that the policy consistently refers to BNG or the BNG area. The key on the map on p70 should also refer to the BNG area (a footnote explaining what BNG is would also be useful).
	LE1	Reference must be made to the Byker and Walker sites mentioned at B5 as the development of these employment sites will help to underpin housing market renewal. Jobs for local people will help to regenerate the area.
	Key Diagram	With regards to the map, it suggests that large areas of BNG carry no priority within the Core Strategy. The inclusion of the Byker, Elswick and North Newcastle specific site allocations DPD would alleviate this issue.
	SA	Disappointed to note that BNG was not included as one of the consultees on the Draft Scoping Report for the SA (pE-25), therefore, they did not have an opportunity to comment on the scale and suitability of the Draft Scoping Report. BNG is a key partner in helping to deliver the Core Strategy and has already made a substantial investment in delivering sustainable development. BNG should be included in all future consultations.

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		The SA Report identifies the need for additional guidance on several issues (p3). BNG would welcome additional guidance on: i) student housing; ii) sustainable design and construction; and iii) measures to manage developer contributions. The preparation of SPDs on ii) and iii) will provide a robust planning framework for raising the standard of development and achieving a degree of consistency. BNG welcome the opportunity to have early discussions in relation to the preparation of such guidance.
Bridleway and Riders Action Group (BRAG) (612)		
Supporting part of the Core Strategy	Vision and Objectives	Encouraged to see the statement in Strategic Objective 8 is inclusive of horse riders.
	EN5	Fully support this statement (EN5d).
Making any other comment on the Core Strategy	Transport and Access	It should be noted that horse riders can use cycle lanes and this should be incorporated into Community Strategy Priorities where cycle lanes are in localities that horse riders use. It should be noted that with the revision of the "Highway Code" new signage may be added to indicate that horse riders are using a cycle lane.
	Town Centres, Shopping and Leisure	Hadrian's Wall is mentioned briefly, but Hadrian's Wall Path is a great tourist attraction bringing visitors and tourists to the city. This should be acknowledged and receive continued promotion and support in the strategy.
A J Brown (453)		
Supporting part of the Core Strategy	Whole Document	Generally very impressed by overall core strategy; no individual comment necessary. An interesting and informative read. A wealth of good ideas and objectives.
Camtec Properties Limited (702)		
Objecting to part of the Core Strategy	EN1	An application for a hotel on an area of land at Brunton Quarry was refused in 2001 and dismissed on appeal in 2002. Since then the Newcastle Great Park development has been extensively completed, which materially changes the area going forward into the LDF plan period to 2021 (bearing in mind the green belt boundary was set in 1986). This land should be considered for removal from the Green Belt. Policy EN1 states that the Site Specific Land Allocations DPD should reaffirm the existing extent and boundaries of the green belt, but this is inconsistent with the aims of the LDF to maintain the existing Green Belt boundaries. Given that the Newcastle Great Park has been developed in a significant rural area, the restriction of development around the periphery will not allow for the regeneration and sustainability so desired. Exceptional circumstances can be demonstrated why Brunton Quarry should be removed from the Green Belt and the site does not meet the purposes of the Green Belt as set out in Para 1.5 of PPG2 for defining Green Belt land. For this objection to be removed, the Site Specific Land Allocations DPD should be flexible with regard to green belt boundaries when dealing with each site specific allocation and not be restricted by the existing boundary.
Objecting to part of the Core Strategy	Vision and Objectives	Object to Para 2.21 which states that "there is no need to consider changes to the green belt boundary." It is felt that given the development potential of the site at Brunton Quarry, it is inappropriate to restrict its development through a green belt allocation. It is felt that the future of the Newcastle Great Park could be jeopardised if Brunton Quarry is not considered as part of the final form. Para 2.21 suggests that the area of green belt surrounding the Newcastle Great Park (of which the site is part of) will not be considered for development given the level of greenfield land in the Newcastle Great Park already in use and the city's large brownfield land supply. Development within the green belt around the city has been allowed in the past due to the consequent regenerative effects on the area. This is the case with Kingston Park Rugby Stadium to the south-west of the site where development in the green belt was allowed on appeal. It is felt that the development of a hotel on the Brunton site would provide similar benefits particularly when it is well located in relation to the Newcastle Great Park development. In order for this objection to be removed, the core strategy should consider changes to the green belt boundary where appropriate.

Type of Response	Policy / Heading	Comment
	Environment and Sustainable Development	<p>Para C6 states that the Council's preferred option is to maintain the existing extent and boundaries of the Green Belt to keep it permanently free of built development and keep urban areas separate. However, this is contradictory as the development of the Newcastle Great Park, which has consumed a significant proportion of the originally adopted Green Belt, and given its large scale development, it is, as Para 2.21 states, an "urban extension". Therefore the Green Belt allocation of the Brunton Quarry site is contrary to the aim of keeping developed areas separate from rural, as it is located adjacent to the Newcastle Great Park which has a significant impact on the rural nature of the site. Setting green belt boundaries is part of government advice in Para 2.8 and 2.9 of PPG2 and the features of the site do not support it being included in the green belt. On the west side of the site, there is no settlement for several miles and the barrier of the A1 to the east and the Quarry Cottages to the north. Therefore without the relatively small Brunton Quarry site, the green belt would still be significant enough to achieve its aims and ensure an appreciable open zone around the built-up area. The Quarry Cottages and the A1 are, in terms of PPG2, readily recognisable features such as a road. The Core Strategy fails to carry this through in maintaining the existing green belt boundary. It is relevant to also understand the length of time green belt designation should last. The essential characteristic of green belts is their permanence. They should last well beyond the plan period and has been interpreted by many inspectors as a need for them to last at least 20-25 years. Land which may not be needed during the plan period for development but does not need to be permanently open can be excluded from the greenbelt to give greater flexibility in planning choices in the future. The existing Tyne and Wear Green Belt Local Plan was adopted in 1986 - 20 years ago - setting the existing green belt boundaries. Indeed the work in order to do so would have originate some time before that and in a sense the green belt can be considered much older. As the current green belt is 20 years old and green belts normally sustain a period of 25 years, it can be considered to be approaching the end of its life. However, the Core Strategy proposes that the green belt boundaries be maintained for the lifetime of the LDF - i.e. a further 15 years - therefore, come the end of the LDF lifetime, the green belt boundaries would have been in place for some 35 years - 10 years more than recommended. The introduction of the Core Strategy and the LDF is an ideal opportunity for the green belt boundary to be reviewed, as it would give a further lifetime for the new green belt of 25 years after 2006 - i.e. 2031, 10 years longer than the LDF period.</p>
Capital Shopping Centres plc (705)		
Supporting part of the Core Strategy	ST1	<p>Offer general support for the aims and objectives of Policy ST1. Newcastle City Centre is highly accessible by public transport, served by three Metro stations and Central Station, and is at the heart of Tyne and Wear's bus networks. Public transport facilities are set to be significantly enhanced in the next few years following the completion of a new bus concourse at Eldon Square shopping centre, the construction of which has recently commenced in association with Capital Shopping Centre's remodelling and redevelopment of the centre. The priority should, therefore, be to seek to enhance the existing public transport systems before seeking to introduce demand management measures on the use of the private car.</p>
	ST2	<p>The early to mid-term priorities, as stated in Policy ST2, appear to be appropriate and accessibility improvements to the Central Station public transport hub (as set out in the first bullet point) are important, given the development activity in the surrounding area of the city centre. This development activity includes the redevelopment of the southern-most part of Eldon Square shopping centre, which will significantly increase footfall in this part of the core shopping area.</p>
	ST3	<p>Support the approach of establishing transport principles in the City Centre AAP, in order to plan for major regeneration. Note the City Council's continued designation of the Inner Distributor Road (IDR) and support the preparation of a transport infrastructure strategy (item "4") that is developed in consultation with key stakeholders.</p>
Making any other comment on the Core Strategy	ST1	<p>In part (d), it would appear appropriate to amend the wording so as to require developments in highly accessible locations (e.g.. The city centre) to provide direct and high quality links with public transport facilities, rather than necessarily having to provide new public transport facilities within the development. Therefore, we would suggest part (d) be revised so as to read: "d. working with developers to ensure that high quality public transport facilities are either provided within all major development and regeneration schemes or are within convenient walking distance, linked by direct pedestrian routes. All new buildings should be located and designed to be conveniently accessible by public transport."</p>

Type of Response	Policy / Heading	Comment
		In part (e), some new large developments within the city centre may include car parking provision that serves the wider city centre and contributes towards the City Council's objective of maintaining 10,000 parking spaces. Part (e) should be amended to read: "e. ensuring that the provision and management of parking is sustainable by setting maximum parking standards for all new developments, promoting low and no parking developments in the city centre (unless contributing towards maintaining the city centre's core car parking stock) and at other highly accessible locations, and requiring pooling of parking spaces in higher density schemes."
	TC1	Note that policies for primary and secondary ground floor retail frontages are to be reviewed and updated within the Development Control DPD or other relevant DPDs and look forward to providing further comment when these DPDs are issued for consultation in due course.
	TC3	It is important that the City Council carefully manage the significant change in the City Centre's retail area over the next ten years or so, in order to ensure the successful completion of committed development schemes that will significantly contribute towards the regeneration and enhancement of the City Centre's historic core. The current redevelopment/remodelling schemes for Eldon Square shopping centre are set to provide around 300,000sq.ft of 'net' additional retail floor space which will significantly increase footfall in the southern part of the Core Shopping Area and secure significant private sector investment in the City's historic core - Grainger Town.
Cyclists Tourign Club (CTC) (185)		
Objecting to part of the Core Strategy	Population and Housing	Mentions pedestrians but not cyclists (p33).
	Transport and Access	High quality and convenient to use cycle parking is very important in encouraging cycle use (p59).
		D28 (p59) needs to mention cyclists.
		Bus lanes also need to be cycle lanes (p51, D3).
		There is no mention of walking and cycling (p12).
		Could the carriage of cycles on the Metro be mentioned in D8, p55?
	Why is there no section on Cycling, which comes after pedestrians and before Public Transport in the Hierarchy of Road Users (p57 & 58)?	
ST2	First bullet point needs to mention cyclists.	
Susan Dodds (1457)		
Supporting part of the Core Strategy	Environment and Sustainable Development	Agrees that current Green Belt is a major environmental asset and that the Council should maintain its existing extent and boundaries (Para C6).
		Believes the opencast coal policy should be brought up to date in accordance with RSS - to reflect the presumption against development (Para C7).
Making any other comment on the Core Strategy	Environment and Sustainable Development	Green Belt areas in Newcastle should be maintained. They are a great asset to the appearance of the City for residents and visitors alike. It is important that the countryside and areas of landscape are easily accessible for everyone to enjoy.
Elders' Council of Newcastle (1423)		
Supporting part of the Core Strategy	Population and Housing	The inclusion of the lifetime homes requirement in the LDF is welcomed. In general people prefer mixed housing developments rather than retirement villages and quality and choice of housing is extremely important - there is a lack of bungalows.
Making any other comment on the Core Strategy	Population and Housing	Providing affordable homes for start-ups is one way that new enterprise can be supported and can aid graduate retention.
	Local Economy	Older people have a lot to offer to fill skills gaps, e.g. B+Q workforce, and can offer mentoring to younger people unfamiliar with the workplace. Older people are looking for work opportunities now, but are often excluded because of age.
		Science City is an opportunity to generate jobs, grow local business and retain local graduate skills.

Type of Response	Policy / Heading	Comment
	Transport and Access	Efficient, effective and economically viable public transport infrastructure is very important. Most older people now use public transport as it is now free, but for a family it is not viable in terms of cost and convenience. Park and Ride schemes on the outskirts of the city should be improved with a circular bus to take people to the City Centre - electric buses are popular. The Quayside bus might be better used if linked up with other cultural centres in the city (e.g. MEA House). Attention also needs to be given to behaviour on buses, e.g. the use of mobile phones and walkmans etc. There could be quiet buses similar to quiet coaches on trains. Walking distance to a bus stop is also an issue for the less mobile older people (Nexus new LinkUp service may help?).
	Town Centres, Shopping and Leisure	Greater emphasis is needed on lifelong learning, which includes opportunities for older people to learn. Older people prefer older tutors for courses.
	Misc.	The importance of feeling safe and secure in the city was highlighted, with good quality street lighting and visible enforcement of safety being important. There is also a need for balanced communities so that there are people out and about in neighbourhoods at all times of the day. Pockets of densely populated student areas are only occupied for part of the year, so are subject to high levels of crime, and very quiet neighbourhoods do not always feel safe.
		There is a need for a balance between green space and housing. Children need places to play (e.g. parks have signs saying 'no ball games' so children end up playing on the street and causing nuisance).
		Community facilities that are open to all ages can be a focal point for developing better community spirit. Schools and their facilities should be open to the public after hours as they can be real focal point for the community. Church halls are also good places for community events, but are sometimes 'owned' by the volunteers. More local shops, post offices, local medical centres and shops which offer delivery services at a reasonable cost are needed.
		There are tensions between proposals for the expansion of the airport (and the associated job opportunities) and the environmental impact of a larger airport. This falls more within the remit of national and regional policies.
		The industrial heritage of Newcastle could be exploited more as a resource for tourism businesses.
		There needs to be better access to information and advice about support/services for older people. Culture and creativity play an important role in driving regeneration. Ouseburn is an example of where this has worked successfully.
English Heritage (204)		
Supporting part of the Core Strategy	Vision and Objectives	Supports the vision for the Core Strategy (p13).
		Supports the formulation of policies designed to protect and enhance the historic environment and townscape (Objective 4). Whilst restraint is necessary to prevent unsympathetic changes to historic assets and their settings it is important not to completely avoid those assets or unduly consider them a constraint. Policies should be drafted in such a way that encouragement is given to, where appropriate, the sympathetic adaptation, conversion, re-use and repair of historic buildings and areas.
	Population and Housing	Welcomes the recognition that local character and amenity may have implications for local housing density (Para. A21, p28).
	SA	In Appendix G, the view that growth is likely to create the conditions whereby reuse and conversion of historic buildings can be made more viable is supported.
		In Para 2.11, the acknowledgement in Task B6 that additional work is required to establish targets and indicators is welcomed.
		In Appendix 3, Option B in respect of housing densities is supported.
		Appendix 4 opines on pF-24 that on-site schemes have the potential of conflicting with heritage if not carefully designed. The need for all development to have regard to the special character of any heritage assets in the locality is supported.
Appendix 1 (pF-6), which concerns Agreed Sustainability Objectives, usefully asks the question of Sustainability Objective 5 as to whether it would conserve or enhance the historic environment. The identification of this as a matter to concern the Sustainability Appraisal is welcomed.		

Type of Response	Policy / Heading	Comment	
Objecting to part of the Core Strategy	Population and Housing	Question whether it is appropriate to consider areas previously used for housing as greenfield sites (Para. A18, p28).	
	PH2	Under reference to West Newcastle the document advises that Throckley and Lemmington/Newburn will become increasingly important. It is unclear, however, in precisely what way.	
	PH5	PH5d refers to a 'suitable' element of housing for households with special needs, but such a requirement lacks clarity and reference should be made to an agreed formula or transparent means by which the figure is to be arrived at. Section 2 of the Policy refers to the protection of large good quality dwellings, but this should also include protection of the character of the neighbourhoods in which they are found.	
	Local Economy	Reference is made to the Draft RSS requirements being a 'loose fit' with Newcastle's current employment land portfolio (Para B6, p36). Bearing in mind the development plan hierarchy, it must surely be that the employment land portfolio that is a loose fit with RSS requirements.	
	EN4	Reference in EN4c to the protection, conservation and enhancement of the historic environment should also make reference to the Newburn Battlefield and the settings of heritage assets. It should be stressed that such a policy can assist the Council in deciding the most appropriate forms of intervention, where necessary, in respect of housing market renewal.	
	SA		In Appendix 2 (pF-8), it is noted that SA Objective 5 could possibly conflict with Core Strategy Objectives 3 and 5 to reduce carbon emissions and combat climate change, and to promote a competitive local economy. This analysis is strongly objected to. Making better use of historic buildings is a means by which society can minimise resource consumption. Demolition as opposed to refurbishment gives rise to a need to remove existing material to landfill (or at best recycle), manufacture new materials, transport them and build afresh. The majority of historic buildings are capable of withstanding conversion and adaptation to provide new uses and to meet modern energy efficient requirements. Those occasions when energy efficiency measures are harmful to the character of a listed building are far outweighed by these benefits.
			Page E-32 contains Appendix 04 dealing with the internal compatibility of SA objectives. Having previously expressed the view that Objective 5 can also be compatible with Objectives 6 and 10 and having been advised on page E-30 that the table has been amended, I observe that it has not.
Remain to be convinced that the suggested indicators are sufficiently representative enough to adequately measure the effect of the Core Strategy on the historic environment. The absence of meaningful targets is also of concern.			
Making any other comment on the Core Strategy	Population and Housing	As drafted, the Para A33 (p33) seems to focus on the creation of a sense of place, character or identity. It should be remembered, however, that everywhere, including existing places, possesses a sense of place and character, although sometimes this is not positive.	
	PH1	Accepts the Council's desire to restrain house building outside of the housing market renewal area and the Great Park, but would not wish to see a complete moratorium that might otherwise prevent the restoration of a historic building for housing purposes.	
	PH2	Warmly welcomes the intention to safeguard and enhance the historic environment when considering site specific allocations or planning permissions for housing in the city centre. Question, however, whether key worker accommodation should be added alongside the reference to student accommodation. It is worth pointing out that the suggested environmental safeguards, laudable as they may be, apply not only to the city centre but to the city as a whole.	
	PH4	Here, and elsewhere within the document, there is repeated use of the word 'should'. This implies a level of choice and flexibility on the part of developers to comply, which I am sure you do not wish to suggest. Use of the word 'shall' or 'will' would be more appropriate.	
	Local Economy	Objectives 3, 7 and 8 are singled out as promoting sustainable development and Para C1 refers to the high quality environment of Newcastle resulting from its legacy of historic buildings and townscape. Why, therefore, is Spatial Objective 4 not also seen as an integral part of achieving sustainable development (Para C2, 41).	
	LE1	Section 2 advises that office development is acceptable within the Ouseburn Regeneration Area as part of mixed use schemes of appropriate local scale. It is also essential that any such developments are appropriate in character, bearing in mind that the area is a significant conservation area. The issue of gentrification elsewhere within this policy is of high applicability to the Ouseburn.	

Type of Response	Policy / Heading	Comment
	Environment and Sustainable Development	Factored into the consideration of energy use and conservation (Para C11, p44) is the need to acknowledge the embodied energy and environmental capital associated with existing buildings. By responding to this it is possible to reduce the amount and distribution of waste from construction and demolition as identified in Para C14. Supports the thrust of Policy EN4 as it is important to ensure that design solutions are informed by an assessment of local character. The Council recognises that it is directly responsible for the design and maintenance of a large part of the city's public environment, but needs to set an example in respect of its own building stock. Where that stock is of historic importance the Council should show leadership in managing it appropriately. Guidance for Hadrian's Wall World Heritage Site is to be welcomed but so too would a policy that has been absent from the UDP.
	EN1	Supports the recycling of building materials, but also feels it is important in the first instance to consider the reuse, adaptation or conversion of existing buildings before contemplation of demolition and replacement. There also appears to be a grammatical error in EN1e.
	Town Centres, Shopping and Leisure	Reference is made on p65 to the possibility of a new neighbourhood centre in the Walker Riverside area. Care needs to be taken to ensure that such a centre does not detract from the other on Shields Road or Wallsend. Likewise, it is important for any shopping facilities within Newcastle Great Park to complement rather than compete with the shopping on Gosforth High Street.
	TC2	Question whether Kingston Park is not more than a district centre as it contains a range of shops that appear to serve a far wider catchment.
	TC4	It should not be forgotten that the historic environment is a valuable contributor to the leisure and visitor offer for the city.
	Misc.	Reference is made to a Draft Supplementary Planning document on Student Housing (Para. 2.17). English Heritage has not been consulted on this.
	Typing Error	Reference is made to a Local Area Agreement to be prepared for 2002 (Para. 1.17, p5)). Presumably this date is wrong. Reference is made to the growth of planning permissions (Para. 2.16, p9). The word growth should be replaced by the word granting.
	SA	Appendix C sets out a review of relevant plans and programmes. An extract from notes prepared by English Heritage to assist with the preparation of Sustainability Appraisals and Strategic Environmental Assessments was submitted for information. Under PH5, the protection of large, good quality dwellings has a link with Objective SA5. With regard to Option A, if the proposal was to introduce, into the Ouseburn, land uses and activities more appropriate to the city centre it could cut across the distinctive character of the area. The comments made on 19 April still apply. ST3 appears to identify a number of drawbacks for the desirability or otherwise of locating city centre uses in the Ouseburn Valley. The question of how the competitiveness of the city centre be assisted by the location of city centre uses elsewhere is raised. Appendix E contains a Scoping Report revised and updated to reflect comments received following consultation. Reference, in paragraph 2.6.5, to the high quality built and historic environment of the city and the contribution this makes to its unique character is welcomed. It is unfortunate that this is not carried through to the draft objectives set out in the box on page E-10. Under Section 3.3 Task A3, there is no reference whatsoever to the heritage of the city or the need to protect or enhance it. That this is not identified as a sustainability issue is a significant flaw in the appraisal. It is all the more surprising, therefore, that proposed Objective 5 is to protect and enhance the city's cultural heritage and diversity. The trail leading to this is somewhat confusing. Regarding Appendix D, SA Indicator 5 is to protect and enhance the city's cultural heritage and diversity. Even as Core Strategy Spatial Objective 4 stands at present it would be sufficient to justify an amendment to the wording of the SA objective to seek to maintain and strengthen local distinctiveness and a sense of place. One of the main issues identified by the appraisal process was the need for detailed development control policies to ensure protection of character and local distinctiveness. Whilst this will seek to do this, it is important to ensure that the role of the historic environment in achieving this is reflected in Core Strategy Spatial Objectives and Sustainability Appraisal Objectives. As a consequence, Core Strategy Spatial Objective 4 should be amended to include reference to the city's distinctive and historic character. Core Strategy Spatial Objective 9 should reflect the widely acknowledged fact that heritage confers economic advantage in an increasingly competitive, global, economy. In Row 5.1, under trends or comparators, there is an error in identifying listed buildings grade I, II* and II.

Type of Response	Policy / Heading	Comment
English Nature Northumbria Team (19)		
Supporting part of the Core Strategy	Vision and Objectives	Support Spatial Objective 7 to protect and enhance wildlife habitats.
	Environment and Sustainable Development	Support the statement in Para. C2 to improve the city's biodiversity and increase environmental awareness.
	EN1	Welcomes and supports EN1b to protect and enhance the natural environment.
Objecting to part of the Core Strategy	Whole Document	Paragraph 2.20 should recognise the wildlife resource of the plan area and could usefully reference 'A biodiversity Audit of the North East', which addresses habitat cover, recognising the semi-natural habitat in Newcastle, including 3 SSSIs and a number of Local Nature Reserves. PPS9 requires that LDFs recognise areas of importance for biodiversity and support restoration and creation of priority habitat, this should be included as a strategic issue.
	Context	The LDF, including the Core Strategy, must be set in the context of Government Planning Policy as set out in Planning Policy Statements (PPS), which also form part of the Development Plan. This should be set out clearly in the introduction and context.
	Vision and Objectives	Spatial Objective 3 should also recognise the value of integrating biodiversity as part of good design in all development. This will also contribute to mitigating the impacts of climate change.
		In Para 3.1, the vision and objectives should clearly recognise cultural, historical and natural (biodiversity and geological conservation) environmental assets.
Making any other comment on the Core Strategy	Environment and Sustainable Development	In Para C5, policies in LDDs should promote any native planting (not just trees) to support wildlife etc.
	EN1	Would look to the aspect on sustainable design, in EN1e, to include building in beneficial biodiversity or geological features as part of good design.
	EN4	This should also recognise the role of the natural environment in character and local distinctiveness
	TC4	The Leisure and Tourism section (p68) should also recognise the role that public open space and biodiversity interests play in leisure, culture and tourism.
Environment Agency Northumbria Area (199)		
Supporting part of the Core Strategy	Vision and Objectives	Support text regarding sustainable growth (bullet 2, p13).
	PH2	Support the role of Pathfinder and Action Areas in the geographic distribution of growth, although for these, and windfall housing, site specific allocations will enable definitive comment.
	EN3	Policy is well argued and defined.
	EN5	Approve the importance afforded to recreational walking routes.
	SA	Overall this is a comprehensive and impressive interpretation of Government guidance on the structure and content of such documents. We appreciate the schedule at Para 3.5 (pE-27) which confirms a very positive response to our input to the SA/SEA scoping consultation in March 2006. We are also very pleased to record the outcomes at S7 (p3) which confirms the need for a Strategic Flood Risk Assessment for the city and further guidance or measures on: water management; protection and enhancement of biodiversity on brownfield sites; sustainable design and construction; air quality.
Making any other comment on the Core Strategy	Vision and Objectives	Clearly Newcastle is being directed towards population, economic and employment growth. You rightly identify (3.2) the tension between this aim and environmental concerns. Also (at 3.3, bullet 5), you mention a city that "prepares for an era of higher energy costs;" and it may be helpful to specify if you anticipate these as being fiscal and/or environmental.

Type of Response	Policy / Heading	Comment	
Strategy		Flood risk is assigned to Objective 7 of ensuring high quality, green and natural environments. The Environment Agency should be an integral part of spatial management in whatever context (as you acknowledge later at Preferred Policy EN1). The SA outcome which necessitates a Strategic Flood Risk Assessment is noted. The need for positive outcomes from environmental management should be stressed (Council Objective, p13, bullet 3).	
	Population and Housing	The Preferred Option (of Moderate Growth) implies a net housing stock increase of 9% above the Draft RSS, and therefore in "broad accordance" with that policy. This is a rather subjective opinion, and for the sake of consistency the equivalent percentage impact should be shown for all other options.	
	PH3	The qualifying statement of planning criteria might be more appropriate in your Development Control Policies DPD.	
	PH4	Support these excellent PDL targets, although argue that the efficient use of land can extend well beyond it being brought back for housing alone.	
	Environment and Sustainable Development		EN1 and EN2 together represent a comprehensive and intelligible approach, with some continuity of policy from the UDP (at Para C4, page 41). The current text could point to the growing importance of flood risk that more recent guidance (PPG25/PPS25) is reflecting. A statement that discourages development in areas of risk is appropriate. An aspiration on soil quality should also be referenced explicitly, either in the context of contamination and/or the improvement of any land that will maximise its range of potential future use.
		EN2	Should encourage innovative (energy) technology at all scales of deployment (sub-policy 2).
	Misc.	Both the Summary document and the main report were clear and concise. However, we noted some inconsistency between the summary and main document. For example, the former has a headlining section on "local environment" (p5) which is not replicated in the Core Spatial Objectives at p15/16 of the main text. It then returns as the subject of Preferred Policy Option EN1 at page 42.	
	FM Developments Ltd (1475)		
Supporting part of the Core Strategy	PH1	Agree with Policy PH1	
Objecting to part of the Core Strategy	PH2	Generally support PH2, but should ensure flexibility across city so that growth is not just in Pathfinder areas. Should allow for flexibility in the deliverability of housing over the plan period.	
	PH3	Supports the inclusion of policy PH3, but part (a) should be changed to read '..it should contribute towards the renewal of housing markets to help to sustain existing communities in areas of low demand or market failure.' Point (e) should be deleted entirely. Windfall sites make a valuable contribution to the overall strategic provision of housing and should not have to provide exceptional planning benefits given this. Affordable housing needs to be based on an up-to-date local housing needs assessment relevant to the local area. The policy should not pre-suppose the type of mechanism to deliver affordable housing, rather it should acknowledge that there are a number of mechanisms to deliver affordable housing.	
	PH4	Development of greenfield sites should not only be brought forward through AAPs and Site Specific Land Allocations, but also where it can be demonstrated that the release of land is needed to meet strategic housing requirements.	
	EN1	Green Belt designations should not be applied to whole urban areas as is the case for Woolsington. Consideration should be given to the physical characteristics that exist on site. Settlements such as Woolsington should be excluded from Green Belt, with boundaries around not too tightly defined to allow for sustainable growth.	
Making any other comment on the Core Strategy	Key Diagram	Scale too small to see Green Belt boundary	
Fordgate Group (721)			

Type of Response	Policy / Heading	Comment
Supporting part of the Core Strategy	Vision and Objectives	Spatial Objective 5 seeks to promote a competitive and sustainable local economy in line with PPS1 and PPG4. In a local context, there is also an important need to encourage development that will generate employment and support and strengthen the economy. This will also assist in raising the profile of Newcastle and the wider Tyne and Wear sub-region as a business location, driving regeneration and attracting people to live in the area. These are important considerations which should be attached significant weight in determining the aims and objectives of the Core Strategy in respect of economic development.
	LE1	Support the encouragement for office development on brownfield sites which are highly accessible by a choice of means of transport, including those which have been previously committed through the granting of planning permission. This should be an important element of the LDF, taking into account guidance in PPS1 and PPG4, which seeks to promote economic development in a sustainable manner. The designation of the Regent Point Site for office use in the Site Specific Land Allocations DPD is suggested.
Objecting to part of the Core Strategy	LE2	LE2 states that the LDF should continue to seek developer contributions in larger developments to assist lifelong learning and training of city residents to improve their access to the job market. It is considered that policies requiring training for employment with new development should focus upon proposals within areas subject to current regeneration schemes, to ensure that such schemes benefit those communities which are most in need of training and that the commercial viability of new developments in other areas is not adversely affected.
George Wimpey City (1484)		
Supporting part of the Core Strategy	Vision and Objectives	The Council's vision to create a vibrant, inclusive, safe, sustainable, accessible and modern European city is welcomed and it is considered that residential development has an important role to play in achieving this. This is particularly relevant when the Spatial Objectives are considered, particularly the aim of halting and reversing the city's population loss, achieving attractive and popular neighbourhoods throughout the city.
	PH4	Welcomes the inclusion of PH4, stating that an average net housing density of at least 40 dwellings per hectare (50 dwellings per hectare in highly sustainable locations) should be provided. This represents a positive move to incorporate key national planning policy guidance.
	Local Economy	It is noted that there is a requirement for small scale local facilities as well as leisure culture and tourism uses within the Lower Ouseburn Valley. This is welcomed and could be incorporated at the Ouseburn Gateway site for example.
	ST1	The inclusion of Policy ST1, which states that one of the key priorities of the early years of the LDF should be "ensuring the provision and management of parking is sustainable by setting maximum parking standards all for new developments, promoting low and no parking developments in the City Centre and at other highly accessible locations and requiring pooling of parking spaces in higher density schemes", is welcomed. The site at the confluence of the Rivers Tyne and Ouseburn is a highly accessible site and therefore could be considered for low parking ratios.
Making any other comment on the Core Strategy	Population and Housing	Drawing upon emerging RSS, it is considered appropriate that Newcastle plans to reverse previous population losses and deliver the Government's Sustainable Communities Agenda as embodied within the Northern Way. Accordingly, Scenario B, and the resultant housing requirement is welcomed but should be subject to 'plan, monitor and manage' and could ultimately be considered too moderate if the aims and objectives of the RSS are delivered. It is important that provision for review is allowed for in this regard.
	PH1	The importance of the Bridging NewcastleGateshead (Pathfinder) Initiative is recognised. However, beyond the defined Pathfinder boundaries there are a range of sites which can help deliver the Council's overarching vision and such developments should not be unnecessarily constrained. Therefore, whilst the prioritisation of Pathfinder is noted this should not be prioritised to the extent that other opportunities are unnecessarily constrained, for example the Lower Ouseburn Valley and the City Centre generally.

Type of Response	Policy / Heading	Comment
	PH2	In looking to meet future housing requirements within the City, the Council's requirement for additional releases to 2011 is predominantly determined by the quantum of extant planning permissions, coupled with a focus on Pathfinder during this period. It will be important to monitor the rate of completions to allow for slippage and non-implementation, when it will be appropriate for the Council to release additional sites cognisant of the annual monitoring reports. Policy PH2 interprets the RSS housing figures and states that 18,000 homes are to be built during the plan period. Of these, 9,150 will be in Pathfinder areas which leaves the remaining 8,850 to be provided throughout the City. If the housing requirement precludes delivery of all available brownfield sites identified within the urban capacity study then consideration may need to be given to the prioritisation of sites, focusing on those within the urban area which maximise regenerative benefits. The important positive role housing has played in the regeneration of the Quayside is noted and the unjustified change to the eastern City Centre boundary in relation to the Ouseburn area of the City is queried.
	PH3	Policy PH3 provides the criteria for the consideration of windfall sites taken from the Interim Planning Guidance on the release of land for housing, but the justification for this policy is somewhat truncated. Additional detail is required to sufficiently justify the policy. In addition, a breakdown of projected figures for windfall sites (and how they relate to site specific land allocations) would be of assistance to the plan, monitor and manage approach.
	PH5	Policy PH5 states that an element of affordable housing of types and sizes to meet local needs will be required for developments over 25 units or more at a level of 25% or more. Whilst it is of acknowledged importance to meet local needs, a mix of homes including family style dwellings will not be suitable for every site. Indeed the market for family style dwellings within the City Centre area is not confirmed, as evidenced by the Regional Housing Aspirations Study. Similarly the requirement to provide affordable housing on every site above 25 units does not appear justifiable in a City where houses can still be purchased for £30,000 in the east end of Newcastle. The policy could also potentially harm regeneration initiatives, such as Pathfinder, within Newcastle, creating a competitive element which would undermine the wider regeneration of key areas. It is, therefore, considered that the policy requires further consideration, particularly where schemes potentially bring forward broader section 106 benefits, or the need within the surrounding area is not confirmed. The policy should make provision for exceptions notwithstanding the general uncertainty over the actual requirement.
	LE1	Policy LE1 states that office development should be located predominantly on brownfield land within and adjoining the City Centre and in the Ouseburn Regeneration Area in mixed use schemes. It is assumed that the Ouseburn Regeneration Area is that defined with the Regeneration Strategy for the Lower Ouseburn Valley, and would suggest that this be made clear within the document.
	Environment and Sustainable Development	The inclusion of the requirement for high standards of design within residential development and the need to provide outdoor amenity space for all dwellings are noted. Policy PH6 should be clarified, stating that outdoor amenity space does not necessarily have to be a green space or a garden, it could be a landscaped courtyard or a public square.
Girls Day School Trust (1466)		
Making any other comment on the Core Strategy	EN5	Supports access for all to high quality parks, green spaces, civic spaces and sports and recreation facilities. It is felt, however, that the policy should also recognise the needs of educational establishments to adapt to changes in the national curriculum. With the national curriculum constantly evolving, there is considerable pressure on schools to meet both Government targets and the growing expectations of pupils and parents. This inevitably results in a requirement for schools to modernise their learning facilities. For this reason, it is considered that section b. of policy EN5 is overly restrictive with regard to educational establishments. Would advocate a change to the policy so as to provide flexibility for the future development plans of the educational establishments in Newcastle.
Government Office for the North East (1393)		
Supporting part of the Core Strategy	Whole Document	We consider the document to be concise, well presented and readable.

Type of Response	Policy / Heading	Comment
Objecting to part of the Core Strategy	Vision and Objectives	The extent to which the Core Strategy picks up on the spatial characteristics of the city and translates them into a spatial vision and land use and transport proposals needs addressing. It has a good suite of useful high level objectives and some relevant sub-objectives, however the approach is primarily thematic and the question remains of how well a consistent and comprehensive spatial vision emerges as a context for the Area Action Plans. Other strategies have produced abundant information on patterns of, for example, educational achievement, deprivation, health issues and movement needs, the issues within these themes, and the actions that are needed to address them. More could be done to ensure that the latest understanding of these is fully fed through into a clear spatial strategy which sets out the future of the various parts of the city in terms of paragraphs 2.9-2.10 of PPS12.
	Population and Housing	The Core Strategy conflicts with Policy H1 of RPG as it focuses heavily on the provision of new houses, but fails to address fully housing stock renewal/replacement issue. In particular it fails to address: <ul style="list-style-type: none"> - How the City intends to address the improvement of the whole housing stock: existing as well as that which is to be provided in the future; - Quality and Decent Homes initiatives in the private sector; - The need to provide sufficient confidence to ensure long term investment in repair to maintain individual homes and areas more generally; - The issue of a long-term strategy for renewal/replacement.
	PH1	Policies should be clear, concise and apply to the whole of the LPAs area or to locations within it. Criteria (c) fails to identify clearly the housing restraint areas and provide a clear explanation about how this part of the policy would be implemented.
		Criteria vii in paragraph 4.24 of PPS12 states that development plan strategies, policies and allocations should represent the most appropriate in all circumstances, having considered all the relevant alternatives and they are founded on a robust evidence base. Policy PH1 identifies that the Council is seeking to arrest and reverse the trend of population decline, through increased house building, but neither the policy nor the reasoned justification explain how this will be achieved, where the increased population will come from or assess the implication of this growth on neighbouring areas and other parts of the region.
	PH2	Policy PH2 conflicts with PPS12 Para. 4.24 in that it does not justify fully the number of replacement dwellings to be provided as part of the proposed 18,000 new homes to be built. A detailed explanation and justification should be provided as part of the submitted version of the Core Strategy.
		Policy PH2 conflicts with paragraph 8 of PPS12 because it proposes net housing provision 9% above the level proposed in submitted RSS. The net housing provision figures in the submitted Core Strategy should be amended to more closely reflect the figures in RSS.
	PH3	Criteria (e) in Policy PH3 conflicts with paragraphs 2.12 of PPS12 as neither criteria (e) nor the reasoned justification explain clearly the circumstances when windfall housing would be permitted. The submitted Core Strategy should provide an explanation or identify explicit circumstances when criteria (e) would apply.
	PH5	Criteria 3 in Policy PH5, relating to proposals for gypsy or traveller caravan sites, conflicts with paragraph 30-33 of Circular 1/2006: Planning for gypsy and traveller caravan sites because it fails to identify explicitly how the City Council intends to address its requirements, and identify an appropriate number of sites for gypsies and travellers.
	LE1	Policy LE1 conflicts with paragraphs 2.10, and criteria vii in paragraph 4 of PPS12 because it fails to include an overall figure for the supply of employment land, which would provide the strategic framework for the City wide allocations. The City wide assessment of land and premises should be undertaken as part of the preparation of the Core Strategy rather than the Site Specific Allocations DPD. The results of this assessment should be included within the submission version of the Core Strategy.
Criteria 2b in Policy LE1 conflicts with paragraph 2.12 of PPS12 because it refers to areas of office use in the UDP. Once the Core Strategy and other DPDs have been adopted, they will supersede and replace the UDP. The submission draft of the Core Strategy should use an alternative form of wording in identifying these areas.		
Environment and Sustainable Development	The Core Strategy conflicts with paragraphs 2.11 of PPS12 and paragraph 40 of MPG1 because it fails to include any mineral policies and provides no clear indication of how the Council propose to address the supply of minerals and the control of minerals in the LDF. Paragraph C7 identifies that there are large reserves of coal and brick clay. The Council should consider the need to safeguard these and other workable mineral deposits from developments likely to sterilise them.	

Type of Response	Policy / Heading	Comment
		Paragraph C7 conflicts with paragraph 8 of MPG3 because it requires both the tests of environmental acceptability and community benefit. Paragraph C7 should be amended to reflect MPG3 or an appropriately worded policy should be included in the either the Core Strategy or the Development Control DPD.
	EN2	Criteria 2 in Policy EN2 conflicts with paragraph 2.12 of PP12 because the reasoned justification fails to provide a clear explanation of its meaning and how it will be applied.
	EN3	Criteria (b) and paragraph C.17 of the reasoned justification conflict with Paragraph 17 of PPS10 and Paragraph 2.12 of PPS12 because they imply that the Council intends to include the criteria based policies for the determination of planning applications for waste facilities, rather than allocating sites in a DPD. Policy EN3 conflicts with paragraph 16 of PPS10 in two particular areas, Firstly, the policy and the reasoned justification only consider the municipal waste stream at the city level. The Core Strategy will also need to consider the commercial and industrial waste streams. Secondly, the policy fails to provide sufficient guidance for the provision of waste management facilities in the proposed site allocation DPD. The submission version of the Core Strategy should include annual rates identifying the tonnages of waste requiring management in the municipal and commercial and industrial streams. It should also identify the capacity gap, viz. the difference the amount of waste treated by existing facilities and the tonnages of waste requiring management by other facilities or processes.
	EN5	Policy EN5 conflicts with paragraph 2.12 of PPS12 in two particular areas. Firstly, it fails to reflect Core Strategy Spatial Objective 8: to promote the health, safety and well-being of residents and visitors. Secondly criteria (a) identifies that a city wide hierarchy and categories for public and private open space and sport and recreation should be defined. This hierarchy and categories should be presented in a policy form in the Core Strategy.
	ST1	Policy ST1 conflicts with paragraphs 2.1, B9 and B10 in PPS12 because it fails to demonstrate how the strategic development policies in the Core Strategy integrate fully with the transport policies.
	Town Centres, Shopping and Leisure	The Town Centre and Shopping Chapter conflicts with paragraphs 1.6, 2.15 and 2.16 of PPS6 because it fails to identify clearly the need for new floor space for retail, leisure and other main town centre uses in the City, and to identify a clear hierarchy of town, district and local centres or to explain how the different centres will contribute towards the spatial vision for the City.
	TC1	Policy TC1 conflicts with paragraph 2.28 of PPS6 because it implies that application of the sequential approach will be used to determine whether there is a need for the development. The PPS emphasises that in assessing proposals for out of centre locations, the need for a development should be established first. Where there is a proven need the sequential approach will be applied. Where there is no need, there is no requirement to apply the sequential approach. The policy should be amended to reflect the PPS.
	TC2	Policy TC2 conflicts with paragraphs 2.32-2.37 of PPS6 and paragraph 4.2.4 vii of PPS12 because the reasoned justification fails to substantiate the need for additional convenience floor space. The submitted Core Strategy should provide additional justification for the extra convenience floor space.
	TC3	Policy TC3 conflicts with paragraphs 2.32-2.37 of PPS6 and paragraph 4.2.4 vii of PPS12. because the reasoned justification fails to substantiate in detail the need for additional comparison floor space. The submitted Core Strategy should provide additional justification for the extra floor space.
	TC4	Policy TC4 conflicts with paragraph 210 of PPS12 because it fails to provide strategic guidance to the location of leisure, cultural and tourism facilities within the City.
	Key Diagram	The Core Strategy POR conflicts with paragraph 2.13 because the key diagram omits important areas identified within policies such as the Ouseburn Regeneration Areas, land for airport related uses, office use areas, and the retail hierarchy. The key diagram would also benefit from a cross reference to the appropriate core strategy policy to aid interpretation.
	Monitoring and Implementation	Whilst it is acknowledged that each policy is accompanied with descriptive text explaining how the policy will be implemented, the Core Strategy conflicts with paragraph 2.9 of PPS12 because it fails to include an overarching monitoring and implementation framework. The submission version of the Core Strategy should incorporate a monitoring and implementation framework, perhaps identifying the policy, principal implementation routes, who is responsible, timescale, resource implications and target indicators.

Type of Response	Policy / Heading	Comment
Making any other comment on the Core Strategy	Whole Document	It is acknowledged that the Core Strategy POR seeks to reflect other strategies such as the Community Strategy and the Local Transport Plan, but during the next few months a number of important strategies will be published, including the Secretary of State's proposed changes to RSS, the Sustainable Community Strategy, the Regional Economic Strategy, including a section on the Tyne and Wear City Region, plus the Newcastle City Region Business Case. The submitted version of the Core Strategy needs to take into account and reflect these emerging strategies also.
	Vision and Objectives	The key priority of halting and reversing the population decline is very ambitious and the Council's ability to deliver this aspiration will be influenced heavily by emerging RSS. In particular, it will require a higher housing allocation than is contained within submitted RSS (July 2005). In the event of emerging RSS failing to include the higher housing figures, it may be necessary for your Council to review the key priority of the LDF and amend the policies accordingly.
H J Banks & Company Ltd (251)		
Supporting part of the Core Strategy	PH4	Support the brownfield target and density proposals.
Objecting to part of the Core Strategy	PH1	Support the aim of moderate population growth in Newcastle, but strongly disagree with the assertion that this will best be achieved through restraining house building outside the pathfinder area and Newcastle Great Park. This solution to Newcastle's housing issues is suburban and will be unsustainable, fighting against market forces. The only no-go areas for new housing in Newcastle should be greenfield sites. The moratorium in place (IPG) outside pathfinder areas has not been tested at inquiry and was only envisaged to run for a short period of time. This moratorium should not be rolled out across the city for the foreseeable future as it would have a considerable negative impact on the economy of the city as well as preventing Newcastle meeting its aim of moderate population growth.
	PH2	The proposed distribution of 3,750 dwellings to the City Centre largely comprises existing commitments. If these permissions are taken up as expected there will be little scope for city centre residential development in the second half of the plan period. The council's opposition to city living appears to be based on the limited market sector catered for. This sector has brought increased vitality to the city's economy and should be allowed to grow further.
	PH3	This policy, whilst being phrased positively is essentially negative. If adopted it would guarantee that a great number of sustainable brownfield proposals will either be refused, or more likely not proposed in the first place because other investments are more attractive. The document assumes that moderate population growth can be achieved without such developments. This approach is flawed and starkly at odds with emerging Central Government policy (in particular the Barker Review). Newcastle is unlikely to be able to attract new economically active people to the city if they are offered a new house only in areas of low demand, market failure, Regeneration Budget programmes, affordable housing, or mixed use schemes. This simply is not a good choice. It will affect people's decision whether or not to take employment in the city region. The only way to bring forward schemes outside these constraints are for developers to provide "other exceptional planning benefits, which cannot be secured by other reasonable means and which would outweigh any harm to housing market renewal objectives". It is not government policy to expect good brownfield housing schemes to provide exceptional planning benefits as they are needed in themselves to achieve Government objectives. It may be possible to offer exceptional benefits in some circumstances but during the plan period there are bound to be periods of economic recession. There is also a prospect of Planning Gain Supplement being imposed. The expectations of planning gain flowing from windfall housing are likely to be unrealistic. Windfall sites have the potential to absorb RSS housing figures, but the revised RSS will hopefully incorporate a greater degree of flexibility to enable this to happen without negative impacts on Pathfinder or other strategies. There is no evidence that healthy competition will prevent Pathfinder from being successful. There is a strong suspicion that the council is unnecessarily guarding its RSS allocation for in-house priorities.
	PH5	While not surprised that Newcastle is aiming for a policy of 25% affordable housing on new developments, there should be an acknowledgement (as there has been in other districts) that the cost of remediation of difficult sites can lead to a lower provision.

Type of Response	Policy / Heading	Comment
Making any other comment on the Core Strategy	Whole Document	There is no mineral policy other than a reference to judging opencast coal proposals according to RSS policy. Hopefully this RSS policy will change as a result of the Examination in Public and the very strong arguments raised against it. In the interim period decisions should pay due attention to the national planning guidance in MPG3. The Council needs to address the clay needs of Throckley Brickworks as historically the factory has been able to source fireclay and brickshales relatively easily, but reserves are running out and the stricter planning regime means that replacement sites will be difficult to find. Newcastle could significantly assist Throckley Brickworks by developing a policy on storage of clays within the surrounding area. Without an opportunity to stockpile, it is often the case that valuable clay reserves are wasted during the mining process because opencast sites are worked at a quicker rate than the brickworks can use the clay. Throckley is a good example of this because of its very limited stocking area. It would be possible for the minerals industry to develop a landscaped clay stockpile close to Throckley which would provide long-term security of supply to the brickworks. This would probably need to be in the green belt. By encouraging this activity the City Council would be contributing towards the long term mineral needs of a valuable local industry in line with national guidance.
Miss Barbara Harbottle (1479)		
Supporting part of the Core Strategy	Population and Housing	There should be no more student housing in the city centre.
	Environment and Sustainable Development	Should encourage 100% household recycling by sustainable enticements. Use up-to-date means - what about Durham waste disposal?
Making any other comment on the Core Strategy	Population and Housing	Keep student housing and domestic housing apart.
	Environment and Sustainable Development	The whole city must be kept clean, not just the city centre. Inconsiderate neighbours can wreck the environment for others.
Highways Agency (2)		
Supporting part of the Core Strategy	Vision and Objectives	Welcome the recognition of the need for 'a highly accessible city with a sustainable transport network,' but recommend that the location of new development should only be considered if it meets this objective.
		Welcome the recognition that controlling traffic congestion will enable city improvements and make a real contribution to tackling carbon emissions. Supports Objective 6 to promote sustainable transport, though would welcome the inclusion of an objective that specifically mentions the need to reduce travel.
	PH1	Welcome the use of the four scenarios to estimate population growth, but has no particular preference, as long as the development associated with such growth can be satisfactorily accommodated within the transport infrastructure particularly the Trunk Road Network (TRN). Welcome the use of Area Action Plans and the Site Specific Land Allocations to implement residential growth and look forward to being consulted upon these documents.
	PH3	Sites need to be considered sequentially, particularly in terms of accessibility. Wish to be consulted at the earliest opportunity with regard to any site that could have an impact on the TRN.
	EN1	Generally support this policy, particularly where it promotes locating development to minimise the need to travel.
	EN2	Generally support this policy, particularly where it promotes locating development to minimise the need to travel.
	ST1	Support strategies and measures aimed at restricting traffic growth and private car journeys, encouraging improving public transport provision and facilitating travel by sustainable modes of transport.
	ST2	Support and encourage infrastructure investment proposals in the region which will improve highway capacity and safety; modernise pedestrian and cycle facilities; and investment decisions which will lead to enhancement of public transport provision.

Type of Response	Policy / Heading	Comment
	ST3	Support and encourage investment in the efficient use of existing transport infrastructure.
Objecting to part of the Core Strategy	LE1	Generally support economic growth where it can be secured sustainably, but many of the identified employment sites are not considered to be particularly sustainable. Wish to see a true sequential approach to the identification of employment sites in the interest of sustainability and in particular the TRN. Also wish that the strategy would give stronger emphasis on the need to provide a transport system/service to accommodate the development proposals.
	ST2	Do not favour the 'predict and provide' approach in mitigating traffic impact due to new developments and prefer traffic demand restraint and technological measures.
Making any other comment on the Core Strategy	PH2	Recognise the need for additional homes to be built, though reserves the right to comment on any developments which may impact upon the TRN. Increases in the number of dwellings within an area could have a significant negative impact upon the operation of the trunk road network and thus residential allocations should be proposed in the most sustainable locations, using sequential testing.
	PH4	Support policies that place greatest focus on sustainability, particularly locating development on previously developed land where it will have a minimal affect on the TRN. It should be remembered, however that not all brownfield sites are sustainable if their accessibility to all forms of transport is poor. Other green field sites may therefore, on balance be preferable.
	ST1	Notwithstanding the need to have adequate parking provision, there should also be an appropriate limit to parking provision in order to encourage the use of public transport and not to frustrate any efforts and measures in the Green Travel Plans. Green Travel Plans should be prepared for major development sites in collaboration with the local highway authority and the Highway Agency's Influencing Travel Behaviour team.
	ST2	Wish to be consulted at the earliest opportunity if any new developments or highway infrastructure improvements are likely to impact on the TRN. The A1 Trunk Road to the west of Newcastle is congested during peak hours and any new developments that would impact on the A1 would generally be discouraged.
	TC1	Generally support the maintaining and enhancing of the vitality and viability of Newcastle Town Centres and the sequential approach to development, concentrating development in principal centres. However a key element for this is having a transport network that can support the enhancements and therefore the development of sites with good public transport provision is preferable.
	TC3	Generally support the maintaining and enhancing of the vitality and viability of Newcastle Town Centres and the sequential approach to development, concentrating development in principal centres. However a key element for this is having a transport network that can support the enhancements and therefore the development of sites with good public transport provision is preferable.
	TC4	Wish to be consulted at the earliest opportunity with regard to any significant developments that may impact on the TRN. Any such developments would need to be assessed against the provisions of Circular 04/2001.
	Home Builders Federation (HBF) (193)	
Objecting to part of the Core Strategy	PH1	Object to the Council's Preferred Option (Scenario B) and would prefer Scenario A (High Growth), which will allow sustained growth in all parts of the City, unless this growth is at the expense of other areas within Tyne & Wear. It would be a high-risk strategy should Newcastle receive an large proportion of the housing provision for Tyne & Wear, as it may be impossible to deliver should a downturn in the flat market occur. A more sophisticated housing strategy is required based on evidence of what and where the housing markets are within Newcastle, and the type of housing required. The approach to housing growth needs to recognise the needs of larger family dwellings and should the flat market slow, there may be insufficient land to cater for lower density developments in the 30 to 50 dph range.
	PH2	Recognise the need to regenerate the Pathfinder area, but consider the best approach to take would be one of allowing a balance between renewing regeneration areas and building upon the success of popular, growing areas. Restraining growth outside market renewal and regeneration areas is not the correct approach to take.
	PH3	Support windfall housing schemes and are encouraged by the inclusion of a policy with specific reference to such types of residential development. However, the policy wording is too prescriptive and should not be restricted to housing development of 10 or more units. It should also be noted that there may be circumstances where development of Greenfield windfall sites should be considered.

Type of Response	Policy / Heading	Comment
	PH4	In connection with housing development and the use of brownfield land and buildings, the Core Strategy seeks to significantly raise the target beyond that set out nationally. Whilst it is appreciated that the area may have a greater proportion of industrialised and brownfield land, the fact that the build rates over the last few years have exceeded the Government target does not justify increasing that target to a much higher percentage. The fact that house builders are now becoming adept at tackling brownfield and contaminated land and exceeding targets surely means that the number of brownfield sites available for development is more likely to diminish over the plan period with the result that Greenfield sites may also be required to be brought forward. Any change of brownfield land target should be based on robust evidence and an investigation of site availability before arriving at a target. Greenfield development should not be restricted to that which is brought forward through Area Action Plan's and Allocations DPDs. Some Greenfield sites may be more sustainable and in more suitable locations than brownfield sites.
	PH5	Policy PH5 covers too many issues and if such issues are to be covered in the subsequent Development Control Policies DPD, do they need to be covered in the Core Strategy. The policy objective should be to create mixed and balanced communities, providing a range of house types to meet the full range of housing need and demand. This policy is too prescriptive and restrictive and is contrary to national guidance regarding housing mix. The principle of providing a mix of house types on sites to create mixed and balanced communities is not objected to, but it should not be so rigidly set. The delivery of a mix of housing types should be based on intelligent led Housing Market Assessment information whereby the mix of housing reflects the need and demand of the particular area. This policy needs to be supported by a Housing Market Assessment, which should be carried out with the involvement of house builders. In seeking to determine what is an appropriate policy approach to securing affordable housing provision, consideration has to be given to the effects on overall housing supply, particularly the viability of development sites, which is a key theme of draft PPS3. Setting a higher percentage target or lower site size threshold is wholly counter productive if that target or threshold impacts on development viability and so prevents sites coming forward, or if achieving that target means compromising so heavily on other policy objectives and planning obligation requirements that the overall quality of development is adversely affected. The threshold should be determined in negotiation with developers on a site by site basis taking into account the requirements of the site, financial and market considerations, the availability of grant funding/public subsidy and the type and extent of housing need in the locality as informed by a robust and up to date housing market assessment.
	PH6	Acknowledge the need and importance of delivering high standards of design in new development. The best approach to achieving this is through detailed consultation with the development industry, in order to establish what can realistically be delivered. The Barker Review recommends that a Code of Best Practice is agreed between the house building industry and CABI in terms of external design of new houses. This code will inevitably be useful to guide LDF approaches. As design is a subject high on the National Government agenda, the LDF should not be too specific with regards to design standards and should instead ensure that it complies with national design guidance. This will ensure that the LDF can be kept up to date with evolving national guidance as and when it is produced.
	Environment and Sustainable Development	Paragraph 1.8 of PPS12 makes it clear that planning policies should not seek to duplicate or cut across matters more appropriately within the scope of other legislative regimes. Energy efficiency in building use and construction is the responsibility of the building regulations Part L. The result of a recent review of these regulations is that all new homes built after April 2006 will be 40% more energy efficient than new homes built in 2002. That is a massive and extremely rapid improvement in performance and new homes are now many tens of times more energy efficient than the existing stock. There must come a point at which, if we are to make real efficiency gains, more attention is given to existing stock, rather than constantly going for the easy option of further restrictions on new building. These requirements are making new homes ever more expensive at a time when affordability is a serious concern and also at a time when these features are still not wanted by consumers. The requirement to provide at least 10% of the energy to be used in new development in a minimum threshold of 10 or more dwellings to come from renewable energy sources in EN2 point 4 of the option should either be removed or the threshold significantly raised as it is unworkable.
Making any other comment on the Core	LE2	Have no objections in principle to the provision to seek development contributions in larger developments, to assist lifelong learning and training of city residents to improve their access to the job market, but question how it will be implemented. More details are needed on this approach.

Type of Response	Policy / Heading	Comment
Strategy	EN5	Support the need to assess the supply of open space and keep up to date with the auditing of existing open space, in order to identify gaps. However, in terms of developer contributions, the consideration of bringing in a tariff approach to housing proposals is premature, bearing in mind PPS3 and PPG3 updates. Rather than commenting on the merits or not of introducing a tariff approach, this policy should be put on hold until Government guidance on developer contributions is clear.
Isle of Capri Casinos and Strawson Property (1472)		
Supporting part of the Core Strategy	Vision and Objectives	The vision to create a safe, sustainable, accessible and modern European City is supported.
	TC4	TC4, which seeks to improve the range of facilities and support the regeneration and enhancement of the City Centre, is welcomed.
Making any other comment on the Core Strategy	TC1	Through the CCAAP, a site specific allocation would seem appropriate for Pottery Lane noting the site's ability to accommodate a mix of major destination uses.
		In determining the definition of the City Centre, it will be important that the boundary is properly defined, reflective of the City's regional function. The previous boundary map of the City Centre is considered appropriate in this regard.
	TC4	Emerging policies for the Discovery Quarter in RSS (Policy 13) need to be facilitated by the Core Strategy.
Mr John Alan Joicey (576)		
Supporting part of the Core Strategy	Whole Document	As the Core Strategy is, it is interesting, easy to understand and receives full backing. There is no objection to any part of it as it stands. It is always good to know what is planned for the future.
Joint Advisory Group (Physical and Sensory Disabilities) (242)		
Making any other comment on the Core Strategy	Population and Housing	Regarding Para. A29, it is hoped that all housing should be designed to meet people's changing needs as they become older or acquire some form of disability. This issues should be at the centre of any policy and not tagged on the end as it seems to be here.
	Transport and Access	The Core Strategy provides an opportunity to promote inclusive environments. Provided detailed guides on Local Transport and Walking.
	Misc.	Given that the authority is responsible for Disability Equality in the same way it is responsible for Racial Equality, this document does not have Disability Equality at its core values. It does mention disabled people as regards housing and transport but not throughout the document. In Section E, for example, the issue of parking is discussed but there is no mention of what arrangements will be made regarding disabled parking facilities under the Blue Badge Scheme. With more disabled and older people being expected to work for longer, there is no recognition in planning terms of what the strategic issues will be for these groups. There has been much debate and many policy initiatives emanating from Government regarding the lengthening of the average working life before retirement and this will have an effect on the LDF. It seems that planning and transportation have not made connections with education and social services as part of the Core Strategy. This seems to be an opportunity missed.
Kenninghall Estates (718)		
Supporting part of the Core Strategy	PH1	Support focus in Part 2a of residential development within the Pathfinder area, although provision should also be made elsewhere in the City to maintain a balanced community.
	PH2	Support the focus on Pathfinder areas and the recognition that Byker and the Lower Ouseburn Valley should be developed for residential use as a priority.
	PH4	Support the focus of development on previously developed sites.
	EN4	Broadly support the recognition of the importance of character and local distinctiveness. However, the effect of over protection or prescription should be approached with caution.
Objecting to part of the Core	PH1	Support the population growth of the city, but believe it should be a higher growth and that Scenario A should be pursued rather than Scenario B.

Type of Response	Policy / Heading	Comment
Strategy	PH3	Object to the restriction of windfall housing as this approach could lead to less sequentially preferable allocated sites coming forward for development before more sequentially preferable windfall sites. This is contrary to PPG3. The Ministerial Statement of 17 June 2003 by the DPM on Housing (Planning) states: "Identifying sites on the proposals map allows allocation to be drawn on expeditiously if the monitoring required by PPG3 demonstrates that windfalls are not being realised as expected." Brownfield, sustainably-located windfalls should therefore come forward before allocated sites provided that they score equally or higher than allocated sites in the sequential test.
	EN2	Whilst we agree that renewable energy should be promoted, we object to the inflexibility of the policy. Not all sites are suitable for renewable energy and each proposal should be assessed on its merits to take into account the site characteristics and circumstances. For the policy to endure it should not refer to current specific standards which may alter.
Making any other comment on the Core Strategy	LE1	Support the Council's aim of providing business accommodation, but would note that PPG3 (as amended) encourages the use of surplus employment land for residential development. The City needs a framework which allows a flexible approach for land use at any one time.
Revd Dr Chris Knights (584)		
Supporting part of the Core Strategy	Population and Housing	Support goal of moderate population growth.
Making any other comment on the Core Strategy	Population and Housing	New houses do need to emphasise families, but near buildings and neighbourhoods need to be attractive, or else people won't like living in them and will seek to live elsewhere.
		What plans are there for community facilities and for places of worship in new housing developments?
	Environment and Sustainable Development	Please do all that you can to promote increased recycling and reduction of waste going to landfill. There should be kerbside recycling collections for cardboard and garden waste.
	Transport and Access	In promoting cycling as a form of transport, please examine provision for secure cycle parking, especially as many cycles these days have quick release wheels and saddles, etc.
		Travel to work distances need to be reduced for environmental reasons and for human flourishing reasons. Public transport needs to be made a more attractive option for all - this is about bus routes (e.g. from population centres to employment centres), the fact that public transport isn't cheap, the fact that the metro or equivalent does not extend into the West End.
	Misc.	Don't forget that human beings are body, mind, soul, spirit unities, not just bodies!
Newcastle needs to become a place where people are happy to live and to work. In planning for the West End, please be aware of the steep North-South hill and the problem this creates for those living in, for example Scotswood Village, with getting to Adelaide Terrace.		
Mrs Daphne McElderry (1477)		
Making any other comment on the Core Strategy	Population and Housing	More consideration needs to be given to eco-friendly aspects, e.g.. Solar panels, insulation, repairable (as opposed to replaceable) things
	Transport and Access	Need a reliable network of buses. Some way in which the bus times could all be predicted - not just a timetable which may / may not be strictly adhered to. Two minutes early is too early, but lateness at rush hour is understandable.
Cllr Lucy McKeever (647)		

Type of Response	Policy / Heading	Comment
Supporting part of the Core Strategy	Population and Housing	<p>Pleased that attention is now being focused on the considerable over-supply of flats in recent residential developments in the city. It is important that the Council is strong on this issue, as developers are continuing to propose intensive one and two bedroom flat developments, when there is simply no market for them. Furthermore, the report shows strong evidence that families are leaving the city because of a shortage of family-sized homes with gardens etc. The interim planning guidance on housing schemes of 10 units or more in non-Pathfinder areas has worked well in North Jesmond, and will hopefully continue to assist the Pathfinder areas, since purely 'market-led' or 'developer-led' housing development will only exacerbate existing imbalances. Regarding 'affordable housing', this term should never be used in policy documents unless accompanied by a meaningful, quantifiable measure of what exactly it means. Affordable for whom, on what incomes etc?</p> <p>Support the preferred option of scenario B for moderate population growth.</p> <p>Regarding student and shared housing, the work which is being done to develop this policy is welcomed. Although it is an SPD, shouldn't this policy receive more prominence in the Core Strategy too?</p>
	Town Centres, Shopping and Leisure	<p>Welcome policies to support local neighbourhood shopping areas and protect them from being over dominated by non-retail use. Para 2.24 refers to a 'crucially important independent sector which enables Newcastle to stand out from clone towns full of identical multiple shops', but the city centre shopping provision is not particularly diverse, and more should be done to encourage small specialist shops, crafts, co-operatives, markets etc. Furthermore, the 'clone town' is spreading to neighbourhood shopping areas - in North Jesmond, our thriving local shopping area has lost independent shops over the past two years, and seen the arrival instead of multi-national chains such as Starbucks and Subway. While much of this is down to market forces and global trends, more analysis about the state of our local shopping areas and the interventions which can be made needs to be carried out. Regarding Para E8, the popular Farmers' Market in the city centre shows there is an appetite for healthy, locally produced food, so why is it only available one day a month?</p>
	Whole Document	<p>Pleased that progress has been made over the past two years on some of the issues raised following the Key Issues Report, though obviously there is still a long way to go.</p>
Making any other comment on the Core Strategy	Transport and Access	<p>Generally agrees with the priorities, but as chair of the Newcastle Cycling Forum, would like to highlight that ST1h (extending the city wide cycle route network) can only be achieved with the necessary resources (officer time as well as funds) and enthusiastic support from the highest level. Far too much time on the Forum is spent dealing with issues such as bollards, bus stops and, yes, a bingo hall, being built on top of existing cycle routes, or trying to explain why 'decorative paving' (i.e. cobblestones) is a hopeless surface for a cycle path. Drivers wouldn't put up with it, so why should cyclists? There are so many European cities (sadly nearly all non-UK) which have got their cycling and public transport provision spot on and we must start looking at good practice from elsewhere.</p>

Mobile Operators Association (MOA) (1445)

Type of Response	Policy / Heading	Comment
Making any other comment on the Core Strategy	Misc.	<p>Have no objections to the Council's Preferred Options, but consider it important that there remains in place a telecommunications policy, but there is no reference made to telecommunications development. The formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being PPG8. We would suggest a policy which reads:</p> <p>"Proposals for telecommunications development will be permitted provided that the following criteria are met -</p> <p>(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;</p> <p>(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;</p> <p>(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.</p> <p>(iv) if proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.</p> <p>When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology."</p> <p>It depends on the Local Development Scheme as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate LDD or what is currently termed Supplementary Planning Guidance (SPG). This could then be read with PPG8, the Code of Best Practice to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and would suggest the following:</p> <p>"Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental Impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document.. .."</p>
WM. Morrisons Supermarkets Plc (284)		
Supporting part of the Core Strategy	TC1	Support TC1 as it is consistent with national policy guidance as set out in PPS6.
	TC2	Support TC2 as it is consistent with national policy guidance as set out in PPS6.
National Offender Management Service (NOMS) (1464)		
Making any other comment on the Core Strategy	Misc.	Both PPS12 and Circular 3/98 'Planning for Future Prison Development' highlight the need for guidance within the LDF on community facilities and infrastructure requirements, and that they should take account of the need for new prison developments (further explanation is given in the full representation). While there are no specific proposals for new prison development in Newcastle at present nor specific sites identified, a criteria based policy should be included to deal with a firm prison proposal should it arise during the plan period. A detailed policy for inclusion in the DPD is proposed and views on how this proposal should be taken forward are welcomed.
Newcastle Great Park Consortium (716)		
Supporting part of the Core Strategy	Population and Housing	The housing section of the Core Strategy states that the Newcastle population is still in decline and a key priority of the strategy is to stabilise and secure a modest increase in the population. This is welcomed and considered appropriate, consistent of the aims and objectives of emerging RSS and the Government's Northern Way, Sustainable Communities Agenda.

Type of Response	Policy / Heading	Comment
	PH1	Welcome the inclusion of policy PH1 which recognises the role of NGP in achieving population growth. Indeed, throughout NGPs history it has always been recognised as a central component of the Council strategy to stem population decline and out migration. Indeed, recent data from property sales in Cells H and I confirms NGP is now beginning to fulfil this most important role. Beyond this role, NGP is also a unique opportunity to create a sustainable community with employment and housing development in parallel. The development will provide key amenities on site and good pedestrian, cycle and public transport links to the surrounding area, fulfilling key objectives outlined in PPG3 (Housing), including delivery of greenfield and brownfield housing in parallel. Furthermore, the type of housing being provided is diversifying the City's housing stock through the provision of more family homes and executive homes in line with recommendations made in the Regional Housing Aspirations Study and Regional Housing Strategy which identified a requirement for more family homes across the city. This is a role NGP will continue to serve over the next 8 years or thereabouts, coupled with higher density and affordable units at the core.
	PH2	PH2 states that 18,000 homes are to be built across the City in period 2004-2021. Of these, 9,150 will be in Pathfinder areas which leaves the remaining 8,850 to be provided throughout the City. Subject to demonstrable progress within Pathfinder, and other sites throughout the City, it may be possible for NGP to ultimately accommodate further dwellings (through higher density development) within a sustainable framework, subject to a demonstrable requirement being identified. Accordingly, the Council's commitment to annual monitoring and a plan, monitor and manage system whereby future needs can be met in accordance with emerging policy PH4(2) is welcomed.
	Town Centres, Shopping and Leisure	The inclusion of TC2, which states that a neighbourhood centre will be provided within NGP, is welcomed. This reflects the aim to create a sustainable mixed use centre at the heart of NGP and proposals are currently before the City Council for 4,150 m2 of retail floor space which would meet this requirement.
Making any other comment on the Core Strategy	PH4	With specific regard to policy PH4(2), clarification is sought in relation to the average density per hectare being sought at NGP. Noting current restrictions on housing numbers, coupled with developable area, it is assumed this should be at 30 dwellings per hectare.
	LE1	<p>Note that LE1 records that NGP has been partly developed with a residual area capable of accommodating some 70ha of development remaining. This, in part, has the benefit of reserved matters planning consent and will be brought forward during the plan period in accordance with emerging RSS.</p> <p>Note that Newcastle Airport is also listed as a suitable site for office development. The policy also states that land allocated for the airport should be restricted to airport related uses except where their criteria meets that set out in draft RSS policy. This was a matter of some considerable debate at the RSS Examination in Public and until the Panel Report is issued the emerging RSS can only be afforded limited weight. Indeed, this is a view presented by the Council at the RSS EiP, representations stating that the Council were, "extremely concerned about the changing policy emphasis of Policy 21 for Airports and its potential impact on the Prestige Employment Sites in the City Region." The City Council's concerns over non airport related development are shared, and therefore it is surprising that the City have revised their policy in the Core Strategy document. The release of land for non-airport related developments would directly compete with and undermine the success of NGP, to the detriment of this nationally important business park. Therefore, LE1 should be amended to remove the reference to the draft RSS criteria, thus restricting land allocated for the airport for airport related uses only.</p>
Newcastle International Airport Ltd (NIA) (316)		
Supporting part of the Core Strategy	Population and Housing	Require that the LDF give full consideration to the safeguarding process in terms of housing design and area allocations, which could affect the design of residential areas within 15km of the airport. It needs to consider the height of buildings, lighting, building materials and water features as well as landscaping. There is need to consider the siting of residential areas in close proximity to an expanding airport in terms of noise. This element needs to be appropriately assessed as a material consideration when determining development proposals.
	Local Economy	The Future of Air Transport White Paper (Dec 2003), which constitutes current government policy in regard to NIA, broadly supports the proposals within the draft Airport Masterplan and this therefore needs to be reflected in the LDF. The Masterplan document outlines all of the proposals for the airport which is consistent with the current land allocations in the UDP. The carrying forward of this land allocation is therefore supported (see B14).

Type of Response	Policy / Heading	Comment
		Supports the inclusion of the supply of business land at the airport. Further expansion of NIA includes the development of non-airport related activities, which will be essential to meet the predicted growth levels of the airport as well as supplying significant employment and growth of the regional economy.
	LE1	Support the redefinition of airport related uses within the RSS document and the need for this to set out the policy to assess appropriate uses within the LDF document.
	Environment and Sustainable Development	Welcome the policy of keeping the greenbelt unchanged. Public safety zones exist within the greenbelt at either end of the runway and protection of these areas is vital for public safety. The provision has been made within the Masterplan document for a possible 345m+ runway extension to the eastern end of the runway. This development can be accommodated under the greenbelt designation as the development will not impact on the greenbelts primary function of retaining openness between developments.
Making any other comment on the Core Strategy	ST1	Support ST1j in regard to surface access and the need for sustainable transport to the airport. Careful consideration is needed for policies regarding the Airport, as public transport is not always viable for shift workers or some travellers from wider catchment areas. The City Council should also consider re-wording the policy in order to link the development of car parking to the provision of public transport alternatives and the demonstration of demand, rather than restricting it.
	ST2	Further consideration should be given to The Northern Gateway Link between Newcastle Great Park and NIA, with the possible re-wording of this section. A public highway link road in this location cannot be supported due to the operational requirements of the airport, but a limited access link may be supported.
	Misc.	The airport is a key regional asset and this should be reflected in the LDF as in the RSS. Therefore, a paragraph should be incorporated within the early part of the document to acknowledge the airport as an International Gateway and a key transport hub for the region.
Newcastle upon Tyne Hospitals NHS Foundation Trust (331)		
Supporting part of the Core Strategy	Population and Housing	Welcome the focus on the use of brownfield sites and the provision of affordable housing, which is an issue for the NHS in the recruitment and retention of key staff groups, who may not be able to afford the substantial housing prices seen in some areas of Newcastle.
	Environment and Sustainable Development	Support the ambitions of continuing protection and enhancement of green space, historic buildings and landscapes and wildlife and their habitats.
		Support the wider environmental initiatives and the Trust plays its own part, through the use of a CCL-exempted-energy-efficient Combined Heat and Power plant, further development of energy conservation measures and contributions to the Waste Management Strategy.
Town Centres, Shopping and Leisure		Support the proposals to aid the regeneration and growth of areas in the West End, Walker Riverside, Newcastle Great Park and the City Centre/East Quayside/Ouseburn, recognising the need for good quality retail outlets, particularly for food, to be available in all localities.
		Welcome the link between the LDF and the Statement on Licensing Policy, as the organisation who "picks up the pieces" of the problems associated with drinking and alcohol-related violence.
Making any other comment on the Core Strategy	Population and Housing	Modest growth of 5.75% over 15 years will be sustainable, without placing undue strain on wider infrastructure, including hospital and other NHS services.
	Local Economy	The Trust is pivotal to the Science City initiative and will seek to work in even more effective partnership with the Universities and Newcastle College with regard to economic stimulation and job creation. As a major employer, the Trust is keen to further develop the opportunities to "grow our own" staff.
	Environment and Sustainable Development	The Royal Victoria Infirmary is a landmark site close to the city centre and the new developments on the site have been commended by the Commission on Architecture and the Built Environment. Future development will be sympathetic to the existing and developing "streetscapes."
	Transport and Access	Continues to develop and promote a Green Transport policy. Public access to the Royal Victoria Infirmary site in particular will be an issue, as the levels of patient care activity increase in future years as the current developments come on stream.

Type of Response	Policy / Heading	Comment
		Recognise that Trust sites are generators of significant traffic volumes and will continue to play its part through its Green Transport policy, parking controls and partnership working with local bus companies, to constrain its own impact on the City Centre. The Royal Victoria Infirmary site is an important adjunct to the University of Newcastle campus and the Science City and University developments will be of particular importance.
NewcastleGateshead Friends of the Earth (728)		
Supporting part of the Core Strategy	Vision and Objectives	Welcome the incorporation of a commitment to reduce carbon emissions in Objective 3 (p15), which is key if the city is to act on both its local and global responsibilities.
Objecting to part of the Core Strategy	EN2	<p>The "strategic" nature of climate change emissions resulting from the aviation industry is identified as justification for the LDF to take a neutral stance as regarding expansion of Newcastle International Airport (Para. C13). This position is unsound and should be reconsidered in light of the following:</p> <ol style="list-style-type: none"> 1. Carbon dioxide emissions are no more or less "global" than those from housing or terrestrial transport which are considered as significant throughout the strategy; 2. A neutral stance is inconsistent with intent of the Nottingham Declaration on Climate Change identified earlier in the strategy; 3. Arguments as to the importance of NIA to the local and regional economy are often overstated with limited qualification; and 4. To deny that any emissions (if not the majority) can be attributed to the city's activities is unquestionably false. <p>The growth of aviation emissions should be subject to the same consideration and scrutiny as housing and other transport activities and policy EN2 should be amended as such. Suggested wording for policy option EN2.5: "Development proposals for Newcastle International Airport must be consistent with Core Strategy Spatial Objective 3 - To reduce carbon emissions and combat climate change"</p>
	SA	<p>Considering the appraisal of options for the Local Economy (Airport site) page F-23 of the Draft SA report, it is clear that option B will inevitably result in increased out-commuting to the airport (with the resulting transport and environmental implications) and will potentially undermine regeneration efforts in more central areas. However, this is not recognised at all in the appraisal of the two options. Our specific comments are as follows (numbered according to the objective numbers in the appraisal):</p> <ol style="list-style-type: none"> 1. How can option B promote strong and inclusive communities, suggested? It is not clear how either option can have a significant impact in this regard, although one could argue that the encouragement of out-commuting could undermine community. 2. The increased out-commuting caused by B will lead to increased pollution and, therefore, negative impacts on health. This is not recognised. 4. It is suggested that because the airport is served by the Metro, option B will lead to better accessibility. By the same token it could be argued that because the Metro Centre is on a train line and has a bus station, focusing more retail development there rather than the city centre will improve accessibility. The best way to ensure good accessibility for jobs, facilities etc. is to focus them on existing town and city centres. This is also consistent with other policies on urban regeneration, retail etc. 8. The increase in out-commuting from option B will increase its contribution to climate change. However, you suggest the impact will be neutral – this is very unlikely. 9. It is suggested that both option A and option B are neutral in terms of making better use of resources. However, option B represents a policy of dispersal rather than concentration and would therefore constitute an inefficient use of land, given the major brownfield sites available within the city. 11. It is suggested that both options will have a positive impact on local air quality. This seems a bizarre assessment. Both will clearly be negative in this regard, but option B more so because of the likely increase in cars travelling to the airport. 13. Development at the airport will be on out of centre sites which are likely to have biodiversity interest. How can option B be neutral in this regard as suggested? 14. It is suggested that both options are neutral in terms of landscape impacts. However, since B is likely lead to more development, B will surely do more damage than A.

Type of Response	Policy / Heading	Comment
Norland Construction Ltd (1468)		
Objecting to part of the Core Strategy	PH1	Restraining house-building outside the BNG Pathfinder area does not recognise the geographical boundaries of local housing markets and distorts the ability of the market to deliver a choice of housing in locations that respond to local needs. This is contrary to the emerging PPS3 and runs contrary to the sustainable communities agenda.
		The regional population figures and consequently the Newcastle housing targets have been challenged at the recent RSS Examination in Public. To assume the strategic approach to growth identified in PH1 is premature, until the outcome of the RSS examination is known and housing allocation figures confirmed.
	PH2	The land between the Prestige Employment Site at Newburn and the population growth area at Benwell/Scotswood should be incorporated into a renewal area to allow the comprehensive redevelopment of the north bank of the river to take place. The Benwell Scotswood Action Area Plan should be extended to the west up to the north bank of Lemington Gut on both sides of Scotswood Road in order to achieve this.
	PH3	The criteria for granting of planning permission for windfall sites should allow for the regeneration of the area of land between Newburn Prestige Employment Area and the Benwell/Scotswood Area Action Plan to allow for the comprehensive redevelopment of the north bank of the River Tyne.
	PH4	The target set of 80% brownfield development should not be a target set "over the plan period as a whole" but should be a minimum requirement set for each part of the plan period including 2004 -2011 in order to deliver sustainable development on brownfield land.
	LE1	Mixed use developments should be allowed not only in the Ouseburn but at Lemington Gut to support the Newburn Riverside employment area and to allow development to take place that will service and support the primary employment use.
	EN4	Subsection (b) of this policy conflicts with policies PH2 and PH3 as sustainable communities require a choice of housing to meet local needs in line with the emerging PPS3. Restraining housing development outside the BNG Pathfinder Area is not sustainable to those communities that fall outside the Pathfinder boundary.
Northern Development Company (1470)		
Supporting part of the Core Strategy	Vision and Objectives	Support the general aim and objectives of the Core Strategy
Northumberland and Newcastle Society (265)		
Making any other comment on the Core Strategy	Vision and Objectives	Reference to working with partners to '..bring forward development in the right place at the right time..' (p15) sounds more than a bit pretentious and very unlikely!
		Under the Core Strategy Spatial Vision there could be a mention of a City celebrating cultural diversity and enjoying a visually stimulating townscape, rich in its architectural heritage. Plus a City which treasures its historic heritage and public art forms. Also, one that not only welcomes visitors, but new people making their lives in the City.
		On p13 there is a rather insidious reference to building on the heritage, cultural and economic strengths of Newcastle and the civic pride of '..our people' plus '..improving the quality of life of our people in our communities..' This hardly sits with an idea of Newcastle being a very inclusive and socially rich and diverse place, and one that is open to change as new cultural groups arrive. Better to say '..the people of Newcastle and its diverse communities..'
		References on p16 to seeking an attractive City Centre should include things about reducing noise and light pollution and unnecessary advertisement clutter; something about saving historic buildings and those which significantly mark the character of the centre by their special architectural and historic interest; and maybe mention about seeking partners and resources to achieve this. There is one token reference to reducing light pollution on p44 (C12), but it doesn't go far enough and needs to be stated much firmer!
	EN5	It is right to link EN5 with health, but there is no mention anywhere of allotments! Given the strong demand in parts of Newcastle and the wider focus on healthy eating (mentioned somewhere else, once, in a rather idealised reference to communities), there ought to be a special focus on allotments as a linked health and recreation issue. It is a related housing issue where tenants of flats may not have access to gardens.

Type of Response	Policy / Heading	Comment
	Misc.	<p>In p5 of the Summary document, negatives such as "...developments that deter crime" should be avoided. The built environment might be exploited by criminals, but it doesn't actually cause the crime! Better to say more positive things such as "...encourage safety and encourage a strong sense of community through good design."</p> <p>In p5 of the Summary document, trees and landscaping should be mentioned as the main document appears to do this. There is no mention of a need for toddler and children play spaces.</p> <p>On p7 of the Summary document, there needs to be a specific reference to protecting existing shopping frontages by curtailing ad hoc supermarket proposals beyond.</p> <p>In p6 of the Summary document, in relation to the quality of the city centre environment, something should also be said about eradicating noise and light pollution. There is nothing about getting homes back into City Centres, which is a national policy, so keeping noise and light levels down is important from an amenity aspect as it is in relation to sustaining an efficient use of scarce resources and going for sustainability and better health. There is talk of "...examining the road network" but no explanation. Why? A more positive pedestrian environment could be mentioned, looking at the impact of vehicular traffic on the wider environment and seeking to reduce the barriers for people with disabilities given the new disability law!</p> <p>In p3 of the Summary document, besides identifying that "Housing is about communities with good local schools, transport, open space & shops..", it is more fundamentally about services, jobs, recreation and good accessibility, especially for younger people and those without private transport, including those with mobility problems such as people with disabilities and older people.</p> <p>On p7 of the Summary document, vague reference is made to "...dealing with anti-social behaviour, crime & disturbance." A more neighbourly relationship to nearby homes and measures to protect residential amenity and the character of residential areas should be pursued.</p> <p>On p7 of the Summary document, the minimisation of car borne traffic and enhancing individual mobility, via an improved public transport system and creating better facilities for people with disabilities and poor mobility due to age, should be stressed.</p>
Northumberland County Council (262)		
Supporting part of the Core Strategy	Local Economy	The City Council proposes to undertake a comprehensive study of the city's employment land allocations to better align supply with the requirements of the Submission Draft RSS. This review is supported in principle, whilst noting that in the medium to long term shortages of employment land are anticipated.
Objecting to part of the Core Strategy	PH1	It is noted that the 18,000 new homes referred to in the policy relates to gross build rates, and whilst there is no direct comparison with figures contained within the emerging Draft RSS on a local authority basis, information on demolitions have been provided within the Core Strategy. These indicate that the net build rates for the three time periods are 700 per annum for the period 2004-2011, 850 per annum for the period 2011-2016 and 850 per annum for the period 2016-2021. Examining these figures against the net figures contained in the emerging Draft RSS, this equates to an additional 50, 80 and 70 units per annum respectively. It is unclear which factors are relevant to warrant the difference between the Core Strategy housing figures and the figures emerging from the Draft RSS. The figures contained in the Core Strategy may revolve around the scale of future demolitions, which can be difficult to predict particularly in the long term. Further clarification on this matter is required. In addition, the level of clearance compared to the figures contained within the Draft RSS would also appear to be relatively low.
	Local Economy	Whilst Policies LE1 and LE2 are supported in principle, it is considered that there are minimal references to the overall economic policy thrust of the Submission Draft RSS, the Northern Way Growth Strategy and the City Region Development Plan within the Competitive Local Economy section. The Core Strategy should be amended to take account of this justification to support the approach adopted in the draft plan.

Type of Response	Policy / Heading	Comment
	Environment and Sustainable Development	Whilst it is accepted that the Submission Draft RSS does not provide an annual waste apportionment to waste planning authority level in Tyne and Wear, it is considered that the Sustainable Waste Management section of the Core Strategy should contain a commitment by the City Council to playing a role in managing the waste that is produced within the City, in contributing to regional self sufficiency for waste types and in implementing the waste hierarchy. The approach as currently outlined would appear to direct a large amount of policy formulation towards the Development Control Policies, Areas Action Plans and Site Specific Allocations DPDs and the Core Strategy does not appear to give the strategic guidance to help these documents undertake this work in a sustainable way. The Sustainable Waste Management section is very much focussed on municipal waste, which the City Council is responsible for as a waste disposal authority. However, a larger amount of commercial and industrial waste is also produced and there is the need to provide facilities to cater for this type of waste. This section of the Core Strategy therefore should address all waste types. The Submission Draft RSS and the background work which informed its preparation provides information on waste types, other than municipal waste, which should assist.
	EN1	The City Council proposes to reaffirm the existing extent and boundaries of the Green Belt, and maintain policies for its protection on enhancement, through the Site Specific Land Allocations DPD. It is noted that the green belt is identified on the proposals map associated with the Core Strategy and PPS12 (Para. 2.20) indicate that where green belt boundaries are defined on proposals maps they need to be linked to a policy. It is therefore considered that Policy EN1 should be amended to state that the existing green belt boundary is to be maintained and defined on the proposals map, rather than referring to another DPD. In addition to the regional role and purpose of the green belt which are set out in regional guidance, the Core Strategy should contain a justification for the role and purpose of the green belt at a local level within the plan area.
	Transport and Access	Policy ST1 is supported in principle, but it is considered that Para. D4 of the supporting text would benefit from references to the Northern Way Growth Strategy, the City Region Development Plan and the Regional Transport Board, as contributing to policy formation at a regional level.
	Town Centres, Shopping and Leisure	<p>Paragraph E11 on comparison goods and city centre shopping notes the City Wide Retail and Leisure Study 2005 estimates growth in Newcastle residents' comparison goods spending would support an additional 25,000m² floor space by 2016. This would increase to 42,000m² by 2021. Whilst reference is made to regional retail and leisure capacity studies from the North East Assembly and their conclusion that a higher level of demand exists from retailers for new or better representation in the City Centre, this level is not quantified. It would be appropriate to attempt to quantify need in this respect. It would also be necessary to include reference to the 30,000m² net additional floor space to be created by the Eldon Square redevelopment scheme which is approved and currently in progress. This commitment must be factored into estimates of future needs and capacity. Such matters should not be determined wholly by reference to retailer demand.</p> <p>Paragraph E6 on local convenience shopping identifies future capacity across the city to support 2,500m² net floor space to 2021 for local shopping. Policy TC2 lists five Local Shopping Service Areas (LSSA) all of which serve identifiable communities. However, the policy includes the North West LSSA at Kingston Park District Centre, which needs to be clearly defined in a future DPD to exclude further expansion of the wider area of Kingston Park as a sub-regional comparison or convenience goods shopping destination. It would be appropriate to disaggregate the city-wide estimates of future spending identified in paragraph E6 to align with the identified Local Convenience Shopping priorities in Policy TC2 in future DPD's.</p>
	TC3	Point 2 of Policy TC3: Comparison Goods and City Centre Shopping indicates that the sequential approach should be applied to any proposals outside the shopping core for comparison goods development proposals above 1,000m ² gross floor space. In accordance with PPS6, the sequential approach should be applied to all development proposals for sites that are not in an existing centre nor allocated in an up-to-date DPD. Point 2 of Policy TC3 should be redrafted to address this matter since it currently implies that a sequential approach need not be applied anywhere outside the shopping core for developments smaller than 1,000m ² .
Northumberland Estates (401)		
Supporting part of the Core	PH1	Support Scenario B, moderate population growth for 285,000 population target. Consider a critical monitoring of delivery is undertaken to ensure that the target areas are delivering housing requirements to reverse population loss, and meeting needs of the housing market.

Type of Response	Policy / Heading	Comment
Strategy	ST1	Should also include support for improvement to A1 Trunk Road as main strategic road through Newcastle.
Making any other comment on the Core Strategy	PH2	Redistribution should be considered not only within pathfinder areas, but between pathfinder and the rest of the city if monitoring shows pathfinder not to be delivering needs of housing market and therefore not preventing population loss. If market needs are not met then population will be lost to city as a whole.
	Monitoring and Implementation	Importance of monitoring and review should be included in Core Strategy. This is particularly important both to ensuring that delivery, in particular in respect of population growth, is being achieved, and secondly to respond to future national / regional guidance, e.g.. Emanating from the Barker Report.
Northumbria University (727)		
Supporting part of the Core Strategy	PH1	Support the level of population growth in principle, but would encourage higher growth.
	PH4	Support the focus of development on Brownfield sites. Broadly support the proposed density levels. However, the policy lacks flexibility to deal with need or exceptional circumstances, including site specific limitations.
	PH5	Support the recognition in PH5 Part 1a and Paragraph A30 of the need for family housing, but are concerned that the Core Strategy must prioritise this need even when this may be contrary to other policies. This need should explicitly be given significant weight as a material consideration which can be weighed in the balance and if appropriate overcome other policies.
	LE2	Support the Council's backing of the Universities.
Objecting to part of the Core Strategy	PH1	Part 2c does not allow flexibility to create balanced communities city-wide. The strategy must allow sustainable development on suitable sites in the city, to meet the needs of the existing population; allow for population growth; and reduce the need to travel in accordance with Policy EN2.
	PH3	Object to the restriction of Windfall Housing. This approach could lead to less sequentially preferable allocated sites coming forward for development, before more sequentially preferable windfall sites. This is contrary to PPG3. The Ministerial Statement of 17 July 2004 by the Deputy Prime Minister on Housing (Planning) states: "Identifying sites on the proposals map allows allocations to be drawn expeditiously if the monitoring required by PPG3 demonstrates that windfalls are not being released as expected." Brownfield sustainably-located windfalls should therefore come forward before allocated sites provided that they score equally or higher than allocated sites in the sequential test.
	PH5	Strongly encourage the City Council to engage in dialogue with the Universities and higher education establishments with reference to policies PH5 Part 2b and Para A31, regarding student accommodation. Refer the Council to our previous representations on the first draft SPD on Student Housing, which proposed the ASHoRe. This strategy would not allow sufficient student accommodation to come forward to provide for existing and proposed student numbers in the city. The Core Strategy should include a positive approach to promote new and quality accommodation for students and allow the replacement of existing poor quality accommodation for any shortfall in building permissions.
	EN2	Agree that renewable energy should be promoted, but object to the inflexibility of the policy. Not all sites are suitable for renewable energy and each proposal should be assessed on its own merits to take into account site characteristics and circumstances. For the policy to endure it should not refer to current specific standards which may alter.
	EN5	Object to Part B as when existing open space is no longer required or is proposed to be developed, there may be exceptional circumstances that over-ride the need to assess its potential for meeting other local or wider needs. This should be provided for within the policy. Object also to the blanket aim of 'access for all'. Although access may be appropriate in certain circumstances, owners of land and property expect to be able to use or develop their land as they judge best, unless the consequences for the environment or the community would be unacceptable. This policy as drafted may not deliver best or most appropriate use of land or resources.
Making any other comment	PH1	Please clarify in the policy whether part 2b refers only to existing permissions at the Great Park, or whether additional Greenfield development is proposed/expected.

Type of Response	Policy / Heading	Comment
on the Core Strategy	EN4	Broadly support the recognition of the importance of character and local distinctiveness. Would caution, however, as to the effect of over-restriction, with particular reference to Part C of the draft policy. There are concerns that a new, wide ranging designation of a conservation area in the City Centre would prevent the necessary growth of the City and its Universities. There are also concerns relating to the over restriction of development and demolition and re-use in relation to buildings that may be affected by the proposed 'local list'.
	TC4	Sport and physical activity, expressed through an engagement with local clubs and centres, universities and commercial sport and leisure organisations, offers a positive environment through which we can broaden the appeal to a wide range of people. The lack of reference to sport and active recreation is an issue that can be overcome through a recognition of the role that local clubs, the two universities and professional and commercial partners can make. The strategy needs to move forward with a recognition that partnerships and contributions can make a difference, endorsing schemes and projects such as facility developments, which benefit the city and the region. Northumbria University is an important contributor in the development of a widening leisure base, one where the community as a whole will be advantaged.
	Misc.	Regional documents promote the economic role of the Universities and Colleges (see RPG1 Section 4.3b, draft RSS Policy 14 and the Regional Economic Strategy). To accord with these Regional Documents, the Core Strategy should include a positive policy to recognise the importance of the Universities and Colleges and allow for their growth.
Northumbrian Water Ltd (15)		
Supporting part of the Core Strategy	EN1	Support reference to sustainable urban drainage systems in EN1f and request a more explicit reference to minimising risk of pollution.
Objecting to part of the Core Strategy	EN2	Request more explicit reference to water efficiency and conservation measures in relation to ensuring that future development proposals contribute towards the achievement of Green Standards.
	EN3	Request more explicit reference to sewerage treatment.
One NorthEast (32)		
Supporting part of the Core Strategy	Vision and Objectives	Welcome the Council's intention to seek brownfield regeneration through the LDF process and that the LDF will also respond to the Northern Way initiative and the Tyne and Wear City Region Development Programme.
	Population and Housing	Welcome the recognition of the contribution that the Bridging NewcastleGateshead programme will make to achievement of housing mix.
		Welcome Strategic Objective 1 which seeks to increase population growth through the maintenance and creation of sustainable communities planned to meet the full range of housing needs.
TC4	The reference to quality of new build and the relationship between leisure and residential uses is an important aspect to ensure the conflict between these uses is minimised and residential amenity is adequately protected.	
Objecting to part of the Core Strategy	Local Economy	Manufacturing employment is in decline, but because of productivity improvements in the sector, manufacturing outputs continue to be an important part of regional GVA and are likely to remain so in future, notwithstanding structural change. Consequently, there remains a need for industrial accommodation to respond to the needs for servicing and warehousing required to enable the city to function satisfactorily. The sites named in the document may not adequately fulfil this requirement.

Type of Response	Policy / Heading	Comment
		It is recognised that some development at airports is directly related to the function and operation of the site and these uses are specifically defined in the Draft RSS and current Council policies. However, it is also recognised that airports can be attractive sites in their own right as businesses are attracted by the proximity to the airport and/or the prestige of an airport location amongst other factors. There is a market in the provision of accommodation for uses which, whilst not directly related to the function of the airport sites, would not locate elsewhere in the region and instead would seek an airport location elsewhere. Clearly this type of development is a specific additional opportunity that can only be realised outside the strict definition of directly airport related. It is for these reasons that the development/use of land at the airport should not be restricted to airport related development but rather consideration should be given to widening the use to allow employment uses B1, B2 and B8 development on the surrounding airport land and therefore creating additional employment opportunities which without the airport might not locate within the Tyne and Wear sub-region. This would enable NIA to compete for future inward investment at the same level as other regional airports. A sequential approach to such proposals would ensure that a balance is achieved between the need to develop the region's various high profile sites and to maximise the benefit for the specific development of land for airport uses.
Making any other comment on the Core Strategy	Vision and Objectives	The loss of population from the city is an important issue, but it is considered that this loss is as much a symptom of other factors which should also provide the focus for the strategy, namely the need for the city's economy to better realise its potential, lack of choice of homes and quality of place.
		Welcome the economic objective set out in the Spatial Vision. However, given the importance of Newcastle in the region, the objective and the issues around economic development generally should be afforded a higher priority in the Core Strategy.
		The emergence of the knowledge based economy is increasing the importance of conglomeration of economic activity in certain sectors and hence increases the potential economic importance of the urban core. Consequently, more emphasis should be placed on the potential and impact for this type of policy within the City.
		Objective 9 should include reference to the City Centre's role as a business and economic centre, involving offices and, as Science City emerges, research facilities.
		Given the success and importance of the city's role as a 'city break' destination, there should be more explicit reference to the visitor economy within the document's strategic context.
	Local Economy	<p>The proposed option (b) for dealing with the national supply of general employment land resource, namely by carrying out a comprehensive study of the city's employment needs, particularly to inform the Site Specific Land Allocations DPD, is the preferred option.</p> <p>An office employment element should be included to ensure that the scope to increase office floor space and density in the city core is addressed. It is important that the LDF plans positively for office development in Newcastle at this stage, particularly given the stance on offices adopted by PPS6. Sites need to be provided and/or redevelopment opportunities positively supported by the planning system and setting out this intention in the Core Strategy will set the agenda for other DPDs within the LDF. This aspect has begun to be answered in the economic section of the document but there is insufficient reference to this important objective in the overarching sections earlier in the document.</p>
Misc.	Within the economic context further details and advice relating to the regional economic context; One NorthEast's investment priorities; the employment land database; housing market renewal; and skills policy can be provided.	
Mr & Mrs O'Neil (696)		
Supporting part of the Core Strategy	Whole Document	Agree that the LDF needs to plan for sustainable communities and consider communities in the round.
		Agree that much of the City's affordable housing stock is concentrated in unpopular former industrial wards which have some of the country's highest levels of multiple deprivation and linked problems such as crime and ill health. Land located on the urban fringe could be released for predominantly affordable housing in a sustainable location within easy access of Newcastle International Airport, a key services based employer. There are concerns in respect of a heavy concentration of one housing product - apartments and flats - and a shortage of new sites for houses with gardens suitable for family use.

Type of Response	Policy / Heading	Comment
		Agree that the biggest issue facing the City is steady population decline which reflects particular local problems in the City's economy and housing markets and that the aim of the Authority should be to provide housing in locations where it is demanded. The City has a central role in the region's economy and whilst land is required for commercial uses it is also required for housing supply in sustainable locations to enable the continuing growth of the economy. It is essential to provide investment to the housing market in order to stimulate movement within the economy.
	Vision and Objectives	Agree with Spatial Objective 1 in so far as development should promote strong, sustainable housing markets and that the Authority shall seek to meet all types of housing needs. Objective 5, in respect of promoting a competitive and stable local economy, is noted and it is considered that commercial and housing growth should go hand in hand.
	Population and Housing	Agree that sustainable communities should be seen as the priority for the City (Para A3).
		Agree that some areas of open space may be more productively used for housing than certain areas of previously developed land (Para A18).
	PH2	Welcome the allocation of houses for Site Specific Land Allocations DPD and windfalls. Ask to be consulted in respect of the preparation of Site Specific Land Allocation Documents. With respect to Site Specific Land Allocations, it is noted that in the North Newcastle area, Policy PH2 seeks to support the emerging Pathfinder North Central Regeneration Plan at Blakelaw, Cowgate, Fawdon and Kenton. It is submitted that our clients' land should be considered alongside this scheme. The land is situated in close proximity to both Blakelaw and Kenton.
	PH5	Broadly support PH5 as sizeable house price inflation combined with a reduction in the supply of social housing has resulted in a marked increase in the need for affordable housing. It is considered that affordable housing in a location on the urban fringe would be welcomed, especially if in close proximity to the North Central Regeneration communities of Blakelaw and Kenton and the accessibility to public transport.
	LE1	LE1 seeks to provide land for airport related development at Newcastle Airport, which is welcomed as the Airport is a major centre for employment growth. On land located in close proximity to the A696, the main road system into the Airport, any housing would be readily accessible from the Airport or from the City.
Objecting to part of the Core Strategy	Whole Document	Disagree that there is no need to change the Green Belt boundary. Land in close proximity to the Airport and a primary transport route, for example, would provide an opportunity to provide key worker and affordable accommodation with minimal interference to the landscape. The growth of the Airport and the demand for housing necessitates a re-appraisal of the Green Belt boundary. Such land can be made available for housing and the provision of at least 50% affordable housing on such sites would benefit the neighbouring communities. There are exceptional circumstances to justify the release of sites from the Green Belt for this purpose. Sites on the urban fringe do not intrude in the landscape and the inclusion of such sites in the Green Belt does not assist in safeguarding the countryside from encroachment. Furthermore, the sites do not provide opportunities for recreation and their continued use for agriculture would have limited appeal.
	Population and Housing	Problems of low demand and lack of investment in the Bridging NewcastleGateshead Housing Market Renewal Pathfinder areas is noted (Para. A2). These wards, however, should not constitute the only areas of land released for affordable housing in the City. Disagree that the RSS housing allocation should focus solely on the regeneration of the areas of the Pathfinder Housing Market Renewal for the first five years of the LDF. Where other suitable, sustainable locations exist, particularly for affordable housing, these should be brought forward. The Pathfinder areas do require inward investment, but the key stimulus to this regeneration is private house building which will only be provided where the population demands it. If adequate services, jobs, employment, schools and shopping facilities are not provided first it is impossible to create demand for people to live in these areas. For this reason, the priorities for house building allocation in the Pathfinder areas are excessive. It should also be noted that there might be a lag in housing supply while the Pathfinder areas are in an early stage of their redevelopment. Alternative housing sites would no doubt be in higher demand by families because of their accessibility, proximity to facilities and schools in the adjacent communities and proximity to employment opportunities including the Airport.

Type of Response	Policy / Heading	Comment
		Disagree with Option B and favour Option A for population growth (Para A5). The Authority should push progressively to achieve a substantial population growth. Substantial population growth and increased housing provision will stimulate activity in the economy and help to reduce house prices associated with under supply. It should be the aim of the Authority to provide affordable properties in areas where housing needs and demands are at their highest. The sites at the urban fringe in Westerhope would help to meet the potential demand in the housing market to assist with achieving sustained population and employment growth.
	PH1	Sub-section 2c of PH1 should be more robust in its support for house building in areas outside of (a) and (b) which contribute to the Spatial Objectives. The Policy should encourage development in areas which are sustainable, can support a local economy, can provide family homes and which feature significant proportions of affordable ownership, notwithstanding that they lie outside of the Pathfinder areas.
	PH3	Policy H4 of RPG1 states that 60% of additional housing should be provided on brownfield land by 2008, rising to 65% by 2016. These targets are incorporated within Policy 30 of the Submission Draft RSS. PH3 does not take into account development opportunities on greenfield land and should contain a policy for rural exception sites. It is submitted that sites located in areas which would be eligible for affordable housing, but are subject to restraint by the Green Belt, could be promoted as rural exception sites.
	PH4	Object to PH4, which states that 80% of all new housing to be built on previously developed land as this is far in excess of the targets set by the RSS.
David Rochester (1199)		
Making any other comment on the Core Strategy	PH3	Concerned about high density housing and the potential difficulties this may cause in the future. People and especially families need space and greenery, preferably their own garden.
	Environment and Sustainable Development	Strong support for improving the spaces and streets between buildings. More greenery is needed, especially trees which can transform otherwise drab and featureless housing areas. Please ensure there is adequate revenue funds to maintain the newly renovated parks. Please plant more trees in the city centre (Monument, Grey Street, Grainger Street, Nuns Street for instance). See what Gateshead can achieve! Much better housing design needed.
	Town Centres, Shopping and Leisure	Support for making the city centre more relevant for a wider range of people, not just party goers. Improve toilet facilities which are now much worse than any continental city. Much more greenery and trees needed. Create new park areas using town moor (extending Exhibition Park westwards to Cow Hill as a botanical garden for instance). Northumberland Street is a mess and jumble of poorly designed buildings.
	Misc.	The City is clearly a better place to live than 20yrs ago. It feels a better place. However, there is much still to do. Concern raised about the folly of high density housing as people need space and greenery. All planning applications for new development should include improvements to the immediate environment by way of trees or green spaces even if this reduces the size of the development. Many more of the poorly designed 60's and 70's buildings need to come down (Douglas House and much of Northumberland Street). Give us a proper Botanical Garden on Cow Hill - Exhibition Park and link it to the university. This would be an asset for future generations.
Royal Mail Group Plc (828)		
Making any other comment on the Core Strategy	ST1	ST1 states that priorities for the early years of the LDF should define locations for areas of traffic restraint including control over speed and volume of traffic in order to improve road safety and enhance neighbourhood amenity and environmental quality. Although the aims of this priority are supported, assurance is sought that such initiatives such as traffic restraint and speed restriction zones would not significantly undermine the operations of the Royal Mail, who require access in and around the city centre.
	ST2	Welcome the initiative proposed in ST2 suggesting improvements to the highways network and transport infrastructure, but would like to see further clarification surrounding the paragraph that states "development proposals should also contribute to the resultant need for such improvements". There is a lack of clarity surrounding this text, for example, does it relate to all types of development or just in relation to housing etc? This issue perhaps should be covered within a SPD, but if this is the case then this should be stated within this document.
Royal Society for the Protection of Birds (RSPB) (472)		

Type of Response	Policy / Heading	Comment
Supporting part of the Core Strategy	Local Economy	Support the decision to conduct a city-wide assessment of land supply, and the commitment to looking at alternative uses such as 'increasing biodiversity' (Para B8). Encourage the Council to carry out this study with careful reference to the Newcastle Biodiversity Action Plan (BAP) and to consider reallocating sites that have local or greater biodiversity importance. At the very least, this assessment should provide baseline information for developers to draw upon when designing proposals, so that such biodiversity is retained/incorporated in line with PPS9.
	EN1	Support EN1 policy points a-f. EN1b would be strengthened by mapping the areas identified for biodiversity enhancement in the Adopted Proposals Maps. EN1f would be strengthened if it included a presumption against development on areas identified by the Environment Agency as at risk of flooding (flooding should also be added to the list of factors that the Development Control Policies DPD will assess planning proposals on). As regards the delivery of EN1c, local authorities are encouraged to include a policy within the Development Control Policies DPD or as a part of a SPD to promote the protection of bird nesting spaces within buildings. Such a policy will contribute towards maximising the opportunities within developments to build-in beneficial biodiversity (see Para. 14 of PPS 9). Strongly support the commitment in EN1 for AAP and Site Specific Land Allocations DPDs to 'include designations and protection and enhancement policies for wildlife habitats'.
	EN2	Strongly support the development of a policy to address climate change. EN2 point 3 would be strengthened if 'buildings will be required to meet the Energy Efficiency Best Practice Standard', and if buildings achieved the BREEAM and Eco-Homes 'excellent' rating (rather than 'very good'). Research carried out by the RSPB reveals that it can cost as little as £160 to bring new homes to the Eco-Homes 'excellent' standard for water and energy efficiency. The resultant reductions in water and energy consumption will provide annual savings of over £100 on typical household bills. The extra cost of a home built to higher levels of resource efficiency will not therefore increase house prices.
	Vision and Objectives	In reference to Spatial Objectives 3, climate change is viewed as the greatest long-term threat to both people and wildlife, and policies encouraging a reduction in water and energy consumption and a decrease in greenhouse gas emissions are strongly supported. As such, the Council should not just be 'seeking high standards of energy efficiency,' but instead 'ensuring high standards' through appropriate policies.
In reference to Spatial Objectives 7, the following addition is recommended: 'wildlife habitats including nationally- and locally-designated sites'.		
Recommend that the sixth bullet point (p13) would be strengthened by referring to a 'healthy, high-quality natural and built environment' rather than a 'welcoming' one.		
Environment and Sustainable Development		In order to provide an appropriately-detailed context, C6 should include reference to the number of SSSIs and locally-designated sites and briefly assess the condition of these designated sites.

Type of Response	Policy / Heading	Comment
	EN1	<p>Though several parts of policy EN1 are strong, there are significant biodiversity issues that are not appropriately addressed:</p> <p>i) Prestwick Carrs - the Draft RSS has identified Biodiversity Target Zones to help planning authorities. These are 'the areas of the Region with the greatest need or potential for the creation/retention and enhancement of biodiversity to meet regional targets'. One of these is Prestwick Carrs, part of which is within Newcastle City Council. As a site identified as of regional biodiversity significance, it is disappointing that there is no specific policy to facilitate the protection and enhancement of Prestwick Carrs within EN1, and that the site is not identified on the Preferred Policy Options map. Note with concern in the Sustainability Appraisal that the Prestwick Carr Nature Reserve SNCI is being recommended for downgrading to a SLCI and strongly encourage the Council to include a specific policy to ensure the biodiversity of the site is protected and enhanced.</p> <p>ii) Newcastle/Gateshead Brownfield Biodiversity Area - the Draft RSS also identifies a broad location on the River Tyne as a Biodiversity Target Zone. This regionally-significant site should be identified on the Preferred Policy Options map, with an appropriate policy in place to ensure its protection and enhancement.</p> <p>iii) SSSI and SNCI policy - PPS9 indicates that LDFs should include specific policy with respect to SSSIs not covered by an additional international designation, and also criteria-based policies with which to judge proposals that will affect SNCIs (paragraphs 8 and 9 respectively). These are not currently present within the Core Strategy and the Council is encouraged to include such policies within the Development Control Policies DPD.</p>
Making any other comment on the Core Strategy	PH4	Support the adoption of a challenging target for the reuse of previously-developed land, as this will make a significant contribution to the sustainable development of Newcastle. However, the biodiversity interest of brownfield land can sometimes be of local or greater significance. LDF policy should therefore be in place to ensure biodiversity assets are identified and protected or enhanced as part of developments, in order to comply with paragraph 13 of PPS9. Welcome the commitment to ensuring that housing density will not 'over-ride due consideration of site constraints.'
	LE1	The Council should ensure that both existing and potential future biodiversity is identified at the design stage of all employment sites, and is retained and enhanced wherever possible. This is a particularly pressing issue for the site at Newburn Riverside, which is an important resource for a range of waterfowl that use the Tyne Mudflats SNCI. The Council is strongly encouraged to provide mitigation on site or elsewhere along the adjacent riverside for any loss of high tide roosts or loafing sites.
	Misc.	<p>Encourage local authorities to include a policy within relevant DPDs or SPDs to promote the protection of bird nesting spaces within buildings. Such a policy will contribute towards maximising the opportunities within developments to build-in beneficial biodiversity (see Para 14 of PPS 9):</p> <p>Suggested Policy: "When considering planning applications the Council will enhance the conservation of birds where possible, including making appropriate provision of nesting spaces within developments."</p> <p>Suggested accompanying text: "The following options (in order of priority) should be applied to enhance the conservation of swift, starling and house sparrow:</p> <ol style="list-style-type: none"> 1. Leave existing nest holes alone 2. Make new holes to retain access to existing nest sites 3. Use existing internal spaces to make new nest sites 4. Utilise the existing roof or fascia design to create new nest sites 5. Create new internal spaces (including swift bricks) 6. As a last resort use externally fitted nest boxes <p>When repairing or renovating buildings all points apply; in new buildings, points four to six apply."</p>

Type of Response	Policy / Heading	Comment
		Encourage local authorities to locate and map all existing sites of the key species (swifts, house martin, starling and house sparrow) in towns and cities. New sites should be added to the database as they become established. The database should be updated at regular intervals (approximately every 5 years) and linked to the planning system to enable the authority to flag up sites, when a development application is made, for the conservation issues to be addressed in an appropriate manner. Also include suggested measures to address these issues.
Ms Rosie Serdiville (1478)		
Supporting part of the Core Strategy	Population and Housing	Approve the idea of more family housing and fewer flats, but sensitivity to local character is also important.
	Environment and Sustainable Development	Energy and climate change issues are important in tackling fuel poverty. Protecting conservation and historic areas needs more than building maintenance. Issues of traffic planning and community facilities also need to be taken into account.
Objecting to part of the Core Strategy	Population and Housing	The suggestion of increasing student accommodation in the city centre needs to be mitigated by an awareness of existing communities and the need to keep a mix of residents.
Making any other comment on the Core Strategy		The consultation process needs to demonstrate responsiveness to encourage future participation. There is a feeling that residents views are ignored.
Mrs Joan Sharif (1480)		
Supporting part of the Core Strategy	Population and Housing	
	Local Economy	
	Environment and Sustainable Development	
	Transport and Access	
	Town Centres, Shopping and Leisure	Why always pubs, clubs and casinos?
Shire Consulting (1482)		
Objecting to part of the Core Strategy	Local Economy	The preamble to this section (Paras.. B4 & B5) notes that the supply of business land considerably exceeds the requirement, by about 50% according to the first LDF Annual Monitoring Report. Paragraph B6a offers an option for reducing this surplus by the ad-hoc approval of other uses on such land and paragraph B7 indicates that this is already happening, although the figure for the scale of this reduction is omitted. The option suggested at B6a of continuing with such ad-hoc approvals in the interim and the comment at B6b that a comprehensive study is needed to assess the true position and inform the Site Specific Land Allocations DPD is supported. However, in the light of this acknowledged surplus and the need for this further work it is inconsistent and unsound that the Council is seeking to continue, within the Preferred Policy LE1, the UDP Policy ED3 requirements for designated Employment Protection Areas. The need for these EPAs should certainly be reassessed but unless there is robust and credible evidence to support the retention of such a designation, it should not form part of the Core Strategy Policies. Preferred Policy LE1 is therefore objected to.

Type of Response	Policy / Heading	Comment
South Tyneside Council (172)		
Supporting part of the Core Strategy	Whole Document	Fully support Newcastle City Council's Preferred Options Core Strategy and congratulates the Council on the progress it has made.
Objecting to part of the Core Strategy	Whole Document	Has minor concern that the Core Strategy needs to give stronger recognition of Newcastle in context with other Tyne and Wear Authorities and neighbouring rural districts. As a Regional Centre for the North East, it provides for catchments beyond its own boundaries for employment, education, shopping, leisure and entertainment and also provides key regional transport hubs, which link the region to wider destinations. The City's role in providing these functions is understated through passive references and should be more explicit, particularly for transport policies which should allow Newcastle to be easily accessible from neighbouring Boroughs and Districts. Transport policies do not emphasise the importance of enhancing links with neighbouring authorities to support the City's regional status.
Sport England (37)		
Objecting to part of the Core Strategy	Vision and Objectives	Pleased to see the health & well-being of residents & visitors as a Spatial Objective (8) for the Core Strategy, but have concerns about how this will be achieved. The first sentence simply mentions good city-wide access..to sports pitches, parks & green spaces & primary health care. In the first instance sports pitches is too narrow a definition of facilities that can have a positive impact on health & well-being, and this should be rephrased as formal & informal sport & recreation facilities. Spatial Planning's role in delivering a healthier population rests with helping to deliver the appropriate conditions within which sport & active recreation can take place. This means not only facility development, but also acting as a focal point for a range of strategies & programmes which seek to deliver more cohesive & robust communities.
	EN5	Have two concerns with EN5. Firstly, it is not properly founded on a robust evidence base as it is intended to cover facilities for sport & recreation as well as open space and, while the Council have undertaken a number of studies & strategies which will inform policy on Green space, Sports Pitches & Allotments, they have failed to carry out a similar study into the provision of formal & built sport & recreation facilities across the city. Secondly (& related to comments on Spatial Objective 8), the policy is not sufficiently spatial in it's remit as it does not: recognise & develop open space, sport & recreation's relationship with the health agenda; give any indication as to what role the Council considers open space, sport & recreation plays in quality of life in the city; link the subject matter back to education renewal programmes, community safety, environmental sustainability, or economic viability. Sport England have developed a guidance document on spatial planning for sport & active recreation which the Council may find useful in considering amendments to its Core Strategy. In light of the above an attempt has been made to redraft Policy EN5: "Newcastle City Council will preserve & where necessary enhance the quantity, quality & accessibility of sport, recreation & open space provision across the city. The Council will seek to work with the education, health, environmental, regeneration & business sectors to ensure that the open space, sport & recreation network/hierarchy meets residents needs & makes the best achievable contribution to their quality of life. Specifically the Council will: - ensure new investment in open space, sport & recreation is located, designed & managed in such a way as to maximise it's benefit to the community; - maintain & develop a network of recreational routes for walkers, cyclists & horse riders which links parks, green spaces & civic spaces." - ensure that new development & regeneration proposals fit in with the city-wide hierarchy & meet standards for open space, sport & recreation provision either on or off-site;
	Transport and Access	The Objectives to deliver the Council's Vision & Objectives include work to improve health & well-being across the city. Walking & cycling are simple ways to make physical activity an automatic part of people's everyday lives and so the limited priority given to these means of transport relative to other transport matters is a concern.
Summerhill Society (592)		
		Registered interest in the Core Strategy process, but are unable to respond at this stage.
Tesco Stores Limited (715)		

Type of Response	Policy / Heading	Comment
Supporting part of the Core Strategy	Town Centres, Shopping and Leisure	Support the recognition in Para E4 that there is scope for a new supermarket in the West End.
	TC2	Support the second section of TC2 which identifies the need for the West End to be regenerated and consideration of the potential for a new heart of district centre status. In this respect we would like to highlight that a new food store at Newcastle General Hospital will result in the redevelopment of an existing brownfield site and help to regenerate the surrounding area. It will also provide a link between two existing shopping centres (West Road and Stanhope Street) and will form a new District Centre.
Objecting to part of the Core Strategy	Town Centres, Shopping and Leisure	In relation to Para E7 which identifies that the west end would have potential for 2,590m2 net additional convenience floor space, it is considered that additional floor space could be accommodated in the area. The household survey undertaken as part of the GVA Grimley Retail Study of Newcastle demonstrated that existing residents in the West End are currently shopping at large food stores outside the area, particularly in Tesco at Kingston Park and Asda at the Metro Centre as these stores offer them a broader range of goods. Therefore, any attempt to reverse the flow of expenditure to the major out of centre stores will not be achieved by the provision for a modest uplift of convenience retail floor space within the area. Any new store needs to represent a significant qualitative improvement if the current dominance of out of centre stores is to be reversed. A larger net convenience floor space should, therefore, be identified.
The Co-operative Group (275)		
Supporting part of the Core Strategy	Vision and Objectives	The group supports the general aims and objectives of the Core Strategy.
UK Coal Mining Ltd (1446)		
Making any other comment on the Core Strategy	Whole Document	It is recommended that the LDF follows the advice set out in national guidance, relating to planning for the supply of coal (relevant extracts from MPG1, MPG3 and PPG2 are summarised in the response). Essentially, relating to economic importance of minerals and the need to ensure an adequate supply (MPG1), sequential testing for the location of coal extraction (MPG3) and the approach to be taken mineral extraction in the Green Belt (PPG2).
	Environment and Sustainable Development	Para C7 acknowledges that there are large reserves of coal and brick clay within the Green Belt and the coal reserves within UK Coal's landholdings in Newcastle are of a quality that there is currently strong market demand for. The LDF should include appropriate policies to allow mineral workings in the Green Belt. The approach recommended in Para C7 of the Core Strategy is to follow the approach of RSS. However, policy 45 of the draft RSS is not in accordance with the approach set out in Para 8 of MPG3 as it requires coal extraction proposals to be both environmentally acceptable and provide overall benefits to the local community.
United Co-operative Ltd (1385)		
Supporting part of the Core Strategy	TC2	There are a number of locations within the City where there is presently under-provision of local convenience retailing. TC2, which aims to maintain and enhance local shopping services is therefore supported. The aims of sustainable development are served by making goods and services available locally in properly located and designed, neighbourhood convenience stores that are generally accessible by foot or bicycle. For those reliant on, or choosing to travel by car, local stores are able to reduce the length of journeys and, when located on main roads, promote linked trips.
Making any other comment	Town Centres, Shopping and	Where convenience stores do not form part of a local centre, they are generally best located on main roads where they are easily accessible by car as well as on foot. Such locations also tend to reduce the conflict between pedestrians and traffic within residential areas.

Type of Response	Policy / Heading	Comment
on the Core Strategy	Leisure	To encourage greater use of local shopping, convenience stores need to offer a range of goods sufficient to provide for day to day needs. Chilled and fresh products comprise a growing proportion of this range, with dry and pre-packed goods tending to form part of the typical main food shop. In addition, convenience stores must be a size sufficient to accommodate access for those with disabilities and carers of children in push-chairs. To accommodate these requirements a modern neighbourhood food store will generally require a sales area of 200-300m2, equating to a gross internal area of 300-400m2. In addition, a customer car park is necessary in the interests of safety and to increase convenience to customers.
Vico Properties (694)		
Supporting part of the Core Strategy	Vision and Objectives	It is our view that the Council's Vision and Objectives, as set out in Part 3, encapsulate the approach to deliver sustainable communities in order to reverse population loss and achieve growth in the City's economy, as reflected in the Spatial Objectives. However, the vision and objectives are perhaps not fully explained or reflected in the Preferred Policy Options.
		Welcome the emphasis placed on the RSS, particularly in view of the strategic framework and the support that it provides for both the Northern Way and the BNG Pathfinder. Both of these initiatives have significant implications for the City in terms of economic growth and regeneration that will be facilitated in part by mixed use developments in sustainable locations, such as that proposed at St James' Place. Regeneration and future development are essential to ensure that the North East improves its economic performance. As stated at paragraph 2.4, Newcastle has a central regional role to play within the economy of the North East. More specifically, the Discovery Quarter has been acknowledged by the City Council to be a key priority to deliver economic growth.
	Local Economy	Details of general business land supply contained in the Core Strategy clearly indicate that there is a surplus of employment land, including brownfield employment land, close to the city centre. The redevelopment of land within the Discovery sub area for mixed use developments, including employment uses, is therefore wholly appropriate as identified in the draft RSS and reflected in the Preferred Policy Options Report and this approach is welcomed.
	Transport and Access	Fully support ST1 and ST2 in reflecting the draft RSS that proposes the City Centre be the focus of a 'core and feeder' transport hub based around Central Station, with the long-term aim of improved access between the regeneration areas and major locations for jobs and services. The creation of a hub at the Central Station will be particularly important in securing the success of the Discovery Quarter and act as a catalyst for future growth.
	Town Centres, Shopping and Leisure	Agree with the perceived need to broaden the leisure economy to appeal to a wider range of customers. As part of the design process this approach has been pursued for St James' Place in light of the mix of uses proposed, including residential family accommodation. The scheme, therefore, includes a mix of leisure and recreational uses that will be convenient to guests of the high quality hotels contained within the development and local residents and should therefore serve a much wider age group, including families.
Objecting to part of the Core Strategy	Population and Housing	Given the importance of the volume of existing planning permissions (estimated at approximately 5,500 units), it is disappointing that the Council seek only to rely on a 10% 'non implementation allowance'. Given the historic low levels of implementation of planning permission across the city, reference to evidence and analysis of all existing planning permissions is expected, to understand in detail viability and deliverability on these sites.
	PH1	Wish to object to the wording of Policy PH1. Whilst accepting Newcastle Great Park as a commitment in terms of planning permission, it should not be considered a 'priority' given its greenfield status and relatively unsustainable location.
		Supporting text in Para. A7 should be revised to include reference to the BNG 'Discovery Quarter and Elswick Strategic Commission'. This key area adjacent to the city centre is pivotal in providing a 'link' from the city centre to the West End and the role this area can play in assisting Housing Market Renewal needs to be clearly recognised and stated. Specific mention should also be made of the City Centre Action Plan and the role this has to play in assisting Housing Market Renewal objectives.

Type of Response	Policy / Heading	Comment
	PH2	<p>There is an identified need for 7,500 units in the period to 2011, summarised in Table 3. We would suggest that this table is made easier to understand, perhaps by dividing into two tables. Firstly, summarising the split between Pathfinder and the rest of the city. Secondly, by outlining the split the Area Action Plans (AAPs) and Site Specific Allocations. The information from Table 3 is carried forward into Policy PH2 and whilst the split over the period 2004-2021 between Pathfinder and the rest of the city is 49% and 51% respectively, this emphasis on 'priority areas' is somewhat misleading. With 10,450 units being recommended on the Site Specific Land Allocations outside of the three key priority AAPs (Benwell Scotswood, Walker Riverside and City Centre) this represents 58% of the total number of new residential units. No evidence is provided as to why the three priority AAPs receive only 42% of the new housing. Information should be provided in this respect. The proposed split between the AAPs and the Site Specific Land Allocations DPD is therefore objected to. Greater emphasis needs to be placed on the three priority AAPs. With reference to the City Centre Area Action Plan, specific mention should be made in PH2 to Pathfinder land within the City Centre AAP (i.e. land to the west of St James' Boulevard) being the priority for this area. A first bullet point should be added to the existing three (historic environment, diverse range of housing needs, student accommodation) underlining the importance of land within the Pathfinder area on the edge of the city centre. Such emphasis would be wholly in line with the BNG objectives as set out in the Discovery Quarter and Elswick Strategic Commission.</p>
	PH5	<p>Although reference is made to the guidance provided in PPG3 regarding the better mix of types and sizes of accommodation, the Core Strategy appears to dismiss the suitability of flatted accommodation for anything other than small households and conversely only considers lower density housing development of three or more bedrooms as being suitable for families. This approach would seem to be at odds with the objective of creating sustainable mixed use communities, accessible to jobs and services. Such an approach is likely only to deliver further housing led developments in less sustainable locations throughout the City. Accordingly, the terminology of the Core Strategy should be amended to refer to 'family homes' rather than 'family housing' to acknowledge the wider residential offer available to this sector of the population. Such an approach would also reflect the wider residential design agenda such as the Building for Life Standards promoted by CABE. Accordingly, the wording of PH5 should recognise the role that large apartments and duplex units can play in providing accommodation suitable for families.</p>
	Town Centres, Shopping and Leisure	<p>Paragraph E6 states that the City Wide Shopping and Leisure Study (June 2005) finds that the City's need for local shopping will be largely in balance with supply, with some gradual growth potential towards the end of the plan period. This contradicts the reading of the Study, as a quantitative need exists for new convenience provision in the Discovery Quarter and West End, due to the movement of convenience expenditure outside of the catchment. This is confirmed by the findings of the GVA City Wide Retail and Leisure Study. Indeed the need for new small convenience provision in this location is recognised by the Council in the LDF Key Issues Report (April 2004). GVA Grimley state that the Inner West LSSA generates £55.1m of convenience expenditure, however, from the results of their household survey they suggest that just £20.5m is retained in the area. The Study (2005), also states that 35% of the available expenditure in the Inner West Area leaks to other survey area's shopping destinations and another 28% to 'other' destinations. GVA Grimley note that this expenditure is mainly being spent at facilities in the Kingston Park District Centre, Shields Road District Centre, the City Centre and Asda Metro Rail Park, Gateshead. Therefore GVA Grimley identify that 63% of the available expenditure is being spent outside of the Inner West LSSA, which equates to £34.7m of convenience expenditure. Given that the Vico application site has an estimated turnover of just £7m, there is sufficient capacity to help claw back some of the expenditure that is currently being spent elsewhere. There is therefore a capacity for at least two convenience food stores to be provided in the area. In light of this, there is sufficient expenditure leakage to justify the new provision in Cruddas Park and a further store at the site at St James Place. Such an approach is also supported in the Discovery Quarter Study that considers there to be a significant distance between the Discovery Sub Area and local services. It considers that the George Street Triangle in particular offers the opportunity to provide local shops and community services to serve existing residential communities to the west of the City Centre and breakdown barriers with the City Centre. Such an approach is also expected to attract people to the area and reverse housing market problems. Therefore, whilst supporting TC2, the supporting text should be revised to reflect the possibility of providing additional local facilities in the shorter term and be less restrictive in terms of floor area. It should be noted that the Retail Assessment submitted in support of the St James Place application demonstrates that the development of additional retail floor space would not result in any adverse impact on existing local centres or the city centre.</p>

Type of Response	Policy / Heading	Comment
	TC3	Policy TC3 reflects PPS6 as it states that comparison shopping growth should be concentrated in the City Centre Shopping Core and that the sequential approach should be applied to any proposals outside the shopping core. However, the Policy goes onto require that the sequential test approach be applied to comparison goods development proposals above 1,000m2. PPS6 requires assessments for schemes over 2,500 m2 with assessments occasionally required for smaller settlements if these are to have a significant impact on smaller centres. In terms of comparison goods shopping in Newcastle City Centre this is unlikely to be the case, given the emphasis on the Shopping Core, and therefore the threshold should be raised to 2500m2. It is, nevertheless, appropriate that any policy on this issue be taken forward in the City Centre Action Plan.
Making any other comment on the Core Strategy	Vision and Objectives	In more general terms, the Core Strategy expects that the provision of a range of jobs and services as part of a mixed use scheme will facilitate the provision of popular and successful communities in accordance with the objectives of the Council, Bridging Newcastle Gateshead (BNG) and Your Homes Newcastle. The Core Strategy expects that such developments will contain affordable family friendly homes and this approach is particularly welcomed. However, the potential for delivering such communities is being unduly restricted through the emphasis on 'housing' rather than 'homes'. There are many examples both in this country and overseas of successful family living in a variety of accommodation types, not just houses with gardens. Although the City has historically depended on this type of accommodation to serve its demand for family type accommodation, a more innovative and sustainable approach to family accommodation will ensure greater success in delivering popular and successful communities.
Waitrose Ltd (288)		
Supporting part of the Core Strategy	EN1	In order to create sustainable communities, there is a need to ensure that communities and areas have sufficient services. This includes having access to local convenience shopping in suitable locations, in order to minimise the need to travel.
	EN4	The supporting text within this Policy refers to the city wide Character Assessment, which will inform policy and guidance on a number of aspects, including "brief's for significant development sites." The term "significant development sites" should be defined within the plan so developers are clear of this typology. To create cohesive and sustainable communities, a mix of uses including retail should be integrated and accessible for the community. This would ensure the objectives of PPS1 and PPS6 are adhered to.
	TC1	Supports the principles of this policy to maintain and enhance the attractiveness, accessibility and competitiveness of the City Centre, district, and other centres, and that they should be the locations for investment.
Objecting to part of the Core Strategy	Vision and Objectives	Objects to the first sentence of Spatial Objective 1 as it fails Test of Soundness iv (conformity) because it does not consider the suitability and viability of sites, as outlined in Paragraph 13 of Draft PPS3. To halt and reverse the city's population loss, there is a need for a more comprehensive approach towards regeneration and not just on focusing on housing. Para 1.9 of PPS6 states that housing will be an important element in most mixed-use, multi-storey developments, but to halt and reverse the city's population loss, the Spatial Objective should also recognise that other wider objectives should also be considered. This includes retail led development, which could encourage economic growth of regional, sub-regional and local economies and creating additional employment opportunities and improve the physical environment.
		The statement of 'seeking high standards of energy efficiency' (Spatial Objective 3) fails Test of Soundness vi (coherence, consistency and effectiveness) as it is unclear and could be interpreted in a number of different ways. There is a need to ensure that these high standards are realistic and implementable. It is concerned that broad objectives for reducing carbon emissions and combating climate change that are not clearly defined could be used by third parties to seek to prevent appropriate and sustainable development. A re-wording of these aspects of the Spatial Objective is needed that take into account these concerns.

Type of Response	Policy / Heading	Comment
		<p>In relation to Spatial Objective 6, the provision of adequate car parking is essential for the successful operation of food stores, where shoppers frequently need to complete the weekly food shopping. The principles to promote sustainable transport in terms of making non-car forms of travel as attractive as possible is supported, but failure to ensure an adequate provision of car parking to serve new retail developments will mean that investors/retailers will be dissuaded from committing to schemes and that where schemes do proceed, compromised car parking means that shoppers are more likely to choose existing out-of-centre retail facilities where car parking is generally higher and more accessible.</p> <p>Supports Spatial Objective 9 of seeking to improve the quality and range of shopping in the city centre, but object to the focus on just the city centre as there should also be an emphasis on achieving these objectives for the City's other retail centres. Providing an overall spatial objective for all retail areas, would ensure that where required the planned growth and development of existing centres is achieved. This would provide an enhancement to existing centres and encourage a wide range of services to meet the shopping needs of all residents.</p> <p>In relation to the 9th Bullet point of Para 3.1, the Core Strategy's Spatial Vision should be both clear and succinct. The Council's overall objectives to deliver the vision are supported, but the Council should also seek to be improving retail provision as well as housing, health and well being across the city. Providing new retail development to satisfy the need, where possible in new or existing centres, would work towards the Government's wider policy objectives outlined in Paragraph 1.5 of PPS6 including promoting social inclusion by ensuring that communities have access to a wide range of retail facilities.</p> <p>In relation to Para 3.3, the reference to shopping in the 8th bullet point for visitors to the city is acknowledged. Promoting social inclusion by ensuring that communities have access to a range of main town centre uses, encouraging investment in deprived areas and delivering more sustainable patterns of development are a number of wider objectives identified in PPS6. The 1st bullet point fails to consider retail as a vital part of creating a healthy and safe neighbourhood and should be amended for clarity, to read: "A city which is once again growing and attracting residents; is made up of attractive, healthy, and safe neighbourhoods with excellent quality of life, environment and local services, which includes convenience shopping facilities; and strong sustainable housing markets providing a full range of housing to meet all needs."</p>
	Population and Housing	Recognise the need to plan for the growth of the City and it is noted that the preferred option of the City Council is Scenario B (Moderate Growth). However, in order for the city to maintain and enhance its role as the regional capital of the North East (as outlined in Draft RSS), a more appropriate strategy for the Council is to take forward Scenario A (Optimistic Growth). The 'Northern Way' priorities include accelerating the pace of growth by using the city regions unique natural advantages to create the best place to live and work in Europe. Scenario A would realise the potential of Newcastle in ensuring that sufficient land is identified and brought forward to meet the needs of the growth in population. Therefore in view of the above comments, the plan does not conform with Draft RSS and therefore fails Test of Soundness iv (Conformity).
	PH1	Concerned with PH1 (2c), which includes the statement of 'restraining house building outside areas a and b where it would not contribute to the strategy.' This strategy could potentially undermine sites that are located outside these areas where there is a recognised need for housing and subsequently potential for improving services, such as retail to meet any potential growth. This includes those popular suburbs identified in paragraph 2.14 of the Core Strategy, which includes Gosforth. As currently drafted Preferred Policy Option PH1 2c fails Test of Soundness ix (Coherence, consistency and effectiveness) because the plan does not allow for flexibility in the housing market and the changing dynamics and needs of the City's population.
	PH3	As currently drafted, PH3 fails Test of Soundness ix (Coherence, consistency and effectiveness), as the approach is not flexible enough to reflect changes in circumstances within the City that may occur during the plan period. Greenfield windfall proposals should also be considered in cases where the site's sustainability merits are greater than those of other identified sites or where following the sequential test no suitable sites have been identified in or on the edge of centres where a need has been established. There may be cases where the development of a greenfield site is considerably more sustainable than either a brownfield windfall site or an allocated site and would better meet the needs of the city's population.

Type of Response	Policy / Heading	Comment
	EN2	As currently drafted, EN2 fails Test of Soundness ix (Coherence, consistency and effectiveness), as while there is need to plan for climate change, the 'blanket approach' set out here is not flexible enough to reflect site specific issues and places an undue restraint on developers. The requirements of the Policy are excessive and unreasonable and are a misinterpretation of the Government's advice contained in PPS1 and PPS22. If the Government wishes to require new development to conform to the ideas contained in this Policy then it should be implemented on a site specific basis through the Building Control System.
	Town Centres, Shopping and Leisure	<p>By providing an overall context for the convenience shopping needs for the whole city, rather than areas that the Council considers will experience the most significant change, will provide a better link to its overall Spatial Objectives and Policies outlined in the Core Strategy.</p> <p>The Council should take a flexible approach to satisfying the identified retail need in the north of the city by looking at existing and new centres to accommodate that need. If this cannot be achieved, edge and out of centre locations should be considered in line with PPS6 guidance.</p> <p>In terms of baseline population information, Para. 7.10 (Estimate of Population in the Survey Area), from the GVA Grimley City Wide Retail and Leisure Study in 2005, states that the population of the survey area is currently 325,824. It states that this is forecast to rise to 327,234 by 2011 and 330,134 by 2016 and 330,679 by 2021. This is an increase of 1.5% over the period 2005 to 2021. Table 1a of the Core Strategy POR which outlines that the 2004 city wide population is 269,500 and although it is noted that the period for the population estimates is different, the current population estimates differ by nearly 60,000 with the City Wide Retail and Leisure Study estimates. The Preferred Option Growth Scenario B estimates for an approximate population increase of 5.6% during the plan period (2004-2021), which differs from the 1.5% increase identified in the City Wide Retail and Leisure Study. Given the discrepancy in baseline population and planned increase estimations, which has been verified by Newcastle City Council (please refer to paragraph 7.9 of the City Wide Retail and Leisure Study), why different information has been used to determine the population strategy and the retail policy strategy for the emerging LDF is questioned. The strategy for Local Convenience Shopping therefore fails Test of Soundness vii (Coherence, consistency and effectiveness).</p>
	TC1	<p>TC1 fails Test of Soundness iv (Conformity) as it does not include reference to out of centre locations when considering new shopping and other town centre uses. The sequential test outlined in PPS6, states that if suitable sites do not exist in the centre, it is acceptable to consider edge-of-centre, then out-of-centre sites in order to satisfy the need.</p> <p>The second Para. of policy text fails to mention 'retail' under the term 'town centre uses.' Paragraph 1.8 of PPS6 states that the main town centres use to which this policy statement applies to includes retail (including warehouse clubs and factory outlet centres).</p>
	TC2	This Policy sets out the locations where convenience goods provision should be maintained and enhanced. The identification of Gosforth and Newcastle Great Park as areas where shopping can be provided or enhanced is supported, but the conclusions of the GVA Grimley study, given the identified need in north Newcastle for a new superstore of approximately 3,700 sq m gross, 2,500 sq m net (2,250 sq m net convenience goods) floor space, is questioned. Newcastle Great Park urban extension has been identified in PH1 as one of two priority areas to focus its house building capacity during the emerging plan period. The discrepancies in baseline population and planned increase estimations is also relevant. By using inconsistent baseline information, a preferred option for location and scale of future additional local convenience shopping is not based on a credible evidence base.
Making any other comment on the Core Strategy	Transport and Access	The City Centre AAP will need to assess the way in which the existing parking capacity is used and managed. This approach should also be applied to district and other retail centres in the City to determine how it should be adopted and adjusted to meet transport needs. The policy should adopt a flexible approach which recognises that it is essential that adequate provision is made for car parking. This is particularly important in the context of food stores when shoppers frequently need to complete the weekly food shopping. Failure to ensure an adequate provision of car parking to serve new retail developments will undermine the success of any scheme and result in its failure to serve the community, satisfy the identified need and retain shopping in the local area.
Ward Bros Plant Hire (699)		
		SEE COMMENTS FOR MR & MRS O'NEIL - REF 969
Woolington Bridge Nurseries Limited (691)		

Type of Response	Policy / Heading	Comment
Supporting part of the Core Strategy	Whole Document	Supports the main context of the core strategy, in particular where the objectives seek to reverse population loss in the city, create attractive and popular neighbourhoods, promote sustainable transport and ensure high quality green and natural environments.
Objecting to part of the Core Strategy	EN1	<p>The Core Strategy pays insufficient regard to the Green Belt. The supporting text recognises the importance of the Green Belt as an environmental asset, which makes a vital contribution to regeneration and delivering development on brownfield land. In listing the components of Green Belt, the document states that it comprises open countryside, recreational areas and areas of landscape importance. However, at this point, it is also important to recognise that parts of the Green Belt accommodates buildings, villages and settlements, including</p> <p>Paragraph C7 recognises two significant Green Belt issues. However, a further key issue to be tackled is the role of the Urban Fringe. It would be useful if the Core Strategy identified the significance and role of the urban fringe around the city and built up areas. The Green Belt overview of the Newcastle upon Tyne Key Issues Paper (2004) sets out that the Council are seeking opportunities to make the urban fringe more attractive and improve links with green space in the built up area. Submission Draft RSS takes this somewhat further - defining a Rural-Urban Fringe and supporting the Countryside Agency's approach to producing multifunctional landscapes (contained within 'The Countryside in and around towns'), which are functionally productive, socially useful and accessible. The Countryside Agency recognises that the countryside immediately around existing urban areas is the most appropriate location for new development where this is characterised by good design to enhance the rural setting, uses the latest sustainable construction techniques and provides residents with a well planned environmental infrastructure, green spaces and links to the surrounding countryside. This particular issue is well demonstrated at the Garden Centre site - a brownfield site on the edge of an established village. The buildings and use of the site are reaching the end of their economic and viable life and, consequently, it seems likely that the site will become derelict and an eyesore on the landscape and the village of Woolsington. Without intervention, the urban fringe will deteriorate significantly in this location. The important role of such sites on the boundary between the urban setting and the rural landscape needs to be recognised.</p> <p>Along with a suggested review of the boundaries of the Village Envelope within Woolsington, the Core Strategy should make reference to existing villages within the Green Belt. It suggests that Development Plans can permit infilling within such villages, where it would not have an adverse effect on the character of the village. Woolsington is an established village, which has been in place prior to the designation of the greenbelt. Rather than the village stagnate through restraint on any form of new development, it is important that the village continue to evolve and sustain itself. The review of the City Council's core planning policies provides an opportunity to review the village boundaries in line with accepted planning practice.</p>

Type of Response	Policy / Heading	Comment
		<p>Paragraph C6 sets out that the Council will seek to keep the Green Belt permanently free of built development. It is not the purpose of PPG2 to keep the Green Belt free of development. Rather, at paragraph 1.4 of PPG2, it states that the fundamental aim is to prevent urban sprawl by keeping land permanently open. PPG2 makes it clear that the purpose of including land within the Green Belt takes precedence over the use of land within the Green Belt. Such purposes are to:</p> <ol style="list-style-type: none"> 1. Check the unrestricted sprawl of large built up areas; 2. Prevent neighbouring towns merging into one another; 3. Assist in safeguarding the countryside from Encroachment; 4. Preserve the setting and special character of historic towns; and 5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>The text should therefore be reworded to acknowledge the aims of PPG2 and recognise that the Green Belt is not wholly free of built development at present, nor is this likely to be the case in the future. In addition, it is accepted in PPG2 that built development may be permitted in exceptional circumstances. It is also essential to make reference to the importance of villages and settlements within the Green Belt. Guidance within PPG2 recognises such settlements and makes it clear that limited infilling can be permitted, where this does not have an adverse effect on the character of the village concerned. Landscapes and village settings vary enormously. It should be acknowledged that there are numerous areas within the Green Belt where sympathetic and modest quality development, in character with its surroundings, would have no negative impact on the basic principles of green belt policy and could have the benefit of allowing the natural evolution of villages and hamlets to continue.</p>
Making any other comment on the Core Strategy	Vision and Objectives	<p>The supporting text relating to Parks & Greenspace (p10) sets out that the Green Belt fits very tightly around the existing and planned built up area and that sufficient sites have been identified to meet housing need, so there is no need to consider changes to the Green Belt boundary. Within this text, reference should be made to the wider requirements and purpose of the Green Belt as set out in PPG2 and the Submission Draft RSS, to check the unrestricted sprawl and coalescence of settlements and to sustain urban communities, through making such areas of Green Belt readily accessible to most people. Policy 10 suggests that Local Development Frameworks should ensure that the Green Belt continues to safeguard the countryside from encroachment and prevent the merging of towns and maintain the broad extent of the Green Belt. In addition, there are a number of villages and small settlements within the Newcastle Green Belt. Each of these villages should continue to be supported to maintain their character and purpose. At this point in the text, we would therefore suggest that the text be reworded to state: "there is no need to consider changes to the Green Belt boundary, however the important role of the Green Belt and the need to sustain villages and settlements within them will be supported."</p>
	Misc.	<p>Cowells Garden Centre and associated landholdings are located directly adjacent to the established residential village of Woolsington. It is recognised that the Site Specific DPD would be a more appropriate forum to consider the use of this land in detail, but the Core Strategy should recognise the presence of villages and settlements in the Green Belt and the importance of the limited brownfield sites in such settlements to accommodate some degree of infilling (in accordance with PPG2). In the Adopted UDP, the Village Envelope excludes the Garden Centre site, despite being a substantial building and an established part of the village. The supporting text goes on to define that the envelope for this purpose [to permit some infilling] has been taken as the continuous line forming the outer edge and contains the current development of the settlement, including the local shops and services. The original village envelope is therefore inaccurate and the Garden Centre site should be included within the village envelope.</p>
Dr Kenneth Wright (1476)		
Supporting part of the Core Strategy	Transport and Access	

Type of Response	Policy / Heading	Comment
Making any other comment on the Core Strategy	Population and Housing	High Standard of insulation should be required.

MS