

## **Newcastle City Council**

### **The Town and Country Planning (Local Development) (England) Regulations 2004 - statement for the purpose of Regulation 31**

#### **Submission Draft Core Strategy Development Plan Document of 23 May 2008**

#### **Summary of the main issues raised in the representations**

##### ***Introduction***

This note has been prepared by the City Council based on representations made on the submission draft Core Strategy during the period 23 May to 4 July 2008. The Council has used its best endeavours to reflect the responses made, but reference should be made to the original representations for the full details.

This statement does not itemise comments by respondent, except that the overall position of the Government Office, North East Assembly, English Heritage, Natural England and the Environment Agency are given. The note does not seek to offer any City Council response to the comments.

The note is structured in the same way as the draft Core Strategy, with general or overarching comments grouped at the end. Where reference is made to a policy in the Core Strategy, then it should be taken as including the related supporting text.

##### ***Vision***

There were relatively few comments on the Vision and those that were made were suggesting added emphasis on particular issues:

- support for sustainable forms of travel
- open space and recreation
- respecting character
- access to retail services.

##### ***Strategic objectives***

Again there were relatively few comments on the Strategic Objectives. The most specific suggestions were:

- a mention for reducing the need to travel as an objective
- greater clarity on the hierarchy of centres, perhaps concentrating on district and neighbourhood centres and losing the possibly ambiguous reference to local centres
- introduction of the need for a new district centre at Newcastle Great Park
- more on the knowledge economy and specific mention for Science City
- more on health
- more on protecting the historic environment for its own sake

## ***CS1 and spatial strategy***

Of those who responded on this section of the document, most indicated support for the document's focus on urban areas. There was one respondent who believed that this and the allied emphasis on the city centre as the focus for new development was too centralist and would lead to over intensive development.

There were a number who did not support a sequential approach for choosing new development sites, saying that this was not needed and was not supported by national policy. In related comments, some said that there should be less presumption against use of greenfield sites and that the document should not give priority to regeneration areas for housing when there was a need for housing across the city.

A number of respondents, mostly with land interests in edge-of-city sites, suggested that the policy was too inflexible in saying that there would be no changes in Green Belt boundary. They generally argued that the policy should allow for future Development Plan Documents allocating land for development to make small scale changes to the Green Belt boundary, especially if sites in the urban area were not coming forward.

Some suggested more flexibility for specific uses, for example offices, which would benefit from a location on the trunk road network. A neighbouring local authority indicated that it was happy with the tight policy on Green Belt, though suggested that it was up to reviews of Regional Spatial Strategy to determine the need to review Green Belts, not lower level documents such as the Core Strategy.

A respondent argued that there should be more emphasis on the knowledge economy and those supporting the economy in this way, notably the Science City initiative.

There were a number of responses echoing comments made later under shopping policies. On the city centre, it was suggested that the policy should be clearer about its proposed expansion of the Core Shopping Area and should make a distinction between expanding this and the even tighter Primary Shopping Area. One respondent wished more flexibility for financial services in primary shopping frontages.

On shopping outside the city centre, two main issues were raised. First, there was a suggestion that the Council should include support for retail development on the Newcastle General Hospital in the Core Strategy, given that the Council has resolved to support it in another document. Second, another respondent asked that a sixth District Centre be proposed at Newcastle Great Park.

A number of respondents to this policy and to others supported the specific mention of the Ouseburn regeneration area as a focus for appropriate forms of development. Some specifically supported the emphasis on mixed use and another wanted mention of the need to respect its historic value. Some wished confirmation that it was a suitable location for higher density housing including flats.

Other matters that should be included in policy CS1 in the view of some respondents included:

- more follow up to the vision and objectives on historic environments
- more on walking

- the importance of management and maintenance.

### ***CS2 Looking after our existing housing***

There were relatively few comments on this section, with attention on specific issues rather than the general thrust. Points made included the need for:

- more recognition for the requirements of larger families
- more recognition for the private sector
- more detail on delivery
- more emphasis on making best use of existing houses in the interests of conserving resources.

### ***CS3 New housing provision***

There was significant interest in the policy, supporting text and the figures for new housing provision. A widespread comment made against this policy and others was that the Council had not prepared either a Strategic Housing Market Assessment (SHMA) or a Strategic Housing Land Availability Assessment (SHLAA) as part of the evidence base.

There were no major challenges to the overall scale of the figures given as far as they went, but overarching comments included:

- need to check figures against revised Regional Spatial Strategy once issued
- the Core Strategy should be planning for a 15 year supply of land to 2024 if not beyond, with a 5 year supply demonstrated now
- the numbers should not be a cap or limit
- more priority should be given to and more units could be accommodated at Newcastle Great Park
- doubts as to whether the city centre could deliver the figures given.

### ***CS4 Housing mix***

A number of respondents queried whether the approach set out need be so prescriptive about housing mix. Some objected to important detail being passed on to be fixed in a lower level Supplementary Planning Document. There were views both for and against the emphasis on larger homes expressed in the policy. Some with central area interests wished more clarity on the suitability of their sites for higher density flats and apartments. There were comments that the policy should be more specific about meeting the needs of older people, through Lifetime Homes or otherwise. Others objected to the proposed imposition of Lifetime Homes requirements through the planning system.

### ***CS5 Affordable housing***

The issue of providing affordable housing through the planning system promoted significant comments. There were many responses that there was a lack of evidence to

back up the target and policy, in terms of no SHMA, no SHLAA and no substantive work on how seeking affordable homes would affect scheme viability. The same respondents then generally objected to the imposition of a specific percentage requirement on every site and the site size threshold. Some suggested the policy should be reworded so that affordable housing would be negotiated site-by-site.

There were a small number of responses that suggested that the Core Strategy was not vigorous enough in seeking affordable housing and the target and requirements should be raised. Some wished more explicit reference to the needs of older people.

### ***CS6 Sites for gypsies, travellers and showpeople***

There were no significant comments on this policy.

### ***CS7 Shared and student housing***

There were strong comments from those involved in higher education that the policy and supporting text took an unduly negative attitude to student housing issues. The contribution of students to the life and the economy in Newcastle should be recognised much better. Some commented on the rather sweeping intention to use planning powers to protect residential amenity and balanced communities. These respondents and some others who provide accommodation in the private rented sector suggested that the role of this sector was underplayed.

In relation to provision of purpose built accommodation, one respondent suggested revisiting the background work on student numbers, which might allow some downward revision of the targets for net new bed spaces. One respondent suggested that the policy should be clearer on preferred locations for purpose built accommodation, with another suggesting that there should be explicit support for such accommodation in district and neighbourhood centres.

### ***CS8 Use of brownfield land and density of housing***

There were a number of responses suggesting that the sequential approach in making decisions on sites for new housing development was not now backed by national policy. Some suggested that the policy should make clearer or greater allowance for the use of greenfield sites, including those that might have been the subject of demolition some time ago and had since been 'grassed over'.

There were some responses saying that the policy was too prescriptive on density, others that it should be clearer on which areas might be suitable for higher density flats and apartments. One respondent said that high density should not automatically be assumed for central areas. Another said that the use of area characterisation would be useful in setting local density standards and that the policy should indicate a preference that existing buildings should be reused where possible.

### ***CS9 Employment land***

There were a number of respondents who suggested greater clarity on how the figures for employment land were arrived at. They did not now match the figures and site type

categorisation in revised Regional Spatial Strategy (second Proposed Changes). Not all the areas mentioned in the policy and text seemed to have matching figures. Point (a) in the policy was unclear as to whether the figure of 10ha referred to the whole of the Discovery Quarter or just to sites related to the Science City initiative. One respondent suggested that the policy gives undue emphasis to *large scale* development in the Discovery Quarter.

A specific suggestion was made that Newburn Riverside should be supported as a location for offices. Another respondent wished some flexibility in looking at development on greenfield or Green Belt sites close to the trunk road corridor.

Comments on the Airport were generally restricted to those of the operating company. Points made included:

- the expected growth levels at the Airport should be more clearly recognised
- there should be more flexibility on uses at the Airport
- the Core Strategy should limit itself to looking at environmental issues that are dealt with locally
- on site car parking reduces car trips and should be seen as a positive part of transport planning for the Airport
- the study on transportation in the sector of the city including the Airport is welcomed, but the company is not convinced about the road link to Newcastle Great Park.

### ***CS10 Education, learning and skills***

There were comments that the policy and text should be strengthened to emphasise the contribution of higher education to the economy of the city. Generally the same respondents said that as they were non-profit making organisations then special consideration should be given to them in seeking planning obligations, especially when they were providing contributions such as publically available open space within their sites. There was both support and opposition to seeking contributions towards training through planning obligations.

### ***CS11 Comparison goods shopping***

Some respondents said strongly that the policy neglected the role of parts of the city other than the city centre in providing for comparison goods floorspace. Some said that there should be more explicit mention and in some cases support for the potential of sites in or on the edge of other centres.

There were a number of substantial responses in relation to the identification in the policy that up to 75,000 sq m net sales area might be needed by 2016 and that the majority of it would be located in an extension of the Core Shopping Area to the east of Pilgrim Street. A neighbouring local authority queried if the potential impact on centres in their area had been assessed. Some respondents suggested that there was not enough evidence about need to have such a prescriptive approach on floorspace now.

In relation to the policy statement that most of net increase in floorspace would go to East Pilgrim Street, there were doubts by some as to whether all the options for

providing a greater proportion of this floorspace elsewhere in the city centre had been full assessed. One respondent suggested that some could be located outside the city centre. The respondent with the most direct interest in East Pilgrim Street welcomed the intent of the policy and suggested that the Core Strategy might allocate the land for the development under the new arrangements just published. One respondent suggested that the policy or text should emphasise that redevelopment of East Pilgrim Street should take account of the strong existing heritage value.

### ***CS12 Local and convenience goods shopping***

There were a number of comments on the proposed hierarchy of centres, with one respondent suggesting only two tiers below the city centre, not three. A new District Centre at Newcastle Great Park was suggested by two respondents. It was argued by some that more provision should be made for expansion of centres other than those mentioned and that edge of centre sites might also have a role. There was a comment that the policy concentrated too much on convenience goods. Another suggested better links to strategies for health, including that for healthy eating.

The use of floorspace figures as a guide for prioritisation of new in-centre development was opposed by some, as was the over-prescriptive nature of locations suggested. One respondent said that the figure for the Benwell Scotswood area taken with known Council support for retail development at Newcastle General Hospital would prejudice their interests and be contrary to the findings of previous studies. Another respondent supported such development on the Hospital site and suggested that it be made explicit in the Core Strategy.

### ***CS13 Leisure, culture and tourism***

Two substantial responses were made, both relating to point (d) in the policy on High Gosforth Park (location of Newcastle Racecourse). One respondent with a direct interest in the site felt that in effect it repeated unnecessarily national guidance on Green Belt and environment designations; it should also be more positive in encouraging new forms of leisure activities, as per saved UDP policies. Another respondent with an interest in wildlife supported a degree of restraint on activities in the Park.

### ***CS14 Delivering the quality city***

There were a limited number of responses on this policy and those that did respond generally supported the intent. However most also felt strongly that the policy was too broad ranging, lacked detail on individual issues mentioned and relied too much on other Development Plan Documents and Supplementary Planning Documents. There were particularly strong comments from one respondent on the lack of detail relating to the protection of and care for the historic environment. A number of others felt that the supporting text indicated an inflexible approach to development on sites or in areas affected by designations that might stifle innovation.

### ***CS15 Sustainable design and construction***

Most responding to this policy indicated support for sustainable development and carbon reduction. Some supported the provisions more or less as stated. A significant number of others with development interests expressed strong concerns about the imposition of standards on renewable energy and performance under building performance codes. Some cited lack of justification and most indicated that the policy would impinge very significantly on development costs and viability, especially for conversions and tightly constrained city centre sites. Most suggested that it was contrary to national and regional guidance. Some thought that the concentration on on-site embedded renewable energy as a means of reducing carbon emissions was too inflexible. Some said the Council should take a clearer lead, for example on district wide schemes.

### ***CS16 Waste management***

Two neighbouring local authorities commented on the waste policy and supporting text. They suggested that the Core Strategy did not adequately show how municipal waste will be dealt with in future, for example by not showing how the gaps between arisings and facilities as identified in regional studies would be addressed. They commented on the lack of provision for industrial and commercial waste. Others commented on the lack of detail as to how local waste management would be undertaken and that reuse of buildings led to a reduction in waste.

### ***Minerals***

This topic did not have a policy (though there was explanatory text) and this was commented upon by one neighbouring local authority with mineral responsibilities. The respondent felt that the Core Strategy did not adequately safeguard known mineral resources including coal and that there should be a stronger commitment to dealing with this issue either through the Core Strategy or in subsequent Development Plan Documents. It was noted that the Council had now received a planning application for opencast coal.

### ***Flooding and integrated water management***

This topic did not have a policy (though did have explanatory text). The statutory agency responsible for overseeing flood risk indicated that the Core Strategy was sound. One respondent commented on the fact that two committed sites were affected by flood risk - Newcastle Great Park and Newburn Riverside - and that this might merit further consideration.

### ***Pollution and environmental management***

This topic did not have a policy (though did have explanatory text). There were no substantive responses, though one respondent said noise merited further consideration in future Development Plan Documents.

### ***CS17 Planning for the green infrastructure network***

There were a number of responses, most of which generally supported the overall thrust of the policy. There was comment about the lack of evidence behind it and the lack of detail in it. Some felt strongly that it was over-dependent on other Development Plan Documents and Supplementary Planning Documents (and that the latter should be used with caution).

A range of respondents thought it could be strengthened in certain areas:

- informal recreation, including and horse riding
- maintenance issues
- links to Rights of Way plans and strategies
- biodiversity and semi-natural habitats.

### ***CS18 Delivering improvements to green infrastructure***

Again for those who responded there was general support for the overall intent, but some concern over detail or lack of it. As with CS17, some thought it was not specific enough and that the evidence base was insufficient. One said that if draft evidence was available, it should be published. Some felt that there should be more mention of maintenance issues. One respondent said very strongly that the policy should be backed up with much clearer Council strategies on the various aspects of open space, including biodiversity, health and less formal aspects of recreation.

Some respondents to this and other policies suggested that non-profit-making organisations, especially those providing publically used open space, should receive special consideration when the Council seeks planning obligations related to open space provision.

### ***CS19 Priorities for transportation investment***

This policy attracted relatively few responses. There was one over-arching comment made that transport issues had not been covered fully enough. There was a welcome for the support given to the Metro light rail system and specific support by one respondent for addressing the problems at the Scotswood and Redheugh bridgeheads.

Some respondents felt that the policy overall lacked detail and that the process of moving from the studies outlined in part (d) to specific proposals and then implementation was also unclear. One aspect of this would be ensuring full environmental appraisal of schemes. It was noted that current Transport Innovation Fund studies would help taking this forward. Some felt that there should be more emphasis on sustainable forms of transport in the policy to match words in the supporting text.

### ***CS20 Influencing travel patterns***

Again, this policy attracted relatively few responses. There were comments that there should be more emphasis on rail and Metro and another that the two transport planning

tools of transport assessments and travel plans should be mentioned and linked more explicitly.

### ***CS21 Air quality***

Once more, this policy attracted relatively few responses. One respondent asked that walking be mentioned (alongside public transport and cycling) as a measure to be promoted. Another suggested that intensification of development in the city centre will make it difficult to improve or even maintain current air quality standards in the city centre, certainly in the short term.

### ***CS22 Infrastructure and developer contributions***

A number of respondents made comment against this policy and elsewhere about planning obligations. One infrastructure provider supported the policy strongly. A number of respondents with development interests indicated that policy was too broad ranging and that it depended unduly on subsequent Supplementary Planning Documents for detail. Some made the point that the policy was too prescriptive about defining precise infrastructure needs at the time of allocating land. Some suggested more explicit references to the related government circular and the principles it set out.

Some non-profit making respondents made a case that they be treated differently from commercial developers. The main case made was in relation to contributions for off-site open space and recreation facilities by those bodies such as higher education institutions that provide a certain amount of publically accessible open space within their own sites. A case for not applying the general provisions to special needs housing was also put.

### ***Overarching or general points***

The Government Office for the North East said it had no representations to make for itself or on behalf of government departments.

The North East Assembly stated that the submission draft Core Strategy was deemed to be in general conformity with existing Regional Spatial Strategy (approved as RPG1) and the Secretary of State's further proposed changes to revised Regional Spatial Strategy. Other specific responses have been included in preceding sections.

English Heritage made a number of comments on policies, many already included above. Some key general points are:

- there is inadequate recognition of importance of protecting historic environments, particularly but not only in policy CS14
- not all character is good, so we should address enhancing poor character as well as protecting that of high quality
- there should be more emphasis on reusing existing buildings as well as using previously developed land
- the sustainability appraisal and the monitoring framework are not fully adequate in their coverage of heritage issues.

Natural England made a wide range of comments, some of which are referred to under policies above. More general points applicable in a number of places include:

- need for more or strengthened references to biodiversity and geodiversity
- the basis for planning for green infrastructure is given, but the Council needs a more fully developed strategy taking into account biodiversity
- there should be more emphasis and detail on the linked open space network and its protection and the Key Diagram may not be adequate in this respect
- the benefits to health from open space, informal recreation, walking and cycling are not mentioned enough

The Environment Agency stated the document was sound.

Some respondents pointed out that the Core Strategy was approved (but not submitted) prior to the publication of two important documents. One was the further proposed changes to revised Regional Spatial Strategy of February 2008. The other was the city's Sustainable Community Strategy, which had moved into its very final stages of approval just as the Core Strategy was being submitted and was published in July 2008. Better alignment as necessary with these two documents is suggested.

General points made by individual respondents perhaps not adequately covered above include:

- transport has not been with not dealt with fully
- the overall document is not a robust delivery vehicle
- the document as a whole does not reflect the aspirations of respondent and the overall process of consultation had not allowed for these to be taken on board.

### ***Key diagram***

There were very few comments on the Key Diagram. The two most substantive were:

- it should be used more to explore the extent and nature of the green infrastructure network
- the depiction of the Green Belt exactly as it currently stands precludes even small changes to its boundary being made.

### **Contact:**

Colin Percy  
Team Manager Planning Policy  
Strategic Housing, Planning and Transportation Division  
Newcastle City Council

Tel: 0191 211 5645

Email: [ldf@newcastle.gov.uk](mailto:ldf@newcastle.gov.uk)

20 August 2008