

Dear Ms Lawless,

1. In advance of issuing my post-hearings letter, I need further information on several issues outlined below:

### **Sequential assessments of office development on allocated sites**

2. I raised an issue regarding the need for sequential and impact assessments to be undertaken where planning permission is sought for office development on allocated employment sites identified within the Plan. Following the hearing sessions, the council provided me with a note (Action 30 PPG Review) which puts forward a main modification to introduce a criterion to Policy DM1 requiring a sequential assessment for office developments over 500 square metres on allocated sites. However, this proposed main modification has not allayed my concerns.
3. While impact assessments are no longer required for office developments outside town centres, paragraph 86 of the Framework confirms that local planning authorities should apply a sequential test to planning applications for town centres uses which are neither in an existing centre nor in accordance with an up-to-date plan. Is it therefore necessary to apply sequential assessments for office development proposals on allocated sites in the Plan? If so, why? Is this justified and would it be in accordance with national policy?
4. If the council wishes to introduce such a modification to Policy DM1, this would not be consistent with criterion 3 of Policy CS6 of the Core Strategy and Urban Core Plan (CSUCP). The council has suggested that as the Plan would be the more recent development plan document, Policy DM1 would take precedence over criterion 3 of Policy CS6 of the CSUCP. I consider this to be a rather ambiguous approach, which may be unreliable in decision-making. Given the joint nature of the CSUCP, does the council consider that formally superseding part of Policy CS6 of the CSUCP would be appropriate and legally compliant with Regulation 8 (5) of The Town and Country Planning (Local Planning) (England) Regulations 2012?

### **Wildlife Enhancement Corridors**

5. Following discussion at the hearings about the evidence base underlying Wildlife Enhancement Corridors (WEC), the council submitted further information including a scoring spreadsheet and mapped examples for Callerton and Newcastle Great Park to provide a linkage between the Newcastle Wildlife Enhancement Corridors document (SD11, 153) and the WEC shown on the Policies Map. In order for the WEC across the city to be justified, further work should be undertaken to set out the site scoring and site mapping across the whole city in order to be able to cross-reference specific locations with their assessment. If this information can be made accessible through digital tools, this would assist public involvement and understanding.

## **Local Geological Sites**

6. Planning Practice Guidance Paragraph 8-013-20190721 confirms that national planning policy expects plans to identify and map Local Geological Sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks. While I note the proposed modifications to Policy DM29 to make greater reference to geodiversity, I am concerned about the underpinning evidence. Since the hearing session for Policy DM29 took place, I have received the Newcastle City Council Geodiversity Audit (July 2019) and a completed Field Record and Assessment Form for the Town Moor Local Geological Site. The recommendations made in the Geodiversity Audit refer to a field-based survey of potential Local Geological Sites, indicating several areas of the city where there is geological interest. Can the council confirm if all of these sites have been assessed. If the sites have not been assessed, could the council provide me with the timescales for doing so.

## **Minerals**

7. I note that the CSUCP refers to safeguarding of known brick clay resources and that both the extant permission for the Brenkley Lane opencast coal site in the north of the city and the proposed Area of Search at Dewley Hill within Policy DM34 refer to the extraction of fireclay. The Framework defines brick clay (including fireclay) as being a mineral resource of local and national importance. The Framework confirms at footnote 68 to paragraph 208 that there should be at least 25 year reserves of brick clay. Could the council please set out what the landbank of permitted brick clay reserves is and where those reserves are located.
8. Furthermore, the council confirmed after the hearings that there is a site in Newburn which deals with recycled and secondary aggregates. The Local Aggregates Assessment 2018 (SD11, 155) also provides information on minerals transport and processing infrastructure, which includes further sites in the city for the manufacture of concrete and concrete products. In order to be consistent with national planning policy at paragraph 204 e) of the Framework, the Plan should safeguard existing, planned and potential sites for the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate products. Could the council please confirm how it intends to comply with the requirements of paragraph 204 e) of the Framework.

## **Next Steps**

9. I would be grateful if the council could indicate within 5 working days the timescales for dealing with the issues outlined in this email and for provision of further information to me. Once I am able to complete my post-hearings letter following receipt of information, I will provide it to the council as soon as possible. Please contact me via the Programme Officer if there are any points of clarification required.

Yours sincerely

**Joanna Gilbert**  
INSPECTOR