Dear Ms [Name],

Thank you for this opportunity to respond to the consultation on Major Modifications to the DAP.

CPRE Northumberland has no comment to make on this occasion.

Yours sincerely,

[Name]
(Chair, CPRE Northumberland)
Please find my response to the DAP consultation attached.

Callerton and Throckley ward
Response to consultation on DAP

Policy DM5 - Housing Sites

Site No 24, “land SW of Throckley Primary School”. It is not entirely clear where this site is from the description but presumably it is the former waterworks site on Hexham Road known as “Henderson Filters”. It is fairly small at only 1.56 Ha and given the nature of the site and the style of surrounding residential properties a notional allocation of 60 homes would appear to be unrealistic and constitute over development. It is my feeling that its elevated location, in a village, would make it unsuitable for development taller than 2 stories, ruling out “town houses” or flats. The site would however be entirely suitable for development at a much lower housing density.

Site No 25, “Land to the South of Hallow Drive, Throckley”. I was under the impression that this very small plot of only 0.32 Ha had been evaluated previously and found to be unsuitable for housing. Concerns were raised about the loss of public amenity if it were to be used for housing. The presence of major underground services that would either need to be diverted or easement allowed for also counts against it. As the site was only allocated a notional 14 properties anyway, before the discovery of these problems, I do not see any justification for its continued inclusion in the DAP

Policy DM11 - Callerton Parkway

Para 5.2.6 refers to location next to A197, presumably this should read “A696” as the A197 is near Ashington!

Para 6.1.1 concerns the conservation of heritage assets. I support the enhanced wording of this paragraph.

Policy DM17 - Preservation of Archaeology

Para 2 includes the addition of the wording “where justified”. It is not clear who would be responsible for making this decision or what the criteria or procedures would be to decide if it was justified or not.

Para 4 includes the wording “any significant archaeological findings”, again we need clarity over the definition of this term, or a reference that directs the reader to where this is formally defined elsewhere.

Policy DM35 – Telecoms

Para 2 now includes the addition of the wording “within the site boundary” I question the addition of this restriction as it could prevent the benefits of high speed broadband infrastructure installed as part of new estates being extended to serve existing communities nearby that would not otherwise have good quality connectivity.

Callerton and Throckley Ward
Jan 2020
Good Day.
Regarding the increase from 185 parking spaces to 600 spaces at the Callerton metro site. I would like to object to this as the original plans made no mention at all regarding the increase to 600 from 185 spaces and as far as I understand this is must be re submitted as it was not in any of the original plans. Regarding all the other new building sites in and around Woollington the amount of green field sites that have been given permission is in my opinion a disgrace as the planning department are always willing to give in to any building company that asks for green field sites for housing when there are multitudes of brown field sites available but because of the green field sites earning much more money than the brown field sites the council always helps the building companies and grants them the green field sites. I think the planning department should consider that the water tables are getting flooded all over the areas and no drainage is happening due to the water table being built on.

Everyone i have spoke to are very concerned regarding why newcastle council always allow building on green field sites and they are destroying the countryside using the old excuse that more housing is required when in fact i have never seen a report lately regarding how many empty properties are empty in the newcastle areas and the last time i seen a report regarding this figure the figure on BBC Look North was 16,000 empty properties so why is the same old excuse used that we need more housing when in fact we do not but the builders are always helped to the hilt with all plans being passed that they submit. In a sentence i am sick of the planning dept handing out freedom to all house builders to just build anywhere they want.
Dear Sir / Madam

DEVELOPMENT AND ALLOCATIONS PLAN - MAIN MODIFICATIONS
Representations on behalf of National Grid

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid
National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Response
We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice
National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult
National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid’s assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

For and on behalf of Avison Young
Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets
Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid’s ‘Guidelines for Development near pylons and high voltage overhead power lines’ promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid’s statutory safety clearances are detailed in their ‘Guidelines when working near National Grid Electricity Transmission assets’, which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets
High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid’s approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid’s 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid’s ‘Guidelines when working near National Grid Gas assets’ can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid
If you require any further information in relation to the above and/or if you would like to check if National Grid’s transmission networks may be affected by a proposed development, please contact:

- National Grid’s Plant Protection team: Cadent Plant Protection Team
  Block 1
  Brick Kiln Street
  Hinckley
  LE10 0NA
  0800 688 588

or visit the website: https://www.beforeyoudig.cadentgas.com/login.aspx
I totally object to this plan of where the car park is to be extended. We are losing more green land
I wish to register my total opposition to the extension of the metro car park on green belt land at Callerton Parkway.

Sent from my iPhone

> On 13 Jan 2020, at 14:12, Planning Policy <PlanningPolicy@newcastle.gov.uk> wrote:
> > Thank you for your email, please note no text or attachment was received as part of the email
> > Thanks
> > Planning Policy
> > > -----Original Message-----
> > > From: [redacted]
> > > Sent: 12 January 2020 03:26
> > > To: Planning Policy <PlanningPolicy@newcastle.gov.uk>
> > > Subject: Green belt and ate Parwsy
> > >
> > >
> > > Sent from my iPhone
> > >******************************************************************************
> > > This email, including any attached files, may contain confidential information and is intended solely for the use of the individual(s) to whom it is addressed. If you are not the intended recipient, the disclosure, copying or distribution of the information included in this email is prohibited and may be unlawful. Please notify us by replying to this communication and confirm deletion of the email. Thank you for your co-operation
> > >******************************************************************************
Dear sir/ madam,
I am writing with great anger and upset with the way Newcastle upon Tyne council has been sabotaging the local green belt and the greenery by allowing various unnecessary developments in the council.
The latest being the attack on the green belt surrounding the Woolsington village- which has been house for lot of nature species, including rare red squirrels and owls. While i deem these r totally unnecessary; the council comes with these strategies as money making sources for its office.
I as nature lover and local resident object to the above project and seek further evidence in support of its proposal.
I believe the council should actively consult the local residents and those who would have potential impact with its proposals and not use a eye blinding process to scrape past the active process for its benefit.
I hope the council learn its lessons and starts to improve the communication.
Looking forward for your response.
Many thanks
I wish to comment on one of the sections that has been updated in the modifications to the DAP. This relates to MM50, Page 71, Paragraph 7.1.1 which relates to minerals. Further to questions raised by the independent inspector, this section now includes confirmation that “a 27 year stock of permitted reserves of brick clay available to support investment in Throckley Brickworks from Red Barns Quarry in South Tyneside”. This is in line with the requirements of paragraph 208 of the NPPF.

However a letter to the Inspector from the Council, dated 16th September 2019, also states “Lamesley Quarry in Gateshead contains a potential future source of brick clay supply for Throckley Brickworks. At present there is no demand for its extraction to supply Throckley Brickworks. This resource is safeguarded for future use through Policy CS20 of the Core Strategy and Urban Core Plan and Policy MSGP32 of the Submission Draft Making Spaces for Growing Places Plan”.

I think it is important to consider inclusion of this additional resource within the modified DAP. This has significant relevance to a current open planning application for an opencast mine at Dewley Hill at Throckley, and to potential future applications, where the extraction of fireclay is included in the application. There is a school of thought that including extraction of fireclay with coal mining operations provides a justification for the extraction of coal and I believe it is imperative that we record all available sources of brick clay within the modified DAP.

Sincerely
I notice on the map attached to the Proposed Main Modifications Development and Allocations Plan (DAP) that a part of the area running from the A69 south to West Denton close has been marked in Green which I am assuming is a proposal to change the status of this land from “Unoccupied” to “Green space”. This is a very good plan. I would also note that the area adjacent to the A 69 still owned by the Highways authority has been left white [you need a big magnification to see it!] which does not make sense as the whole area has been continuously open to unlimited public access and has been continuously used by a large number of people for the last twenty five years to my knowledge. It is and has been used mostly for dog walking.

The other point about this land is that there are a number of services running underground north to south through the centre of it. A 6 inch water main runs through it and under the A 69, there is a fire hydrant and a branch water main running along the north side of West Denton Close. There is a gas main running north/south through it and both telephone and fibre optic services also run through the centre of it to the A69.

It is a valuable amenity which a significant number of local people have enjoyed for over 25 years and their right to continue to do this should be included in your plan.

Regards
Newcastle City Council Development and Allocations Plan - Proposed Main Modifications Consultation

Contact Details
Planning and Local Authority Liaison Department
The Coal Authority
200 Lichfield Lane
Berry Hill
MANSFIELD
Nottinghamshire
NG18 4RG

Planning Email: planningconsultation@coal.gov.uk
Planning Enquiries: 01623 637 119

Date
24 January 2020

Newcastle City Council Development and Allocations Plan - Proposed Main Modifications Consultation

Thank you for your notification in respect of the above consultation received on the 16 December 2019.

The Coal Authority has the following comments to make in respect of the Main Modifications proposed.

<table>
<thead>
<tr>
<th>Main Modification</th>
<th>Policy/Paragraph</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM32</td>
<td>After Para 6.10.8</td>
<td>Support this modification</td>
</tr>
<tr>
<td>MM51</td>
<td>DM32</td>
<td>No objection to the modification proposed</td>
</tr>
</tbody>
</table>

Please do not hesitate to contact me should you wish to discuss this further.

Regards
Dear Sir or Madam,

I have read through the proposed modifications and would like to make the following points.

ref. MM42, page59, policy DM29, protecting and enhancing geodiversity, biodiversity and habitats. By removing the reference to protected species alongside SSSI sites, you have left wildlife open to destruction from development. The whole policy has been watered down by replacing 'must' with 'should be' throughout. This is weak and only serves to demonstrate the Council's willingness to allow development that damages biodiversity while claiming to protect it. In DM29, a list of sites important for their geodiversity has been added, but a list of biodiverse sites has been removed - for what reason?

My second point relates to horse riding, or more precisely, to the total lack of reference to horse riding. Although a minority group, there are a significant number of horses (hundreds) kept for leisure and competition purposes within the boundaries of the City of Newcastle. Many of their riders are children. Horse riding is a healthy form of recreation and exercise and horse riders are legitimate users of public rights of way. Recent developments on former Green belt land have affected us badly (loss of grazing land, danger from building sites and disruption to bridleways and roads.) Yet despite the fact that improved public rights of way for horse riding feature in the Local Transport Plan, which is part of your One Core Strategy, here is no mention at all in the DAP or its modifications of horse riding. See MM66 page104 - 109, Appendix 6 - Transport and accessibility - ‘Pedestrian and cycle movement’ (no horse riding) 'number of pedestrian and cycle accidents' (no horse riders' accidents)

Schedule of additional modifications, AM 37 & 38 - 'Local cycling and walking infrastructure plans' (no horse riding)
Your reasons for modification recognise 'under delivery'. Too right. It is just as easy to create a bridleway as it is a cycle/walkway, so why not do this, especially in areas on the fringes of the city. We need more safe, traffic free routes, not less, and it seem that Newcastle City Council is not concerned about our safety at all. Horse riders are vulnerable road users, just as cyclists are, yet we receive little or no attention by comparison. And before you point out that horses are not used as transport, most cyclists using our bridleways aren’t riding to work either, they are cycling for leisure and exercise. Other councils (notably North Tyneside) work closely with horse riders to improve and extend the bridleway network, but in recent years progress in Newcastle has stopped, giving the appearance of an anti horse attitude. I know I asked repeatedly for horse riders to be taken into consideration as part of the One Core Strategy consultation, but to no avail.

To give you an example of how this has affected me personally - Meadow Hill, Throckley. This massive building site has engulfed our bridleway, bringing danger in the form of diggers, dumpers and flapping plastic. The road around the estate crosses the bridleway twice. We won’t have right of way, or even a light controlled crossing. The developer is building a 'walkway/cycleway' around the perimeter of the site and refuses to allow future access to horse riders because 'it would be too dangerous', completely missing the fact that their development has brought danger and misery to us. I know of at least 2 serious accidents, one where a horse was hit by a car, and another where a rider broke her back in a fall caused by a stray sheet of plastic blowing onto the bridleway in front of her horse. That was me. I don't suppose you have a record of this though, as you only record pedestrian an cycle accidents!

Yours faithfully
Dear Sir/Madam

On behalf of Woolsington Residents Association (WRA) I would like to make the following representations regarding the above subject.

MM14: The designated Callerton Parkway site potential for 600 cars. Residents are fed up of green field spaces being used for car parking as the area is awash with them. Newcastle International Airport (NIA) had 10750 spaces as at 2016 and the numbers are growing at an alarming rate:
- 7450 more spaces planned before 2035
- 50 more spaces for hire car activities by expanding onto adjacent land (8.62 NIA Masterplan 2035)
- 140 staff parking space (9.83 NIA Masterplan) Then 465 car spaces at the business park which is under construction-this is directly opposite the Callerton Parkway site on the B6918.

Increasing Callerton Parkway site from 195 to 600 parking spaces appears unnecessary and unwanted, given the thousands of spaces already in existence. (A total of 19050 including the 195 already at Callerton Parkway) This development will ruin our rural and visual amenity, damage wildlife and destroy habitat and is contrary to MM49 (development will only be allowed if it retains the verdant, spacious character and amenity of the village). The field appears to be a natural drainage area and any development could compromise this.

MM16 factually incorrect and misleading regarding the location of Callerton Parkway. The two roads next to the station are the A696 and the B6918 not the A197 which is near Wansbeck Hospital, Ashington, some 20 miles from this proposed development. Was this deliberate to add weight to the argument to develop the site to 600 spaces? We are concerned that this misinformation could be prejudicial to the decision made.

Woolsington is sandwiched between two major movement corridors, identified in the Landscape Character Assessment, and, in accordance with Policy DM20 (6.6.5) these routes merit special attention...including tree and hedgerow planting.
To date Woolsington has lost green space including trees and hedgerows and nothing has been done to enhance these assets. Allowing this development will lead to further losses and contrary to DM 20(6.6.5). The expansion will also create a dichotomous state as the north of the village will be split from the south, leading to degradation and fragmentation, not to mention loss of community.

MM49 we support clauses 1i and 1ii.

At best we would like this project cancelled, and, at worst, significantly reduced in size. Any changes to habitat should be mitigated and the site should be buffered with hedges and trees so it is not visible from the road.

Regards

WRA Chair
Sent from my iPhone
Dear [Name],

PROPOSED MAIN MODIFICATIONS – NEWCASTLE UPON TYNE DEVELOPMENT AND ALLOCATIONS PLAN 2015 - 2030

Thank you for your consultation of 16 December 2019 regarding the modifications to the Newcastle upon Tyne Development and Allocations Plan 2015 – 2030 (the Plan).

In November 2019 Highways England provided comments responding to the Pre-Submission Plan. Our response identified that we were generally supportive of the Plan, which we considered to be consistent with the provisions within the adopted Core Strategy and Urban Core Plan. We raised no objections, considered the Plan to be sound and that it met the tests of being effective and appropriately justified. This was based on our consideration of the policies and proposals within the Plan and the accompanying transport infrastructure evidence base, presented in the Development Allocations Plan Highways Modelling Report (July 2018). We subsequently identified that we had no reason to speak at the hearings as part of the Examination into the Plan.

We have reviewed the proposed main modifications to the Plan and we do not consider the modifications to have any impact on the view that we have previously made. We therefore maintain our position of having no objection to the Plan.

I trust this response suitably sets out Highways England’s position. Should you require any further information please do not hesitate to contact me.

Yours sincerely,

[Name]
Planning & Development
Yorkshire & North East
Email: [Email]
Dear Sir / Madam

I refer to the above document and your recent consultation with Sport England. Thank you for seeking our views on this matter.

Sport England worked closely with the Council to sharpen a number of policies and we are pleased to see that the agreed changes have been taken on board by the Inspector. Sport England therefore wishes to express its support for the proposed modifications around DM20 (MM27) and DM30 (MM48).

Please do not hesitate to me should you require any clarification on this response.

regards

M:

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our website, and our Data Protection Officer can be contacted by emailing Erin Stephens.
The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England’s Privacy Statement may be found here https://www.sportengland.org/privacy-statement/ If you have any queries about Sport England’s handling of personal data you can contact Louise Hartley, Sport England’s Data Protection Officer directly by emailing DPO@sportengland.org
Dear,

I’ve lived here now for 10 years we didn’t know about the extension to the airport car parking scheme behind us that’s going ahead now there talking about extra car parking for over 600 cars at callerton I’ve never seen that car park half full in 10 year also I hear the guy who owns Druid park across from me is applying for extra car parking on the top field.

We are having major issues atm with people parking on the grass verges because they won’t pay a £5 surcharge for parking at Druid park and the amount of cars speeding is ridiculous we know who they are Avis, hertz, and others who work in the area I’ve seen one major accident again due to speeding and it’s only a matter of time before someone is seriously hurt but that’s another problem the extra car parking spaces I feel are not needed at all .will look forward to your reply

Yours sincerely
Dear [Name],

Thank you for consulting Natural England with regard to the Proposed Main Modifications Development and Allocations (DAP).

Further to review of the Proposed Schedule of Main Modifications, Sustainability Appraisal Addendum, and Geodiversity Audit (Evidence Report) I am pleased to advise as follows.

Natural England would welcome the inclusion of the wording highlighted in yellow below, at the end of the last additional sentence proposed in Para 6.15.3 (MM44):

<table>
<thead>
<tr>
<th>Main Modification No.</th>
<th>Page No.</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM44</td>
<td>60 – 61</td>
<td>6.15.3</td>
<td></td>
</tr>
</tbody>
</table>

The maintenance, enhancement and restoration of sites of national and local importance for biodiversity and geology are currently no internationally designated sites (Special Areas of Conservation (SAC), Special Protection Areas (SPA)). Newcastle boundary, however the River Tyne allows connectivity to international and national coastal and marine designations. Northumbria SPA and Ramsar site and Durham Coast SPA. The city has five Sites of Special Scientific Interest (SSSI) (LNR) which are statutory designated sites. SSSIs are of national importance for their flora, fauna or geological features that contribute to the maintenance, enhancement and restoration of sites of national importance for flora, fauna or geology, education and public enjoyment. With regard to development which is likely to have an adverse impact on sites of national and local importance for biodiversity and geology, Natural England consider this will reflect sufficiently perhaps the obligations for public bodies with regard to decisions affecting protected sites/SSSIs. The following link provides further information for reference: .gov link.

I trust this meets with your approval.

Should you have any queries please feel free to contact me.

Kind regards,

Northumbria Area Team
Natural England
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

Please note I work full time Monday to Friday

www.gov.uk/naturalengland; Follow us on Twitter.

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England’s traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.
We now offer free and chargeable advice to land owners and managers planning works on Sites of Special Scientific Interest through SSSI Advice Service.

To help Developers consider the environment Natural England offers two chargeable services:,
- the Discretionary Advice Service (DAS) which can provide advice on planning/licensing proposals;
- the Pre-submission Screening Service (PSS) for European Protected Species mitigation licence applications.

This message has been sent using TLS 1.2
This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.
Thank you for consulting Woolsington Parish Council on the Proposed Main Modifications Development and Allocations Plan (DAP).

Please find the representations of the Parish Council attached.

We would be grateful if you could confirm receipt.

Kind regards

Parish Councillors for Woolsington + Bank Foot
Newcastle’s Development and Allocations Plan (DAP) was submitted to the Secretary of State for Examination in March 2019. The Examination hearings took place between 2 July and 11 July 2019 and were led by an independent Inspector appointed by the Secretary of State. The Inspector has written to the council to confirm that the Examination can proceed to the consultation on the proposed Main Modifications and Sustainability Appraisal Addendum. The proposed Schedule of Main Modifications are those which the Inspector considers are necessary to make the DAP sound and/or legally compliant. The Main Modifications are proposed without prejudice to the Inspector’s final conclusions on the DAP which will take account of all representations received in response to this consultation.

Response by Woolsington Parish Council

Woolsington Parish Council (WPC) requests a holding objection pending further discussions with Planning Officers in order address the following points:

Support

Woolsington Parish Council supports the City Council’s policies featured in the DAP modifications for:

- MM34 Flood Risk and Water Management
- MM38 Protecting and Enhancing Green Infrastructure
- MM40 & MM41: Existing Trees and Hedgerows, New Trees and Hedgerows and Landscaping.
- MM42 & MM43 Protecting and Enhancing Biodiversity and Habitats
- MM44 Biodiversity and Geology sites
- MM46 & MM47 Wildlife
- MM48 Open Green Spaces
- MM49 Protection of the Woolsington Village Envelope Green Belt

Concern 1

1. However, WPC is concerned about likely forthcoming planning applications, which are featured in the DAP modifications MM07, that could potentially put at risk the City Council’s outcomes for all of these policies.

Therefore WPC requests clarification as to how each of these policies will be applied to the introduction of new housing developments featured in the DAP main modifications.
a) Housing Site 15: Land south of Brunton Lane. Cell D
With indicative number of properties of 600

b) Housing Site 30: Land in south-west corner of Cell C
With indicative number of properties of 133

MM07: In particular WPC requests clarification of:
- the biodiversity net gain
- mitigation plans
- benefits to the off-site boundaries
- the level of public involvement in preparation of these plans

as recommended in the Summary at the end of this document.

Concern 2

MM16 Callerton Parkway Park + Ride designation - expansion on Green Belt

WPC requests detailed justification and reasoning to be explained as to the use of green belt land and which other options have been evaluated and why these other options have been ruled out. WPC is concerned as to how this relates to MM49 Protection of the Woolsington Village Envelope Green Belt and what plans are in place for mitigation.

WPC requests clarification on the following points:

- the reasoning behind the decision to increase parking spaces from the current 195 to 600, as opposed to an incremental increase in capacity based on demand and actual usage.

- plans for biodiversity net gain as outlined in the Summary

Mitigation plans and implementation: MM16

WPC requests:
- A comprehensive ecologist’s report for this site together with results from the British Trust for Ornithology and the local community
- clear evidence of mitigation, and associated timescales, in order to satisfy all of the conservation related policies
- Public consultation is requested for mitigation plans
- If use of the green belt can be fully justified, the Parish Council requests that the site should be landscaped in line with its green belt designation and surrounded by an appropriate 30 metre shelterbelt.
Summary

For both modifications featured in MM07 and MM16, WPC wishes to make the following representations:

Biodiversity net gain.

Woolsington Parish Council requests clarification In order to be in a position to understand and evaluate plans for Biodiversity net gain, WPC requests action and wishes to make reference to:

Section 16 of the National Policy Planning Framework FPPF Habitats and Biodiversity; Paragraph 174

“To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’.

Mitigation Plans and level of public involvement

WPC wishes to refer to the policy paper produced by the Department of Food and Rural Affairs which targets the government’s ambition to reduce the loss of Biodiversity. These policies feature plans for leading to healthier and well-functioning eco systems, for wildlife and people, by engaging significantly more people in Biodiversity issues.

WPC is concerned that there appears to be no opportunity for public involvement in preparation of the mitigation plans. Furthermore there are no mechanisms described to ensure delivery.

Use of Greenbelt MM16

WPC again wishes to refer to the National Policy Planning Framework FPPF Section 13 Protecting Green Belt Land.

WPC wishes to object to the use of greenbelt land for the purpose described in MM16, for many reasons, for example, those quoted in paragraphs133,134,135,136 &140

133. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

134. Green Belt serves five purposes:

a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
135. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:
   a) demonstrate why normal planning and development management policies would not be adequate;
   b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
   c) show what the consequences of the proposal would be for sustainable development; d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas;

136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified

140. If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area

Benefits to off-site boundaries

With reference to the *Planners Manual for Ancient Woodland and Veteran Trees by the Woodland Trust 2019*, WPC requests, with MM07, to see details of the appropriate shelterbelt proposals to screen housing developments, for the both sites, and request that it is to be introduced in advance of development.

If use of greenbelt is ever considered, then the site should be landscaped in line with its green belt designation and surrounded by an appropriate 30 metre shelterbelt in advance of any development

However, WPC unanimously requests that with MM16 use of greenbelt should not be considered
Dear Sir/Madam

**MM14. The designated Callerton Parkway site potential for 600 car parking spaces.**

I would like to make representations on the above subject on behalf of Union Sports Ltd, the Operating Company responsible for the Sports Ground Druid Park

The loss of green field space to support Car Parking is not something we can support considering the number of car parking spaces currently available in the area, some 11,215 due to grow by a further 7640 by 2035. Increasing the Callerton Parkway capacity from 195 to 600 spaces would appear to be totally unnecessary given that a sites operated by Newcastle Airport adjacent to Callerton Parkway is closed for a large part of the year. Better use of existing sites would surely provide the necessary spaces.

As well as ruining our rural and visual amenity, damage wildlife and habitat and be contradictory to MM49 (development will only be allowed if it retains the verdant, spacious character and amenity of the village) the development would surely exacerbate drainage issues.

Woolsington is sandwiched between two major movement corridors as identified in the Landscape Character Assessment, and, in accordance with Policy DM20 (6.6.5) ‘these routes merit special attention’…. ..‘including tree and hedgerow planting’.

The expansion at Callerton Parkway will help create a split in the village, the north from the south, ultimately leading to a loss of the tight community spirit felt by residents and local businesses.

Thank you for the opportunity to express my opinions and concerns regarding this development and hope as a result you can find means of better utilising existing facilities.

Sent from my iPhone
Dear Sir/Madam,

Please find below details of representations submitted on behalf of Bellway Homes Ltd (North East) in respect of Newcastle City Council’s Proposed Main Modifications to its Development and Allocations Plan (DAP). The comments are broken down by comments on Main Modification numbers as requested by the Council for ease of reference.

**MM08: Policy DM6 – Accessible and Adaptable Housing and MM09: Paragraph 4.2.6**

Whilst it is acknowledged that the Planning Practice Guidance (PPG) does not specifically discuss transition periods for adaptable and accessible policies like it does for policies relating to Nationally Described Space Standards (NDSS) the principle of the impact is very similar. The PPG states in relation to introducing local NDSS policies that; ‘there may need to be a reasonable transitional period following adoption of a new policy ... to enable developers to factor in the cost of ... standards into future land acquisitions’ (Paragraph: 020 Reference ID: 56-020-20150327) It is considered that a similar consideration in relation to Part M4(2) requirements would also be pragmatic.

The reason for the transition would be the risk that applications that are in process at the time of the adoption may have to have amendments made to accommodate the 25% Part M4(2) standard which could delay the determination of applications. Also, sites may have been acquired on the basis of outline planning permissions without optional standards for Part M4(2) having been factored in and this could affect the viability of sites, particularly larger sites with development phases. All this could affect the overall delivery rate of housing in Newcastle upon Tyne.

An appropriate amended approach would be to adopt a similar transition period for the application of standards as allowed for in relation to NDSS in the provisions of Policy DM7 of the DAP, in particular its supporting text at para 4.3.2, which allows for a one year transition from the adoption of the DAP and excluding applications for reserved matters pursuant to outline planning permissions approved/with a resolution to grant before the end of the transition period. This would follow the approach of North Tyneside Council which has a transition clause covering both NDSS and Part M4 requirements in its adopted Local Plan (July 2017) with para 7.109 stating:

> ‘In order to allow for an appropriate transitional period the standards will only be applied to outline or full applications approved after 1 October 2018. It will not be applied retrospectively to those applications for reserved matters where the outline permission was determined or is subject to a resolution to grant permission (including subject to planning obligations) before 1 October 2018.’

Stockton-on-Tees Borough Council also applied a transition period for implementing Part M optional standards in its adopted Local Plan (30 January 2019) deferring the requirement coming in to force until 1 April 2019 (under Policy H4(9)). This also excluded the requirements being applicable to reserved matters applications where outline planning permission was granted or there was a resolution to grant before 1 April 2019. Therefore, there is precedent in the North East for applying a transition to the adaptable and accessible option standards in the same way as required for NDSS requirements.

We therefore request that amendments are made either to Policy DM6 or paragraph 4.26 to introduce the following text similar to paragraph 4.3.2 of the DAP:

> ‘These adaptable standards will be introduced in one year from the date of adoption allowing for a period of transition. It will not be applied retrospectively to those applications for reserved matters where the outline permission was determined or is subject to a resolution to grant permission (including subject to planning obligations) before the end of the transition period.’

Making these suggested amendments to either the Policy DM6 or supporting paragraph 4.26 would provide certainty for developers going forwards and avoid the issue of delays to applications from the immediate implementation of the requirements on the date of the adoption of the Plan.

**MM15: Paragraph 5.2.3 (Public Transport)**
It is unclear whether the proposed amendments to paragraph 5.2.3 are seeking that bus services should run through major developments or only need to run in proximity to serve developments i.e. be within 400m of bus stop which is served frequently. It would not be feasible for all major developments (i.e. 10 dwellings or more) to facilitate bus services potentially running through them. It is requested that the wording is reviewed to avoid this ambiguity and potential issues when the policy is applied at a later date.

MM37: Paragraph 6.12.6
The proposed amendment to paragraph 6.12.6 includes reference ‘Where a development is required to provide SuDs on site, developers will be required to maintain the SuDs in perpetuity.’ However, the accepted practice is not for developers to maintain the SuDS but for a management company responsible for a development to carry out the long-term maintenance. Therefore, to reflect this and ensure flexibility it is recommended that the wording is amended as follows to make it effective:

‘Where a development is required to provide SuDs on site, developers will be required to put in place measures to provide for the effective long-term maintenance of the SuDs in perpetuity.’

MM38: DM27 – Protecting and Enhancing Green Infrastructure
The proposed modification to the first sentence of Policy DM27 to read ‘Development will be required to protect, maintain optimise the benefits and enhance existing green infrastructure assets, and contribute towards the delivery of new green infrastructure assets by:’ is not clear as to whether it is the benefits of Green Infrastructure (existing or proposed assets) that need to be optimised. The only other reference to benefits is included in relation to subsection 4 of the Policy which refers to ‘the benefits of any development will outweigh the harm’ to Green Infrastructure. It is requested that the wording of Policy DM27 is reviewed and updated for clarity.

MM41: Paragraph 6.14.4 (Trees must be provided)
The proposed main modification to paragraph 6.14.4 that states that development ‘will be required to’ include trees and the removal of the reference to ‘where appropriate’ should be re-considered. It will not necessarily be appropriate for all forms of development (as defined by the Town and Country Planning Act 1990 as amended) that are proposed within the City to include trees. Therefore, a blanket requirement to do so for all development without any qualification is considered to make the Plan ineffective in relation to this point. It is recommended that if the amendment to insert ‘will be required to’ is retained that the deleted reference to ‘where appropriate’ is reinstated to paragraph 6.14.4.

Next Steps and Way Forwards
Should there be any queries regarding the above representations please let me know. Otherwise, we look forward to the Council and Inspector’s consideration of the representations in progressing the preparation of the DAP to adoption.

Regards,

Bellway Homes Limited (North East)
Bellway House
Kings Park
Kingsway North
Gateshead
Tyne and Wear
NE11 0JH

www.bellway.co.uk
Dear Sir / Madam,

On behalf of Taylor Wimpey, please find attached some representations to the Proposed Main Modifications to the DAP.

Attached is both a Word and a pdf version.

We trust that the attached are in order; however, should you have any queries, please do not hesitate to contact us.

Kind regards

Lichfields, The St Nicholas Building, St Nicholas Street, Newcastle upon Tyne NE1 1RF

lichfields.uk
Newcastle upon Tyne Development and Allocations Plan: Proposed Main Modifications

Respondent: Taylor Wimpey North East

1.0 Introduction

1.1 On behalf of our client, Taylor Wimpey North East, we wish to thank the Council for the opportunity to comment on Proposed Main Modifications to the Newcastle upon Tyne Development and Allocations Plan 2015 – 2030.

1.2 The representation provides Taylor Wimpey’s comments on the proposed Main Modifications. It also reiterates the previous comments that have been made but which were not incorporated into the Proposed Main Modifications. We would be grateful if these comments could be reconsidered.

2.0 Comments on the Proposed Main Modifications

Policy DM6 – Accessible and Adaptable Housing

2.1 Although the proposed Main Modifications do not refer to a transition period between the adoption of the DAP and when the policy will be applied, we understand from discussions with the Council that this is being considered. We would be obliged if this could be included in the DAP and that clarity is provided that the policy requirements will not be retrospectively applied to applications for Reserved Matters where a site benefits from outline planning permission or a minded to approve permission before the end of the transition period. The transitional approach would be consistent with the approach to Policy DM7 ‘Space Standards’ and the supporting text at paragraph 4.3.2.

Policy DM11 - Public Transport

2.2 Taylor Wimpey welcomes the amendment to paragraph 5.2.3 which removes the requirements for developments to be served by frequent daytime bus services to the Urban Core and key local services.

2.3 However, it is still considered that the requirement for developments to be within 400m walking distance of a bus stop or 800m of a metro station is onerous and is not based on robust evidence, contrary to the NPPG. Although walking distances will vary between individuals and circumstances, the Chartered Institution of Highways & Transportation (CIHT) suggests walking is a viable travel choice over short distances of around 800 metres and offers the greatest potential to replace car trips under 2km (Providing for Journey on Food, CIHT (2000)). For commuting purposes, the guidance suggests that an acceptable walking distance is 1,000 metres, with 2,000 metres being the ‘preferred maximum’ walking distance.

2.4 Taylor Wimpey is also concerned that Policy DM11 could require developers to undertake work on land outside their control to provide pedestrian and / or cycle links. There could be situations where this is not appropriate and it is respectfully requested that a more flexible approach is
sought to ensure that this policy is justified and effective and hence the Plan is sound, in accordance with the NPPF (para. 35).

2.5 The following changes are requested to paragraph 5.2.3:

2.6 “To ensure Major developments are accessible by should have good accessibility to public transport through being situated within 1km, where practical they should be within 400 metres walking distance of a bus stop or 800 metres of a Metro station. Major developments should be served by existing or new bus services at a frequency commensurate with the scale, nature and location of the development proposed. The layouts of new major developments should be designed to facilitate the efficient operation of bus services and routes should be as direct as possible.”

Approved Masterplans

2.7 Taylor Wimpey welcomes and supports the new text that has been included at paragraphs 6.5.9 and 6.13.11 which recognise that there are approved masterplans which have taken into account and incorporated green infrastructure and wildlife enhancement corridors in their design and it is expected that these sites will be built out in accordance with the approved masterplans. Paragraph 3.3.6 is also welcomed which recognises that the Great Park District Centre, as well as other emerging centres, will be comprehensively developed as part of approved masterplans.

2.8 However, it is recognised that such text has not been provided in relation to the supporting text to Policy DM10 (Pedestrian and Cycle Movements) and Policy DM30 (Protecting and Providing for Open Space, Sports and Recreational Buildings and Land). In order to ensure a consistent approach and to avoid any uncertainty on the interpretation of policy in decision-making, it is respectfully requested that the following text is included in the supporting text to Policies DM10 and DM30.

2.9 New paragraph 5.1.6:

“The council has approved masterplans for a number of sites that seek to deliver the land allocations in the CSUCP. These plans have taken account of Policy CS13 in the CSUCP and demonstrate how the development will be accessible for pedestrians and cyclists. It is expected that sites will be built out in accordance with the approved masterplans”.

2.10 New paragraph below paragraph 6.16.3:

“The council has approved masterplans for a number of sites that seek to deliver the land allocations in the CSUCP. These plans have taken account of Policies CS14 and CS18 in the CSUCP and demonstrate how the housing allocations and permissions can be delivered incorporating open spaces to deliver sustainable communities. It is expected that sites will be built out in accordance with the approved masterplans”.

Policy DM20 – Design

2.11 It is noted that paragraph 6.6.6 has been amended to include reference to ‘urban heat islands’. However, Taylor Wimpey is not aware that the council has provided any evidence which has identified that this as an issue nor where these “islands” are located for development control purposes.

2.12 The only reference to urban heat islands that we can find is contained in the Green Infrastructure Delivery Framework (December 2018). Paragraph 5.1 advises that the multiple benefits of green infrastructure include urban heat island mitigation, whilst the table on page 33
makes reference to seeking to ensure that new developments incorporate green spaces, green roofs and SuDS for management of surface water and heat island effects. Similar references are contained in the 2011 Green Infrastructure Delivery Framework reports.

2.13 Given that the council does not appear to have any evidence about ‘urban heat islands’ it is respectfully requested that references are deleted; otherwise the requirement conflicts with the NPPF which requires policies to be underpinned by relevant and up-to-date evidence (para. 31) and for Plans to be justified and consistent with national policy (para. 35).

**Policy DM30 – Protecting and Providing for Open Space, Sports and Recreational Buildings and Land**

**General Approach**

2.14 Although Taylor Wimpey recognises the importance of open space and the need to provide different typologies as part of new developments, they consider that the open space policy and supporting text is overly restrictive and inflexible. They consider that the policy should not be applied as a rigid formula, as there are always exceptions which could relate to site specific circumstances such as existing open space typology surpluses or deficits in the wider area or other circumstances such as ecology or open space quality. As such, it is respectfully requested that the policy is reworded to enable a more flexible approach that takes into account site specific circumstances.

2.15 Furthermore, there could be cases where it is considered reasonable, due to site specific circumstances, for the distance or walk time to a specific typology to be slightly greater than those provided in the table. Additionally, the standards do not take into account whether there is a surplus or deficit of a typology in the wider area, which could in turn mean it is acceptable to adjust the standards in a local area.

2.16 Taylor Wimpey also considers that the approach of financial contributions is inflexible and does not take into account site-specific circumstances. Paragraph 6.16.10 requires a contribution to be provided where development of open space is proposed and the standards are not met or would be infringed. However, there could be cases where a greater amount of a different typology is proposed when compared to the typology that is being lost. It may also be the case that the different typology would be more important in the local area because there is a deficiency, whilst there could be a surplus of the typology that is being lost.

2.17 Taylor Wimpey respectfully requests that the following changes are made to Policy DM30(4) and its supporting text:

*Policy DM30(4)*

“Residential development will be subject to the thresholds for open space provision set out in Table 2 and will be required to contribute to the provision of new open space, sports and recreational buildings and land, enhancements to existing open space and maintenance to meet the council’s open space standards for new development as set out in Table 3 and the council’s priorities as set out in the Open Space Assessment, Plan for Playing Pitches and Plan for Built Facilities, unless an alternative approach is justified and agreed with the Council as a result of site-specific evaluation.”

*Paragraph 6.16.7:*
“The following standards will be used when assessing existing provision of open space in terms of quantity and access, unless an alternative approach is justified and agreed with the Council as a result of site-specific justification.”

Paragraph 6.16.9:

“Developers wishing to bring forward alternative uses for open space must provide an assessment which clearly demonstrates that the policy criteria have been met using information provided within the council’s Open Space Assessment, Plan for Playing Pitches and Plan for Built Facilities, unless an alternative approach is justified and agreed with the Council. This assessment should be provided as part of any planning application.”

Paragraph 6.16.10:

“The reconfiguration of land identified as open space can be an effective approach to addressing identified deficiencies. The change of use of one typology into another can help secure its future as part of re-provision and may provide windfall opportunities. For this reason, consideration will be given to proposals that provide demonstrable improvements in the functional value, accessibility to and public use of open space through its reconfiguration. If there is a deficiency of more than one typology in an area, any change of use does not necessarily have to be to the typology for which there is the greatest deficiency, instead it could be to a typology which improves current provision. Proposals will need to form part of a deliverable, comprehensive development scheme where open space requirements have been positively considered. Where development of open space is proposed where the standards are not met or would be infringed, the loss must be offset by the creation of, or financial contributions towards, an alternative open space site of at least equal size, accessibility and quality located within the same residential neighbourhood as the development site, where possible, or where this is not possible, the same ward as the development site, unless an alternative approach can be justified through site-specific evaluation.”

Paragraph 6.16.16:

“New development will be required to provide open space, and sports and recreational buildings either on-site, or where appropriate, contribute to improve existing facilities off-site. Table 2 provides the thresholds for the requirement for on-site and off-site provision and will be used as guidance for decision-making, whilst also taking into account site specific circumstances. The requirements for new provision will be assessed on the type and size of development and on the existing quantity and access to open space and sports and recreational buildings within the local area. Where on-site provision is required, this will be provided in line with the quantity standards for new provision as set out in Table 3.”

Paragraph 6.16.17:

“New development will be required to provide open space, and sports and recreational buildings either on-site, or where appropriate, contribute to improve existing facilities off-site. Table 2 provides the thresholds for the requirement for on-site and off-site provision and will be used as guidance for decision-making. The requirements for new provision will be assessed on the type and size of development and on the existing quantity and access to open space and sports and recreational buildings within the local area. Where on-site provision is required, this will be provided in line with the quantity standards for new provision as set out in Table 3, unless an alternative approach can be justified through site-specific evaluation.”
Paragraph 6.16.20:

“The Open Space Assessment sets out quality standards for the different typologies of open space. Developers providing open space on-site will be required to consult these standards and ensure that any on-site facilities are provided in line with this guidance, unless an alternative approach can be justified. Developers will be required to submit design proposals for on-site open space as part of the planning application. A management plan for open space will also need to be submitted and approved as part of a planning obligation.”

2.18 At the current time, Taylor Wimpey does not consider that Policy DM30 is justified, effective and consistent with national policy on the grounds that the standards are overly restrictive, inflexible and do not take into account site-specific circumstances. The above changes would ensure a sound approach, consistent with the NPPF.

Minimum Size of Open Spaces

2.19 Paragraph 6.16.4 states that the minimum size of amenity / natural green space considered acceptable as part of new development and that would count towards open space provision would need to be 0.15ha and that smaller areas will not count towards the required level of provision. Taylor Wimpey does not agree with the minimum size threshold of 0.15 and respectfully requests that this is deleted from paragraphs 6.16.4 and 6.16.5. The requirement is considered to be inflexible and onerous and there could be cases where smaller areas are created that provide an important contribution towards open space provision.
3.0 Previous Comments on the Development and Allocations Plan

Policy DM6 – Accessible and Adaptable Housing

3.1 Policy DM6 states:

“The design of new build homes will be required to be flexible and adaptable for the future to meet the needs of the population. This will be achieved by requiring new housing developments of 10 dwellings or more to provide 25% of all new homes to be built to Accessible and Adaptable Standard (Building Regulations M4(2)).”

3.2 The National Planning Practice Guidance (NPPG) gives authorities the option to set optional technical housing standards (Ref ID: 56-002-20160519); however, the NPPG also states that authorities should consider the impact of using these standards and, in particular, the costs relating to optional Building Regulation requirements (Ref ID: 56-003-20150327).

3.3 Taylor Wimpey has raised concern in their previous representations about the potential impact upon build cost, affordability, viability and housing delivery and they are not convinced that the implications have been considered by the Council in detail. The Council’s ‘Addressing Housing Needs and Standards’ report (Sept 2018) identifies an ageing population within Newcastle; however, this is not sufficient evidence to identify a need to impose a requirement for M4(2) homes. In terms of the evidence which should be provided to demonstrate a need to set higher accessibility and adaptability standards, NPPG (Ref ID: 56-007-20150327) states that consideration should be given to the likely future need; the size, location, type and quality of dwellings; the accessibility and adaptability of existing stock; how needs vary across different tenures; and overall viability. Taylor Wimpey therefore consider that the enhanced standards should only be used if clear evidence of need is demonstrated and that the proposals are viable.

3.4 At paragraph 4.2.2, reference is made to CSUCP Policy CS11 which encourages the provision of Lifetime Homes, Wheelchair Accessible Homes and increasing the choice of suitable accommodation for the elderly population and those with special needs. Policy CS11 therefore seeks to encourage the provision of accessible homes. The Inspector’s Report for the CSUCP (at paragraph 62) states that:

“The clause encouraging the provision of Lifetime Homes and Wheelchair-Accessible Homes strikes an appropriate strategic balance between highlighting this important need whilst not making it a specific requirement that could compromise viability. A similar argument applies to the clause seeking increased choice for the elderly: many different types of accommodation are required and it is not feasible to set specific targets in a strategic policy.” (Lichfields’ emphasis).

3.5 Given this context, it is not considered that this requirement can be justified.

4.0 Policy DM10 – Pedestrian and Cycle Movements

4.1 As mentioned in earlier representations, Taylor Wimpey is concerned that Policy DM10 could require developers to undertake work on land outside their control to provide pedestrian and/or cycle links. This is because there could be situations where this is not appropriate and it is respectfully requested that a more flexible approach is sought. As such, Taylor Wimpey suggests the following changes to the policy and its supporting text to provide greater flexibility. This will ensure that this policy is justified and effective and hence the Plan is sound, in accordance with the NPPF (para. 35).
4.2 The following changes are respectfully requested to Policy DM10 and its supporting text:

**Policy DM10:**

“Development will be required to **seek to undertake the following, where appropriate and practical:**

1. Provide safe, convenient, attractive and continuous pedestrian and cycle links to key local facilities and services.
2. Provide connections through developments both to the existing and future wider pedestrian and cycle network.
3. Demonstrate that major developments are within acceptable walking and cycling distances of key local facilities and services.”

**Paragraph 5.1.3:**

“To improve accessibility for pedestrians and cyclists, developments **should be required to** provide links through sites and routes to the wider walking and cycling network, where possible. This includes the Public Rights of Way (PROW)Network and the pedestrian and cycle network. The PROW network is also important for equestrians. Developments should facilitate equestrian movement by enhancing the existing network through the creation of linkages and safe crossings, and by increasing access to the PROW network, where appropriate and practical. A pedestrian and cycling network plan will be developed based on the Department for Transport’s (DfT) Local Cycling and Walking Infrastructure Plans (LCWIP) guidance and this will form part of the council’s Cycling Strategy.”

5.0 **Policy DM20 – Design**

5.1 Taylor Wimpey does not consider that it is necessary for all developments to meet all criteria of Policy DM20. The blanket application of this policy to all developments would amount to an onerous and inflexible approach that cannot be justified. This is contrary to the National Planning Policy Framework (NPPF) (February 2019) (para. 35). Indeed, Policy DM20 contains criteria that could be difficult to achieve on some sites for the following reasons:

- Part 5 requires an appropriate mix of uses to be accommodated; however, this may not always be appropriate or relevant to a development;
- Part 7 requires a comprehensive and co-ordinated approach to development; however, this will not be relevant to small scale / minor developments;
- Part 8 requires trees planting to be maximised; however, no justification has been provided and this is not required by national policy;
- Part 10 requires developments to incorporate measures to address the impacts of climate change and adverse microclimatic conditions; however, no details are provided of what this relates to, for example if this relates to flood risk then this is covered by Policy DM26. Such measures could have viability implications and need to be viability tested; and
- Part 11 requires that mechanical plant, refuse and cycle storage are integrated into the design of a building. However, this is not relevant to residential developments.

5.2 Paragraph 6.6.3 states that a range of options should be explored demonstrating appropriate massing and a mix of uses for the site. However, considering a mix of uses may not be relevant
to a residential development. Paragraph 6.6.6 refers to buildings being adaptable to other uses; however, this may not be relevant to a residential development.

Taylor Wimpey respectfully requests the following amendments:

**Policy DM20**

“Development will be required to **should** deliver high quality and sustainable design by:

1. Taking full advantage of positive site features including retaining the best buildings and securing opportunities to improve the character and quality of an area.

2. Demonstrating a positive response to topography, natural and built landscapes.

3. Using materials, colours, tones and textures appropriate to the characteristics of the area.

4. Enhancing the appearance of the city from major movement corridors.

5. Accommodating an appropriate mix of uses, **where appropriate.**

6. Making efficient use of land by promoting higher densities, taking account of the character of the area and location.

7. Taking a comprehensive and co-ordinated approach to development, **where appropriate.**

8. Incorporating hard and soft landscaping as an integral part of design, maximising tree planting, **where appropriate** and providing for its long-term maintenance.

9. Providing high quality inclusive spaces and buildings which promote and active and healthy lifestyles;

10. Incorporating measures to address the impacts of climate change and adverse microclimatic conditions, **where possible and subject to development viability.**

11. Integrating mechanical plant, refuse and cycle storage into the design of **non-residential** buildings.

12. Ensuring that development contributes to a reduction in crime and disorder and is resilient to terrorism, delivers safe and secure buildings and spaces.”

**Paragraph 6.6.3**

“Development should ensure it is integrated into its surrounding built, natural and historic environments by adding to the overall quality of the area. A range of options should be explored demonstrating appropriate massing and a mix of uses for the site, **where appropriate.** Buildings should also be flexible so that they can change and adapt over time. In order to achieve sustainable development, proposals should make optimal use of land, particularly in highly accessible locations subject to an assessment of site constraints. The opportunity for high quality hard and soft landscape design will be integral to achieve a successful design.”
Paragraph 6.6.6

“High quality design should create buildings and spaces that promote active and healthy lifestyles, can be successfully accessed and used by everyone safely, and ensure that they assess the defence and security threats, can be adaptable to other uses and are resilient to the effects of climate change, where appropriate. This requires consideration as to how buildings and their individual elements are viewed and function together to encourage multiple benefits for all. In considering the layout and design of buildings, development must demonstrate how it has included measures that address its impact upon climate change such as impact upon local microclimatic conditions, including daylight and sunlight, shadowing, glare, urban heat islands, and wind, where appropriate.”

6.0 Policy DM23 – Residential Amenity

6.1 Taylor Wimpey considers that aspects of Policy DM23 are onerous and conflict with national policy. For example the NPPF does not require that all trees are protected, instead it allows for mitigation. Part (iv) advises that the introduction of unacceptable additional access, traffic or parking resulting in an increase of visual intrusion, noise or disturbance should be avoided; however, just because something is considered to be “unacceptable” does not mean that there is a significant harmful effect and that the development should be avoided, whilst the effects of any impact could be appropriately mitigated.

6.2 Paragraph 6.9.2 raises concern about increased activity, traffic, noise, disturbance as a result of development; however, mitigation can be used to help minimise any impacts.

6.3 Taylor Wimpey respectfully request that the following changes are made to Policy DM23 and paragraph 6.92.

Policy DM23 - Residential Amenity

2. Impact on residential amenity will be assessed to:

i. protect or enhance the distinctive character of the existing building(s) and the surrounding area with respect to the design, scale and materials used on the building(s);

ii. protect trees and other soft landscaping of high amenity value, wherever possible, providing and provide replacement planting where necessary;

iii. ensure development will maintain a good standard of daylight, sunlight, outlook and privacy for all existing and future occupants of buildings;

iv. avoid the introduction of unacceptable additional accesses, traffic or parking which would result in significant harm to highway safety or residential amenity, as a result of increased resulting in an increase of visual intrusion, noise or disturbance, unless appropriate mitigation can be provided; and

v. ensure that noise, disturbances, smells, fumes and other harmful effects from surrounding land uses and/or associated operations will not have an unacceptable adverse impact on residential amenity.”

6.4 Paragraph 6.9.2
“Residential areas can be adversely affected by development which increases building or population density including extensions, conversions, redevelopment, and sub-division of curtilages to create new building plots. The impact may arise directly from the building work, displacing garden space or other greenery, or resulting in a lack of reasonable outlook or light from windows. It may also arise indirectly from increased activity, traffic, noise, disturbance, or overlooking of private areas. Mitigation will be sought to help reduce the impacts.”

6.5 Paragraph 6.9.3 refers to a Design Guidance which will provide recommended separation distances between residential buildings. Taylor Wimpey is not aware that the Planning / Design Guidance has been produced. The details on separation distances are extremely important factors to applicants and developers. This is because separation distances can have a significant impact on site efficiency and assumptions made by developers when bringing forward a policy compliant and viable scheme. It is considered to be inappropriate to reference an SPD in the Development and Allocation Plan in advance of the SPD being prepared.

6.6 Any Planning / Design Guidance should be developed with stakeholder and public involvement and should be subject to appropriate consultation through its development and not adopted by the Council without any involvement from the industry pursuant to the Development and Allocations Plan. Given the absence of the SPD, it is respectfully requested that reference to this document is deleted from the DAP.
Good afternoon,

Please find attached the Persimmon Homes response to the DAP Major Modifications consultation.

I would be grateful if you could confirm receipt of the attached.

Kind regards

Persimmon Homes Ltd t/a Persimmon Homes NE
2 Esh Plaza
Sir Bobby Robson Way
Newcastle Great Park
NE13 9BA

Dear Sir/Madam,

Please find attached the following letter regarding the Proposed Main Modifications Development and Allocations Plan (DAP) Consultation and a copy of the associated Schedule of Representations Procedure.

Thanks

Planning Policy

Planning
Newcastle City Council
9th Floor
Civic Centre
Newcastle upon Tyne

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POLICY RESPONSE:

Response to Newcastle City Council Development Allocations Plan Major Modifications:

Persimmon Homes North East

January 2019

PRODUCED BY:
Persimmon Homes North East Ltd
2 Esh Plaza
Sir Bobby Robson Way
Great Park
NE13 9BA
**Introduction**

Persimmon Homes North East has had a continued involvement as a key member interested in the adopted Newcastle Core Strategy and are glad to have the opportunity review this next stage of the plan. The development industry should be heavily involved in the preparation process of the emerging plan. This response covers the Development Allocations Plan and proposed Major Modifications following the Examination in Public and post hearings response from the Inspector.

**Local Plan Supporting Documents**

Persimmon Homes welcome the introduction of paragraph 2.3.3 referencing that masterplans for allocated development sites will be a material planning consideration when considering development proposals. We do however consider that paragraph 2.3.3 should reference “approved masterplans” rather than “adopted masterplans”. This will provide consistency with similar modifications made throughout the plan, for example the addition of paragraph 6.13.11, and ensures that masterplans approved as part of planning applications are given due weight.

**Policy DM3 – District Local Centres**

Persimmon Homes support the amendments made to Policy DM3 to introduce a new structure to the policy and the separation between existing and emerging centres.

We also support the introduction of para 3.3.6 which provides the opportunity for residential development to be introduced within District and Local Centres.

**Policy DM5 – Housing Sites**

Persimmon Homes support the amendments to this policy to provide an indicative number of dwellings, in order to provide clarity to the policy and to aid in the monitoring of its effectiveness.

**Policy DM6 – Accessible and Adaptable Housing**

Persimmon Homes remain concerned about the imposition and requirements of the policy for 25% of homes to be built to M4(2) standards. This remains a concern as the need for accessible and adaptable housing has not been adequately evidenced nor has the viability impact of this policy requirement been taken into account.

We remain concerned that the proposed modifications have not introduced a transitional period, to allow developers to factor in this new standards within site acquisitions, site viability and site design.

**Policy DM7 – Space Standards**

Persimmon Homes continue to consider that this policy should be deleted. The need for space standards has not been adequately demonstrated and the impact on affordability has not been adequately taken into account.

Should this policy be retained, the requirement should not be imposed on sites with outline planning permission or sites with an approved masterplan. The principle of this approach has been introduced as part of the proposed modifications throughout the plan. We consider that an additional paragraph should be included for within the supporting text to state that sites with approved masterplans will be exempt from the requirements of Policy DM7.
**Policy DM10 – Pedestrian and Cycle Movement**
Persimmon Homes remain concerned that this policy has not been amended to provide for more flexible wording, by including for “where appropriate” within each part of the policy. This will ensure that the individual requirements of the policy is considered in the context of individual sites and the achievability of applying the policy requirement.

**Policy DM11 – Public Transport**
Persimmon Homes welcome some amendments made to this policy and the supporting text which has sought to remove some of the contradictions between the policy wording and supporting text, such as the additions to paragraph 5.2.3.

We however remain concerned that that this policy has not been amended to provide for more flexible wording by including for “where appropriate” within each part of the policy. This will ensure that the individual requirements of the policy is considered in the context of individual sites and the achievability of applying the policy requirement.

We support the introduction of paragraph 5.2.7 which makes reference to the review of the Newcastle Great Park and Ride.

**Policy DM20 – Design**
Persimmon Homes remain concerned that this policy does not include for sufficient clarity to ensure that the policy requirements can be applied to developments where appropriate to the context and location of the application site. The policy should include for criteria which makes it clear to applicants where the policy requirement is considered relevant based on general location or development type, for example development in the Urban Core. It is noted from the Examination Hearings that particular requirements of this policy such as Part 10, will apply to proposed development within the Urban Core. This is not clear within the wording of the policy and it is simply requested in the supporting text that Design and Access Statements should set out how the design of the development has sought to address matters set out in the policy. It is not considered that this statement provides sufficient flexibility to remove the blanket requirement of this policy or provide sufficient clarity and therefore this policy should be improved.

**Policy DM23 – Residential Amenity**
Persimmon Homes disagree with the principle that Policy DM23 and it’s supporting text makes reference to an SPD in advance of the SPD being prepared. At this stage any viability burden is unknown as well as any impacts on layouts and efficiency of site masterplans therefore it is essential that any future SPD should be developed with stakeholder involvement and should be subject to appropriate consultation and involvement from the industry pursuant.

**DM24 – Environmental and Health Impacts of Development**
Persimmon Homes welcome the addition to the supporting text at paragraph 6.10.9 which makes reference to the validation checklist and when background reports on various site specific matters will be required. It is considered that a clear reference should be made between this paragraph and the requirements of Policy DM24, to ensure there is sufficient flexibility in that the policy will be applied where appropriate to the context of a site.

**DM26 – Flood Risk and Water Management**
Persimmon Homes welcome the proposed amendments at Part 1(ii) of the policy which has removed reference to the requirement for green roofs and walls and subsequently this has been replaced to “incorporate green infrastructure”.
We still have concerns that the policy requires developers to reduce flood risk by “maximising permeable surfaces”. The policy should be more flexible in that it seeks to “encourage” the use of permeable surfaces or allow for developers to appropriately demonstrate how other measures have been incorporated into the proposed development, to manage and reduce flood risk.

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Persimmon Homes welcome the proposed amendments to Policy DM27 and the supporting text which has recognised the position of approved masterplans for Core Strategy land allocations, which have incorporated strategic green infrastructure and that sites will be built out in accordance with approved masterplans.

**DM28 – Trees and Landscaping**

Persimmon Homes have concerns that there are no proposed modifications to this policy which removes the protection of all trees or landscape features on a development site and does not differentiate between high and low value trees and landscape features.

We also have concerns that paragraph 6.4.14 of the supporting text now includes for proposed amendments which remove flexibility within the policy. The supporting text stated that “development must include new trees and landscaping where appropriate which will enhance the quality and character of the area”. The proposed amendments remove this element of flexibility by removing the ability for new trees and landscaping to be provided “where appropriate”. While we acknowledge the improvement which trees and landscaping will make to the built environment, the former wording should be retained as this requirement is not relevant to every scheme and is not achievable on every site.

The supporting text of this policy still continues to lack clarity in terms of how the policy requirements can be achieved on site. The supporting text for example states “trees and landscaping should also be used to mitigate and enhance sites affected by local environmental conditions including air quality, urban heat islands and wind tunnel effects”. The Council acknowledged within the Examination Hearing that this policy is most relevant to the Urban Core of the city, however this clarity is not evident within the text. Further clarity should be provided.

**DM29 – Protecting and Enhancing Geodiversity, Biodiversity and Habitats**

Persimmon Homes support the proposed amendments to the supporting text at paragraph 6.5.9 to tie in the position of approved masterplans.

Following the Examination Hearing in July 2019, Persimmon Homes and other interested parties engaged with the Council in relation to this policy and proposed amendments to the supporting text. It was agreed with the Council that the following wording would be proposed at paragraph 6.15.10 of the supporting text:

> Any mitigation or enhancement to biodiversity and habitats should be on site. Where this is not practical, planning obligations will be required to secure off site net gains in biodiversity. Where mitigation is required to compensate for any habitats and species or features of value that are harmed or lost these should be provided on site. Where on site mitigation is not possible, planning obligations will be required to secure off site mitigation to allow for habitats, species and features replacements, and may include enhancing existing Wildlife Enhancements Corridors nearby.

It is considered that the wording above is sufficiently clear and flexible to meet the requirements of the policy whilst complying with the requirement to provide biodiversity net gains, which can be provided both on and off site. The proposed amendments at paragraph 6.15.10 currently being consulted should be amended in line with the above wording, as discussed in July 2019.
DM30 – Protecting and Providing for Open Space, Sports and Recreational Buildings and Land

It is acknowledged that the proposed amendments for this policy seek to combine former policies DM30 and DM31 into one single open space policy.

Paragraph 6.16.19 refers to a type, form and location of open space being guided where appropriate by a masterplan or brief. It is considered that this paragraph should be amended further to make specific reference to approved masterplans for allocated sites, to state that “the Council has approved masterplans for a number of sites that seek the delivery of housing land allocations in the CSUCP. These plans demonstrate how the housing allocations can be delivered incorporating the required open space typologies where appropriate on site”. Alternatively this policy should be cross referenced with paragraph 6.13.11 of the plan which also makes reference to approved masterplans. It is important that the plan as a whole takes a consistent approach.

Part 3 of Policy DM30 sets out where the development of ancillary facilities on open space will be supported. It is considered that Part 3 of the policy contradicts paragraph 6.16.12 of the supporting text, in that Part 3(v) states that ancillary facilities will be supported where “it would contribute positively to the setting and quality that the open space performs”. Paragraph 6.16.12 concludes that that ancillary facilities must be “appropriate to their location, and not compromise the value and the function that open space can perform”. Part 3(v) of the policy is not supported and it is considered that this should be updated to be consistent with paragraph 6.16.12 of the supporting text, to ensure that the policy test in this instance is “no harm” as opposed to “no impact” as currently worded.

The supporting text at paragraph 6.16.4 sets a minimum size of amenity/natural greenspace considered acceptable as part of new development and states that the minimum threshold will need to be 0.15ha in size. Any space below this size may be acceptable in terms of visual amenity or for the provision of sustainable drainage. Table 2 of the supporting text sets the threshold for open space provision based on the number of proposed dwellings and this should be read in conjunction with Table 3 which sets a quantity standard of open space typology.

It is considered that some development sizes, particularly in the 20 – 49 dwelling category, would be required to provide amenity greenspace in accordance with Table 2, however the quantity standard set out in Table 3 may result in less than 0.15ha of amenity open space being required. For example, a development site of 25 dwellings would generate an average population of 58 persons (based on average 2.3 persons per dwelling). Under the quantity standard generated utilising the standards in Table 3, the development would generate the need for 0.058ha of amenity green space. There is therefore a conflict between the supporting text and the open space standards within the policy, where a greater level of provision above what is required is unnecessarily requested.

A new paragraph has been inserted at 6.16.22 which seeks to encourage the potential for new residential development to secure enhancements to existing facilities on the basis that a higher quality and wider variety of open space is often more valuable to communities than a greater quantity of provision. The text goes on to suggest that development should deliver open space provision or enhancement that addresses identified needs. No further clarity is provided in terms of how this process will be undertaken and how existing and proposed provision will be assessed to achieve improvements to existing facilities. For example, would an off site contribution be required to improve existing facilities off site and how would this be calculated. If this is the position the Council will adopt, there is the opportunity to better link paragraph 6.16.22 with other sections of the supporting text such as paragraphs 6.16.17 and 6.16.28, which relate to where off site provision is required. It is considered that the addition of para 6.16.22 has been somewhat of an afterthought and should be better integrated within the supporting text of the policy for clarity.
To whom it may concern,

Please see attached the Newcastle Great Park Consortium responses following consultation on the Proposed Main Modifications Development and Allocations Plan (DAP).

Should you require any further information please do not hesitate to contact me.

Regards,

Newcastle Great Park

We are proud to be an official partner of Team GB.

Persimmon Homes is proud to support local communities. Every year our Community Champions scheme donates £750,000 to local groups and our Building Futures scheme supports young people with donations of over £1 million. Find out more...
Newcastle City Council  
Planning Policy  
9th Floor  
Barras Bridge  
Newcastle upon Tyne  
NE1 8QH

3rd February 2020  
Our Ref: NGP/03.02.20-01

Sent via email: planningpolicy@newcastle.gov.uk

To whom it may concern,

We write on behalf of the Newcastle Great Park Consortium following consultation on the **Proposed Main Modifications Development and Allocations Plan (DAP)**. Please see our responses set out below.

**Local Plan Supporting Documents**

The Newcastle Great Park Consortium (Consortium) welcome the introduction of paragraph 2.3.3 referencing that masterplans for allocated development sites will be a material planning consideration when considering development proposals. We do however consider that paragraph 2.3.3 should reference “approved masterplans” rather than “adopted masterplans”. This will provide consistency with similar modifications made throughout the plan, for example the addition of paragraph 6.13.11, and ensures that masterplans approved as part of planning applications are given due weight.

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For and on Behalf of Newcastle Great Park Consortium
Barton Farm
Brunton Lane
Newcastle Upon Tyne
NE13 9NT
Dear [Name],

Proposed Main Modifications Development and Allocations Plan Consultation

Thank you for consulting Historic England on the above main modifications and associated documents. Please find attached our response.

Kind regards

Inspector of Historic Buildings and Areas | North East and Yorkshire Region
Historic England | 37 Tanner Row | York | YO1 6WP

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PROPOSED MAIN MODIFICATIONS, NEWCASTLE UPON TYNE DEVELOPMENT AND ALLOCATIONS PLAN (DAP) CONSULTATION

Thank you for consulting Historic England on the proposed modifications to the Newcastle upon Tyne Development and Allocations Plan. Having considered the proposed modifications and accompanying documents (Sustainability Appraisal Addendum and Geodiversity Audit) we do not have any comments to make at this stage. The history of our engagement with the Development and Allocations Plan and previous issues we have raised is outlined in the Statement of Common Ground submitted as part of the examination (SD6, DtCSoCG; p.46).

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours sincerely,

Inspector of Historic Buildings and Areas
Response to the Inspector’s Proposed Main Modifications Development Allocations Plan (DAP) on behalf of Newcastle International Airport Limited (NIAL).

1. **Wildlife Enhancement Corridors (DM29)**

1.1 As outlined within previous DAP consultation responses (20/11/17), we maintain our primary concern/objection for the wildlife enhancement corridors designation within the majority of land on employment site KEAc, Southside of the runway. We also have objections to this restrictive designation being introduced to Sites A, B, C & D, as outlined in NIAL’s 2035 adopted Masterplan (see Figure 20)\(^1\).

1.2 Sites A, B and D are allocated for employment development in the 2015 ‘Planning for the Future Core Strategy and Urban Core Plan’ for Gateshead and Newcastle Upon Tyne 2010-2030’ (CSUP), and also benefit from Enterprise Zone Status. Further details of the emerging DAP Wildlife Enhancement Corridor allocations, via each site, and a supportive commentary of NIAL’s future development aspirations are outlined below.

**Site A**

1.3 The majority of Employment Site A is designated as a wildlife enhancement corridor. This site is allocated for employment uses, as outlined in Policy KEA1 (Newcastle International Airport) (KEAc) of the CSUP. The NIAL 2035 Masterplan seeks to protect the land for the development of a large scale, regionally important freight distribution development, or other project of significant scale, which will have a considerable positive economic impact on the North East.

**Site B**

1.4 Site B has a partial Wildlife Enhancement Corridor allocation. NIAL and Tynexe Ltd (a joint venture delivery company between Newcastle City Council and Dystart Developments Ltd) agreed a long term development agreement to deliver Newcastle Airport Business Park in a phased basis. Site B is currently under development to provide the headquarters of Bellway Homes. As outlined in the adopted NIAL 2035 Masterplan, Bellway will be a high profile anchor tenant for the site and we expect that this will be a significant draw for other high profile businesses, which will also be attracted by excellent access to the Airport and the Nexus Metro network.

**Site C**

1.5 The entirety of Site C is allocated as a Wildlife Enhancement Corridor. Although this site is currently allocated as Green Belt land, as previously outlined in the NIAL 2035 Masterplan, it is an aspiration to work with partners with a view to establishing a for a more favourable

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planning status and accommodate development. Future Site C use would support the growth of the Airport.

Site D

1.6 Part of the southern boundary of Site D is also allocated as a wildlife enhancement corridor. As outlined in the 2035 NIAL Masterplan, Site D is closely associated with the Great Park Housing development. The proximity to housing and the large development footprint it provides, means it is well suited for an office-type development.

Wildlife Enhancement Corridor Objection reasons in relation to Main Modifications

1.7 Reason One – Economic Growth Potential of NIAL Employment Sites- The CSUP outlines (paragraph 16.117):

"The airport is considered to be an important employment location for general employment uses and the Key Employment Site will be a premier business location in Newcastle’s portfolio of economic land."

As outlined in paragraph 1.2, Sites A, B and D are allocated for employment development in the CSUP.

1.8 The allocation of sites outlined in paragraphs 1.1-1.6 for wildlife enhancement corridors in the draft DAP contradicts the above statement and approach, by adding a material development constraint.

1.9 Indicative documents can be provided to demonstrate that the wildlife enhancement corridor designation could prevent the sites achieve their objective. Such documentation would express additional, emerging strategic thinking we have developed since the DAP examination and the initial DAP consultation began. Furthermore, allocating sites B, C and D as Wildlife Enhancement Corridors could restrict the growth benefits outlined in paragraphs 1.4-6 coming forward. This approach would therefore not be in accordance with CSUCP Policy KEA1 (Newcastle Airport) in relation to the text which supports the continued expansion of the Airport.

1.10 The designation of wildlife corridors in the Airport Employment Sites would restrict development, and therefore the Airport objects to these proposed allocations.

1.11 Reason Two - Alternative locations - It is suggested that a wildlife corridor should instead focus on the Ouseburn and Foxcover Wood. Taking this approach would ensure the wildlife corridors could be maintained and enhanced around the fringes of the Airport Employment Sites, and would still allow for the aforementioned sites to be developed, constraint free, allowing the Airport/regional growth benefits to fully flourish. We previously outlined comments on this point in our 20/11/2017 DAP Consultation response.
1.12 **Reason Three - Aircraft Safety** - There is also a risk that planting wildlife attracting landscaping so close to the runway (as part of proposed wildlife enhancement corridors), could (for example) attract birds, which could pose strike risks with existing aircraft operations. This consideration would be consistent with the emerging DM Policy 25 'Aircraft Safety'.

1.13 **Reason Four - Biodiversity Enhancement** - Since the DAP consultation and examination process began, we have published a target to achieve net zero by 2035\(^2\), which aligns with the end date of the Masterplan and the Airport’s centenary year. As part of our net Zero Carbon Strategy, we will be implementing a programme of broad-leaf tree planting. These will provide natural habitat benefits for the local environment. This approach would complement the modification wording in paragraph 6.15.10 of the DAP, which states (in the context of mitigation measures if not able to integrate Wildlife Enhancement Corridors into a new development site), development should consider ‘Biodiversity and habitat enhancements to provide net gains and mitigation for any habitats and species of value that are harmed or lost should be provided’.

1.14 Significant consideration should therefore be made to our wider approach to biodiversity enhancement and weight should be given to this approach, when deciding whether wildlife enhancement corridors should be designated within the Airport Employment Sites. We would be happy to speak to the City Council in further detail to explain and clarify our approach to tree planting and biodiversity.

2. **Aircraft Safety Policy (DM25)**

2.1 We suggest that the CAA (Civil Aviation Authority) are included as a consultee in the 'Aircraft Safety' Policy. Since the 2019 DAP examination, it was announced that Aerodrome safeguarding policy documents ‘Guidance to Crane Operators on Aviation Lighting and Notification’ (CAP 1096) and ‘Safeguarding of Aerodromes’ (CAP 738) are being updated.

2.2 The crane guidance, (when in operation) would require applicants to liaise with the CAA in the first instance. It is therefore vital that they are included as a consultee in this policy.

2.3 We would be willing to explain in a meeting with the City Council how these CAP policy changes impact on the planning decision process in further detail. This proposed change would relate to Paragraph 6.11.2 and 6.11.3 (Main Modification No. MM33), as referenced in the schedule of main modifications document.

2.4 Broadly, the main modifications to Paragraphs 6.11.2 and 6.11.3 (Main Modification No. MM33) are welcomed, however these changes do not fully consider all Aerodrome safeguarding impacts. We request that these paragraphs are updated to reflect a more comprehensive view of all Aerodrome safeguarding consideration (i.e. heat emissions, blasting and greater details of landscaping/open water considerations), and any

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\(^2\) [https://www.newcastleairport.com/net-zero-carbon-2035/]
safeguarding policy changes that come out of the changes to the CAP guidance (see paragraphs 2.1 – 2.3). We would be happy to work with the City Council to draft this wording. A further, comprehensive list of aerodrome safeguarding considerations and development issues to consider in this drafting can be found in our 20/11/2017 DAP Consultation response (see paragraphs 15 and 17).

3. **Noise Policy and Mitigation**

3.1 We previously raised concerns in our 20/11/2017 DAP consultation response, regarding the impact that the noise generated by the Airport would have on new development in close proximity to it, and how this would be assessed in the planning decision process. Since the DAP examination process began, the 2035 NIAL Masterplan was adopted. This publication included the production of noise contours for 2035 that take account of the growth of the Airport and a possible runway extension, for both daytime and night time. The contours should be the starting point for assessing the current noise impacts from the Airport and the main point of reference for considering future noise levels.

3.2 Paragraph 182 of the National Planning Policy Framework (NPPF) (Feb 2019) states that “existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established”. It states that where a significant adverse impact on a new development is identified it is the ‘agent of change’ which should be required to mitigate any impact. This paragraph is especially important to us, as we wish to avoid development without suitable mitigation being approved too close to the Airport and its approach paths which would restrict development of the Airport as an existing business. The 2035 Masterplan and noise contours (with Runway Extension) are the expression of future growth plans in terms of an expanded flight program at the Airport. In terms of the planning decision process, noise would therefore need to be considered in relation to current and future operations at the Airport.

3.3 The above is particularly important, considering the recent consultation on the APF (UK Airspace Policy Framework) - which reviews the levels at which significant annoyance are reached. As a result of this consultation, there were changes to the Lowest Observable Adverse Effect Level (LOAEL) proposed, which is when the impact on health and quality of life can be observed. The LOAEL is proposed at 51 dBLAeq, 16h during the day and 45 dBLAeq, 8h during the night. This policy change means that there is more sensitivity to noise in annoyance levels.

3.4 We request that these changes to the 2035 NIAL noise contour maps (with runway extension), the considerations outlined in paragraph 3.2, and the policy changes in the APF (see paragraph 3.3) are incorporated within the final DAP document. In addition, such redrafting should reference internal and external noise impact guidance from a range of noise sources, such as the World Health Organisation’s (WHO) definition of noise impact (including NOEL, LOAEL and SOAEL levels), the Noise Policy Statement for England, the BS 8233 standards, and Department for Transport/CAA guidance as appropriate (see paragraph 6 of our 20/11/2017 DAP consultation response for further details).

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3 https://www.newcastleairport.com/about-your-airport/masterplan/masterplan-documents/
Our request for such noise policy/wording modifications relate to the proposed deletion of Pol9 (Aircraft Noise), the proposed Policy DM25 (Aircraft Safety), as well as the redrafting/modifications of Policy DM24 (Environmental and Health Impacts of Development) in the emerging DAP. We would be happy to meet the City Council to discuss these matters further and assist with the policy drafting as appropriate.
Dear Sir / Madam,

Please find attached the Home Builders Federation (HBF) response to the Newcastle Main Modifications Development and Allocations Plan (DAP) consultation.

It would be greatly appreciated if you could confirm receipt of this response.

If you require any further information please feel free to get in touch at the details below.

Kind regards

Home Builders Federation

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Dear Sir/Madam,

Please find attached the following letter regarding the Proposed Main Modifications Development and Allocations Plan (DAP) Consultation and a copy of the associated Schedule of Representations Procedure.

Thanks

Planning Policy

Planning
Newcastle City Council
9th Floor
Civic Centre
Newcastle upon Tyne

Telephone: 0191 211 6300
Email: planning@newcastle.gov.uk
Website: www.newcastle.gov.uk/planning
Dear Sir / Madam,

NEWCASTLE LOCAL PLAN: DEVELOPMENT AND ALLOCATIONS PLAN MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation on the Newcastle Local Plan: Development and Allocations Plan Main Modifications Consultation.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC’s, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Policy DM5 – Housing Sites
The HBF support the Council in providing an indicative number of dwellings, to provide clarity to the policy and to aid in the monitoring of its effectiveness.

Policy DM6 – Accessible and Adaptable Housing
The HBF continue to be concerned by the requirement within this policy for 25% of homes to be built to M4(2) standards. The HBF continue to have concerns in relation to the evidence to support this policy and the viability of this policy requirement. However, if this policy is to be retained, the HBF would continue to ask that a transitional period be included following the adoption to allow for developers to factor in the costs of the standards into future land acquisitions.

The HBF also have concerns in relation to paragraph 4.2.6 which requires off-site contributions where step-free access is not feasible.

Policy DM7 – Space Standards
The HBF continue to consider that this policy should be deleted, as they continue to consider that the need for the NDSS has not been adequately demonstrated.
Future Engagement
I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the adoption of the Local Plan and all forthcoming consultations upon associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

Local Plans Manager – North
Email: [redacted]
Phone: [redacted]
Please find attached my objection.

Many thanks
To Newcastle Planning Department,

I wish to offer the following comments as part of the consultation on the Proposed Main Modifications in the Development and Allocations Plan (DAP):

**MM13, Page number 34, Paragraph 5.1.2**

I support this amendment, and welcome all moves which seek to embed accessibility into local policy.

**MM15, Page number 35, Paragraph 5.2.3**

I object to the above amendment on the basis that it would make development less sustainable, with developers no longer being obligated to place smaller developments within 400 metres walking distance of a bus stop or 800m of a metro station. This will mean residents of smaller developments will be more reliant on cars, and potentially have less access to key services. Furthermore, the changes would also result in smaller-scale major developments having access to less frequent bus services which would also undermine sustainability and reduce accessibility (as providing ‘frequent’ services as a default would be replaced with to a subjective appraisal of need based upon development size). This penalises residents of smaller developments unfairly, given that a smaller development size does not correlate with less of a need to access frequent transportation. These amendments would thus run contrary to Policy CS13 of Newcastle’s Local Plan, specifically:

1. **Promoting sustainable travel choices including:**
   1. Improving equality of access to transport for everyone.
   (As the amendments would discriminate against those living in smaller developments).
   3. An integrated public transport network and interchanges
   (Smaller developments would no longer need to be tied into the public transport network, thereby creating an increasingly fragmentary effect upon the network over time.)
   6. Encouraging a change from sole occupancy car use to more sustainable alternatives
   (In permitting developments that are further away from public transport infrastructure, car use (and sole occupancy car use is being promoted). Likewise, by permitting development that is serviced by less frequent bus services, people will be forced to use cars in order to make appointments and to travel in a convenient manner).

3. **Ensuring development:**
   2. Minimises car trips, [and] promotes and enhances public transport [...].
   (The same rational which applies to 1. Vi. is applicable here.)

These, however, are not the only policies at odds with the amendments, for they would also represent a step away from national policy. The National Planning Policy Framework (NPPF) states that *‘The planning system should support the transition to a low carbon future in a changing climate’* and therefore, Local Plans (including the DAB) should be carried out: *‘In line with the objectives and provisions of the Climate Change Act 2008.’* That is to say, it should facilitate a 100% reduction in carbon emissions by 2050 (from a 1990 baseline). And yet what the amendments would actual do would be to lessen our ability to achieve this legally-binding target by locking us into 15 years of development in which sustainable transport is side-lined for all but the biggest developments. As
shown in the Centre for Alternative Technology’s Zero Carbon Britain (ZCB) report, the transition away from cars and towards more sustainable forms of transport (including buses) is a vital step in order to meet our zero carbon commitments (and to limiting warming to under 1.5 degrees as mandated by the Paris Agreement). We should therefore be looking for ways to structure the built environment in ways which would maximise public transport uptake rather than deter it. This is especially pressing given that both Parliament and Newcastle City Council have declared us to be in a state of Climate Emergency. I would like to highlight the words of Councillor Forbes who stated: ‘We declared a climate emergency earlier this year and this is a real opportunity to make bold and once-in-a-generation plans for Newcastle, putting climate change at the heart of every decision we make.’ I echo his call, and believe that the amendment would fail to do just that. As the amendment would contradict both national and local policy, I urge you to reject it.

MM38, Page numbers 55 – 56, Policy DM27 - Protecting and Enhancing Green Infrastructure

‘Optimizing the benefits’ of Green Infrastructure, while a valid ambition in its own right, does not prevent the loss of existing green infrastructure to development and as such is not sufficient to meet national policy objectives. That is to say, it is possible to ‘optimise the benefits’ of an increasingly shrinking and fragmented area of land. Given this, I object to the removal of the commitment to ‘protect and maintain’ Newcastle’s Green Infrastructure, as it would run contrary to Paragraph 171, Chapter 15 of the NPPF, which states: ‘Plans should […] take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.’ Likewise, the U.K Government’s green strategy (as detailed in ‘A Green Future: Our 25 Year Plan to Improve the Environment’) highlights the necessity of protecting Green Infrastructure: ‘As we build more homes, preserving and creating green spaces in towns is more important than ever’.

In addition to national policy, the importance of protecting and maintaining green infrastructure is recognised locally; and thus the removal of these priorities would be equally incompatible with local objectives. For example, within Newcastle’s ‘Green Infrastructure Delivery Framework’ report, protection and enhancement of Green Infrastructure, Strategic Network Corridors and Opportunity Areas is named as one of four key themes which should guide future policy. Similarly, within the same document, maintaining the integrity of the green infrastructure network is deemed a ‘guiding principle’ which should ‘cut across the different directorates and work areas, such as transport, infrastructure, open space projects, flood management plans, economic development and housing delivery’. These values are also embedded in Newcastle’s Local Plan (Core Strategy and Urban Core Plan) with Policy CS18 stating:

‘A high quality and comprehensive framework of interconnected green infrastructure that offers ease of movement and an appealing natural environment for people and wildlife will be achieved by:

1. Maintaining, protecting and enhancing the integrity, connectivity, multifunctionality and accessibility of the Strategic Green Infrastructure Network.

2. Protection, enhancement and management of green infrastructure assets which include:

____________________________________

i. **Biodiversity and geodiversity assets**, including designated sites, designated wildlife corridors and priority habitats and species,

ii. **Distinctive landscape character**, recognising the particular importance of our rivers and topography,

iii. **Trees, woodland and hedgerows.**

[...]

5. **Protecting and enhancing open spaces, sport and recreational facilities in accordance with agreed standards in line with National Policy**

The amendment would thus serve to undermine local and national policy and, subsequently, should not be implemented.

In regards to point 2 (Addressing gaps in the Strategic Green Infrastructure Network corridors and, providing improvements within the Opportunity Areas designated on the Policies Map, and enhancing the function of the Green Belt as a green infrastructure resource.), I support the extension of this policy to the Green Belt. Its inclusion reflects the ‘great importance’ the government attaches to the Green Belt (as recognised in Chapter 13 of the NPPF), and so the amendment is in-line with national objectives.

Bullet point 3 has been removed in its entirety (3. Ensuring development proposals which could adversely affect green infrastructure assets demonstrate: i. that alternative provision which maintains or creates new green infrastructure assets is accessible and of equal value to health, climate protection, and biodiversity; or ii. the proposed development would be ancillary to the main use of the green infrastructure asset and the benefits would outweigh any harm) and replaced with bullet point 4 (4. Any development that would have an adverse impact on green infrastructure assets will be required to demonstrate that the benefits of any development will outweigh the harm.). I object to this amendment as it will result in the fragmentation and deterioration of Newcastle’s green infrastructure, which places it at odds with national and local policy objectives (as detailed above). The value of bullet point 3 (as cited above) is that, in order for planning permission to be granted, developers would need to commit to mitigating any negative impacts their development caused to our green infrastructure. By replacing this with bullet point 4, any level of damage becomes permissible to Newcastle’s green infrastructure, as long as there are benefits in other areas which are subjectively appraised to outweigh the environmental damage wrought. This, in combination with the removal of an obligation to mitigate this damage, would serve to reduce the integrity, amount and quality of green infrastructure. It would, accordingly, fail to protect, maintain, and enhance. Likewise, should optimising the benefits of green infrastructure become a goal, the amendment would also fail to secure this objective; for how can the benefits be maximised with unmitigated damage (i.e. the reduction or minimisation of the benefits of green infrastructure) permitted?
The damage that would become permissible, should the amendment be approved, would extend beyond the green infrastructure site itself. This is because, as Natural England’s Green Infrastructure Guidance report\(^4\) details, the benefits of green infrastructure are myriad and broad (Fig 1).

![Fig 1. Chart showing the benefits of green infrastructure and how it assists meet policy objectives.](image)

Consequently, the amendment would undermine several national policy objectives, including (but not limited to):

- ‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: [...] enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.’ (Paragraph 91, Chapter 8, NPPF).

(The amendment would enable the loss of accessible green infrastructure and undermine the objective to create healthy spaces as these places can now be destroyed without an additional site ‘of equal value to health’ being created. This would represent a material loss to local communities.

- ‘Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of

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\(^4\) Natural England’s Green Infrastructure Guidance (NE176):
http://publications.naturalengland.org.uk/publication/35033
quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.’ (Paragraph 97, Chapter 8, NPPF)

(This requirement would no longer be reflected locally which would make the DAP inconsistent with the NPPF).

- ‘Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.’ (Paragraph 149, Chapter 14, NPPF).

(Green infrastructure, the NPPF states, is a flood mitigation measure in itself and so in allowing it to be reduced (which the amendment would do – it is no longer ‘protected’) will increase flood risk and undermine adaptive capacity to climate change. As it is also a climate change mitigation method, the amendment would also undermine our capacity to reach our climate change targets (including those laid out in the Climate Change Act 2008). This would also stand at odds with the national trajectory towards scaling up our natural carbon sinks (which include our green infrastructure networks) - an example of which would be the recent creation of £10 million ‘Urban Tree Challenge Fund’ which aims to plant more than 130,000 trees planted across England’s towns and cities by 2020)."

I would also like to highlight the following statement made by Natural England in their aforementioned report; they state that the purpose of green infrastructure is ‘about underpinning the sustainability of a town or city, including making it resilient to the effects of climate change and enabling local authorities to meet their duty to conserve biodiversity under the Natural Environment and Rural Communities Act (NERC) 2006.’ If the existence of green infrastructure strengthens sustainability, then the converse must also be true. And as the amendment would enable the green infrastructure network to become fragmented, smaller and consequently more vulnerable, Newcastle would inevitably become less sustainable. Given that sustainability is a central tenant of the NPPF, this shift away from it must be considered unacceptable. On the basis of this, and due to the amendments general incompatibility with national and local policies and objectives, I argue that it should not be implemented.

MM46, Page number 62, Paragraph 6.15.9 and MM47, Page number 62, Paragraph 6.15.10

While unfortunately not enough time remains before the consultation deadline to enable me to comment on these amendments in depth, I would still like object to these alterations. I feel they would neither ‘protect’ nor ‘maintain’ green infrastructure and as such would be noncompliant with national and local policies (and therefore many of my previous comments would be equally applicable to them).

Thank you in advance for your consideration of my submission.

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5 https://www.gov.uk/government/news/government-delivers-new-10m-fund-to-plant-over-130000-urban-trees
Yours sincerely,
Hi

Please see email below.

Thanks

Please Note that I do not work on Wednesday

Hi, I’m contacting yourself as you are named as the independent programme officer dealing with the above document.

I am concerned that much of the pro environment intent is being ignored ie, this passage is taken directly from the interactive map:

**EDUCATIONAL ESTABLISHMENTS WITH ATTACHED OPEN SPACE (UDP OS1.6): Chapel Park Middle:**

Open Space Areas offer opportunities for exercise, development of sporting skills, relaxation, and fresh air, and are essential to the City’s health and wellbeing. They contribute to a well-balanced land use mix, good environment, development of tourism, and successful economy.

View information

Ward: Chapel Ward

However this site is now at a planning stage to build 102 houses which seemingly contradicts the environment, people friendly note attached to this area. I would be interested in your views
and as the timescale for public representation ends this week an early response would be very much appreciated.

Many thanks
Dear Sir/Madam,

We understand the consultation on the Proposed Main Modifications Development and Allocations Plan has now ended.

We are concerned that the majority of points raised in our detailed submission, particularly relating to Policies DM27, DM28, DM29, DM30 and DM31, have been overlooked or ignored.

Given the importance of open space and green infrastructure in supporting a healthy city, mitigating for climate change and supporting biodiversity, as well as the Council’s recent declaration of a climate emergency, we would expect to see better standards reflected in the planning system.

Kind regards,

Save Newcastle Wildlife

On 16 Dec 2019, at 10:07, Planning Policy <PlanningPolicy@newcastle.gov.uk> wrote:

Dear Sir/Madam,

Please find attached the following letter regarding the Proposed Main Modifications Development and Allocations Plan (DAP) Consultation and a copy of the associated Schedule of Representations Procedure.

Thanks
Planning Policy
Planning
Newcastle City Council
9th Floor
Civic Centre
Newcastle upon Tyne

Telephone: 0191 2116150
Email: rebecca.dorward@newcastle.gov.uk
Website: www.newcastle.gov.uk/planning

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Please read our Privacy Notice which sets out how we use information in the course of our work as a Local Planning Authority.

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<DAP Main Mods Consultation Letter.pdf><DAP Statement of reps Main Mods.pdf>