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Introduction

This consultation feedback report sets out how Newcastle City Council has involved the community and relevant bodies throughout the preparation of the Development and Allocations Plan (DAP). It identifies how the council has complied with the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

This report is divided into four sections;

- Introduction
- Draft DAP Regulation 18
- Pre-Submission DAP Regulation 19 and 20
- Conclusion and Next Steps

Local Plan Preparation and Consultation

In preparing Local Plan documents, the council must have regard to the requirements and regulations in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

Consultation must also be carried out in accordance with the council’s Statement of Community Involvement (SCI) 2013 and 2018. The SCI sets out what consultation will take place with the community and statutory consultees on planning policy documents and planning applications.

In accordance with Regulation 22 of the 2012 Regulations, this report sets out

- Which bodies and persons the council invited to make representations under regulation 18 (1);
- How these bodies and persons were invited to make representations under regulation 18;
- A summary of the main issues raised by the representations made pursuant to regulation 18, and;
- How any representations made pursuant to regulation 18 have been taken into account.

The 2012 Regulations identify three key stages of plan preparation a Local Planning Authority (LPA) can submit a Local Plan document to the Secretary of State.

The key stages are:

- (Regulation 18) – Preparation of a Local Plan
- (Regulation 19 & 20) – Publication of a Local Plan
- (Regulation 22) – Submission of a Local Plan

Regulation 18

(1) A local planning authority must –
a. Notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

b. Invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain

(2) The bodies or persons referred to in paragraph (1) are –

a. Such of the specific consultation bodies as the local planning authority consider may have an interest in the proposed local plan;

b. Such of the general consultation bodies as the local planning authority consider appropriate; and

c. Such residents or other persons carrying on business in the local planning authority’s area from which the local planning authority consider it appropriate to invite representations

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)

**Regulation 19**

Before submitting a Local Plan to the Secretary of State under section 20 of the Act, the local planning authority must –

a. Make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

b. Ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18 (1)

**Regulation 20**

(1) Any persons may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act
A Local Plan can be submitted to the Secretary of State under Regulation 22 following the completion of the previous stages of plan preparation and adherence to the regulations set out above.

The council also have a set of principles ‘Let’s Talk Principles’ which should be applied to all consultation and engagement.

**Let’s Talk Principles**

- Consultation should take place at the earliest possible stage and allow enough time for people to have their say before key decisions are made
- Consultation should be easy to understand and accessible so everyone can contribute
- Consultation should reach out in a range of different ways to as many different parts of the community as possible
- The council will listen and consultation feedback will be an important part of decision making

**Development and Allocations Plan**

The Development and Allocations Plan (DAP) forms an important part of Newcastle’s Local Plan which is a collection of documents that sets the framework for development in Newcastle to 2030.

The DAP forms Part 2 of the Local Plan, setting out Newcastle City Council’s planning policies for managing development in Newcastle, together with site allocations and designations. It will support the strategic policies and growth strategy of the Core Strategy and Urban Core Plan (CSUCP), which is Part 1 of the Local Plan adopted in March 2015.

Both plans will provide strategic and detailed planning policies to ensure the council has policies in place to deliver our growth ambitions.

This report covers the following stages of public consultation;

<table>
<thead>
<tr>
<th>Stage</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scoping Report</td>
<td>17 January – 28 February 2014</td>
</tr>
<tr>
<td>Draft DAP</td>
<td>9 October – 20 November 2017</td>
</tr>
<tr>
<td>Pre-Submission DAP</td>
<td>5 October - 16 November 2018</td>
</tr>
</tbody>
</table>

**Development and Allocations Scoping Report**
The Development and Allocations Scoping Report was consulted on from 17 January for six weeks until 28 February 2014. The Scoping Report set out the range of topics the Council proposed to cover in the Development and Allocations Plan and where appropriate make policy for.

**Call out for sites**

In January 2016, the Council undertook a six-week consultation to call out for sites, the purpose of this was to engage with developers, stakeholders and landowners, to update the Council on sites in the current SHLAA (2013) and the ELR (2013) and to identify new sites to be assessed. The Council also sought views on the draft Housing and Employment Land Availability Assessment (HELAA) Methodology. This was considered to be a technical stage of the plan preparation and therefore the consultation was targeted to relevant stakeholders.

**Draft DAP (Regulation 18)**

**When did we consult?**

Consultation on the draft Development and Allocations Plan was held between 9 October and 20 November 2017. This consultation adhered to the requirements identified in the 2012 Regulations, Regulation 18 stage, for the preparation of a Local Plan.

**Which bodies and persons were invited to make representations under Regulation 18?**

The council contacted all statutory consultees and general consultation bodies held in the Local Plan consultation database either through an email or letter. A copy of the consultation letter and email text is included in Appendix 1, with a list of the consultees contacted in Appendix 11.

**How were bodies and persons invited to make representations?**

The council raised awareness and promoted consultation and events by:

- Sending letters and emails (Appendix 1) to all contacts on the Newcastle Local Plan Consultation Database (Appendix 11) on the 9 October. This database contains residents, stakeholders and organisations that requested to be on the database or are a statutory consultee. The database is continually updated and anyone who requests can be added. 311 letters and emails were sent out to notify individuals and groups of the consultation.
• Following Council approval to consult on the draft DAP, the website was updated and documents and evidence were made available online.
• Releasing a press statement (6 October 2017) in the Journal.
• Publishing a notification of consultation in Citylife in November 2017, which is distributed to every household in the city
• Sharing details of the consultation on the Council’s social media (Facebook and Twitter) from 1 October with regular updates throughout the consultation period.

Elders’ Council Meeting
Planning officers attended from the Council attended the Elders’ Council’s ‘Older Person’s Friendly City Group’ meeting on the 2 October, which was attended by 12 Elders’ Council Members. A presentation was given to the Older Person’s Friendly City Group, outlining the purpose of the draft DAP, in context with the adopted CSUCP. The process for consultation and methods of submitting responses on the draft DAP were explained. A draft schedule of the consultation events and draft frequently asked questions (FAQs) were also made available at the session.

Following the short presentation there was an opportunity to ask some questions and the following points were noted:

• Some thought that student housing is being oversupplied whilst others thought it was an excellent City centre use
• Adaptable housing and building regulation standards were discussed
• There was discussion around proposed spacing standards
• Concern was raised over the potential loss of open space
• Concern was raised over the impact of development on trees and green infrastructure in general
• There was discussion over Green Belt housing allocations in the CSUCP.

Disability and Access Forum Meeting
Planning Officers attended the Disability and Access Forum on the 1 November to discuss the draft DAP, outlining the purpose of the draft DAP in context of the CSUCP, as well as discussing some of the key policies within the document and identifying the allocated housing sites. Members in attendance were also informed of the consultation process and how to respond to the consultation. During the discussion the following points were noted:

• Request for the document in audio so it could be easily accessed
• To extend the deadline for response to allow time to listen to and consider audio.
• Accessible student accommodation – lifts in all accommodation so they can be adapted at a later date for non-students if necessary.
• Parking for residents- make sure there is enough parking for residents of new housing instead of front gardens
• More provision of supported living accommodation in the form of tower blocks and generally
• All houses should be built to adaptable standards as it would be cheaper to do so in the long term than have to adapt them later.
• Further consideration is needed for transport scheme and pedestrian priority and layout.
• Further discussion would be welcomed by the group before the next round of public consultation

Young People’s Engagement and Youth Council Meeting

• Publicity was posted across the City in child friendly settings such as Sports Centres and Libraries alerting children and young people to the consultation process
• The Communities Team publicised the consultation to all groups on their mailing lists (via e-mail) including those for children and young people attaching relevant copies of documentation
• Newcastle Youth Council have discussed the consultation and are in support of the document (NYC full Council meeting October 2017). The Youth Council have asked to be involved in further consultation (as and when appropriate)
• Youth Councillor Kieron Gibson is the NYC portfolio holder for planning and infrastructure and has explored the policies in relation to the consultation. No questions or queries emerged from this exercise
• NYC Members were asked to speak to their peers about the consultation and encourage participation

Events
A total of 11 events were held, from the 17 October to 18 November 2017.

<table>
<thead>
<tr>
<th>Date</th>
<th>Location</th>
<th>Time</th>
<th>Number of Attendees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuesday 17 Oct</td>
<td>City Community and Information Hub and Library (City Library), Charles Avison Building, 33 New Bridge Street West, Newcastle upon Tyne NE1 8AX</td>
<td>12pm-2pm</td>
<td>11</td>
</tr>
<tr>
<td>Thursday 19 Oct</td>
<td>Outer West Community and Information Hub and Library, Outer West Library, Denton Way, Denton Park, Newcastle upon Tyne, NE5 2QZ</td>
<td>10:30am-12:30pm</td>
<td>5</td>
</tr>
<tr>
<td>Friday 20 Oct</td>
<td>Kingston Park Community Centre, 102 Brunton Lane, NE3 2SW</td>
<td>2pm-4pm</td>
<td>8</td>
</tr>
<tr>
<td>Date</td>
<td>Location</td>
<td>Time</td>
<td>Number</td>
</tr>
<tr>
<td>-----------------</td>
<td>---------------------------------------------------------------------------</td>
<td>--------------------</td>
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</tr>
<tr>
<td>Wednesday 25 Oct</td>
<td>Trinity Church, High Street, Gosforth, NE3 4AG</td>
<td>3:30pm-5:30pm</td>
<td>10</td>
</tr>
<tr>
<td>Tuesday 31 Oct</td>
<td>Scotswood Neighbourhood Centre, 221 Woodstock Road, NE15 6HE*</td>
<td>12pm-2pm</td>
<td>0</td>
</tr>
<tr>
<td>*moved to Scotswood Centre, 466-474 Armstrong Road, Scotswood, Newcastle upon Tyne NE15 6BY</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wed 1 Nov</td>
<td>City Community and Information Hub and Library (City Library), Charles Avison Building, 33 New Bridge Street West, Newcastle upon Tyne NE1 8AX</td>
<td>2pm-4pm</td>
<td>8</td>
</tr>
<tr>
<td>Monday 6 Nov</td>
<td>Throckley Community Hall, Back Victoria Terrace, NE15 9EL</td>
<td>5pm-7pm</td>
<td>6</td>
</tr>
<tr>
<td>Thursday 9 Nov</td>
<td>Jesmond Community Library, 76A St George's Terrace, NE2 2DL</td>
<td>5pm-7pm</td>
<td>11</td>
</tr>
<tr>
<td>Friday 10 Nov</td>
<td>East End Community and Information Hub and Library, Hadrian Square, Byker, Newcastle upon Tyne, NE6 1AL</td>
<td>10:30am-12:30pm</td>
<td>3</td>
</tr>
<tr>
<td>Tuesday 14 Nov</td>
<td>Pottery Bank Children’s Centre, Yelverton Crescent, NE6 3SW</td>
<td>2pm-4pm</td>
<td>3</td>
</tr>
<tr>
<td>Saturday 18 Nov</td>
<td>City Community and Information Hub and Library (City Library), Charles Avison Building, 33 New Bridge Street West, Newcastle upon Tyne NE1 8AX</td>
<td>10:30am-12:30pm</td>
<td>19</td>
</tr>
</tbody>
</table>

**Draft DAP Consultation Responses**

This section brings together results from all the consultation processes and organises them by the chapters and themes in the draft DAP. It is a quantitative and qualitative overview of the response and comments made by residents and organisations. A summary of all responses received is included in this report (Appendix 12).

Comments have been counted rather than total submissions to allow more thorough analysis. So, whilst 104 responses were received, these can be divided into 259 comments relating to specific policy areas, and 444 attributed to individual policies.

Economic Prosperity
What residents told us:

Three residents were in support of the policies, in particular the plan’s recognition of retail centres and the potential redevelopment of the General Hospital site

One resident objected to these policies, stating that the CSUCP had established Newcastle’s retail hierarchy. They also made the point that local centres should be high priority to promote sustainability, in terms of fewer car journeys leading to stronger local economies

Five residents made general comments on this policy area, questioning the need for employment sites in Byker, requesting the vacant buildings be brought into use and expressing concern about economic policy in the city

What organisations told us:

Four organisations were in support of the policies, requesting that more variety of development is allowed within retail centres to create more sustainable centres, and discussing the potential of specific sites and areas of the city

Eight organisations objected to policies in this area, stating that the accessibility of proposed employment sites from residential areas should be considered, and that the standards set by the policies protecting employment sites are too strict. It was also requested that the boundaries of particular retail centres be extended, and that the requirements for including non-retail development in a retail centre be clarified

Eleven organisations made general comments about this policy area, requesting that the criteria for retail centres be expanded to include sui generis or other uses, and that additional sites be allocated for employment uses. Also, Historic England expressed concern about the potential for proposed employment allocations to impact on heritage assets

Homes

<table>
<thead>
<tr>
<th>General comments</th>
<th>39</th>
</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>4</td>
</tr>
</tbody>
</table>
What residents told us:

Two residents were in support of this policy area, stating that the optional housing standards do not go far enough, and expressing support for the proposed allocation of the General Hospital site.

Five residents objected to the policies on housing. They expressed concerns about housing allocations on greenfield and former Green Belt land, traffic implications of development, and the potential for proposed allocation sites to be accessible by sustainable transport.

Twelve residents made general comments on this policy area, asking about plans for specific sites, expressing concern about housing allocations on open space, and requesting that new developments be freehold without maintenance charges.

What organisations told us:

Two organisations were in support of the housing policies, and particularly the variety in location of development and the inclusion of policies to provide housing suitable for older people.

Eleven organisations objected to these policies, querying the allocation or lack of allocation of specific sites. The evidence of need and viability supporting the optional housing standard policies was questioned. Also, the accessibility and the potential of the sites to sustainable transport was raised as a concern.

Twenty-seven organisations made general comments about proposed housing policy. A number of these questioned the robustness of the evidence of need and viability supporting the policies on optional housing standards. Others supported the inclusion of the standards, or discussed specific individual sites.

Transport and Accessibility

<table>
<thead>
<tr>
<th>Comments</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>General comments</td>
<td>26</td>
</tr>
<tr>
<td>In support</td>
<td>8</td>
</tr>
<tr>
<td>In objection</td>
<td>11</td>
</tr>
<tr>
<td>Total Comments</td>
<td>45</td>
</tr>
</tbody>
</table>
What residents told us:

Five residents were in support of these policies, stating that there should be more pedestrian and cycle routes through the city but stressing that an increase in cycling infrastructure should not have a negative impact on pedestrians.

Seven residents objected to the transport and accessibility policies, stating that there should be more cycle lanes and that the Strategic Cycle Network should be shown on the policies map. Concerns were also raised about the lack of provision for horse riders, and the level of detail provided on Public Rights of Way.

Twelve residents made general comments about this policy area, requesting improvements to public transport facilities, and requesting better cycling infrastructure and maintenance of roads.

What organisations told us:

Three organisations were in support of these policies, but requesting mention of air quality and water quality of rivers in relation to this policy area.

Four organisations objected to the policies on transport and accessibility, with the majority considering that the policies did not go far enough in encouraging sustainability and park and ride provision in particular, and one stating that they considered requirements excessive.

Fourteen organisations made general comments on this policy area, comments included stating that the evidence underpinning the policies should be reviewed and that park and ride facilities should be promoted. Minor amendments to wording were also suggested. It was recommended that measurable targets be set to demonstrate the deliverability of the policy over the plan period.

People and Place

<table>
<thead>
<tr>
<th>General comments</th>
<th>33</th>
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</thead>
<tbody>
<tr>
<td>In support</td>
<td>8</td>
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<tr>
<td>In objection</td>
<td>14</td>
</tr>
<tr>
<td>Total Comments</td>
<td>55</td>
</tr>
</tbody>
</table>

What residents told us:

Three residents were in support of these policies, requesting that the library be open longer and that more public toilets be provided, especially for disabled people.

Five residents objected to the policies on people and place, on the basis that the plan does not do enough to protect green infrastructure. It was also suggested that the density of development is significant and that this should be included in the plan.
Eleven residents submitted general comments on these policies, stating that more should be done in general to protect, enhance, and add to green infrastructure.

The identification of some open space as ‘surplus’ was criticised.

What organisations told us:

Five organisations were in support of the policies on People and Place, making minor suggestions for how the policies could be strengthened in general.

Nine organisations objected to the policies. Many expressed concern about the policies on open space, referring to the potential impact of the proposed move of the city’s parks to a charitable trust, or objecting to the change in standards for open space compared to the UDP. Some also requested that policies in this section in general be strengthened. Others were concerned about the fact that designations in this policy area overlapped sites, and considered the requirements of some of the policies to be unnecessary and overbearing when taken in addition to existing CSUCP requirements.

Twenty-two organisations made general comments about this policy area. Commenters largely requested amendments to the policies, to make them more robust, improve consistency with national policy, or to minimise the potential of the policies to harm other interests, including, transport, farming, and development sites.

Minerals and Waste

<table>
<thead>
<tr>
<th>General comments</th>
<th>13</th>
</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>5</td>
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<tr>
<td>In objection</td>
<td>4</td>
</tr>
<tr>
<td>Total Comments</td>
<td>22</td>
</tr>
</tbody>
</table>

What residents told us:

One resident commented in support of the policies, but expressed concern about existing provision of waste services in the city.

One resident commented in objection to the policies as DM32 did not include mention of the proposed Dewley Hill extraction site.

Two residents made general comments on the policies, and also expressed concern about littering and the existing provision of waste services.

What organisations told us:
Four organisations were in support of the policies, noting that the ‘agricultural land’ which would be affected by possible mining is of low value and requesting wording amendments to reflect this.

Three organisations objected to the policies, outlining concern about the designation of Dewley Hill as an area of search due to concerns about the environment, the loss of green space, and aircraft safety.

Eleven organisations made general comments relating to this policy area. These highlighted potential cross-boundary, ecological, and highways issues relating to the proposed area of search. Others made suggestions for amendments to the policies on waste.

Infrastructure and Delivery

<table>
<thead>
<tr>
<th>General comments</th>
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</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>1</td>
</tr>
<tr>
<td>In objection</td>
<td>0</td>
</tr>
<tr>
<td>Total Comments</td>
<td>7</td>
</tr>
</tbody>
</table>

What residents told us:

One resident expressed support for the policy.

Five residents made general comments about the policy. One individual expressed concern about the potential for increased telecommunications and digital infrastructure would result in more roadworks, one thought underground fibre cable preferable to providing internet to homes using telegraph poles, and one was concerned about provision for those with no access to computers or smartphones.

What organisations told us:

One organisation, Kingston Park Neighbourhood Forum, commented on this policy. They acknowledged the importance of broadband but stated that the internet is not accessible to all members of the community and so other communications infrastructure should be maintained.

Other Comments
A number of comments were not made against any specific policy or policy area but were made as general comments about the plan as a whole or the consultation process itself. As no option to make comments in support or in objection was included in this section of the form, all comments here have been recorded as general comments.

<table>
<thead>
<tr>
<th>General comments</th>
<th>37</th>
</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>0</td>
</tr>
<tr>
<td>In objection</td>
<td>0</td>
</tr>
<tr>
<td>Total Comments</td>
<td>37</td>
</tr>
</tbody>
</table>

What residents told us:

Fifteen residents made general comments, raising a number of points. Some felt that the consultation itself was flawed, others thought that the policies map was misleading or that the DAP itself was not clear enough. Others felt that it did not do enough to address issues of sustainability or public transport.

What organisations told us:

Twenty-two organisations made general comments that did not relate to any one policy or policy area. They also raised comments about transport and sustainability, and many raised additional points regarding specific sites.

By Policy

This section includes analysis of responses by specific policy rather than by general themes.

DM1 – Employment Sites

<table>
<thead>
<tr>
<th>General comments</th>
<th>6</th>
</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>3</td>
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<tr>
<td>In objection</td>
<td>3</td>
</tr>
<tr>
<td>Total Comments</td>
<td>12</td>
</tr>
</tbody>
</table>

What residents told us:
One resident was in support of the inclusion of the General Hospital site within this policy, making a number of suggestions for how the site could best be redeveloped.

One resident made a general comment on this policy, expressing concern about the market for employment land allocations in Byker.

What organisations told us:

Two organisations were in support of the policy, one requesting that a mixed use economy in the Ouseburn area be retained and nurtured, and one supporting the deallocation of a specific site owned by the commenter.

Three organisations objected to the policy, recommending that employment sites be located in areas adjacent to residential developments, to increase accessibility and avoid unnecessary journeys, and advocating for greater provision of mixed use development in general.

Five organisations made general comments about this policy. The National Grid noted that one employment site is situated beneath power lines, expressing safety concerns about the potential for development to be located there. Highways England requested that development proposals put forward for the sites be required to demonstrate that the development would not have an adverse impact on the road network. Others raised boundary issues or proposed additional sites for allocation.

Finally, Historic England raised concerns about the potential impact of proposed allocations on heritage assets.

DM2 – Protection of Employment Sites

<table>
<thead>
<tr>
<th>General comments</th>
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</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
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<tr>
<td>In objection</td>
<td>2</td>
</tr>
<tr>
<td>Total Comments</td>
<td>9</td>
</tr>
</tbody>
</table>

What residents told us:

Two residents made general comments about this policy, questioning whether there was a market for employment sites in Byker, and asking for clarification regarding the area of a specific site.

What organisations told us:

One organisation commented in support of the policy, requesting that a mixed use economy in the Ouseburn area be retained and nurtured.

Two organisations objected to this policy. One requested a change to the wording of the policy to clarify that parking related to the employment site would be permitted.
within the site, so as to prevent this from being displaced onto surrounding residential streets. One requested that their site not be included within the policy, and stated that the wording as drafted is onerous.

Four organisations made general comments on the policy. Highways England recommended that development proposals on identified employment sites be required to demonstrate that there would be no adverse impact on the Strategic Road Network. Others requested that the potential need for additional road infrastructure to support economic development be acknowledged within the policy, and requested recognition of non-B use employment sites within the city, or an inclusion of sui generis uses within the policy.

DM3 – District and Local Retail Centres

<table>
<thead>
<tr>
<th>General comments</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>4</td>
</tr>
<tr>
<td>In objection</td>
<td>9</td>
</tr>
<tr>
<td>Total Comments</td>
<td>17</td>
</tr>
</tbody>
</table>

What residents told us:

Two residents were in support of this policy, in particular of retail health checks and protection of specific centres. In addition, one of these residents requested that the policies on retail centres in general include Sandyford’s Goldspink Lane and Starbeck Avenue.

One resident objected to the policy, stating that the retail hierarchy is set out in policy CS7 of the CSUCP, and that Local Centres should be higher priority.

One resident made a general comment about this policy, expressing general concern about lack of investment in Elswick and Byker.

What organisations told us:

Two organisations commented in support of this policy. They expressed support for protection of the city’s retail centres but requested that the definition of retail centres be broader, so as to create a fuller range shops, food outlets, and services in one location.

Seven organisations objected to the policy. They requested that the policy be amended to require provision of quality walking and cycling infrastructure within and leading to retail centres, objecting to the continuation of the Hot Food Takeaways SPD implied by the policy, and requested that the boundaries of proposed retail centres be amended to include additional sites. Furthermore, concerns were raised...
about the lack of flexibility in the policy, which was seen to limit non-retail development to a detrimental extent.

Three organisations made general comments about this policy, supporting the principle of designated retail centres, suggesting additional measures by which economic prosperity could be encouraged in the city. Additionally, one expressed concern that part of Dinnington’s retail centre is open space and asked that this be removed from the centre

DM4 – Retail and Leisure Impact Assessment

<table>
<thead>
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<th>General comments</th>
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</tr>
</thead>
<tbody>
<tr>
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<td>In objection</td>
<td>3</td>
</tr>
<tr>
<td>Total Comments</td>
<td>10</td>
</tr>
</tbody>
</table>

What residents told us:

One resident was in support of the policy, but requested that the policies on retail centres in general include Sandyford’s Goldspink Lane and Starbeck Avenue

One resident made a general comment about this policy, expressing general concern about lack of investment in Elswick and Byker.

What organisations told us:

Three organisations were in support of the policy. They supported protection of the city’s retail centres but requested that the definition of retail centres be broader, so as to create a fuller range of public and commercial services in one location

Two organisations objected to this policy, as the threshold area of development which would require an impact assessment is smaller than what is recommended in the NPPF, which is seen as an unnecessary constraint on development. Also, it was felt that mixed use development is preferable in general so a policy which could limit the potential of this type of development should not be included in the DAP

Two organisations made general comments about the policy, with one requesting that the potential impact of existing development on proposed new development be considered and mitigated against through the planning process. Highways England recommended that a transport assessment should be included as part of the impact assessment required by this policy, so as to understand the potential impacts on the local and strategic road networks.

DM5 – Housing Sites
What residents told us:

One resident supported the policy, stating that the allocation of disused sites, and recognition of self-build plots, is appreciated.

Five residents objected to the policy. One did so on the basis that development in Newcastle Great Park will negatively affect Havannah Nature Reserve, whilst another felt that the masterplans for Newcastle Great Park and Scotswood Development Area were now out of date. Others expressed concern about the impact of new developments on traffic, and the ability of proposed allocations to support well-connected sustainable transport. Some also objected to the location of a number of sites on greenfield and former Green Belt land.

Eight residents made general comments on this policy, asking for clarification regarding use of specific sites within the city and affordable housing requirements. Also, concerns were raised about the allocation of open space for residential development, and the potential for new leasehold developments to be built.

What organisations told us:

Two organisations were in support, with the Elders Council requesting that new housing developments be suitable for older people.

Ten organisations objected to this policy. Tyne and Wear Public Transport Users Group suggested that the impact of proposed residential sites on air pollution should be a consideration in allocating sites, and that public transport access to proposed sites should be realistic and viable. Other commenters expressed that the policy should identify what type of housing should be provided on each site, that specific sites should also be allocated, and that the sustainability of proposed sites should be given greater consideration.

Twenty organisations made general comments on this policy, requesting clarification about what affordable housing and additional infrastructure would need to be provided as part of delivering these housing sites, and opposing new leasehold development. Two of these organisations recommended that the Council provide a buffer above and beyond the housing requirement of sites which are deliverable within the plan period, and others queried whether all proposed sites would be deliverable over the plan period. Save Newcastle Wildlife requested that the two proposed housing sites which are situated on open space should be removed from the plan, and the Environment Agency pointed out that some sites would require risk
assessments before being brought forward for development. Concerns were raised by Historic England about the potential for a number of housing sites to affect heritage assets in the city

DM6 – Accessible and Adaptable Housing

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<td>In support</td>
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<td>In objection</td>
<td>5</td>
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<tr>
<td>Total Comments</td>
<td>20</td>
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What residents told us:

One resident was in support of the policy, but stated that the proportion of accessible and adaptable housing required should be higher

One resident objected to this policy, as the housing policies generally are not specific enough about the exact size, type, and tenure of housing that should be provided throughout the city

Two residents made general comments about this policy, stating that the proposed housing policies do not do enough to ensure development in the right location

What organisations told us:

One organisation (the Elders’ Council) were in support of the policy, stating that housing should be built to Lifetime Homes standards

Four organisations objected to this policy on the grounds that the policy wording was not clear enough on when its provisions should be triggered, that the evidence of need and viability is not sufficient to justify the policy and the specific proportion of accessible and adaptable housing required

Eleven organisations made general comments on this policy, supporting accessible standards, but expressing concerns about the viability of the policy and the lack of supporting evidence.

DM7 – Space Standards

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<td>In support</td>
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<td>In objection</td>
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<td>Total Comments</td>
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</table>
What residents told us:

One resident was in support of the policy, but stated that it did not go far enough, asking that standards of wall thickness and sound proofing be included in the plan.

Three individuals made general comments on the policy, objecting to leasehold development and requesting more residential development in Byker.

What organisations told us:

One organisation was in support of the standards, but noted the importance of building homes to Lifetime Homes standards.

Five organisations made comments objecting to this policy, one advocating for the Parker Morris standards to be used instead, one asking for the viability exemption to be removed, and one asking for clarification regarding what housing types the standards would apply to. Others objected on the grounds that the evidence of need and viability underpinning the policy was not sufficiently robust.

Nine organisations made general comments on this policy, largely questioning the evidence used to justify the policy and requesting a more thorough assessment of market signals and the potential impact of the policy on housing delivery in the city. One organisation requested that the viability exemption be moved from the supporting text into the policy wording.

**DM8 – Specialist Residential Accommodation**

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<td>Total Comments</td>
<td>6</td>
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What residents told us:

One resident made a general comment about this policy, stating that overall housing provision as set out in the plan is insufficient.

What organisations told us:

One organisation, the Elders’ Council, was in support of this policy. They noted that it is important to ensure that such housing is within a neighbourhood and not fenced off.
One organisation, Age Friendly City/Future Homes 100 objected to the policy, as they consider that this policy is about controlling development of specialist accommodation rather than encouraging it. They also stated that it was important that specialist housing be well integrated with general housing, and asked that the Lifetime Neighbourhoods standard be reintroduced.

Three organisations made general comments about this policy, one asking for density standards to be implemented, one recommending that soundproofing of housing be required in the city centre, and one stating that reducing the number of housing standards required would encourage development.

DM9 – General Hospital Site

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<td>In support</td>
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<td>In objection</td>
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<tr>
<td>Total Comments</td>
<td>13</td>
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</table>

What residents told us:

One resident was in support of the policy, suggesting a number of potential uses for the site.

One resident objected on this policy, asking that the site be turned into an eco-centre.

Three residents made general comments on this policy, asking what had been proposed for the site.

What organisations told us:

One organisation commented in support of the policy, but advised that a good mix of housing on the site would create a more sustainable community.

Seven organisations made general comments on the policy. The Tenants and Residents of Elswick Triangle expressed concern that housing on the site could contribute to social problems in the west end. Highways England requested that a robust transport assessment be carried out to assess the implications of developing the site for the Strategic Road Network. Others requested that the site be used to provide accessible housing, and that the heritage assets on site be protected.

DM10 – Pedestrian and Cycle Movement

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<th>General comments</th>
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<tr>
<td>In support</td>
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</table>
What residents told us:

Three residents commented in support, encouraging better pedestrian and cycle routes throughout the city

Six residents objected to this policy, on the basis that more should be done for cyclists through the plan (for example, formal protection and status given to the Strategic Cycle Network, showing cycle routes on the policies map). One objected to the lack of provision for horse riders through the plan

Seven residents made general comments on this policy, requesting segregation of pedestrians and cyclists whilst generally supporting increased cycle paths

What organisations told us:

Two residents’ groups were in support of the policy, but requested improvements to pavements and increased crossing times for pedestrians at traffic lights

Four organisations objected to the policy, with the majority arguing that the policy does not do enough to ensure delivery of sustainable transport options.

Additionally, Taylor Wimpey stated that the policy is unnecessary as existing policy requirements through the CSUCP are sufficient

Eight organisations made general comments on the policy, largely supportive of the policies and their intentions but querying the evidence which supports them, and requesting that more be done to enable disabled people to get around the city

DM11 – Public Transport

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<tr>
<td>In support</td>
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<td>In objection</td>
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<td>Total Comments</td>
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</table>

What residents told us:

Three residents made comments supporting the policy, but suggested increased segregation of pedestrians and cyclists, extending the Metro to the west of the city, and creating a TfL-style unified provider for buses
One resident objected to the policy on the basis that it does not require developments to be designed so as to improve sustainability from the outset.

Four residents made general comments on this policy, expressing general concern about transport in the city, with one suggesting a number of measures by which Newcastle could promote sustainable transport.

What organisations told us:

Two organisations were in support of the policy, stating that sustainable transport should be encouraged but asking that more be done to strengthen park and ride facilities and improve the quality of pavements due to accessibility concerns.

Three organisations objected to the policy, requesting that it be amended to be more ambitious in delivering more sustainable transport.

Seven organisations made general comments about this policy, raising points about the accessibility and sustainability of public transport, and provision of park and ride within the city.

**DM12 – Parking and Servicing**

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<td>In objection</td>
<td>3</td>
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<td>Total Comments</td>
<td>16</td>
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</table>

One resident was in support of the policy, but advised that better cycling infrastructure should be prevented from making it more difficult or dangerous for pedestrians to get around.

One resident objected on the basis that a lack of cycle lanes puts cyclists in danger.

Three residents made general comments on this policy, stating that pavements should be better maintained, and requesting that the laws regarding cycling on pavements be more strictly enforced to prevent harm to pedestrians.

What organisations told us:

Two organisations objected to this policy on the basis that it encourages increased car use. They recommend amending the policy to require provision of cycle parking and parking for disabled people, and electric charging points.

Nine organisations made general comments on this policy. Newcastle Disability Forum requested that the transport network be made more accessible in general to disabled users, for example through lower kerbs on street corners. Other
Commenters also requested improved accessibility, better segregation of pedestrians and cyclists, clearer standards for what is required through the policy, and more to be done to encourage sustainable transport in general. Historic England also noted that parking requirements could constrain development where the historic environment would be adversely affected by parking provision.

DM13 – Road Hierarchy

What residents told us:

Two residents objected to this policy, stating that it should include the Strategic Cycle Network as a designation and on the policies map, and expressing concern about the safety of Bentinck Road as a secondary road replacing Grainger Park Road.

Two residents made general comments on this policy, requesting amendments to wording to improve clarity and expressed concern about the general condition of Newcastle’s roads.

One organisation (Space for Gosforth) objected to this policy, suggesting amendments to wording and recommending that two additional tiers be added to the road hierarchy.

Four organisations made general comments on the policy, requesting clearer standards for what is expected through the policy, and advising that the guidance and standards which support the policy should be updated and consulted on.

DM14 – Mitigation and Highway Management

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<td>In support</td>
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<td>In objection</td>
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<td>Total Comments</td>
<td>11</td>
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</table>
What residents told us:

Three residents made general comments on this policy, expressing concern about the state of the road in terms of congestion and littering.

What organisations told us:

Two organisations commented in support of the policy, expressing concern about the accessibility of the road network to older people, and requesting mention of how the impacts of the road network on rivers could be mitigated.

Two organisations objected to the policy, suggesting that the wording be amended to more strongly encourage more sustainable modes of transport.

Four organisations made general comments on this policy. The National Leasehold Campaign requested that all roads be fully adopted by the Council and funded through Council tax. Others requested more detail to clarify exactly how the policy is to be applied, and recommended encouraging more sustainable modes of transport and accessible routes around the city.

DM15 – Conservation of Heritage Assets

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<td>In objection</td>
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<td>Total Comments</td>
<td>7</td>
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</table>

Two residents made general comments, referring to open space and the policy direction of the plan.

What organisations told us:

Two residents’ organisations were in support of the policy, welcoming the protection of the historic environment.

One organisation objected to this policy, and requested greater clarity and a more thorough evidence base for the plan.

Two organisations made general comments about this policy, stating that it should be amended to be more consistent with national policy, and requesting greater specific protection for Hadrian’s wall within the plan, either its own policy or as part of DM15.
One resident made a general comment on the policy, expressing concern about the general direction of the plan.

What organisations told us:

Two residents’ organisations were in support of this policy, welcoming the proposed protection of the historic environment.

One organisation objected to this policy, requesting greater clarity in what is required and a more thorough evidence base for the plan.

Two organisations made general comments, stating that the policy should be modified to be more consistent with NPPF paragraph 128, so as to create a proportionate approach to development which may impact on heritage assets, as opposed to the standard approach as in the policy as drafted.

DM17 – Preservation of Archaeological Remains and Archaeological Work

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<td>In objection</td>
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<td>Total Comments</td>
<td>4</td>
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</table>
No individual residents made comments on this policy

What organisations told us:

Two residents’ groups made comments in support of this policy, welcoming the protection and conservation of the historic environment

One organisation objected to this policy, and requesting greater clarity and a more thorough evidence base for the plan

One organisation made a general comment about this policy, broadly supporting its aims but stating that the policy should be modified to be more consistent with NPPF paragraph 128, to create a proportionate approach to development which may impact on heritage assets

DM18 – Building Recording

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<tr>
<td>In support</td>
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<td>In objection</td>
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<tr>
<td>Total Comments</td>
<td>3</td>
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</table>

What residents told us:

One resident made a general comment expressing concern about the infrastructure and amenity of Throckley

What organisations told us:

One organisation objected, requesting greater clarity in what is required throughout the plan

One organisation made a general comment welcoming the plan’s approach to the historic environment

DM19 – Battlefield of Newburn Ford 1640

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<th>General comments</th>
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<tr>
<td>In support</td>
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</table>
What residents told us:

One resident objected on the basis that development on the site had been permitted in the past, despite the historical value of the site

Two residents made general comments on the policy, expressing concern about the general direction of the plan

What organisations told us:

One organisation objected, requesting greater clarity in what is required throughout the plan

One organisation (Historic England) made a general comment on this policy, welcoming the policy and its intent but suggesting that the wording be amended

DM20 – Design

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<td>In support</td>
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<td>In objection</td>
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<tr>
<td>Total Comments</td>
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</table>

What residents told us:

One resident was in support of the policy

One resident made a general comment expressing concern about the direction of the plan

What organisations told us:

Two organisations were in support of the policy, stating that the preservation of heritage should be a priority within the plan

One organisation objected, suggesting that more emphasis should be placed on retaining buildings of historical and architectural merit

Four organisations made general comments, with Sport England making the point that the plan should encourage design which makes the built environment more conducive to physical activity, and Story Homes requesting that the policy be reworded to provide greater clarity

DM21 – Shopfronts and Signage
What residents told us:

One resident supported the policy

Two residents made general comments about the policy, supporting the protection of historic shopfronts

What organisations told us:

One organisation, the Elders Council, was in support of the policy and advised that protecting the historic environment is important

Two organisations made general comments about the policy, stating that good design and control of parking should be a major consideration in determining planning applications

DM22 – Temporary Shroud Adverts

No comments were received relating to this policy.

DM23 – Residential Amenity

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<td>In objection</td>
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<td>Total Comments</td>
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</table>

What residents told us:

Two residents made general comments about this policy, requesting professional maintenance and protection of parks and open spaces

What organisations told us:

Two organisations objected to this policy, both supporting the general direction of the policy but requesting amendments to the wording to make the policy more flexible, to account for biodiversity, and to encourage public transport use

Four organisations made general comments about this policy, supporting the role of the policy but stating that the policy as drafted is too rigid and not consistent with national policy.
DM24 – Environmental Protection

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<td>Total Comments</td>
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</table>

One resident commented in support of the policy, but stated that public toilets should be provided for all, but particularly for disabled people.

Two residents made general comments which did not relate directly to this policy, expressing concern about the direction of the plan and requesting greater protection for specific areas of the city.

What organisations told us:

Two organisations supported the policy, with the Coal Authority in particular noting the requirement to consider ground stability issues.

Two organisations objected. The Newcastle Green party requesting amendments to preserve buildings of architectural or historical merit, and Newcastle Airport expressing concern about the potential for some designs and materials to encourage roosting birds.

Four organisations made general comments, with Historic England being generally supportive, and Story Homes raising a number of concerns about the consistency of the policy with the NPPF.

DM25 – Flood Risk and Water Management

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<td>In objection</td>
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<td>Total Comments</td>
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What residents told us:

Two residents made general comments which did not relate directly to this policy, expressing concern about the direction of the plan and requesting greater protection for specific areas of the city.

What organisations told us:
Two organisations supported the policy, welcoming the approach taken by the Plan on this issue.

Two organisations objected to the policy. Newcastle Airport cited safety concerns about the potential for areas of open water to attract birds.

Two residents organisations made general comments supporting green infrastructure.

What residents told us:

Three residents objected to the policy as they consider it insufficient to protect green infrastructure from new development.

Five residents made general comments, generally supporting higher standards for green infrastructure provision, with one commenter requesting that the policy be reworded to help achieve this.

What organisations told us:

Two organisations supported the policy, welcoming the multifunctionality, but stating that the distinction between green infrastructure corridors and opportunity areas on the policies map is not clear.

Three organisations objected to the policy. One due to safety concerns relating the airport, one considered the policy to burdensome to developers, and one considered that reprovision of green infrastructure would be insufficient unless it was of equal value to what was lost.

Seven organisations made general comments about the policy, citing multiple concerns. Northumberland Council noted that a number of Strategic Green Infrastructure corridors adjoined the border with Northumberland and therefore had the potential to be cross boundary. Others wanted clarification on how the policy would be put into practice, requesting that parts be reworded to clarify the policy and its requirements. Concern was raised over the fact that the GI Network overlaps the area of search designated by policy DM33.
DM26 – Protecting and Enhancing Green Infrastructure

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<td>In objection</td>
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<td>Total Comments</td>
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</table>

What residents told us:

- Three residents objected to the policy as they consider it insufficient to protect green infrastructure from new development.
- Five residents made general comments, generally supporting higher standards for green infrastructure provision, with one commenter requesting that the policy be reworded to help achieve this.

What organisations told us:

- Two organisations supported the policy, welcoming the multifunctionality, but stating that the distinction between green infrastructure corridors and opportunity areas on the policies map is not clear.
- Three organisations objected to the policy. One due to safety concerns relating the airport, one considered the policy to burdensome to developers, and one considered that reprovision of green infrastructure would be insufficient unless it was of equal value to what was lost.
- Seven organisations made general comments about the policy, citing multiple concerns. Northumberland Council noted that a number of Strategic Green Infrastructure corridors adjoined the border with Northumberland and therefore had the potential to be cross boundary. Others wanted clarification on how the policy would be put into practice, requesting that parts be reworded to clarify the policy and its requirements. Concern was raised over the fact that the GI Network overlaps the area of search designated by policy DM33.

DM27 – Trees and Landscaping

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<td>In objection</td>
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<td>Total Comments</td>
<td>11</td>
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</table>
What residents told us:

One resident objected, stating that the policy is worded with too many loopholes to be of value.

Five residents made general comments which were largely supportive of the policy but requesting that more be done to protect or enhance green spaces in specific areas of the city.

What organisations told us:

Two organisations supported the policy, referring to the benefits of green space but requesting that reference to ancient woodland be added.

Newcastle International Airport objected on the basis that landscaping which encourages birds may not be acceptable in certain locations due to safety concerns.

Two organisations made general comments, supporting provision of green spaces and policy to protect them, but requesting that the policy be reworded, in part to require development to incorporate trees.

DM28 – Protecting and Enhancing Biodiversity and Habitats

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<td>In objection</td>
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<td>Total Comments</td>
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What residents told us:

Three residents objected to the policy, stating that the policy is worded with too many loopholes to be of value.

Four residents made general comments, requesting amendments to the policy to protect biodiversity, or requesting assurance that specific areas of the city would be protected.

What organisations told us:

Natural England supported the policy, suggesting minor amendments to the wording of the policy but stating that the policy is robust.
Three organisations objected to the policy. Newcastle Green Party stated that a cabinet portfolio post for biodiversity and natural environment should be created to support this issue, whilst others raised concerns about safeguarding the airport and the application of the policy to a specific site.

Nine organisations made general comments largely acknowledging the importance of green infrastructure. One commenter questioned the robustness of the evidence used to support the policy.

**DM29 – Protecting Open Space**

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<td>In objection</td>
<td>9</td>
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<tr>
<td>Total Comments</td>
<td>26</td>
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</table>

What residents told us:

Two residents objected to the policy, considering greenfield development to be unnecessary and request that unused brownfield sites be brought forward instead, and stating that open space would be developed if it was profitable despite the policy.

Seven residents made general comments, objecting to the change to open space standards compared to the UDP. One objected to the language used, stating that open space should not be considered ‘surplus’. They also objected to housing allocations which could impact on wildlife corridors.

What organisations told us:

Age Friendly City and the Elders Council commented in support, stating that preserving parks and green space is necessary to support physical and mental health, they asked whether standards for open space provision took into account the fact the older people have limited mobility and so would be best served by smaller open spaces closer to home.

Seven organisations objected to the policy. They stated that no final decisions should be made before parks are managed by a charitable trust, and objected to the use of the word ‘delete’ to refer open space. CPRE opposed the reduction in proposed open space compared to the UDP. Newcastle Airport object to land adjoining the airport being designated as amenity green space as they do not consider this to be accurate. They are concerned that the designation will restrict potential future development. Others felt that this policy in addition to allocations in the CSUCP is unnecessary, or that the open space requirement should not be less than that in the UDP.
Eight organisations made general comments, with tenants groups requesting more green space on West Road and in general throughout the city due to its positive health benefits. Others considered that the policy did not go far enough in protecting green infrastructure, or that the evidence base was flawed.

**DM30 – Provision of Open Space, Sports, and Recreational Buildings**

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<td>In objection</td>
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<td><strong>Total Comments</strong></td>
<td><strong>16</strong></td>
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</table>

**What residents told us:**

One resident supported the policy, stating that point three of this policy was essential.

One resident objected, stating that open space would be developed if it was profitable despite the policy.

Three residents made general comments, suggesting professional maintenance and protection of parks, and expressing concern about the infrastructure and amenities of Throckley, and the direction of the plan in general.

**What organisations told us:**

One organisation, the Elders’ Council supported the policy, stating that preserving parks and green space is necessary to support physical and mental health.

Four organisations made objections to the policy. These objections were made on the basis that no final decisions should be made before parks are moved to a charitable trust, that the policy was not necessary on specific sites, and that open space requirements should not be reduced from UDP standards.

Six organisations made general comments on this policy. Newcastle University requested that the allocation of a specific site as open space be reconsidered, whilst Sport England requested that the policy be amended to be more directly relevant to recreational buildings. Two residents’ groups considered provision of open space on new developments to be a priority, with Save Newcastle Wildlife recommending that provision of communal food growing opportunities be made a requirement rather than something to be encouraged. Others requested a definition for ‘recreational buildings’, or stated they consider the evidence base used for the policy to be flawed.

**DM31 – Green Belt Development**

<table>
<thead>
<tr>
<th>General comments</th>
<th>9</th>
</tr>
</thead>
<tbody>
<tr>
<td>In support</td>
<td>0</td>
</tr>
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</table>
What residents told us:

Two residents objected to the policy as they consider Green Belt development to be unnecessary, requesting that unused brownfield sites be brought forward instead.

Four residents made general comments, opposing the erosion of the Green Belt, and the degradation of amenities in Throckley. Commenters also supported the protection of the Ouseburn Corridor as set out in the CSUCP.

What organisations told us:

Five organisations made general comments on this policy. One stated that Green Belt development is likely to be inevitable, while Highways England had concerns about the impact of such development on the Strategic Road Network. WYG (on behalf of Arena Racing Company Ltd) asked that Newcastle Racecourse be designated as a major developed site within the Green Belt through this policy.

Nexus stated that the policy should allow for development on the site, and Historic England requested amendments to wording to reflect the NPPF.

DM32 – Minerals Extraction and Reclamation

<table>
<thead>
<tr>
<th>General comments</th>
<th>8</th>
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</thead>
<tbody>
<tr>
<td>In support</td>
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</tr>
<tr>
<td>In objection</td>
<td>2</td>
</tr>
<tr>
<td>Total Comments</td>
<td>12</td>
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</tbody>
</table>

What residents told us:

One resident objected as they felt that the plan did not mention the proposed coal extraction site at Dewley Hill.

One made a general comment expressing concern about the future of recycling and waste services in the city.

What organisations told us:

Two organisations supported the policy, requesting that the proposed site be considered based on the need for coal compared to the need for agricultural land, and suggesting minor amendments to the supporting text.
Newcastle Green Party objected to the policy and request that it be reworded to permit proposals only where they would not adversely impact climate change mitigation.

Seven organisations made general comments. Concern was expressed about boundary issues, ecology and potential health impacts, and the impact on the Strategic Road Network and aircraft.

<table>
<thead>
<tr>
<th>General comments</th>
<th>6</th>
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</thead>
<tbody>
<tr>
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<td>In objection</td>
<td>2</td>
</tr>
<tr>
<td>Total Comments</td>
<td>11</td>
</tr>
</tbody>
</table>

What residents told us:

One resident made a comment against this policy, expressing concern about the future of recycling and waste services.

What organisations told us:

Two organisations supported the policy, but request amendments to the policy to remove the requirement to maintain the site for 15 years after cessation of mining, and to amend the reference to the site’s existing use as agricultural land.

Two organisations objected to the policy due to concerns about its proximity to the airport and the potential effect on transport infrastructure of mineral extraction.

Five organisations made general comments. They largely requested mitigation of environmental impacts, and recommended that the relevant policy frameworks be taken into account. Save Newcastle Wildlife argued that there is no longer a requirement for coal and that therefore the policy should be removed. Northumberland County Council request an amendment to the supporting text to clarify that planning applications concerning the Area of Search should take into account the potential impact on Northumberland.

DM34 – Recycling and Refuse Storage Provision

<table>
<thead>
<tr>
<th>General comments</th>
<th>7</th>
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</thead>
<tbody>
<tr>
<td>In support</td>
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<tr>
<td>In objection</td>
<td>0</td>
</tr>
<tr>
<td>Total Comments</td>
<td>9</td>
</tr>
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</table>
What residents told us:

One comment supported the policy, however, they expressed general dissatisfaction with current waste provision.

Two residents made general comments, requesting more fines for littering, covered bins, and increased collections.

The Elders’ Council supported the policy, stating that existing recycling and refuse storage was inadequate in places, and recommending an increase in convictions for misuse of bins.

Five organisations made general comments on the policy. Two residents’ groups (Newcastle Disability Forum and Kingston Park Neighbourhood Forum) expressed support for recycling and proposed that new developments could incorporate mechanical waste disposal units. Newcastle International Airport suggested that waste facilities may need safeguarding in some locations. One developer stated that, though they support the aims of the policy, they did not consider the policy justified or sound as it lacks proportionality and flexibility.

DM35 – Telecommunications and Digital Infrastructure

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<th>General comments</th>
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<tbody>
<tr>
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<tr>
<td>In objection</td>
<td>0</td>
</tr>
<tr>
<td>Total Comments</td>
<td>5</td>
</tr>
</tbody>
</table>

What residents told us:

One resident supported the policy.

Three residents made general comments about the policy. One individual expressed concern about the potential for increased telecommunications and digital infrastructure to result in more roadworks, one thought underground fibre cable preferable to providing internet to homes using telegraph poles, and one was concerned about provision for those with no access to computers or smartphones.

What organisations told us:

One organisation, Kingston Park Neighbourhood Forum, commented on this policy. They acknowledged the importance of broadband but stated that the internet is not accessible to all members of the community and so other communications infrastructure should be maintained.
How have the main issues been addressed and taken forward in the next stage of the Local Plan?

The comments raised during the Draft DAP public consultation were taken into account and each representation was provided with a council in the Draft DAP Consultation Feedback Report, which was made available on the council’s website.

Pre-Submission DAP (Regulation 19 and 20)

When did we consult?

Consultation on the Pre-Submission Development and Allocations Plan took place between 5 October to 16 November 2018. This consultation was carried out in accordance with Regulation 19 and 20 of the 2012 Regulations.

Which bodies and persons were invited to make representations under Regulation 19?

The council contacted all statutory consultees and general consultation bodies held in the Local Plan consultation database either through an email or letter. A copy of the consultation letter and email text is included in Appendix 13, with a list of the consultees contacted in Appendix 23.

How were bodies and persons invited to make representations?

The council used several methods of public engagement to consult on the pre-submission DAP. The council raised awareness and promoted consultation by:

- Sending letters and email (Appendix 13) to all contacts held on the Local Plan consultation database (Appendix 23) on the 5 October. This database contains residents, stakeholders and organisations that requested to be on the database or are a statutory consultee. In addition, all those who made comments at the draft stage of consultation and wished to be updated on the DAP were also informed through this method.
- At the start of consultation the councils website was updated where relevant documents, evidence and ways to make comments were made available online (Appendix 17)
- An online consultation response form was published, allowing people to make representations on the DAP (Appendix 14) and a guidance note providing guidance on how to make comments (Appendix 21)
- A press statement was published in the Journal (Appendix 16)
• Updating the council’s Twitter and Facebook throughout the consultation period
• Briefing council members who were given a presentation on the consultation and an opportunity to discuss the DAP
• Display boards were in place at Newcastle City, Gosforth Shopping Centre, East End Customer Service Centre and the Outer West Customer Service Centre throughout the consultation. Information about the DAP, a copy of the main document was made available, contact information and information on how to submit comments on the DAP. This included a drop in post box, which was regularly checked by officers for any hand written comment forms.
(Appendix 19)

Events

There were six staffed consultation events held during the consultation period, at the City Library, 33 New Bridge Street West, NE1 8AX. Planning Officers and Communities Officers were available at these events to answer questions from the public, to explain the DAP and its policies and assist members of the public to submit comments on the DAP. These events were held for 2 hours, at various times and on different days of the week.

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
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<tbody>
<tr>
<td>Saturday 6 October</td>
<td>10:30am-12:30 pm</td>
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<tr>
<td>Tuesday 9 October</td>
<td>5-7 pm</td>
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<tr>
<td>Thursday 18 October</td>
<td>5-7 pm</td>
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<tr>
<td>Monday 22 October</td>
<td>12-2 pm</td>
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<tr>
<td>Tuesday 30 October</td>
<td>12-2 pm</td>
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<tr>
<td>Saturday 10 November</td>
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Strategic Housing Market Assessment (SHMA) Briefing for Developers and Registered Providers

A breakfast meeting was held on 5 July 2017 with developers and registered providers to discuss the emerging SHMA survey, and what the purpose of a SHMA is. This sets a joint target for 30,000 homes across the two authorities. The presentation provides stakeholders an update on the findings of the Opinion Research Services study into Objectively Assessed Need. This would allow the Council to review housing and planning polices ahead of the Development and Allocations Plan. Stakeholders were briefed on the findings of the study and given an opportunity to comment on the findings.
Strategic Housing Market Assessment (SHMA) Duty to Cooperate Meeting

A meeting was held on 7 February 2017 to agree the approach to defining the Housing Market Area (HMA) for Newcastle and Gateshead with Local Authorities. The conclusion was that there are three authorities within the HMA; Newcastle, Gateshead and North Tyneside. It was agreed that Gateshead share a HMA with Newcastle and that Newcastle also share a HMA with North Tyneside.

Local Authorities were also updated on the timeline for the preparation of the SHMA. Objectively Assessed Need (OAN) has been examined at North Tyneside Local Plan examination. There is no need to incorporate North Tyneside’s OAN in the Newcastle and Gateshead SHMA.

Elders Council Meeting

A meeting was held on 6 November 2018, with eight members of the Elders Council and Officers from Newcastle City Council. This meeting was to discuss the DAP and the policies. There were discussions on the following topics – Accessibility, the amendment to wording from ‘developers may’ to ‘developers must’. This was well received. Creating sustainable communities – creating housing sites in the city centre which could be promoted for families and mixed use. Creating an accessible city centre and a concentration on good pavements and less trip hazards. The importance of cultural aspects of the plan and creating a culturally vibrant city. The importance of being able to get around easily

Youth Council Briefing

A meeting was held on 16 October 2018 with members of the youth council and an officer from the communities team to discuss the pre-submission DAP, particularly setting out the differences between the draft and pre-submission version of the plan and how this stage of consultation is the last stage before submitting to the inspector for examination.

Disability and Access Forum Meeting

Council officers met with 8 members of the Disability and Access Forum on 3 October 2018 to discuss the DAP and its policies. There were discussions centred on the following topics; Accessibility, the important of wheelchair accessibility and the change of working in the accessibility policy from ‘developers may’ to ‘developers must’. This was well received. There was discussion regarding the approach to building affordable and specialist homes.

Developer/Housebuilder Viability Stakeholder Breakfast Meeting

A breakfast meeting was held on 18 June 2018 to discuss viability implications of Gateshead’s Making Spaces for Growing Places, and Newcastle’s Development and Allocations Plan. It introduced a number of changes and offered an opportunity to comment for a number of key stakeholders. Invitations were sent to those who had made comments on the viability of either or both plans as part of the authorities’ consultation, and individuals and groups who had indicated that they wished to be
contacted about further planning policy developments in both authorities’ consultation databases.

**Registered Provider Viability Stakeholder Breakfast Meeting**

On 18 June 2018 a meeting was held to discuss viability implications of Gateshead’s *Making Spaces for Growing Places*, and Newcastle’s *Development and Allocations Plan*. It introduced a number of changes and offered an opportunity to comment for a number of key stakeholders. Invitations were sent to registered providers.

**Persimmon Stakeholder Meeting**

Meeting held 27 June 2018 with officers from Persimmon Homes, Newcastle Council and Gateshead Council to discuss in further detail comments raised by Persimmon Homes regarding viability.

**Bellway 1 to 1 Viability Meeting**

Meeting held 27 June 2018 with Bellway and Officers from Gateshead Council to discuss information requested by Bellway on viability issues.

**Home Builders Federation Viability Conference Call**

11 July 2018, Conference call held between Home Builders Federation and Officers from Gateshead Council and Newcastle City Council.

**Barratt David Wilson Homes Meeting**

Meeting held 4 July 2018 with officers from Barratt David Wilson Homes, Newcastle Council and Gateshead Council to discuss in further detail comments raised by Persimmon Homes regarding viability.

**Bernicia (Register Provider) Stakeholder Viability Meeting**

Meeting held on 26 June 2018 with Bernicia and Officers from Newcastle Council to discuss information regarding viability issues.

**Persimmon and Taylor Wimpey Stakeholder Meeting**

Meeting held 1 February 2019 with officers from Persimmon Homes and Taylor Wimpey with Newcastle Council officers to request discuss data submitted by Persimmon Homes in the Regulation 19 representation regarding Nationally Described Spacing Standards and Newcastle Great Park Consortium Regulation 19 representations.

**Pre-Submission Consultation Responses**

**General DAP comments**

- Gladman development raised that the council must be able to demonstrate that it has engaged and worked with neighbouring authorities as part of duty to co-operate.
• They added that as part of the sustainability appraisal process it should be clear why some policy options have been rejected and that decision making should be robust, justified and transparent
• The environment agency states that the Sustainability Appraisal does not make reference to the objectives of the Government’s 25 year environment plan
• The department for education welcomes the publication of the education evidence and guidance for the delivery of new schools, it also supports the councils approach to ensuring developer contributions are required to address the impacts arising from growth
• The elders council considers that the DAP does not adequately satisfy NPPF para 102 in relation to its treatment of poor quality and its causes at a policy level.
• A resident considers that public input is rarely listened too so won’t be contributing and feels things have been decided internally at NCC before public consultation and input.
• A resident objects to the DAP and considers the Plan needs to be public led not council led. Comments that the CSUCP will be needed to be looked at again, as it will be out of date when the North of Tyne Mayor is elected.
• Highways England considered the DAP Highways Modelling Report and considers the scale of the impact identified is considered to be insufficient
• Banks Property consider that the DAP does not identify or protect future highway schemes and does not retain detail of UDP Policies T7.1 – T7.5.

Economic Prosperity

Policy DM1  Employment Sites

• Historic England made the following comments: With reference to sites 13/19/26 in DM1. They commented that there is no evidence to suggest that the HELAA or ELR has assessed the sites other than 13,19, and 26 for their impact on heritage assets. It does not specify which assets they are referring to or what level of investigation they expect.
• Historic England stated that they had been unable to find design guides or development criteria for the Employment Sites which demonstrate that potential impact of development on heritage assets has been taken into account or that opportunities to conserve and enhance the historic environment have been considered.
• Historic England refers to NPPF paragraphs 184, 185 which states that heritage assets are irreplaceable resources, and their significance should be sustained and enhanced with new development making a positive contribution to local character and distinctiveness.
• Paragraph 190 requires local planning authorities to identify the significance of a heritage asset that may be affected by a proposal.
• Planning practice guidance also requires ‘where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development’.
• National Grid made the following comment referring specifically to Newburn Industrial Estate, National Grid stated that several power lines run through or in proximity to the site.
• Ashdale Land commented that the HELAA site” Land South of Rotary Way” should be allocated in the DAP for “roadside Commercial/ Employment” uses
Policy DM2  Protection of Employment Sites

A resident commented that:

- Paragraph 3.1.7 does not comply with the NPPF, which requires planning policies to minimise trip generation and journey length. It is inconsistent with section 5 Transport and Accessibility.
- The allocation of discrete employment sites does not meet sustainability criteria. It has led to the development of large business parks such as Quorum and Cobalt which has led to increased traffic generation.
- All office development should be mixed use in the same way as the Urban Core.
- Use classes A1-A5, B1, C1-C4, D1 and D2 can be integrated into mixed use urban centres, to which everyone can cycle.
- B2 and B8 uses are a separate issue.

Policy DM3  District and Local Centres

- Burnett Planning supports the inclusion of Belvedere Retail Park within the Kingston Park District Centre boundary.
- Objection raised by Burnett Planning to the boundary of Kingston Park Retail Centre, considers that Kingston Retail Park functions as part of the Centre and merits inclusion in the boundary.
- Theatres Trust objects based on there being no reference to cultural uses in the Plan.
- Persimmon consider the term to maintain an ‘active ground floor frontage’ is vague and does not provide a suitable definition, requests amendment to require key active frontages on streets set aside for A1 uses.
- The NGP Consortium welcomes allocation at NGP but considers the term to maintain an ‘active ground floor frontage’ is vague and DM3 is overly restrictive and conflicts with the NPPF.

Policy DM4  Retail and Leisure Impact Assessment

No comments received at Regulation 19

Homes

Policy DM5  Housing Sites

- CPRE consider that the housing allocations at Hartburn Walk and Thornley Road are not adequately justified.
- Several respondents object to the allocation of site 25 (Land to the south of Hallow Drive, Throckley), and that brownfield land should instead be allocated for housing.
- CPRE state that open space assessments should be prepared to support the allocation of sites 40 and 41.
- Northumbrian Water request that reference is made to the need to plan drainage strategies early in designs to inform masterplanning.
• Historic England consider that the supporting Development Principles document should include more detailed information regarding historic environment and conservation issues.
• Rapleys support the allocation of site 36 (Land at Whickham View), and confirm ongoing commitment to the site.
• Northumbrian Water support the allocation of site 24 (Throckley Water Treatment Works).
• Newcastle University object to the inclusion of the Henderson Hall site in the HELAA as the site is not available.
• One respondent stated that housing shouldn’t be allocated as large blocks of land and should include employment opportunities.
• Gentoo Homes and Ashdale Land request the allocation of their sites, as they are deliverable in accordance with the NPPF.
• Gladman and HBF argue that the DAP should include an additional buffer of sites to ensure a necessary level of contingency.
• HBF stipulate that assumptions on sites in relation to delivery and capacity should be realistic and based on reliable evidence. It is important that all allocated sites are considered to be deliverable.

**Policy DM6 Accessible and Adaptable Housing**

• Barratt David Wilson Homes, Elders Council and Gentoo Homes support the delivery of accessible and adaptable homes in principle.
• Gentoo Homes don’t support the intention to introduce accessible and adaptable requirement without compromise or flexibility across all proposals of 11 or more homes.
• The majority of respondents object as DM6 goes against the intentions of policy CS11 and could impact on the viability and deliverability of future developments.
• A number of developers do not consider that an ageing population is sufficient evidence to identify a need for M4(2) homes.
• Gladman state that the SHMA evidence used is somewhat dated, and Persimmon state that assumptions presented in the supporting evidence are flawed.
• Barratt David Wilson Homes raise a number of concerns with assumptions in the Viability and Deliverability Report.
• Several developers request that a transition period is included, and that it will not be retrospectively applied to sites with planning permission.
• The proposed blanket 25% provision is not considered to be robustly justified by Story Homes.

**Policy DM7 Space Standards**

• Several developers state that there is a lack of evidence contained within the Addressing Housing Needs and Standards document to justify its implementation.
• HBF and Persimmon raise a number of concerns with assumptions in the Viability and Deliverability Report.
• A number of developers argue that a need for NDSS hasn’t been demonstrated and that the evidence provided does not show NDSS to be viable.
• Several developers argue that NDSS will add cost and exacerbate local affordability issues, pricing people out of the market.
• Developers argue that implementation of NDSS may limit development to less dwellings than specified in the DAP and will impact on deliverability rates.
• Some developers consider that there is no evidence that the size of the homes being built are considered inappropriate by those purchasing them.
• HBF state that evidence should include market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met.
• HBF and Persimmon assess that the policy has not evidenced suitable or robust evidence of need.
• Taylor Wimpey argue that evidence reference studies which seek to correlate internal space with health issues, which is emotive and misleading.
• It is assessed that the impact of NDSS has not been considered in relation to density, increased costs and CIL payments.
• Several developers stipulate that a detailed assessment of market typologies is required.
• Barratt David Wilson Homes request that a transition period is implemented.

Policy DM8  Specialist Residential Accommodation

No comments received at Regulation 19

Policy DM9  Campus for Ageing and Vitality Site

• Historic England commented in support of the policy but requested that the supporting text include a sign posting to the Camps for Ageing and Vitality Site Evidence Paper & Sequential Test in the DAP evidence base
• Newcastle University commented that the CAV site is identified in the DAP as a mixed-use site for those uses including A1, B1, C2, C3 and D1. But that there is no indication as to the proportion of each use preferred by the council. This information would be required in order to complete the masterplan.
• The Council, the University and the Hospital Trust have agreed to produce a masterplan for the site. The masterplan aligned with the previous version of the DAP (2017 consultation). The current version of the DAP does not reflect the HELAA and employment sites assessment which identified specific capacity of 2.2ha of employment land and 100 of residential units on site.
• Paragraph 4.5.2 refers to the development of offices and R&D facilities in the CAV. The university acknowledge the deletion of the CAV site from Policy DM1.
• The lack of specific allocation of acceptable quantum of uses makes it difficult to plan for a proper mix of uses, and to protect R&D and employment related uses from other more commercially valuable uses.
• The CAV site is shown in the DAP Policies Map to include the university’s existing campus, this site boundary is different in the HELAA and should be amended.

Transport and Accessibility

General Transport Comments
• The DAP does not identify or protect future highway schemes and does not retain detail of UDP Policies T7.1 – T7.5. To ensure DAP is effective the policy should be clearer to maximise ability of schemes to be brought forward.
• Does not adequately satisfy NPPF para 102 in relation to its treatment of poor quality and its causes at a policy level. A free-standing policy on treating the causes of poor air quality pro-actively through transport measures should be included in this section. Should also be reference to existing and possible future AQMA.
• Northumberland County Council supports the proposals in the Transport and Accessibility section and welcomes the opportunity to work with NCC on cross boundary transport issues.

Policy DM10 Pedestrian and Cycle Movement

• A resident commented that there is no evidence of walking and cycling routes being included in the initial planning and therefore developments will lack permeability for walking and cycling.
• Story Homes raise concerns regarding the effectiveness and deliverability of the policy. The wording should be amended to encourage, where appropriate and deliverable.
• T&W Joint Local Access Forum states that there should be specific mention of disabled and less mobile users.
• They consider new non-motor routes should be planned for and should mesh with the existing and upgraded PRoW to meet greater demand associated with the substantial house building programme.
• Councillor Fairlie supports policy

Policy DM11 Public Transport

• Councillor Fairlie raises disappointment that enhancement of Bank Foot is not planned.
• NGP Consortium consider that Policy DM11 and paragraph 5.2.7 relating to Newcastle Great Park, Park & Ride should be amended to refer to the dual use with the schools and the review mechanism.
• Story Homes state the wording of the policy and supporting text is too rigid, lacks flexibility, is onerous, is not based on robust evidence and is contrary to the NPPF.
• Taylor Wimpey identifies that the policy omits the safeguarding of corridors for new Metro and tram routes.
• Need to define what is meant by a frequent bus service otherwise this policy is not enforceable.

Policy DM12 Parking and Servicing

• Savills support the policy but consider it should retain a level of flexibility on how these facilities can be delivered, particularly the delivery of cycle storage facilities within residential developments.

Policy DM13 Road Hierarchy

• CPRE Northumberland consider that the policy nor the associated map refer to Tyne & Wear Freight Partnership preferred freight routes.
Newcastle Airport states that the plan should designate the Great Park spine road as a secondary distributor road.

A resident stated that new development should demonstrate its impact on the surrounding road network and illustrate the site’s accessibility by sustainable modes.

**Policy DM14 Mitigation and Highway Management**

No comments received at Regulation 19

**People and Place**

**Policy DM15 Conservation of Heritage Assets**

- CPRE Northumberland made the following comments Clause 3 of the policy requires that just one of two criteria (i) and (ii) needs to be met for the unlisted heritage asset to be demolished. This does not give effective protection - both criteria (i) and (ii) should be met before demolition is allowed
- Historic England made the following comment that part (2) should be amended to state 'preserved and enhanced'

Northumbrian Water commented:

- DM15 Mentions “setting, appearance or character” while the NPPF speaks about significance. This should be redrafted to make the policy NPPF compliant
- NPPF Paragraph 189 – the impact of the proposal should be assessed by the LPA not the applicant
- NPPF Paragraph 190 places the burden of assessing the impact of the proposal on the LPA
- NPPF paragraph 194, states that a clear and convincing justification is only required under NPPF where harm would be caused (195-196)
- NPPF sets out balancing principles to be applied when there is deemed to be “harm”. See NPPF Para 195-196. DM15 does not allow for the balancing principles to be applied and is therefore unsound.

**Policy DM16 Conservation and Enhancement of the Setting of Heritage Assets**

- The policy should be amended with the words “conserve and enhances the significance” in order to be in line with NPPF
- The Ouseburn Trust registered their support for the policy

Northumbrian Water commented:

- NPPF refers to the impact of development in terms of “Significance” and “Harm” rather than “Setting or surrounding key views”.
- Northumbrian Water commented that the policy as worded does not allow the “balancing principles” in the NPPF (Paragraph 195-196) to be applied.
- Northumbrian Water commented that Point 2 provides no clarity on how the decision maker should consider “additional impacts, including the degree of
permanence of any impact”. The NPPF requires plans to be clearly worded and unambiguous (NPPF paragraph 16).

Policy DM17 Preservation of Archaeological Remains and Archaeological Work

Northumbrian Water made several comments in their representation:

- Clarification was requested regarding whether or not point 1 of the policy’s reference to “archaeological evaluations” refers to both desk based and field assessments
- It was requested that field assessments only be required where necessary
- The respondent commented that the NPPF paragraphs 195-7 set out “balancing principles”. These deal with how proposals which will harm the significance of a designated or non-designated heritage asset (including archaeological remains) should be assessed. The respondent commented that as it was currently worded the policy did not allow these principles to be applied
- The respondent commented that DM17 point 2 is ambiguous, because where a development would not affect the site/ remains no preservation would be needed.
- The respondent commented that the policy should be reworded to clarify that where there are adverse effects, the balancing principles in the NPPF would apply and that where remains exit preservation in situ is the preferred strategy.

Historic England made several comments on the policy:

- DM17 Part 1 includes the term “investigations” and this could be misinterpreted to mean post-determination archaeological works
- It was recommended that part 1 of the policy state “through undertaking archaeological investigations assessment and evaluation where proposed development”
- It was recommended that part 2 of the policy state the following to reflect NPPF paragraphs 193 and 197 “where assessment and evaluation have established that proposed development will adversely affect a site or area of archaeological interest, clear and convincing justification will be required. Where development harmful to a heritage asset is to be given permission, its archaeological remains below ground and on the surface will be recorded and excavated prior to development commencing”
- It was recommended that part 3 would be more accurate if it stated “protect, maintain and enhance the integrity and understanding of the Frontiers of the Roman Empire World Heritage site and its buffer zone and its wider landscape setting.”
- It was recommended that part 4 be amended to incorporate the sentence “Any significant archaeological findings will also be published in a publicly-accessible form.

The Ouseburn Trust commented in support of the policy.

Story homes made several comments on the policy:

- Point 2 states;

  “where assessment and evaluation have established that proposed development will adversely affect a site or area of archaeological interest the developer will be required to preserve in-situ.”

  Story Homes argue that this wording could apply to “any development”, because all development will result in the disturbance or loss of archaeological remains.
• The wording in the policy does not conform with the wording in 6.3.5 which states that the local authority will determine the need to preserve remains in-situ.
• DM17 points 1 & 2, as well as paragraphs 6.3.3/6.3.4/6.3.7 should state that archaeological investigation should be proportionate to the potential archaeological importance and impact involved. This is in order to be compliant with NPPF paragraph 199.

Policy DM18 Building Recording

Northumbrian Water made several comments in relation to the policy:

• The representation states that policy DM18 requires building recording of heritage assets to be carried out prior to demolition, alteration, extension or restoration.
• They state that the NPPF only requires recording to be carried out if any heritage assets will be lost (wholly or in part). They state that this makes the policy inconsistent with the NPPF.
• Cllr S. Fairlie commented in support of the application

Policy DM19 Battlefield of Newburn Ford 1640

• Historic England made the following comments at pre-submission consultation:
  • Paragraph 6.5.1 and policy suggest that the significance of the battlefield is limited to landscape and appearance, whereas the significance actually extends beyond landscape.
  • Recommended changes include reference to:
    The archaeological potential of the site.
    The need to protect, evaluate and interpret any surviving artefacts.
    Amend part 1 to state:
    • “1. Protecting it against development that would adversely affect the interpretation of the course of events during the battle, by impacting upon;
      a. The below ground archaeological potential; and
      b. The landscape”
  • A respondent commented that 6.5.1 includes a historical inaccuracy

Policy DM20 Design

• The policy is supported by Cllr Fairlie and the Ouseburn Trust
• Newcastle Green Party consider DM20 should include a prescription for minimum energy efficiency standards and provision of renewable energy generation
• CPRE suggests that the policy gives insufficient guidance on what might be suitable in terms of tree planting
• CPRE states policy omits any requirement for energy efficiency, considers guidance in needed
• Taylor Wimpey considers some criteria is onerous, inflexible and could be difficult to achieve on some sites
• Story homes recommends additional where ‘appropriate’ statements to be added to the policy
• Sport England suggests amendment to include criteria, that development should include measures which have a positive impact on physical activity.

Policy DM21 Shopfronts and Signage
No comments received at Regulation 19

Policy DM22 Temporary Shroud Adverts
No comments received at Regulation 19

Policy DM23 Residential Amenity
• Comments raised from Taylor Wimpey considers that aspects of Policy DM23 are onerous and conflicts with national policy, for example, the NPPF does not require that all trees are protected, instead it allows for mitigation.
• They would like an opportunity to comment on Design Guidance to comment on recommended separation distances
• Story Homes raised disappointment that details on separation distances have not been made in parallel to the DAP
• Story Homes considered provisions of DM23 unduly restrictive
• They request that the policy is amended from ‘protect’ to ‘conserve’

Policy DM24 Environmental and Health Impacts of Development
• Environment Agency welcomes policy but suggests referencing impact of development on water environment
• CPRE considers the words ‘known of suspected’ land contamination or instability should be removed as it implies ignorance of land contamination is an acceptable opt-out
• Persimmon objects to the criteria that there should be no unreasonable restrictions placed upon an existing noise generating use arising from a development, considers this does not fully reflect NPPF
• Bellway considers the policy is onerous and implies that the assessment referenced are required for any planning applications, requests inclusion of ‘where appropriate’ within the policy
• Newcastle Airport welcomes requirements to consider impact of noise from existing businesses but considers policy should make it clear what action to be taken if mitigation scheme not agreed
• Story Homes considers DM24 is onerous in requiring that development must assess and mitigate impacts
• Elders Council suggestion to include ‘emissions resulting in poor’ air quality
• They welcome amended wording from draft version

Policy DM25 Aircraft Safety

• Newcastle Airport stated that they are largely happy with the policy but suggest minor amendments to reflect the need for any mitigation strategy to reflect cumulative impact and that the policy concerns aircraft rather than the airport itself

Policy DM26 Flood Risk and Water Management

• The Environment Agency welcomes the inclusion of the policy but suggest a reference to ensuring that future developments will not have an impact on the water environment
• They recommend a reference in the policy which directs new housing drains and sewage connections to be connected to the correct drainage
• Recommends including a reference that minewater change should be considered as part of any new development
• Northumbrian Water support the comprehensive approach taken to sustainable water and flood risk management
• Taylor Wimpey raises a number of suggest wording changes including; removing requirement to avoiding the culverting of watercourses, that green roof and walls should be subject to viability.
• They consider that aspects of the policy should only be sought if necessary to make a development acceptable in planning terms, this includes river restoration, requirement to minimise development on existing green space where it has the potential to manage flood risk, the need to improve surface and ground water quality and quantity and that SuDs should only be required where ground conditions are appropriate
• Story Homes consider that the policy lacks flexibility, recommends the inclusion of ‘appropriate’ to the policy.
• They consider that DM26 (2ii) is not consistent with DEFRA guidance, which considers that the design of a site for exceedance should be based on a reasonable and practicable approach to avoid an unviable design solution
• The Environment Agency considers that the SFRA needs to reflect the NPPF, to include new climate change projections and references to the groundwater and mine water, as well as to the 10% allowances on sites for recommendations A, B and C.

Policy DM27 Protecting and Enhancing Green Infrastructure

• Natural England welcomes the development of a Green Infrastructure Delivery Framework
• Save Newcastle Wildlife raises concerns that the policy is not in accordance with paragraph 141 of the NPPF, considers that a statement is required stating that the strategic GI network is not limited to the areas shown on the proposals map. They consider this area shown is arbitrary and doesn’t show large areas of green belt.
• The Environment Agency supports the policy
• Taylor Wimpey consider that the GI shown on the policies map and GI requirements conflicts with sites allocated in the CSUCP and requests that green infrastructure requirements are not applied to sites allocated in the CSUCP
• They consider that this policy is covered elsewhere in the DAP
• A resident stated that the policy map extends over residential areas
• The Environment Agency would like the policy to also cover the water environment
Policy DM28 Trees and Landscaping

- CPRE consider the criteria regarding the loss of ancient woodland is not strong enough
- The Environment Agency recommends including a reference which encourages tree planting of native species of local provenance
- Taylor Wimpey considers that the policy conflicts with the NPPF, it does not differentiate between high or low value trees
- They consider that the policy goes beyond the NPPF by requiring protection of all trees, and that the NPPF doesn’t require alternative locations for the development need to be first considered before resulting in the loss of trees or landscape features
- Story Homes considers that policy implies a blanket requirement to ‘protect’ existing trees, and considers this may not always been justified or appropriate
- A resident considers that the environment needs to be protected to ensure health benefits
- Save Newcastle Wildlife considers that the need to achieve net gains for biodiversity by the planting of net gain of trees, whenever felling takes place
- Requests the inclusion of tree standards to consider tree compensation and ascertain number of replacement trees needed
- They consider the DAP should encompass reference to community woodlands
- Newcastle Great Park considers the policy conflicts with the NPPF, it does not differentiate between high and low value trees. They consider that the policy goes beyond the NPPF by requiring protection of all trees, and that the NPPF doesn’t require alternative locations for the development need to be first considered before resulting in the loss of trees or landscape features

Policy DM29 Protecting and Enhancing Biodiversity and Habitats

- Newcastle Airport is broadly supportive of the policy but objects to the extent of the wildlife enhancement corridors around the airport site
- Newcastle Great Park considers the policy is unsound because it is onerous and conflicts with national policy, the policy does not take into account the exception of where the benefits of a development outweigh the impact on features of a SSSI
- Save Newcastle Wildlife objects to the removal of the Local Nature Reserve designations at the southern part of Cell B1 of the Newcastle Great Park
- They seek clarity on the need for developers to adhere to the Mitigation Hierarchy and requests that standards are included for ecological improvements to secure measurable net gains
- Requests clarification on the definition of adequate mitigation, and requests deletion of ‘significant’ as they consider that any harm to habitats and biodiversity should be avoided
- MB European objects as it considers the designation incorporates large parts of the Quayside which are urban/built up and the designation is not necessary. They consider that point 6i is not consistent with the NPPF as it doesn’t provide flexibility
- The Environment Agency would like to see the policy extended to cover the water environment
- Taylor Wimpey objects to the policy, considering it onerous and conflicting with national policy, the policy does not take into account the exception of where the benefits of a development outweigh the impact on features of a SSSI.
• They consider that the NPPF sets out a different test for protected species that that referred to in the DAP.
• They consider the policy goes beyond the NPPF in requiring net gains instead of pursuing opportunities or encouraging net gains.
• The NPPF does not require a hierarchical approach whereby alternatives are first sought followed by mitigation
• Story Homes considers the requirement to ‘maximise the opportunity’ is excessive, expresses disappointment that biodiversity standards have not been made in parallel to the DAP.
• Barton Willmore (on behalf of Ashdale Land) objects to the designation of a Wildlife Enhancement Corridor over the site south of Rotary Way
• Newcastle University consider their preliminary appraisal shows that the site (Red Hall Drive) does not have significant potential to be high value to local wildlife. They request that the wildlife enhancement corridor designation it removed on the site.

Policy DM30 Protecting Open Space

• NGP would like Policy DM30 and the supporting text to be revised to provide a more flexible approach to allow for site specific circumstances and additional wording on the re-provision of open space. NGP would also like the policies map to be revised to include the current open space provision at NGP.
• SNW has objected to the wording of DM30.1.iii. stating that it is not in accordance with the NPPF and should apply to replacement sports and recreational facilities only and should be revised accordingly. SNW has objected to the policies map and state that Cell C3 at Newcastle Great Park should be designated open space. SNW consider the open space standards to be too low and that the supporting text should be revised to ensure that open space is not double-counted. Additional text should also be included to explain that the local provision must be assessed by reference to the relevant walking distance.
• Sport England would like the supporting text to be revised to make it clear that decisions as to whether playing field and sports buildings and land are surplus should be taken on the basis of assessments contained within the Plan for Playing Pitches and the Plan for Built Facilities.
• Taylor Wimpey would like Policy DM30 and the supporting text to be revised to provide a more flexible approach to allow for site specific circumstances and additional wording on the re-provision of open space.
• Newcastle University would like their site at Red Hall Drive deallocated as open space in the DAP.
• A resident noted that protecting open spaces in the urban area is important for health, supporting sport, leisure, walking and cycling

Policy DM31 Provision of Open Space, Sports and Recreational Buildings

• NGP consider the policies to be overly restrictive and that it would not be appropriate for the DAP to retrospectively impose standards on strategic sites that already have outline permissions or with approved masterplans. The policy should be revised to enable a more flexible approach.
• Story Homes would like the supporting text to be revised to allow a flexible approach to landscape and management plans whereby they could be approved through planning conditions rather than legal agreements.
• SNW consider the standards to be too low and that the requirements would be ineffective unless further guidance is given in the DAP on the correct way to apply standards. SNW recommend additional text is added to ensure open space is planned as an integral part of development in order to provide an effective policy framework.
• Taylor Wimpey consider the policies to be overly restrictive and that it would not be appropriate for the DAP to retrospectively impose standards on strategic sites that already have outline permissions or with approved masterplans. The policy should be revised to enable a more flexible approach.
• Sport England consider that the policy and supporting text should provide clarity as to the relationship between it, the Plan for Playing Pitches and Plan for Built Facilities, and the CIL / Planning Obligations SPD. Sport England are supportive of each but consider that the way they relate to each other should and could be clearer.

**Policy DM32 Green Belt Development**

No comments received

**Minerals and Waste**

**Policy DM33 Minerals Extraction and Reclamation**

• CPRE considers DM33 should be re-scaled to reflect the need to protect the best qualities of agricultural land that the North East actually has
• Green Party state that policy is not in line with UK Climate Change Act (2008). Policy should be amended to state EIA requirement and that applications should have no net detrimental effect on climate change
• Banks Group consider that policy is not positively worded or prepared. Doesn’t consider the weight that should be given to the benefits of minerals extraction
• In relation to surface mining of coal, there is no means to acknowledge and balance the national, local or community benefits

**Policy DM34 Area of Search**

• Northumberland CC support designation of Area of Search
• Banks Mining support allocation. Request site area in Evidence Base document corrected to 100ha (as in DAP)

**Policy DM35 Recycling and Refuse Storage Provision**

No comments received

**Infrastructure and Delivery**

**Policy DM36 Telecommunications and Digital Infrastructure**

• CPRE consider Clause 2 as ineffective
• Several comments raised (Barratt, Bellway, Story Homes, Taylor Wimpey and HBF) argue that digital infrastructure (eg high-speed broadband & fibre) is not under direct control of development industry, could cause deliverability issues & obstruct housing delivery.
• Barratt consider it is not appropriate to seek standards over and above Building Regulations
• Bellway and Taylor Wimpey request addition of “Where feasible” to part 2 of DM36
• Story Homes request amendment of part 2 to state “encouraged to work with infrastructure providers to promote the expansion of”
• Comment from a resident requesting infrastructure is installed with knowledge and agreement of general public

How have the main issues been addressed and taken into account?

The council considered all representations made during the pre-submission consultation and has prepared a separate report, setting out a summary of all representations received and includes a council response. This response highlights how the key issues raised during the consultation have been considered.

Conclusion

Draft Development and Allocations Plan

In total, 104 responses were received comprising 259 comments relating to a specific policy area or issue. The majority of respondents (51%) made general comments, with 13% supporting the Plan and its policies and 22% objecting to proposals. The greatest majority of the response received was in relation to Homes.

<table>
<thead>
<tr>
<th>Policy Area</th>
<th>Number of comments received</th>
<th>Percentage</th>
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<tbody>
<tr>
<td>Economic Prosperity</td>
<td>33</td>
<td>13%</td>
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<tr>
<td>Homes</td>
<td>60</td>
<td>23%</td>
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<tr>
<td>Transport and Accessibility</td>
<td>45</td>
<td>17%</td>
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<td>People and Places</td>
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<td>21%</td>
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<td>Minerals and Waste</td>
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<td>Infrastructure and Delivery</td>
<td>7</td>
<td>3%</td>
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<tr>
<td>Other</td>
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<tr>
<td>Total</td>
<td>259</td>
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53 responses were received, comprising 175 comments relating to a specific policy area or issue.

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<td>7%</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>175</strong></td>
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A separate appendices document has been prepared setting out the relevant documents used in the consultation of the Development and Allocations Plan.