

# North Tyneside Local Plan 2015

## Proposed Main Modifications to the North Tyneside Local Plan

### Schedule of Representations

*March 2017*

---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM55	<b>Consultation Point</b>	MM10	<b>Local Plan Reference</b>	Para 1.26
-------------------	--------	---------------------------	------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The HBF supports the inclusion of this additional sentence which aids clarity

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response Noted
-------------------------	----------------

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM123	<b>Consultation Point</b>	MM15	<b>Local Plan Reference</b>	New Para after 1.36)		
-------------------	--------	---------------------------	------	-----------------------------	----------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM15 (new paragraph 1.36 regarding heritage assessment of development sites)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	589675	<b>Name</b>	Mrs Yvonne Roberts	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM24	<b>Consultation Point</b>	MM29	<b>Local Plan Reference</b>	Para 3.3
-------------------	--------	---------------------------	------	-----------------------------	----------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	-----	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

--

#### Changes Sought

I would like to see more definition on the term 'affordable housing' perhaps to read 'affordable housing , when necessary and to suit all ages of resident population'.

### North Tyneside Council Response

**Is response duly made?** No. The comment is not relevant to modification MM29. Affordable housing and the specific role of housing in an aging population is explained further under Objective 4 and in the Housing Chapter.

**Officer Response** This response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM124	<b>Consultation Point</b>	MM30	<b>Local Plan Reference</b>	Vision box, First para.		
-------------------	--------	---------------------------	------	-----------------------------	-------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM30 (strengthening reference to climate change)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM125	<b>Consultation Point</b>	MM36	<b>Local Plan Reference</b>	Objective 6		
-------------------	---------	---------------------------	------	-----------------------------	-------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM36 (referencing the historic environment within the objectives)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM113	<b>Consultation Point</b>	MM36	<b>Local Plan Reference</b>	Objective 6
-------------------	---------	---------------------------	------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

BDW supports recognition of the importance to regenerate the Borough through the enhancement of character and attractiveness of the North West Villages. However, the Council and Inspector are aware of our earlier representations which demonstrate that a continuation of the past failed planning strategies will not lead to the realization of this objective within this location.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM126	<b>Consultation Point</b>	MM42	<b>Local Plan Reference</b>	Objective 12
-------------------	---------	---------------------------	------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	--	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM42 (referencing the historic environment)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response noted.
-------------------------	-----------------



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM77	<b>Consultation Point</b>	MM44	<b>Local Plan Reference</b>	Para 4.5		
-------------------	--------	---------------------------	------	-----------------------------	----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC support the inclusion of the strategic allocations at Murton and Killingworth Moor, where it is recognised the importance of these two strategic sites in guiding the proposals and policies of the Local Plan.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response noted
-------------------------	----------------

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM114	<b>Consultation Point</b>	MM45	<b>Local Plan Reference</b>	Para 4.6 and Map 2		
-------------------	---------	---------------------------	------	-----------------------------	--------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified		
---------------	--	---------------	----	---------------------	-----------	--	--

### Representation

#### Consultee Comment

BDW would note our comments made in respect of Matter 2 and specifically the decision to extend the North West Villages Sub Area further South to incorporate SHLAA site 069, a site awarded planning permission by appeal. This conflicts with the 2016 SHLAA (NT/07/9/9) which shows the sub area to the North along Killingworth Way. Until sufficient justification is provided BDW considers this decision unjustified and therefore unsound. This site was previously considered part of Killingworth rather than Camperdown and therefore the adjustment of the boundary is illogical.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The boundary for the North West Villages is not subject to a proposed Main Modification whilst this comment restates matters already discussed through the examination process.

**Officer Response** Response not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960257	<b>Name</b>	Murton Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	1010551	<b>Organisation</b>		<b>Agent if applicable</b>	Barton Wilmore		

### Comments Details

<b>Comment ID</b>	LPM100	<b>Consultation Point</b>	MM45	<b>Local Plan Reference</b>	Para 4.6 and Map 2		
-------------------	--------	---------------------------	------	-----------------------------	--------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

Responding to MM45, MM59, MM61 and MM62 Our client is pleased that a key asset of the plan is identified as being the delivery of the Murton Strategic Allocation and indeed despite the alterations which have taken place in defining the Strategic Policy Areas, the strategic allocations at Murton and Killingworth Moor have been retained and subsequently underpin the plan (Para 4.5).

Our client therefore supports the alterations being suggested to Map 2 " Key Diagram to update the designations, however would highlight that the link road to the north east through the site (to Earsdon) has not been included on the key diagram, which is logical, as the allocation should not incorporate land within the Green Belt, as this would (and has previously) result in confusion as to the scope of where residential development is to be located.

However, there should be an acknowledgement that a road is an appropriate type of development within the Green Belt and this matter has been discussed and agreed upon within the lead up to the final plan. This is on the basis that the through road is a necessity to the success and acceptable impact of the strategic allocation. The Transport Assessment and Infrastructure Delivery Plan (Site specific for Murton) is formed on the basis of including the through road as the main artery of the Murton site and provides the relief for traffic pressure to the south (for alternative routes in and around the site).

This is most evident at Policy DM1.6 whereby the text has been altered to read the following; "Proposals that are not appropriate to the Green Belt, particularly those offering increased or enhance access to the open countryside and that provide opportunities for beneficial use as a biodiversity resource, will be supported where they preserve the openness of the Green Belt and will not harm the objectives of the designation".

If policy is being created to outline where development is not inappropriate but can offer benefit, then it is logical to increase the scope to include 'local transport infrastructure which can demonstrate a requirement for a Green Belt location', as per Paragraph 90 of the NPPF. Other elements of Paragraph 90 may be included, but for a strategic allocation which relies upon the inclusion of a road at its core, policy should provide certainty within the Plan.

If the Council wish to provide this reassurance outside of Green Belt policy then the alterations being suggested at Paragraph 4.28 could be expanded upon, which currently states the following; "In conformity with the NPPF, the Council will regard the construction of new buildings in the Green Belt as inappropriate."

However, as set out in Paragraph 89, there are certain exceptions to this including, as examples: the provision of buildings for agricultural uses; appropriate facilities for outdoor sport and recreation; and extensions or alterations to an existing building. Such proposals will be determined on an individual basis and subject to the qualifications for these exceptions as set out in national policy.

It would be simple to add reference to Paragraph 90 of the NPPF given its importance and whilst our client does not wish to keep on repeating the point, given the importance of the through road, it is imperative that certainty in delivery is provided.

Having said this we support the Council in the delivery of the Plan without the need to amend the Green Belt itself and indeed support the replacement of Paragraph 4.29, which states the following; "The existing boundaries of the North Tyneside Green Belt have not been amended through the Local Plan. This position is based on the findings of the Green Belt Review (2015), following consideration of: the requirements for growth and development to 2032; the role of the designated land in the context of the NPPF objectives; and, the capacity of remaining safeguarded land. In conclusion, there remains sufficient land in sustainable locations to meet the development needs of the Borough for at least the current plan period without requiring a change to the Green Belt."

The delivery of the housing target has been scrutinised throughout the Examination in Public, with comment on the housing target made later in these representations, however it is clear that the strategic allocations underpin the delivery of housing within the Borough and their quick and efficient delivery is essential. However without Green Belt removal (for housing) there is little slack in the need for the delivery of sites identified, therefore again certainty in insuring the delivery of the strategic allocations is essential to meet the aspirations of the Plan.

#### Changes Sought

#### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

Response noted. The Council would highlight that the requirement for the strategic link road and its indicative alignment through the Green Belt south of Earsdon and west of Wellfield is included on the Policies Map. In addition a range of evidence has been prepared demonstrating the requirement for the road, whilst the Council's Green Belt Assessment has specifically considered in broad terms the impact development of the road would have upon the Green Belt. In addition, National Planning Policy is clear that transport infrastructure that cannot be met in any other way is an appropriate form of development within the Green Belt. Therefore, whilst the consortium's interest in emphasising this point is noted, it is not considered necessary to the soundness of the Local Plan or to providing the necessary certainty regarding the delivery of the road in the Green Belt to add this specific reference to the general policy or text at this point in the Local Plan.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1065805	<b>Name</b>	Mr Gordon Harrison	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Nexus	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM38	<b>Consultation Point</b>	MM53	<b>Local Plan Reference</b>	Policy S1.4
-------------------	--------	---------------------------	------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	-----	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

To make more land available, the contribution from brownfield and surplus public sector land should be maximised, “to support the regeneration of our cities, towns and villages, to support economic growth and to limit the pressure on the countryside,” states the paper. The National Planning Policy Framework (NPPF) will be amended to indicate that “great weight should be attached to the value of using suitable brownfield land within settlements for homes”. Benton Curve is surplus public sector land and is mostly brownfield.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	517819	<b>Name</b>	Liz Bray	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Tyne & Wear Local Access Forum	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM136	<b>Consultation Point</b>	MM53	<b>Local Plan Reference</b>	Policy S1.4
-------------------	---------	---------------------------	------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	---

### Representation

#### Consultee Comment

We would suggest the following small but helpful amendments to the proposed modifications (shown in *italics*) to reinforce our advice and give Public Rights of Way, non-motorised access and the Rights of Way Improvement Plan more prominence in planning for North Tyneside.

#### Changes Sought

MM 53 Page 29 S1.4 add to point (e) *encouraging accessibility and walking, cycling, horseriding and public transport, in accordance with the Tyne & Wear Rights of Way Improvement Plan*, “*1*..

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	Whilst the basis for making this comment is understood this does not respond to the modifications within MM53 relating to climate change and efficiency of use of land. However, Additional Modifications have been proposed and previously published by the Council in response to previous comments from the Local Access Forum. In particular AM331 of the schedule of modifications published in September 2016 references the role of the Public Rights of Way Improvement Plan. The combined Main and Additional Modifications mean the adopted Local Plan will fully address the points set out by the Local Access Forum.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1063818	<b>Name</b>	Mr Gordon Harrison	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Nexus	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM28	<b>Consultation Point</b>	MM53	<b>Local Plan Reference</b>	Policy S1.4
-------------------	--------	---------------------------	------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	-----	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

The proposed amendment at point 'c' of MM53 is supported, as it brings consistency with the National Policy Planning Framework.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM115	<b>Consultation Point</b>	MM60	<b>Local Plan Reference</b>	Para 4.26 and 4.27		
-------------------	---------	---------------------------	------	-----------------------------	--------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

BDW does not consider the proposed Green Belt to be robust, permanent and able to endure beyond the plan period for the reasons provided within our representations. In summary; There is insufficient residential land allocated within the Plan, particularly within the North West Sub Area with an over-reliance on small vacant brownfield sites. Despite Burradon being a key regeneration area the Local Plan fails to identify any development capacity over the entire plan period. The Local Plan only identifies 546 dwellings worth of safeguarded land for delivery post 2032 in comparison to 5,000 dwellings identified by the UDP

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. No proposed Main Modifications are made to the extent of the Green Belt in North Tyneside. This comment restates matters previously raised and considered through the examination process.

**Officer Response** Response not duly made.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM116	<b>Consultation Point</b>	MM62	<b>Local Plan Reference</b>	Para 4.29		
-------------------	---------	---------------------------	------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified		
---------------	--	---------------	----	---------------------	-----------	--	--

### Representation

#### Consultee Comment

BDW supports the change from a 'review of the Green Belt' to a 'change to the Green Belt'. However, for the reasons provided we object to the insertion of text identifying that a need to amend the Green Belt is unnecessary.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The objection to this modification is noted but the Council does not consider the Main Modification requires amendment as a result of the comment.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPM90	<b>Consultation Point</b>	MM64	<b>Local Plan Reference</b>	Para 4.31		
-------------------	-------	---------------------------	------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

This should be amended to be in accord with paragraph 85 of the NPPF which does not use the phrase 'potential development needs' rather 'to meet longer term development needs'.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The response is noted and the specific wording of NPPF recognised. However, the Council do not consider amendment is necessary to ensure conformity with NPPF and the current wording is not viewed as unsound.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	546048	<b>Name</b>	Andy Kahn	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	805618	<b>Organisation</b>	Port of Tyne	<b>Agent if applicable</b>	Lambert Smith Hampton		

### Comments Details

<b>Comment ID</b>	LPM71	<b>Consultation Point</b>	MM453	<b>Local Plan Reference</b>	Policy S2.2 Sites List		
-------------------	-------	---------------------------	-------	-----------------------------	------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

We note the site area of our client's site (Ref: Esso site - E050) has been amended from 18.20ha to 20.85ha. However, the red-line boundary shown on the plan (Map 7) has not changed. Whilst we agree the site area and boundary need amending to reflect the discussions at the examination, the total site actually more logically comprises 23.4 ha (as shown on the attached plan). We highlight that if the areas outside the red-line plan shown on Map 7 are not included, then they would just become derelict, overgrown and unsightly scrub land that would likely attract unwanted and unsociable uses.

-Red Line Boundary <http://northtyneside-consult.limehouse.co.uk/file/4458024>

#### Changes Sought

We request that Map 7 is modified to reflect the changes in site area shown in Policy S2.2 (see comments below).

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The amended capacity at this site is the result of minor adjustments to correct the original boundary that are included on the revised Map 7. The additional request to extend the area of Site E050 further is noted. It should be noted that whilst not part of E050 the land referenced is also allocated for employment development. A further modification to include this area - essentially transferring it from E052 to E050 – is not considered necessary to ensure the availability and future delivery of the land.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069153	<b>Name</b>	Laura Hutson	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Sport England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM142	<b>Consultation Point</b>	MM453	<b>Local Plan Reference</b>	Policy S2.2 Sites List		
-------------------	--------	---------------------------	-------	-----------------------------	------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

In particular, I note that Employment Site Allocation EO 29 Tyne Tunnel remains allocated; as this includes the playing field at High Flatworth, I reiterate that this will need to be replaced for Sport England not to object to development.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The comment is noted. However, it repeats the comment made by Sport England with respect to the Pre-Submission Consultation Draft Plan (November 2015).

**Officer Response** The Council provided the following in response to Sport England's comments to the November 2015 Draft Plan: "Reference is made in paragraph 5.46 to the playing fields and expansion of employment on the site would require a suitable replacement being found."

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>		<b>Name</b>	Chris Checkley	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	908926	<b>Organisation</b>	Keenan Processing Ltd	<b>Agent if applicable</b>	Checkley Planning		

### Comments Details

<b>Comment ID</b>	LPM148	<b>Consultation Point</b>	MM476	<b>Local Plan Reference</b>	Policy S2.2 Sites List		
-------------------	--------	---------------------------	-------	-----------------------------	------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy		
---------------	--	---------------	----	---------------------	---	--	--

### Representation

#### Consultee Comment

MM476 proposes to add a new section of text to Policy S2.2 itself underneath the list of Proposed Employment Sites. The new text says "Those mixed-use sites allocated at Policy S4.3 may also provide an additional contribution to the supply of employment land. Proposals for employment uses that are compatible with residential development will be supported where they are consistent with other policies of this Local Plan."

Keenan Processing Ltd (Keenans) object to MM476 on the grounds that it is not sound. First, the so-called "Mixed Use allocations" (including Site 29) are misnamed (they are really either "potential mixed-use" or "alternative single uses"). Second, they continue to fail to meet the basic requirement of national policy/guidance that allocations in Local Plans should provide clarity on the nature and scale of development that is actually proposed :-

- The National Planning Policy Framework states (para 154) that: "Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where..."

- The national Planning Practice Guidance states (Paragraph: 010 Reference ID: 12-010-20140306) in relation to "How detailed should a Local Plan be?" that: "Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the "what, where, when and how" questions)."

Therefore it should be possible - reading the Local Plan and Proposals Map alone - to understand exactly what is proposed in terms of uses and amounts (nature and scale) of development on the "Mixed Use" Sites shown on the Proposals Map. However, Policy S4.3 states that Site 29 (for example) involved housing (potential 65 homes). But neither Policy S2.2 nor S4.3 - as submitted or as modified - states that employment development "will" be included, only that it "may", and gives no indication of the amount of land for employment.

It is unsound that it remains necessary to go outside the LP - to the various Site Schedules - before it can be understood that "Site 29: Mixed Use" shown on the

proposals map is intended to be allocated for "residential and/or employment". The lack of certainty regarding the intended land uses and amounts is also unsound (the LP also failing to determine whether the site will be housing and employment, or housing alone, or employment alone).

### Changes Sought

MM476 should be deleted. Mixed use sites should specify - within the LP policies themselves - the uses and amounts of development that are allocated.

Site 29 should be excluded from the list of so-called "Mixed Use" Sites in Policy S4.3 (which are shown on the Proposals Map) and any reference to housing development on Site 29 should be deleted.

Site 29 should be included within the list of specific Proposed Employment Sites within Policy S2.2 with the land amount specified. The evidential basis includes the specific recommendation in the Council's own ELR 2009 (paras 12.2 & 12.6) that Backworth Business Park should be set aside for local owner-occupier industrial concerns to develop small plots with their own bespoke premises to meet their individual needs. The history of owner-occupier industrial planning applications proves that there is demand here close to the A19.

As was suggested at the hearing, the overall size of the allocation at Site 29 should be reduced in area to focus on the existing business park and industry - with the greenfield land to the east and the TPO constrained land to the south both excluded. (as indicated on attached map)

<http://northtyneside-consult.limehouse.co.uk/file/4499358>

### North Tyneside Council Response

**Is response duly made?** No. The comment is noted. However, it repeats the comment made by Sport England with respect to the Pre-Submission Consultation Draft Plan (November 2015).

#### Officer Response

This response echoes many of the comments and evidence raised by Checkley Planning and Keenan Processing Ltd during the examination process. However, the specific concerns identified within this response suggest that a mixed use allocation, that may allow additional employment development would not provide sufficient clarity about the potential future development of the site in the context of NPPF and Planning Guidance.

The Council consider that the approach to the mixed-use sites reflects the specific circumstances that have arisen in certain locations in North Tyneside that require appropriate flexibility to enable investment and regeneration to take place guided by policy safeguards to ensure the ability of existing businesses to operate is maintained. This is the case at Backworth Business Park where the ongoing retention of land for employment which is neither available or proven to be attractive to the market is not considered appropriate. Identification of a conservative volume of residential development at a level that enables flexibility to respond to the constraints that have been discussed is the core proposal of the Local Plan for this mixed use site. Retention of existing businesses would make this site a mixed use location. The addition of further commercial development appropriate to residential uses remains a flexible option for the site and would be an acceptable form of development as part of an overall mixed use scheme. To specify a minimum or maximum level of such provision within the Local Plan would be unduly restrictive and in the Council's view would not be justified or effective.

--	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	546048	<b>Name</b>	Andy Kahn	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	805618	<b>Organisation</b>	Port of Tyne	<b>Agent if applicable</b>	Lambert Smith Hampton		

### Comments Details

<b>Comment ID</b>	LPM72	<b>Consultation Point</b>	MM101	<b>Local Plan Reference</b>	Map 7
-------------------	-------	---------------------------	-------	-----------------------------	-------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

We note the amendments to Map 7 showing our client's site and support the inclusion of the additional access point of Hayhole Road. As noted above, we request that the Council amend the boundary of the red-line plan to reflect the site area changes referred to in the modifications to Policy S2.2. For clarity, we attach a red-line plan showing the extent of the site area. In addition to the above, we note that the base OS map for Map 7 has been updated to show the area to the north west of the site denoted as marsh with a path running through it. In this respect, we wish confirm that this part of the site is private land with no rights of way across it. It is all fenced off and clearly signposted as private and dangerous. Moreover, we highlight that the site was previously used as a Council waste dumping ground and is therefore contaminated and potentially dangerous with hidden depressions. We strongly feel that including these annotations gives the wrong impression to the public as to the classification and current usability of this land. Port of Tyne is currently well progressed in the process of securing LEP Enterprise Zone funding to remediate this site in order to make it safer and bring it back into employment use through employment related development.

- Red Line Boundary <http://northtyneside-consult.limehouse.co.uk/file/4458024>

#### Changes Sought

Given the existing nature of the site, we believe that the updated annotations are unhelpful and misleading, and strongly recommend that the Council correct/remove these annotations or simply revert to the original OS base map used in the Submission Document for Map 7.

### North Tyneside Council Response

#### Is response duly made? Yes.

<b>Officer Response</b>	The request to extend the area of Site E050 further is noted. It should be noted that whilst not part of E050 the land referenced is also allocated for employment development. A further modification to include this area - essentially transferring it from E052 to E050 – is not considered necessary to make the land available. In general OS base map material does not form part of the policy or guidance provided by the Local Plan and would have no influence upon future consideration of the site in accordance with the Local Plan.
-------------------------	--



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM145	<b>Consultation Point</b>	MM118	<b>Local Plan Reference</b>	Policy S3.1
-------------------	---------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	-----	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM118 (referencing heritage assets)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1068524	<b>Name</b>	Domino's Pizza UK & Ireland Plc	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	1068520	<b>Organisation</b>	Domino's Pizza UK & Ireland Plc	<b>Agent if applicable</b>	Pegasus Group		

### Comments Details

<b>Comment ID</b>	LPM74	<b>Consultation Point</b>	MM145	<b>Local Plan Reference</b>	Policy DM3.7
-------------------	-------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Consistant with National Policy
---------------	--	---------------	----	---------------------	---------------------------------

### Representation

#### Consultee Comment

See full response attached. In summary "Overall, it is clear that if adopted Policy DM3.7 would prevent any takeaway applications being permitted within large areas of North Tyneside at present (as over 15% of Year 6 pupils in most of the wards are currently very overweight). Even if this figure were to change, the restrictions on takeaways within 400 metres of schools would mean takeaways would still be excluded from large parts of North Tyneside (including identified centres where such uses are encouraged by other policies). As such, the draft policy effectively places a moratorium on takeaways within large parts of the North Tyneside Council area which is extremely inflexible, harmful to economic growth and business and not in accordance with the National Planning Policy Framework, which encourages LPAs to meet the needs of main town centre uses such as that proposed in drawing up Local Plans. On this basis, Pegasus wishes to object to the main modification MM145 to Policy DM3.7 and strongly request that further modifications are required in order to find the plan sound."

Full Response - <http://northtyneside-consult.limehouse.co.uk/file/4441434>

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The Council worked with the Inspector to modify the policy to reduce the restriction on A5 uses. The Council is working on a number of initiatives to reduce childhood obesity, one of which is to reduce the effect an obesogenic environment has on obesity. The Council believes the number of wards where the percentage of overweight children exceeds the policy restrictions will lessen in future years.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPMM91	<b>Consultation Point</b>	MM148	<b>Local Plan Reference</b>	New Para after 7.1		
-------------------	--------	---------------------------	-------	-----------------------------	--------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

This is welcomed and reflects NPPF.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM57	<b>Consultation Point</b>	MM149	<b>Local Plan Reference</b>	New Para after 7.1
-------------------	--------	---------------------------	-------	-----------------------------	--------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The following comments also refer to the consequential changes to the supporting text set out within main modifications MM149, MM150, MM163, MM165 etc. The Council and the Inspector will be aware of the position of the HBF in relation to the housing requirement. This is set out within paragraphs 18 to 36 of our comments upon the submission version of the plan and matter 3 examination hearing statement. Throughout these comments we considered that a moderate uplift was required to take account of market signals in line with the PPG and recommendations from LPEG. We also asserted that the submitted plan requirement for an average of 828 dwellings per annum (dpa) sat at the lower end of an acceptable range. These comments are considered to remain valid. Given our previous comments upon this issue and statements made within examination hearing session 3 we are disappointed to note that the proposed main modification seeks to reduce the housing requirement over the plan period from 17,388 to 16,593 dwellings, an average of 790dpa. This is 38dpa lower than the submitted plan. The HBF is, however, pleased to note that the housing requirement is identified as a minimum requirement.

#### Changes Sought

It is understood that the 790 average figure is derived from the updated 2016 SHMA figure of 727 plus an uplift to account for market signals (page 4 examination document EX-NTC-54). The HBF welcome the principle of an uplift to take account of market signals. It is, however, unclear why no uplift is provided until 2021/22. The HBF consider that the uplift should be applied throughout the plan period. The use of the LPEG methodology, as described in their report to Government, would require the uplift to be applied over the full plan period. 10% uplift across the plan period would identify an average requirement of 800dpa or 16,800 over the plan period. This small additional increase would be based upon a clearly justified response to market signals. The HBF does, however, also consider the 15% or 20% uplift identified within table 5 of the Housing Needs and Supply Update (Examination ref: EX-NTC-54) to be appropriate if applied over the full plan period.

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Please see response to comment ID LPMM56 and Main Modification MM155.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1068189	<b>Name</b>	Mr Michael McIntyre	<b>Group Representation?</b>	Yes	<b>Group Numbers</b>	350
<b>Agent ID</b>		<b>Organisation</b>	Monkseaton Action Group	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM51	<b>Consultation Point</b>	MM149	<b>Local Plan Reference</b>	New Para after 7.1
-------------------	-------	---------------------------	-------	-----------------------------	--------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	--	---------------------	---

### Representation

#### Consultee Comment

OMS and DCLG data indicates a decline in the rate of growth. In addition, the referendum result has not been taken into account, which when implemented will result in decline of inward migration from Europe, indeed, the latest figures show a fall in net migration of 49,000.

#### Changes Sought

The main modification is not sound as it does not take into account the most up to date data or the expected fall in net inward migration.

### North Tyneside Council Response

#### Is response duly made? Yes.

<b>Officer Response</b>	<p>The requested amendment is not accepted. The adjusted housing requirement in the proposed Main Modification is based upon the most up to date population and household projections.</p> <p>The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at <a href="http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485">http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485</a> which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice and analysis of more robust 10 year migration trend analysis for North Tyneside.</p>
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

## Consultee Details

Consultee ID	1066725	Name	CLlr Judith Wallace	Group Representation?	No	Group Numbers	
Agent ID		Organisation		Agent if applicable			

## Comments Details

Comment ID	LPMM43	Consultation Point	MM149	Local Plan Reference	New Para after 7.1
------------	--------	--------------------	-------	----------------------	--------------------

## Reasons for Support / Objection

Legal?		Sound?	No	Why Unsound?	Positively prepared; Effective
--------	--	--------	----	--------------	--------------------------------

## Representation

## Consultee Comment

I believe that insufficient weight has been given to the most recent projections from ONS and DCLG, both of which indicate lower population growth for the Borough, and therefore lower numbers of additional homes required. The DCLG requirement is 14,331. I consider that the starting point should have been 707 properties per annum. I believe that, with regard to the jobs-led forecast, insufficient weight has been given to the number of unemployed people of working age who reside in the Borough. With regard to the migration-led forecast, "which can be adjusted based on possible or known factors", it seems that no consideration has been given to the impact of Brexit: the UK will regain control of its borders. The most recent figures indicate that net migration to the UK is falling. The expectation is that this is likely to continue. Due consideration could have been given to reducing the DCLG requirement and the 707 pa in light of these points.

## Changes Sought

## North Tyneside Council Response

## Is response duly made? Yes.

Officer Response	<p>The revised housing requirement is informed by robust evidence and is set at a level that takes into account national government policy to ensure Local Plan are aspirational and realistic and use the latest projections as a starting point allowing for economic growth and market signals. The housing requirement has reduced reflecting the latest 2014 based projections and has been informed by analysis of employment growth, and future potential changes in migration and commuting. Assumptions such as rates of unemployment are fully incorporated into the Local Plan. The potential impact of Brexit upon migration, particularly for a Borough such as North Tyneside where net international migration is small is entirely unknown at this time.</p> <p>The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the</p>
------------------	---

	<p>Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at <a href="http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485">http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485</a> which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice and analysis of more robust 10 year migration trend analysis for North Tyneside</p>
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM58	<b>Consultation Point</b>	MM150	<b>Local Plan Reference</b>	New Para after 7.1
-------------------	-------	---------------------------	-------	-----------------------------	--------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The following comments also refer to the consequential changes to the supporting text set out within main modifications MM149, MM150, MM163, MM165 etc. The Council and the Inspector will be aware of the position of the HBF in relation to the housing requirement. This is set out within paragraphs 18 to 36 of our comments upon the submission version of the plan and matter 3 examination hearing statement. Throughout these comments we considered that a moderate uplift was required to take account of market signals in line with the PPG and recommendations from LPEG. We also asserted that the submitted plan requirement for an average of 828 dwellings per annum (dpa) sat at the lower end of an acceptable range. These comments are considered to remain valid. Given our previous comments upon this issue and statements made within examination hearing session 3 we are disappointed to note that the proposed main modification seeks to reduce the housing requirement over the plan period from 17,388 to 16,593 dwellings, an average of 790dpa. This is 38dpa lower than the submitted plan. The HBF is, however, pleased to note that the housing requirement is identified as a minimum requirement.

#### Changes Sought

It is understood that the 790 average figure is derived from the updated 2016 SHMA figure of 727 plus an uplift to account for market signals (page 4 examination document EX-NTC-54). The HBF welcome the principle of an uplift to take account of market signals. It is, however, unclear why no uplift is provided until 2021/22. The HBF consider that the uplift should be applied throughout the plan period. The use of the LPEG methodology, as described in their report to Government, would require the uplift to be applied over the full plan period. A 10% uplift across the plan period would identify an average requirement of 800dpa or 16,800 over the plan period. This small additional increase would be based upon a clearly justified response to market signals. The HBF does, however, also consider the 15% or 20% uplift identified within table 5 of the Housing Needs and Supply Update (Examination ref: EX-NTC-54) to be appropriate if applied over the full plan period.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	Please see response to comment ID LPM56 and Main Modification MM155.
-------------------------	--



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069028	<b>Name</b>	John Fleming	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Gladman Dvelopments	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM131	<b>Consultation Point</b>	MM150	<b>Local Plan Reference</b>	New Para after 7.1
-------------------	--------	---------------------------	-------	-----------------------------	--------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The proposed modification states that in addition to these housing forecasts the objectively assessed housing need for the Borough incorporates a modest uplift to respond to market signals and issues of housing affordability. The uplift is 15% from 2021/2 reflecting the need for a stepped approach to sustainable housing delivery and as such equates to a total 9% increase over the plan period. It is unclear how a market signals adjustment has been applied from 2021 as this would suggest a policy on approach rather than adjustments being made to the household projections to reflect appropriate market signals, as well as other market indicators of the balance between demand for and supply of dwellings.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The advice provided by the Inspector noted that the discussions through the Local Plan examination concluded that an adjustment for Local Plan housing needs should be made. This reflects advice within the Local Plan Expert Report to government that is noted as provided key direction to calculating housing needs and requirements but is recognised as not forming planning advice or guidance at this time. Planning guidance at ID-2a-020 states "... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period". The approach proposed incorporates a market signals uplift as recommended through LPEG that has been applied in a manner consistent with planning guidance. It results in an increase in North Tyneside's housing requirement from an average rate of delivery over the previous five years of 434 dwellings per annum to 740 dwellings per annum - reflecting a 60% uplift - followed by a further increase to 930 dwellings per annum - reflecting an additional 25% uplift in rates of delivery. Planning guidance does not indicate or dictate the manner
-------------------------	---

	in which an appropriate uplift for Market Signals should be applied to housing needs. For North Tyneside the Council consider the uplift set out is a reasonable and measured response to the market signals evidence outlined within the 2016 SHMA Addendum that can be expected to address the affordability issues identified.
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808139	<b>Name</b>	Mr Gerald Fletcher	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM108	<b>Consultation Point</b>	MM150	<b>Local Plan Reference</b>	New Para after 7.1		
-------------------	---------	---------------------------	-------	-----------------------------	--------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

What safeguards against developers changing plans to maximise profits

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. This response does not address MM150 which discusses evidence informing the boroughs assessment of Objectively Assessed Needs for housing and the housing requirement.

**Officer Response** This response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPM92	<b>Consultation Point</b>	MM150	<b>Local Plan Reference</b>	New Para after 7.1		
-------------------	-------	---------------------------	-------	-----------------------------	--------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

This proposes to apply an uplift to the housing requirement to take account for market signals, however it is unclear why the uplift of 15% is not provided until 2021/22. The uplift should be applied throughout the plan period.

#### Changes Sought

### North Tyneside Council Response

#### Is response duly made? Yes.

<b>Officer Response</b>	<p>The advice provided by the Inspector noted that the discussions through the Local Plan examination concluded that an adjustment for housing market signals should be made. This reflects advice within the Local Plan Expert Report to government that is noted as providing key direction to calculating housing needs and requirements but is recognised as not forming planning advice or guidance at this time. Planning guidance at ID-2a-020 states "... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period". The approach proposed incorporates a market signals uplift as recommended through LPEG that has been applied in a manner consistent with planning guidance. It results in an increase in North Tyneside's housing requirement from an average rate of delivery over the previous five years of 434 dwellings per annum to 740 dwellings per annum - reflecting a 60% uplift - followed by a further increase to 930 dwellings per annum - reflecting an additional 25% uplift in rates of delivery. Planning guidance does not indicate or dictate the manner in which an appropriate uplift for Market Signals should be applied to housing needs. For North Tyneside the Council consider the uplift set out is a reasonable and measured response to the market signals evidence outlined within the 2016 SHMA Addendum that can be expected to address the affordability issues identified.</p>
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1058365	<b>Name</b>	Mr Sean Brockbank	<b>Group Representation?</b>	No	<b>Group Numbers</b>	1
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM3	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2
-------------------	------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The soundness of the statement that: To provide for the growth and development needed in North Tyneside to meet the Borough's Objectively Assessed Need objectively assessed need for new homes, provision is made for the development of at least 16,593 homes from 2011/12 to 2031/32. This overall requirement will be provided through a phased approach, to deliver an average of 790 new homes per year per annum over the plan period.

Indicates to a reader that whilst the redacted figure of 17 388 as a final total has been rejected, there needs to be far greater clarity by the replacement of it with the term, at least 16 593 homes. This has significant semantic / legal impact - is the Inspector suggesting that this new figure is a start point only and in fact the upper figure previously used can be exceeded?

#### Changes Sought

Clarification is needed of the top end of the numbers allowed rather than a nebulous term like, at least.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	National planning policy is clear that housing requirements can never be expressed as a ceiling. The previous wording simply set out the housing requirement and whilst it placed no ceiling upon housing delivery was not considered sufficiently clear in terms of its meaning in terms of its role in setting the minimum level of delivery that should be achieved within North Tyneside.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPM89	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2		
-------------------	-------	---------------------------	-------	-----------------------------	-------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

With regard to the housing requirements we note the proposed main modification seeks to reduce the housing requirement over the plan period from 17,388 to 16,593 dwellings, an average of 790dpa. It is disappointing that this is 38dpa lower than the submitted plan, however it is welcomed that this is noted as a minimum requirement.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Responses noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM56	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2
-------------------	-------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The following comments also refer to the consequential changes to the supporting text set out within main modifications MM149, MM150, MM163, MM165 etc. The Council and the Inspector will be aware of the position of the HBF in relation to the housing requirement. This is set out within paragraphs 18 to 36 of our comments upon the submission version of the plan and matter 3 examination hearing statement. Throughout these comments we considered that a moderate uplift was required to take account of market signals in line with the PPG and recommendations from LPEG. We also asserted that the submitted plan requirement for an average of 828 dwellings per annum (dpa) sat at the lower end of an acceptable range. These comments are considered to remain valid. Given our previous comments upon this issue and statements made within examination hearing session 3 we are disappointed to note that the proposed main modification seeks to reduce the housing requirement over the plan period from 17,388 to 16,593 dwellings, an average of 790dpa. This is 38dpa lower than the submitted plan. The HBF is, however, pleased to note that the housing requirement is identified as a minimum requirement.

#### Changes Sought

It is understood that the 790 average figure is derived from the updated 2016 SHMA figure of 727 plus an uplift to account for market signals (page 4 examination document EX-NTC-54). The HBF welcome the principle of an uplift to take account of market signals. It is, however, unclear why no uplift is provided until 2021/22. The HBF consider that the uplift should be applied throughout the plan period. The use of the LPEG methodology, as described in their report to Government, would require the uplift to be applied over the full plan period. A 10% uplift across the plan period would identify an average requirement of 800dpa or 16,800 over the plan period. This small additional increase would be based upon a clearly justified response to market signals. The HBF does, however, also consider the 15% or 20% uplift identified within table 5 of the Housing Needs and Supply Update (Examination ref: EX-NTC-54) to be appropriate if applied over the full plan period.

### North Tyneside Council Response

#### Is response duly made? Yes.

<b>Officer Response</b>	The advice provided by the Inspector noted that the discussions through the Local Plan examination concluded that an adjustment for Local Plan housing needs should be made. This reflects advice within the Local Plan Expert Report to government that is noted as provided key direction to calculating housing needs and requirements but is recognised as not forming planning advice or guidance at this time. Planning
-------------------------	---

guidance at ID-2a-020 that states "... they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period". The approach proposed incorporates a market signals uplift as recommended through LPEG that has been applied in a manner consistent with planning guidance. It results in an increase in North Tyneside's housing requirement from an average rate of delivery over the previous five years of 434 dwellings per annum to 740 dwellings per annum - reflecting a 60% uplift - followed by a further increase to 930 dwellings per annum - reflecting an additional 25% uplift in rates of delivery. Planning guidance does not indicate or dictate the manner in which an appropriate uplift for Market Signals should be applied to housing needs. For North Tyneside the Council consider the uplift set out is a reasonable and measured response to the market signals evidence outlined within the 2016 SHMA Addendum that can be expected to address the affordability issues identified.

The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at [http://www.northtyneside.gov.uk/pls/portal/NTC\\_PSCM.PSCM\\_Web.download?p\\_ID=567485](http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485) which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069028	<b>Name</b>	John Fleming	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Gladman Developments	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM132	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2
-------------------	--------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

Whilst Gladman welcome NTBC recognition that the housing target should not be seen as a ceiling figure, we are concerned that the intention to phase the delivery of the housing target over the plan period jeopardises the soundness of the Plan. The result of this policy will act to artificially suppress the delivery of development in the early years of the plan.

The Framework is clear in its intention to boost significantly the supply of housing. This strategy is further underlined by the buffers applied by the Framework, and the move by Planning Practice Guidance (PPG) and guidance provided by the Planning Advisory Service that requires local planning authorities to meet backlog within a five year period. The intentions of national policy and guidance are clear therefore, and the application of a phasing policy is in conflict with the very principles of national policy.

In addition, Gladman consider the back loading of land supply will likely threaten the deliverability of the Plan. Should the Council fail to deliver these higher rates of delivery towards the end of the Plan period, there is little flexibility or opportunity provided to ensure that the housing target can be met in full. The phasing policy is therefore unsound and should be deleted in favour of a flat annual housing target.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The concerns expressed regarding the soundness of the proposed phasing policy do not take into consideration the supporting evidence that has informed its preparation. Through the examination process the option to introduce a phased housing requirement were discussed by participants who had responded to the Local Plan and it was acknowledged that with appropriate evidence this could form an appropriate basis for establishing the housing target. In summary the housing requirement is not simply formed on the basis of arbitrarily backloading
-------------------------	--

	housing need arising today and is instead based upon the annual housing projection prepared independently by Edge Analytics and based directly upon the 2014 based sub national population, medium jobs led (sens 3) and 10 year migration trend forecasts for the Borough. Housing need and delivery therefore is not artificially suppressed in North Tyneside as a result of introducing this phasing element.
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960257	<b>Name</b>	Murton Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	1010551	<b>Organisation</b>		<b>Agent if applicable</b>	Barton Wilmore		

### Comments Details

<b>Comment ID</b>	LPMM104	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2
-------------------	---------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The Council have updated Policy S4.2 to state that; "To provide for the growth and development needed in North Tyneside to meet the Borough's objectively assessed need for new homes, provision is made for the development of at least 16,593 homes from 2011/12 to 2031/32. This overall requirement will be provided through a phased approach, to deliver an annual average of 790 new homes per year annum over the plan period".

This equates to a reduction in the housing target from the submitted Plan of some 795 units or 38 units per year over the plan period. Whilst this is a significant reduction, it is noted that an additional paragraph is to be included to incorporate the delivery of a buffer of 20% to the housing target, as well as an additional non-implementation rate of 5% to be applied. Although we note that the suggestion is that on-going monitoring of performance may alter these buffers should an alternative basis for calculating the five year housing land supply emerge.

However, certainty is needed in ensuring delivery and if the phased approach to delivery is considered to be a suitable route to delivery, the method of calculating the five year housing land supply should not be altered unless an early plan review is required. Whilst we understand the Council's desire to provide flexibility in delivery, most notably as the phased requirement is dependent on the successful provision of key infrastructure to support development in a timely manner; particularly with regard to the strategic allocation at Murton, the delivery of housing and the targets ensuing should be clear and unequivocal so that those preparing applications have a barometer for assessment and a clear indication of the expectation for housing delivery in order to meet need.

The critical infrastructure elements identified within the new paragraph are as follows; £ Murton Strategic Link Road; £ Potential new Metro Station; and £ Schools and education provision.

The provision of the Strategic Link Road has already been commented upon above and the changes needed to the Plan which still remain have been highlighted.

The second point relates to the potential new Metro station. Whilst our client supports the provision of the Metro station and agrees with the net benefit it provides to both the Murton strategic allocation and the wider area, it should be made clear that an alternative can be provided in the form of additional bus networks and still be considered acceptable and within the remit of the aspirations of the Plan. The reason this is highlighted is that reference is made to critical infrastructure, which would imply necessity, however an alternative (if not favourable option) is still available and this should be clear within the Plan, so that there are no illusions as to the potential scope of the future development.

It should also be made clear that a partial reasoning for the adjustment of the housing delivery schedule to allow a phased approach is due to the lead-in process for

the strategic allocations and the reliance the housing target has upon these sites. Our client has been open about the time it takes in the process of finalising the masterplan for the site, gaining planning permission and then mobilising on site before the sites can realistically contribute towards housing delivery. In this sense, it is clear that our client has every intention to deliver housing as soon as is practically possible and in this regard, there should be no need to reconsider the calculation of housing delivery and five-year supply based on the failure to deliver on the strategic sites.

As our client highlighted at the Examination in Public, the forecasting for the scenario being pursued by the Council is based on a trend between workers and jobs in North Tyneside and their counterparts in neighbouring authorities, most notably Newcastle as the largest provider of jobs in the region. It was highlighted that the growth in Newcastle has happened exponentially in relationship to North Tyneside and whilst our client supports the growth in employment in North Tyneside, it is clear that the relationship between these two authorities is still going to be one that has a reliance upon job provision within Newcastle and therefore in particular the reduction in commuting expected by North Tyneside is unlikely to occur on the scale suggested by the Council. This in juxtaposition to the statement as amended at Para 7.21 of the Main Modifications, which states that 'if successful, this complementary strategy would reduce historic patterns of migration from Newcastle to North Tyneside, whilst delivering growth in Northumberland that can support employment needs of North Tyneside and reflects the stable level of growth set out in Policy S4.1.' The position of the Council in aiming to reduce commuting is too optimistic and as such using a more realistic scenario a greater housing target would be required.

Our client presented a number of options for the future housing target based on a range of scenarios and would reiterate these points for both the Council and the Inspector to consider as an alternative to the housing target. In the event that the proposed target suggested by the Council within the Main Modifications of 790 homes per year is maintained it is clear that the 20% buffer for under-delivery is an absolute necessity, which would lift the requirement for housing delivery to 931 new homes per annum over the next five years to 31 March 2021.

Likewise an additional buffer for non-implementation is paramount (suggested as 5%). The council have sought to include measures to adjust supply targets based on ongoing monitoring, but the clear message should not be forgotten in that the Council have consistently under-delivered, have set a conservative target for housing growth, but one which is very much achievable and the repercussions for under-delivery and non-implementation should be clear and absolute.

In this regard what is unequivocal in this suggested target is that there is still an absolute need for the strategic allocations and that they need to start delivery as soon as possible. In this regard the ability for strategic allocations to deliver to their maximum is still of great benefit to the Plan and the Borough. To reiterate our comments presented within our Matter Statements, the Murton Strategic allocation has the potential to deliver above 3,000 units as outlined within Policy S4.4 (a). On the basis of a 35dph density the scheme could deliver approximately 3,640 units. Whilst the masterplan process outlined within Policy S4.4 (c) is underway through the construction of a Detailed Delivery Framework which will result in a masterplan and thus an expected delivery output, the policy flexibility is of benefit to both the developer in providing the most realistic and successful development for the market and for the Council in supporting a proposal which has the potential for surplus delivery over policy which will assist in achieving delivery; especially of under-delivery is occurring.

#### Changes Sought

#### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

The phased requirement set out at Table X of MM445 will remain unchanged regardless of future monitoring until such time as the plan requirement is replaced by a review of the Local Plan or this element of it. Assumptions regarding the calculation of the five year land supply

are not anticipated to change unless as a result of the monitoring of housing delivery - which is recorded and made public through the authorities Monitoring Report and the annually updated housing land supply analysis. These housing land supply documents are prepared in collaboration with the development industry and subject to engagement. This monitoring would alter the assessment of the NPPF buffer to be applied in calculating housing land supply, an ongoing variable that is an integral component of national policy. No other changes are proposed to the methodology for calculating housing land supply other than to revert - as soon as practicable to adoption of a "Sedgefield" methodology for addressing any previous undersupply.

Points made regarding infrastructure critical to the delivery of housing in North Tyneside specifically in relation to a Potential Metro Station is recognised and the Murton Consortium's principle support delivering a Potential Metro Station as part of the delivery of the strategic allocation, expressed in this response and through the Examination in Public is welcomed by the Council. This specific reference and reference elsewhere within the Local Plan is clear that the Metro Stations are "Potential" and as a consequence an alternative form of public transport provision could be secured to achieve sustainable travel for the site and enable housing delivery.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066725	<b>Name</b>	CLlr Judith Wallace	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM45	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2
-------------------	--------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

I consider that the reduction in objectively assessed need for new homes from 17,388 to 16,593 is insufficient: : please see comments on MM149 above. In addition, I consider that the words "at least" before "16,593" ought to be removed as this figure ought not be the minimum. It seems that the views of local residents have not been fully taken into account: residents have strongly opposed the inclusion of the Murton Gap area in the draft Local Plan as they appreciate that the construction of 3000 homes here will have a detrimental effect on the environment, traffic congestion, schools and healthcare.

#### Changes Sought

I suggest that the figure of 16, 593 should be reduced and that a figure of 12, 898 would be more appropriate.

### North Tyneside Council Response

#### Is response duly made? Yes.

#### Officer Response

The requested change is not accepted. The revised housing requirement is underpinned by robust evidence of the future growth of North Tyneside. The Government's National Planning Policy is clear that housing requirements can never be expressed as a ceiling. The previous wording simply set out the housing requirement and whilst it placed no ceiling upon housing delivery was not considered sufficiently clear in terms of its meaning in terms of its role in setting the minimum level of delivery that should be achieved within North Tyneside.

The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at [http://www.northtyneside.gov.uk/pls/portal/NTC\\_PSCM.PSCM\\_Web.download?p\\_ID=567485](http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485) which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.

	<p>The Local Plan was prepared with extensive consultation and adjusted in line with feedback from residents and other consultees: the Main Modifications reflect the final point reached following a thorough Examination In Public.</p>
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM117	<b>Consultation Point</b>	MM155	<b>Local Plan Reference</b>	Policy S4.2
-------------------	---------	---------------------------	-------	-----------------------------	-------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

Our comments also refer to the consequential changes to the supporting text set out within main modifications MM149, MM150, MM163, MM165 etc. BDW wishes to fully endorse and support the comments made by the HBF in relation to this matter. In summary these are; We remain of the position that 828 dwellings per annum should be adopted as the minimum requirement. Whilst we welcome the principle of an uplift to the 2016 SHMA figure of 727 to account for market signals, it is unclear why no uplift is provided until 2021/22. We consider that a 10% uplift should be applied across the entire plan period.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Through the examination process the preference for relying upon the latest population and household projections was rigorously considered and concluded that the 2014 based projections were the most appropriate starting point for the Borough. Meanwhile the application of a 10% uplift to the baseline assessment of 727 dwellings per annum has been applied to the Local Plan housing requirement to ensure that the plan makes an appropriate response to market signals whilst maintaining an achievable and deliverable housing requirement.
-------------------------	--



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM118	<b>Consultation Point</b>	MM456	<b>Local Plan Reference</b>	New Policy S4.2a
-------------------	--------	---------------------------	-------	-----------------------------	------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

BDW welcomes the use of additional review mechanisms in principle. However, the term 'if exceptional circumstances prevail' creates significant uncertainty as to when such actions would be triggered. The Council and Inspector will note the delivery test identified in the Government's Housing White Paper 'Fixing our broken housing market'. With this in mind we propose that a Local Plan review is triggered where housing delivery falls 20% below the cumulative target or where the cumulative target is missed for three consecutive years. In addition to the above, we consider that the triggers proposed lack reference to the Local Plan's spatial strategy. Our comments to date have clearly identified the fragility of the Area Specific Strategy for the North West Villages and as such a partial review should be invoked should the relevant objectives begin to fail.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	BDW will appreciate that reference to "where exceptional circumstances" prevail is a reference to NPPF and planning guidance regarding planning and the review of Green Belt boundaries. The policy wording is in conformity with current national guidance. The Government's Housing White Paper 'Fixing our broken housing market' proposes greater clarity regarding exceptional circumstances. The Housing White Paper proposals contain a wider range of issues that will require substantial legislative work before they are enacted. The Local Plan has been prepared with sufficient flexibility to allow for new national planning policy and guidance, legislation and regulation as it emerges.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM61	<b>Consultation Point</b>	MM456	<b>Local Plan Reference</b>	New Policy S4.2a
-------------------	-------	---------------------------	-------	-----------------------------	------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The new policy sets out a framework for monitoring the delivery of housing over the plan period. The policy indicates some of the remedial actions the Council will take if the number of completed dwellings falls below the cumulative target over any 12 month monitoring period. Throughout the examination hearing sessions the HBF was supportive of the principle of such a policy and the actions identified. This remains to be our position. The Council and Inspector will also note the delivery test identified within the Government's Housing White Paper 'Fixing our broken housing market' and the various actions required based upon the level of delivery against the housing requirement. These triggers and actions will need to be borne in mind.

#### Changes Sought

A key trigger identified in the modification relates to the partial review of the plan. The policy currently suggests that this will only occur "if exceptional circumstances prevail". This creates a significant amount of uncertainty regarding when such actions would be triggered. To provide greater clarity and certainty and to ensure the policy is effective it is recommended clear triggers are included. This could include the trigger of a Local Plan review where delivery falls 20% below the cumulative target or where the cumulative target is missed for three consecutive years. In terms of the phased approach to the housing requirement I refer to our comments upon main modification MM457 below.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	It should be noted that reference to "where exceptional circumstances" prevail is a reference to NPPF and planning guidance regarding planning and the review of Green Belt boundaries - in other words an integral part of any Local Plan review would be to consider options in relation to safeguarded land and green belt if exceptions circumstances in the context of NPPF exist. The policy wording is in conformity with current national guidance and sets out that any requirement for review will be informed by the annual monitoring process, which itself is aligned with the annual assessment of 5 Year housing land supply prepared in with the engagement of the development industry. The Government's Housing White Paper 'Fixing our broken housing market' proposes greater clarity regarding exceptional circumstances. The Housing White Paper proposals contain a wider range of issues that will require substantial legislative work before they are enacted. The
-------------------------	--

	Local Plan has been prepared with sufficient flexibility to allow for new national planning policy and guidance, legislation and regulation as it emerges.
--	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069028	<b>Name</b>	John Fleming	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Gladman Dvelopments	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM133	<b>Consultation Point</b>	MM456	<b>Local Plan Reference</b>	New Policy S4.2a
-------------------	--------	---------------------------	-------	-----------------------------	------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

Whilst recognising that this modification largely reiterates the suggested wording recommended by the Inspector, Gladman consider that a more effective policy mechanism is required to ensure that development proposals are able to come forward in a timely manner. The current mechanism proposed may not adequately deal with the issue of housing shortfall, it would seem sensible that this issue be dealt with now to avoid the need to undertake a Local Plan review or further DPDs within a short period of time following the adoption of the Local Plan.

Gladman note the recent Inspector's Report to the Scarborough Local Plan which introduced a main modification to ensure that the Plan is justified and effective, which required the five year supply at 1 April 2016 to be explicitly stated in the reasoned justification to HC1 along with an explanation as to how it has been calculated including reference to the shortfall in delivery in the period 2011 to 2016 being made up in the next five years, and the application of a 20% buffer to the base requirement as well as to the shortfall.

Of further importance, is that the Inspector in this instance identified that policy HC1 should be modified to include a positive approach to the consideration of housing proposals outside development limits of a scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites. A similar approach is required in North Tyneside to ensure that the Plan can be considered sound.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	That element of this response relating to ensuring appropriate text is included within the reasoned justification regarding the current position and approach to 5 Year Land Supply is considered to be addressed by the text introduced through MM483. This explains both the position at
-------------------------	--

	<p>31 March 2016 and the approach to assessing five year land supply that would be taken in the future. Regarding reference to Main Modifications to policy HC1 of the Scarborough Local Plan it is suggested that the context for such a criteria within North Tyneisde is quite different. The Local PPlan for North Tyneside does not draw boundaries of development limits whilst land outside the urban area itself is uniformly designated as Safeguarded Land or Green Belt.</p>
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM80	<b>Consultation Point</b>	MM456	<b>Local Plan Reference</b>	New Policy S4.2a		
-------------------	--------	---------------------------	-------	-----------------------------	------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC support the inclusion of an additional monitoring policy to support housing delivery. We also support the Council's statement that it will work with developers of the strategic housing sites (which includes Killingworth Moor) and other stakeholders to ensure the timely development of the proposals. KMC also support the Council in ensuring the timely development of the associated key infrastructure requirements. Whilst KMC are committed to providing the necessary infrastructure, the exact infrastructure requirements and the timing / phasing of the infrastructure will need to be discussed further and agreed with the Council.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPM93	<b>Consultation Point</b>	MM456	<b>Local Plan Reference</b>	New Policy S4.2a		
-------------------	-------	---------------------------	-------	-----------------------------	------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

This new policy to require additional monitoring is welcomed, however the proposed wording lacks certainty and clarity. Reference is made to: Preparation of an interim position statement and drawing on evidence from the Strategic Housing Land Availability Assessment to identify additional housing land, including options for safeguarded land. This should be publication of a statement, there is no indication of when this should be undertaken or come into effect. There is no justification for the removal of safeguarded land from this trigger. The policy should include clear and accountable measures for the triggers such as under delivery by 15% below the cumulative target or if delivery is not met for three years as per the recent Housing White Paper (Feb 2017) (para 2.49).

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

It is considered that the policy wording is clear that where under-delivery arises against the Local Plan requirement the first step would be preparation of an interim position statement to seek to establish additional housing land that could be brought forward. Whilst use of the word "publication" as an alternative to "preparation" is noted as a recommendation this is not considered to significantly enhance or increase the clarity of the policy.

Reference to options for safeguarded land were moved from this measure to form part of the Local Plan review.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPM83	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a		
-------------------	-------	---------------------------	-------	-----------------------------	----------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

It remains the position of KMC that the OAN for North Tyneside is 828 dwellings per annum (dpa) over the projection period 2011 to 2032. Notwithstanding, KMC recognises that the level of housing need discussed in the Examination Hearings (727 dpa) has been increased in the final Main Modifications to 790 dpa. This is on the basis of the evidence discussed at the Examination Hearings and published following the sessions including the Inspector's Note on Matters 3 and 4 (December 2016) which identifies the figure of 790 dpa as an appropriate OAN given demographic, economic and market signals issues. Overall, the KMC considers this new position and the evidence base which supports it is sufficient to demonstrate the housing requirement for the Local Plan is sound.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response noted.
-------------------------	-----------------



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM62	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a
-------------------	-------	---------------------------	-------	-----------------------------	----------------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The modification includes a significant number of issues including a phased approach to the housing requirement, the five year housing land supply and windfall sites. These issues are dealt with separately below. Phased housing requirement The proposed phasing of the housing requirement is set out within Table X of the proposed main modification. The phasing places significant emphasis upon delivery in the mid to latter stages of the plan period. As explained within our matter 4 examination hearing statement and orally during the discussions upon matter 4 the HBF does not support the back-loading of housing requirements where this cannot be justified. Our reasoning is that this simply 'puts-off' meeting the needs of the area in the short term and may have implications for the achievement of the Council's economic ambitions. In terms of North Tyneside the Council and Inspector will recall, from statements made during the matter 4 examination hearing session, that whilst we do not support the principle of a phased requirement it does appear that this could be justified in North Tyneside due to the demographic modelling work undertaken and the delivery implications associated with the two large strategic sites. It is only for these reasons that we raise no further objection to the principle of phasing. Five year housing land supply In terms of the five year supply the HBF agrees with the main modification that a 20% buffer should be applied due to persistent under-delivery and that a 5% non-implementation allowance is appropriate. These both conform to our previous comments upon this issue (matter 4 hearing statement). The Housing White Paper also provides clear guidance upon Government thinking on persistent under-delivery. Paragraph 2.49 of the White Paper indicates that delivery of less than 85% of the housing requirement over the previous three years should be considered persistent under-delivery and a 20% buffer should be applied. We do not, however, agree to the use of the 'Liverpool' method of dealing with unmet housing supply. This is discussed in greater detail in response to Main Modification MM843 below. Windfalls The plan and main modifications continues to place significant reliance upon delivery from windfalls. Within our comments upon the submission version of the plan and matter 4 examination hearing statement (paragraphs 8 to 12) we clearly set out our concerns with the Council's approach. Our concerns primarily relate to the continued reliance upon larger windfall sites. The Council has not provided any further evidence in this regard and as such our concerns remain.

#### Changes Sought

**North Tyneside Council Response****Is response duly made?** Yes.**Officer Response**

The HBF's recognition of the evidence based analysis that has informed the phased approach to North Tyneside's revised housing requirement is noted, as is support for application of a 20% buffer and 5% non implementation allowance to the calculation of North Tyneside's five year housing land supply.

The Housing White Paper proposals contain a wider range of issues that will require substantial legislative work before they are enacted. The Local Plan has been prepared with sufficient flexibility to allow for new national planning policy and guidance, legislation and regulation as it emerges.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM119	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a		
-------------------	---------	---------------------------	-------	-----------------------------	----------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

BDW objects to the changes proposed by modification 457. Firstly, the introduction of a phased housing requirement simply delays meeting need until later in the Plan unnecessarily. Given that the housing requirement is a minimum we consider this a particularly negative approach when considered against national policy and in particularly the Housing White Paper which seeks to accelerate supply now, not in 5 or 10 years. Furthermore, this method suggests that there are insufficient deliverable sites to meet need now. It is for this reason we maintain our position that a review of the Green Belt should have been undertaken to support supply in the early stages of the Plan accordingly. The Local Plan and main modification continues to place significant reliance upon the delivery of windfalls. Within our comments made to the submission draft and relevant examination hearing statements we clearly set out our concerns to this approach. There remains insufficient evidence to support this supply, particularly larger sites which have historically been won by appeal. Again we would stress that need for a Green Belt review is paramount to ensure the objectives of the Plan are realised.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at <a href="http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485">http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485</a> which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

## Consultee Details

Consultee ID	1068189	Name	Mr Michael McIntyre	Group Representation?	Yes	Group Numbers	350
Agent ID		Organisation	Monkseaton Action Group	Agent if applicable			

## Comments Details

Comment ID	LPM52	Consultation Point	MM457	Local Plan Reference	New Para to support Policy S4.2a
------------	-------	--------------------	-------	----------------------	----------------------------------

## Reasons for Support / Objection

Legal?		Sound?	No	Why Unsound?	Positively prepared; Justified; Effective
--------	--	--------	----	--------------	---

## Representation

## Consultee Comment

Average population growth in North Tyneside for the past twenty years is 2% per annum. The number of dwelling assessed forecasts a growth of 10% per annum, this clearly is not a sound basis on which to assess housing need. The potential new Metro stations are integral to achieve modal shift and therefore need to be constructed prior to the development of the Murton gap site. If construction is not possible for whatever reasons the development should not be allowed and the Local plan should clearly state that is the case, which it currently does not. It is therefore not legally compliant with national policy.

## Changes Sought

Population growth forecasts should more closely reflect historical levels of growth, which is a more sound basis of calculation. The main modification would be legally compliant with national policy if the construction of the Metro stations were made a legal obligation - requirement and development could not take place unless they were built.

## North Tyneside Council Response

## Is response duly made? Yes.

Officer Response	<p>The requested change is not accepted. The revised housing requirement is underpinned by robust evidence of the future growth of North Tyneside. The Local Plan policy does not set out legal obligations it sets out the framework against which future proposals and applications for development will be considered. It would be against the specific applications that future legally binding planning obligations through s106 agreements would be made.</p> <p>The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at <a href="http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485">http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485</a> which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.</p>
------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066725	<b>Name</b>	CLlr Judith Wallace	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM46	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a
-------------------	--------	---------------------------	-------	-----------------------------	----------------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

Please see comments to MM 149 and MM155 above. Accordingly, I suggest that the figure of 16,593 should be replaced with 12,898, and the figures in the Table recalculated pro rata. With regard to the "potential new Metro station", clarification is needed about recalculating the numbers of houses until any new station is operational.

#### Changes Sought

I suggest that the figure of 16, 593 should be replaced with 12,898 and the Table recalculated accordingly.

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at <a href="http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485">http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485</a> which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1059551	<b>Name</b>	Mr W.E. Rochester	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM23	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a
-------------------	--------	---------------------------	-------	-----------------------------	----------------------------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	--

### Representation

#### Consultee Comment

The Murton Gap Consortium Phasing Plan EX-HS-8-4-d dated 20 October 2016 is attached. This Final Phasing Plan conflicts with the North Tyneside Policies Map shown in "Main Modifications" clause MM186. The Murton Gap Consortium [Land Ownership] Final Phasing Plan does not comply with the NTC Policies Map as follows:- Policies Map shows New York road within the village as a pedestrian and cycleway. The Phasing Plan permits east and west bound traffic to/from the Murton Gap housing estate at Murton Lane through New York village. It also conflicts with NTC Document NT11/2/2 pages 26/27 which shows current access from Northam Road roundabout closed to traffic to/from New York village. Policies Map shows an extensive Wildlife corridor between the Green Belt at the Metro Rail and the A191 on Rake Lane. The Final Phasing Plan shows a Wildlife Corridor much reduced in area which has been taken over by housing in Phases 2A, 3A, 2C and 3B on the Final Phasing Plan. Policies Map shows "Mixed use Zones" but these are not provided or identified on the Final Phasing Plan. Policies Map shows green "Amenity Spaces and Buffer Zones" but these are not provided or shown on the Final Phasing Plan. Murton Gap Consortium [Land Ownership] Final Phasing Plan The Final Phasing Plan document EX-HS-8-4-d should be reviewed by NTC in the context of the North Tyneside Policies Map shown in Main Modification MM186 and also on Information Leaflet A2 size version dated November 2015. There are a number of issues with the Final Phasing Plan produced by Murton Gap Consortium [the landowners] issued and dated 20th October 2016 the day before closure to Public Respondents by the Inspector on 21st October 2016. The Major problem with the Murton Gap Development is that in general it is mostly landlocked except for parts of the A191 and the proposal to build an estate of 3,000 houses in Murton Gap presents serious issues and severe future traffic congestion. The Murton Gap Housing Development unfolds in three phases from 2018 to 2032. The construction Phasing is shown on the Final Phasing Plan above as Phase 1, to be constructed over a period of 2018 to 2022, Phase 2, to be constructed over a period of 2023 to 2027 and Phase 3, 2028 to 2032. Provision of infrastructure/road building is also phased during the same periods Phases 1, colour green, Phase 2 colour blue and Phase 3 colour yellow, over the three phasing periods as on the Phasing Plan. The Earsdon Link Road is not planned to open to Earsdon until 2023 so Phase 1 housing will be complete before the Link Road is open to Murton Gap residents. The Final Phasing Plan shows traffic exit from Phase 1B into New York village with white arrow directing traffic westbound to Northam road roundabout. This conflicts with document NT11/2/2 page 26/27 which shows access to the Northam road roundabout closed to traffic to/from New York village. The Final Phasing Plan shows a further white arrow directing traffic east through New York village to the A191 roundabout at Murton House farm. Traffic flow will be restricted having to give way to right oncoming traffic at Murton House roundabout

causing stationary traffic tail backs into New York village. New York road in the village is a pedestrian and cycleway according to the Policies Map. Traffic from phases 1B, 2A and 2C heading southbound is shown to exit from Murton Gap using Murton Lane into New York village. The alternative is to travel northbound via Phases 1A to the southern section of the incomplete Earsdon Link Road. Traffic is unlikely to travel northbound whilst heading southbound. Further use will be made of Murton Lane into New York village and will cause severe traffic congestion in New York village until 2028/32 when Phase 3 access to the roundabout at North Tyneside Hospital opens to all phases of residential traffic. Up until 2022/27 only Phase 1C traffic has use of this roundabout until Phase 3B is complete in 2028/32. Traffic flows eastbound from Murton Gap phases 1A and 1B and later phases 2A and 2B will use the Murton Lane/Westminster avenue junction into New York village or the southern section of the Earsdon Link road to the A191 eastbound and descend upon the Foxhunters roundabout heading for North Shields and Whitley Bay. Document NT11/3 clause 5.23 page 17 confirms Foxhunters roundabout is already over capacity resulting in severe traffic congestion. Improvements to Foxhunters roundabout are excluded from the “Local Plan” project budget costs. Document NT11/1/1 clause 4.3.2.2 bullet point 5 refers to restricting traffic onto the Foxhunters roundabout from the new Rake Lane roundabout from Phase 1C with bus gates. How will bus gates from phase 1C restrict traffic east bound on the A191 from phases 1A and 1B already complete and later phases to prevent traffic descending on the Foxhunters roundabout? Car drivers with the mindset to use the shortest route to principal destinations of Newcastle, Whitley Bay and North Shields from Murton Gap estate will use the two exits onto the A191 that is the southbound Link Road and Murton Lane into New York village. Traffic will head eastbound to Murton House farm roundabout on the A191 causing additional tailbacks into New York village. North Tyneside Hospital roundabout does not open to Murton Gap Traffic until 2028/32 except for exclusive use by residents in the local Phase 1C development. Phase 3 road infrastructure [yellow on the map] does not open to traffic until 2028/32. This will require northbound traffic from earlier Phases 1A, 1B, 2B and 2C to use the Earsdon Link road from its opening in 2023. A19 Northbound traffic, to say Morpeth, will use the Link Road from 2013 but then have a significant journey southbound using the A186 via the extensive Shiremoor bypass to Holystone before reaching the A19 northbound. The shortest route will be via the Link road south or Murton Lane into New York village to the A191 then onward to the A19 at Holystone. The question then arises will much use be made of the Earsdon Link Road northbound by Murton Gap estate residents. Benefit will mostly be by Park Lane residents? Norham Road is a single carriageway, an unclassified residential road. Your information leaflet map dated November 2015 upgrades it to a “Principal Highway Route” for key north/southbound traffic from Murton Gap in addition to the current congestion issues from Cobalt Business Park. How will Norham Road become upgraded to a “Principal Highway Route” to accommodate traffic to the east west via the A1058 Coast Road and the southbound A19 Tyne Tunnel route? Will Phase 2C residents from 2023 “2027 travelling northbound prior to Phase 3 infrastructure have to travel through Murton Gap estate via Phase 1B then Phase 1A to reach Earsdon via the new link road and the A186 then via this extensive A186 Shiremoor bypass to reach the A19. It will not be used by car drivers with the “mindset” to use the shortest route possible to the principal destinations of Newcastle, Whitley Bay and North Shields. They will use the two Murton Gap exits southbound, Earsdon Link south or Murton Lane into New York village again resulting in severe congestion! The A192 Seatonville Road Monkseaton and at Park Lane Shiremoor will suffer further congestion with traffic descending on West Monkseaton and Shiremoor Metro stations prior to a “potential” new Metro Station opening dedicated to Murton Gap. This could not be before 2023 when the Earsdon Link road is open to traffic. Westminster/New York junction should be deleted from the “Local Plan” and other options for traffic to join the A191 reviewed. This will prevent construction traffic and Murton Gap residential traffic entering New York village to prevent traffic congestion and pollution and dedared a pedestrian and cycleway on the NTC Policies Map. Billymill Lane B1316 from the above A191 Murton House farm roundabout should be the “Principal Highway Route” for key north/southbound traffic from Murton Gap to the Coast Road A1058 either dedicated or together with Norham Road. 15. The proposed Earsdon Link road encroaches on the green belt north of the Metro Line as does the proposed Murton Gap Metro Station. Another Main Modification and an issue for review at Public Consultation 16. NTC describe Murton Gap Metro Station as “potential”, or is it an “idea”? This should be a Consortium commitment backed up contractually with start and completion dates? There is also a need for artistic impressions against the background of St Alban’s Church Earsdon set on the outcrop to prevent this potential “blot on the landscape” to be put the Public for agreement at Consultation. 17. The Murton Gap Phasing Plan dated 20th October 2016 requires review as to how residents of varying abilities, using variable modes of transport can reach their desired destinations over each phase of



construction using the existing and phased road infrastructure. This Council review requires Public Consultation for destinations including Newcastle, North Shields, Whitley Bay, north/south bound, Tyne Tunnel, schools, shops, Metro stations, walking, including with dogs and how this could increase traffic flows and families having two or more cars over an already congested road infrastructure. 18. Has access from Murton Gap to West Monkseaton Metro Station been reviewed by the Council by upgrading Cauldwell Avenue to access Earsdon Road to reach the Metro station until such times as Murton Gap Metro Station is built and in full operation? Is adequate car parking and public transport to be provided to this Metro station or Shiremoor Metro station? 19. NT 11/3 clause 5.19 page 16 quote "Creation of a new access for the new link road at New York Road is likely to be the first stage in delivering the primary highway infrastructure, enabling access to the site and commencement of housing delivery from the south." NT11/3 clause 5.20 page 16 quote "Meanwhile, to enable concurrent delivery of development parcels during Phase 1, the creation of suitable access junctions at the Murton Lane junction with Westminster Avenue in New York, and the Rake Lane Hospital access will also be required during the first years of the development." The use of New York village, Westminster Avenue and Murton Lane as access to Murton Gap site for building materials and construction traffic for a 3,000 housing development to be constructed over a period from 2018 to 2032 and over a 14 year period is totally unacceptable!

### Changes Sought

North Tyneside Council and their Consultants need to review Murton Gap Final Phasing plan "thinking outside the box" in conjunction with the overall North Tyneside road network as shown mostly on the North Tyneside Information Leaflet of November 2015 and decide how resident in each of the phases will reach their principal destinations of Newcastle, North Shields, Whitley Bay, Tyne Tunnel, A19 including Northumberland Park, Shiremoor and West Monkseaton Metro Stations, the latter two having severe parking issues. North Tyneside Council should insist upon completion of the Murton Gap Infrastructure prior to commencing phases 2 and 3. The Murton Gap Consortium Phasing Plan dated 20th October 2016 must be further developed. How residents of Murton Gap of varying ages and abilities using variable modes of transport can reach their desired destinations over each phase of construction using the existing and phased road infrastructure as set out by Murton Gap Consortium needs to be reviewed by the Council.. North Tyneside Council needs to review this Final Phasing Plan so that destinations including Newcastle, North Shields, Whitley Bay, north/south bound, Tyne Tunnel, schools, shops, Metro stations, walking, including with dogs can at their choosing be adequately accessed by local residents. The Consortium Final Phasing Plan needs to be brought into line with the "Local Plan Policies Map" and corrected in accordance with Section 7 above. Should the development of this excessive number of 3,000 houses ever be permitted in Murton Gap or reach the statute book then site access and construction traffic should be limited to the early southern connection of the Earsdon Link Road to the A191 ONLY. Traffic congestion in the environs of New York village, Westminster Avenue, Murton Lane with noise, dust and air pollution from lorries and other construction traffic, including mud and pollution in the environs of North Tyneside General Hospital should not be permitted on the grounds of Public Health! Use of these two junctions Murton Lane and North Tyneside Hospital roundabout between 2018 and 2032 should be refused and other options should be considered. Much information concerning the Murton Gap Strategic site has unfolded on a piecemeal basis since Public Consultation in November 2015. Keeping track of these changes with conflicting clauses within N.T. Council documents and their significance is time consuming and impossible for many local residents. A summary package for this Strategic Murton Gap Development consolidating this information and showing clearly what is intended should be prepared by the Council and a further Public Consultation dedicated to Murton Gap be offered to the Public for consideration.

### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

The submitted Murton Gap consortium phasing plan does not represent the policy of the Local Plan. The Local Plan sets out that following its adoption a masterplan should be prepared and agreed jointly between the Council and development consortia. This masterplan should be in general conformity with the indicative concept plan and would then form the basis upon which future planning applications would be



	considered. In addition a significant focus of this response is in relation to previously aired comments in relation to the Murton Gap strategic allocation – in the main there are no Main Modifications the Murton Gap site that lead to the comments made.
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808139	<b>Name</b>	Mr Gerald Fletcher	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM109	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a		
-------------------	---------	---------------------------	-------	-----------------------------	----------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

Access to Murton site - What safeguards against changing route

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. This response does not address any proposed Main Modification. The Local Plan sets out an indicative Concept Plan for Murton Gap that includes indicative points of access that would be supported by the Council.

**Officer Response** This response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPM94	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a		
-------------------	-------	---------------------------	-------	-----------------------------	----------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

The Council propose a phased development over the plan period and propose to utilise the Liverpool Method for the calculation of the Five Year Housing Land Supply. This is not supported see MM 483. The Council continue to indicate a significant reliance on windfall sites to meet the housing requirements. This is not acceptable and no further evidence has been provided in support of this approach. The consideration of safeguarded sites for development, which are identified to meet future needs should be prioritised over large scale windfall sites.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	<p>The outcome of the hearing process for the Examination in Public and the range of evidence collated and discussed regarding the specific circumstances and nature of housing land supply in North Tyneside led to the conclusion that a "residual" based approach to addressing the housing land supply shortfall was appropriate. The Council has responded in particular to the Inspector's advice note regarding housing requirements and calculating housing land supply.</p> <p>The application of a windfall allowance has been clearly demonstrated as reasonable and justified through the Council's housing evidence - provided through the SHLAA 2016. The scale of any given windfall site is not specified but large scale windfall releases are not required to meet the allowance identified. The respondent might also note the continued support identified by the government within the White Paper of February 2017 for making appropriate allowance and enabling windfall housing delivery.</p>
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1063818	<b>Name</b>	Mr Gordon Harrison	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Nexus	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM32	<b>Consultation Point</b>	MM457	<b>Local Plan Reference</b>	New Para to support Policy S4.2a		
-------------------	--------	---------------------------	-------	-----------------------------	----------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	-----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

Nexus supports the clarity given by the proposed modification in respect of the delivery of infrastructure related to main housing development. The position of Nexus in relation to the provision of infrastructure related to Metro stations and the proposed bridge over Metro at Murton Gap remains as agreed in the joint position statements agreed between Nexus and the Council prior to the Examination in Public.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM59	<b>Consultation Point</b>	MM163	<b>Local Plan Reference</b>	Para 7.14
-------------------	--------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The following comments also refer to the consequential changes to the supporting text set out within main modifications MM149, MM150, MM163, MM165 etc. The Council and the Inspector will be aware of the position of the HBF in relation to the housing requirement. This is set out within paragraphs 18 to 36 of our comments upon the submission version of the plan and matter 3 examination hearing statement.

Throughout these comments we considered that a moderate uplift was required to take account of market signals in line with the PPG and recommendations from LPEG. We also asserted that the submitted plan requirement for an average of 828 dwellings per annum (dpa) sat at the lower end of an acceptable range. These comments are considered to remain valid. Given our previous comments upon this issue and statements made within examination hearing session 3 we are disappointed to note that the proposed main modification seeks to reduce the housing requirement over the plan period from 17,388 to 16,593 dwellings, an average of 790dpa. This is 38dpa lower than the submitted plan. The HBF is, however, pleased to note that the housing requirement is identified as a minimum requirement.

#### Changes Sought

It is understood that the 790 average figure is derived from the updated 2016 SHMA figure of 727 plus an uplift to account for market signals (page 4 examination document EX-NTC-54). The HBF welcome the principle of an uplift to take account of market signals. It is, however, unclear why no uplift is provided until 2021/22. The HBF consider that the uplift should be applied throughout the plan period. The use of the LPEG methodology, as described in their report to Government, would require the uplift to be applied over the full plan period. A 10% uplift across the plan period would identify an average requirement of 800dpa or 16,800 over the plan period. This small additional increase would be based upon a clearly justified response to market signals. The HBF does, however, also consider the 15% or 20% uplift identified within table 5 of the Housing Needs and Supply Update (Examination ref: EX-NTC-54) to be appropriate if applied over the full plan period.

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Please see response to comment ID LPMM56 and Main Modification MM155.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPM85	<b>Consultation Point</b>	MM163	<b>Local Plan Reference</b>	Para 7.14		
-------------------	-------	---------------------------	-------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

It remains the position of KMC that the OAN for North Tyneside is 828 dwellings per annum (dpa) over the projection period 2011 to 2032. Notwithstanding, KMC recognises that the level of housing need discussed in the Examination Hearings (727 dpa) has been increased in the final Main Modifications to 790 dpa. This is on the basis of the evidence discussed at the Examination Hearings and published following the sessions including the Inspector's Note on Matters 3 and 4 (December 2016) which identifies the figure of 790 dpa as an appropriate OAN given demographic, economic and market signals issues. Overall, the KMC considers this new position and the evidence base which supports it is sufficient to demonstrate the housing requirement for the Local Plan is sound.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response** This response setting out that the proposed Main Modification is considered sound is noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM86	<b>Consultation Point</b>	MM164	<b>Local Plan Reference</b>	Para 7.14		
-------------------	--------	---------------------------	-------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

It remains the position of KMC that the OAN for North Tyneside is 828 dwellings per annum (dpa) over the projection period 2011 to 2032. Notwithstanding, KMC recognises that the level of housing need discussed in the Examination Hearings (727 dpa) has been increased in the final Main Modifications to 790 dpa. This is on the basis of the evidence discussed at the Examination Hearings and published following the sessions including the Inspector's Note on Matters 3 and 4 (December 2016) which identifies the figure of 790 dpa as an appropriate OAN given demographic, economic and market signals issues. Overall, the KMC considers this new position and the evidence base which supports it is sufficient to demonstrate the housing requirement for the Local Plan is sound.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response** This response setting out that the proposed Main Modification is considered sound is noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM60	<b>Consultation Point</b>	MM165	<b>Local Plan Reference</b>	Para 7.16
-------------------	-------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The following comments also refer to the consequential changes to the supporting text set out within main modifications MM149, MM150, MM163, MM165 etc. The Council and the Inspector will be aware of the position of the HBF in relation to the housing requirement. This is set out within paragraphs 18 to 36 of our comments upon the submission version of the plan and matter 3 examination hearing statement. Throughout these comments we considered that a moderate uplift was required to take account of market signals in line with the PPG and recommendations from LPEG. We also asserted that the submitted plan requirement for an average of 828 dwellings per annum (dpa) sat at the lower end of an acceptable range. These comments are considered to remain valid. Given our previous comments upon this issue and statements made within examination hearing session 3 we are disappointed to note that the proposed main modification seeks to reduce the housing requirement over the plan period from 17,388 to 16,593 dwellings, an average of 790dpa. This is 38dpa lower than the submitted plan. The HBF is, however, pleased to note that the housing requirement is identified as a minimum requirement.

#### Changes Sought

It is understood that the 790 average figure is derived from the updated 2016 SHMA figure of 727 plus an uplift to account for market signals (page 4 examination document EX-NTC-54). The HBF welcome the principle of an uplift to take account of market signals. It is, however, unclear why no uplift is provided until 2021/22. The HBF consider that the uplift should be applied throughout the plan period. The use of the LPEG methodology, as described in their report to Government, would require the uplift to be applied over the full plan period. A 10% uplift across the plan period would identify an average requirement of 800dpa or 16,800 over the plan period. This small additional increase would be based upon a clearly justified response to market signals. The HBF does, however, also consider the 15% or 20% uplift identified within table 5 of the Housing Needs and Supply Update (Examination ref: EX-NTC-54) to be appropriate if applied over the full plan period.

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Please see response to comment ID LPM60 and Main Modification MM155.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPM88	<b>Consultation Point</b>	MM165	<b>Local Plan Reference</b>	Para 7.16		
-------------------	-------	---------------------------	-------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

It remains the position of KMC that the OAN for North Tyneside is 828 dwellings per annum (dpa) over the projection period 2011 to 2032. Notwithstanding, KMC recognises that the level of housing need discussed in the Examination Hearings (727 dpa) has been increased in the final Main Modifications to 790 dpa. This is on the basis of the evidence discussed at the Examination Hearings and published following the sessions including the Inspector's Note on Matters 3 and 4 (December 2016) which identifies the figure of 790 dpa as an appropriate OAN given demographic, economic and market signals issues. Overall, the KMC considers this new position and the evidence base which supports it is sufficient to demonstrate the housing requirement for the Local Plan is sound.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response noted.
-------------------------	-----------------

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066725	<b>Name</b>	CLlr Judith Wallace	<b>Group Representation?</b>	Yes	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM47	<b>Consultation Point</b>	MM165	<b>Local Plan Reference</b>	Para 7.16
-------------------	--------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

Please see my comments to Main Modifications 149, 155 and 457. Accordingly, I consider that "at least " should be deleted and the figure of 16, 593 be replaced with 12, 898.

#### Changes Sought

see above.

### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

The requested change is not accepted.

The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at [http://www.northtyneside.gov.uk/pls/portal/NTC\\_PSCM.PSCM\\_Web.download?p\\_ID=567485](http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485) which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPMM95	<b>Consultation Point</b>	MM165	<b>Local Plan Reference</b>	Para 7.16		
-------------------	--------	---------------------------	-------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

The inclusion of the words 'at least 16,593 is welcomed.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPM84	<b>Consultation Point</b>	MM483	<b>Local Plan Reference</b>	New Para after 7.18		
-------------------	-------	---------------------------	-------	-----------------------------	---------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

It remains the position of KMC that the OAN for North Tyneside is 828 dwellings per annum (dpa) over the projection period 2011 to 2032. Notwithstanding, KMC recognises that the level of housing need discussed in the Examination Hearings (727 dpa) has been increased in the final Main Modifications to 790 dpa. This is on the basis of the evidence discussed at the Examination Hearings and published following the sessions including the Inspector's Note on Matters 3 and 4 (December 2016) which identifies the figure of 790 dpa as an appropriate OAN given demographic, economic and market signals issues. Overall, the KMC considers this new position and the evidence base which supports it is sufficient to demonstrate the housing requirement for the Local Plan is sound.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response identifying that the Main Modification regarding the revised housing requirement for North Tyneside is sound, is noted.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069028	<b>Name</b>	John Fleming	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Gladman Dvelopments	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM134	<b>Consultation Point</b>	MM483	<b>Local Plan Reference</b>	New Para after 7.18
-------------------	--------	---------------------------	-------	-----------------------------	---------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The proposed modification provides further clarification on the 5 year housing land supply position and the method for assessing housing land supply following the adoption of the Plan. Gladman do not consider the use of the "Liverpool" method together with a stepped trajectory to be an appropriate basis for calculating 5 year housing land supply. The Council by its own omission acknowledges that there has been a shortfall in housing delivery over recent years and has led to an undersupply of new housing against the relevant target. It is Gladman's opinion that the Council should instead use the Sedgefield methodology and applying the buffer of 20% to the annual requirement (including the sum total of under delivery that has already been observed since the start of the plan period) in order to enable the delivery of the levels of housing that are needed now. The allocation of further sites in sustainable locations would be useful to support this goal.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The outcome of the hearing process for the examination in public and the range of evidence collated and discussed regarding the specific circumstances and nature of housing land supply in North Tyneside led to the conclusion that a "residual" based approach to addressing the housing land supply shortfall was appropriate. The Council has responded in particular to the Inspector's advice note regarding housing requirements and calculating housing land supply.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM64	<b>Consultation Point</b>	MM483	<b>Local Plan Reference</b>	New Para after 7.18
-------------------	--------	---------------------------	-------	-----------------------------	---------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Consistent with National Policy
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

The proposed modification is considered unsound as it is not positively prepared justified or consistent with the PPG. The main modification relates to new paragraphs explaining the Council's approach to the five year housing land supply calculation. In respect of the housing requirement, 20% buffer and 5% discount rate I refer to our responses to MM155 and MM457 above. The modification identifies a 5.56 year supply as of 1st April 2016. This is, however, based upon the 'Liverpool' method of dealing with under-delivery since the start of the plan period by spreading it over the remainder of the plan period. The HBF does not consider the use of the 'Liverpool' method to be justified or consistent with the PPG (ID 3-035) and considers the 'Sedgefield method' dealing with the backlog in the first five years to be more appropriate. The use of the 'Liverpool' method also departs from the Council's previous stance upon this issue which supported the use of the 'Sedgefield' method (paragraph 8.20, North Tyneside SHLAA 2016 and paragraph 4.1.32 of the Council's matter 4 examination hearing statement). The reason for this departure is unknown and not clarified. The approach is also not justified by the evidence, the Council has not indicated any special circumstances to deviate away from the guidance within the PPG and indeed its own evidence set out within the December SHLAA addendum (Addendum of Analysis of Scenarios A to G as considered through the Local Plan Examination in Public) and Housing Needs and Supply Update clearly illustrates, based upon the Council's evidence, that with the phased approach to the housing requirement a five year supply of housing land can be demonstrated utilising the 'Sedgefield' method1. The HBF therefore concludes that there is no justification for the use of the 'Liverpool' method and to ensure the plan is positively prepared and consistent with the PPG the Sedgefield method should be utilised.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The outcome of the hearing process for the examination in public and the range of evidence collated and discussed regarding the specific circumstances and nature of housing land supply in North Tyneside led to the conclusion that a "residual" based approach to addressing the housing land supply shortfall was appropriate. The Council has responded in particular to the Inspector's advice note regarding housing requirements and calculating housing land supply.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM120	<b>Consultation Point</b>	MM483	<b>Local Plan Reference</b>	New Para after 7.18		
-------------------	---------	---------------------------	-------	-----------------------------	---------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

BDW does not support the use of a phased housing requirement as identified above. We also consider use of the Liverpool method contrary to PPG (ID-3-035) and not the most appropriate strategy for North Tyneside. In an authority where a persistent undersupply is acknowledged it would appear inappropriate to exasperate the situation by adoption of the Liverpool methodology which delays the delivery of housing need further. It is also noted that the Council originally considered the Sedgfield methodology most appropriate for addressing the 5 year housing land supply. We consider there insufficient evidence to justify a departure from this strategy.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The outcome of the hearing process for the examination in public and the range of evidence collated and discussed regarding the specific circumstances and nature of housing land supply in North Tyneside led to the conclusion that a "residual" based approach to addressing the housing land supply shortfall was appropriate. The Council has responded in particular to the Inspector's advice note regarding housing requirements and calculating housing land supply.
-------------------------	---



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066725	<b>Name</b>	CLlr Judith Wallace	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM48	<b>Consultation Point</b>	MM483	<b>Local Plan Reference</b>	New Para after 7.18
-------------------	--------	---------------------------	-------	-----------------------------	---------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	--	---------------------	---

### Representation

#### Consultee Comment

Please see my comments on Main Modifications 149, 155, 457 and 165 . Accordingly, I consider that the total figure for housing need should be reduced to 12,898 and the annual figure of 790 reduced to provide phased delivery towards this figure over the duration of the Plan. This will provide adequate housing and recognise residents' opposition, particularly to development on the Murton Gap site.

#### Changes Sought

see above.

### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

The requested change is not accepted.  
The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at [http://www.northtyneside.gov.uk/pls/portal/NTC\\_PSCM.PSCM\\_Web.download?p\\_ID=567485](http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485) which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

## Consultee Details

Consultee ID	808367	Name	Mr G Oliver	Group Representation?		Group Numbers	
Agent ID	959707	Organisation		Agent if applicable	George F White		

## Comments Details

Comment ID	LPM96	Consultation Point	MM483	Local Plan Reference	New Para after 7.18		
------------	-------	--------------------	-------	----------------------	---------------------	--	--

## Reasons for Support / Objection

Legal?		Sound?		Why Unsound?			
--------	--	--------	--	--------------	--	--	--

## Representation

## Consultee Comment

This sets out the Council's proposed approach to the five year housing land supply. This approach is unsound and the following objections are made: 1) the use of the 'Liverpool Method' is not sufficiently justified or consistent with the PPG (ID 3-035). The Sedgfield method as previously employed by the council is more appropriate, there is not sufficient justification indicated to depart from this approach.

Indeed uncertainty is identified by the Council in the proposed modification which provide no justification for a reversion back to the Sedgfield method in the future: The Main Modification states: If an undersupply is apparent, application of the appropriate method of spreading this residual need "currently the Liverpool approach but, if more suitable in the future, a Sedgfield method; 2) The recent Housing White paper indicates that the Government will shortly provide guidance on the calculation of the 5 YHLS and that this will be fixed annually. The proposed modification will require updating to reflect this. In the meantime the use of the Liverpool method will create uncertainty in the development process.

## Changes Sought

## North Tyneside Council Response

## Is response duly made? Yes.

Officer Response	<p>The outcome of the hearing process for the examination in public and the range of evidence collated and discussed regarding the specific circumstances and nature of housing land supply in North Tyneside led to the conclusion that a "residual" based approach to addressing the housing land supply shortfall was appropriate. The Council has responded in particular to the Inspector's advice note regarding housing requirements and calculating housing land supply.</p> <p>The Council's understanding is that the government White Paper proposes introducing the option for Local Authorities to gain agreement over the Five year housing land supply position of the area on an annual basis. This agreement would remove repeated disagreement and</p>
------------------	--

	discussion regarding the supply position for the area and ensure consistency. The Council does not consider this to represent a challenge to the approach that has been proposed to the Five year land supply within the Main Modifications.
--	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066725	<b>Name</b>	CLlr Judith Wallace	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM49	<b>Consultation Point</b>	MM169	<b>Local Plan Reference</b>	Table 5
-------------------	--------	---------------------------	-------	-----------------------------	---------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

Please see my comments on Main Modifications 149, 155, 457, 165, 167 and 483. Accordingly, I consider that the figure of 16,593 should be replaced with 12,898 and the remainder of the figures recalculated appropriately.

#### Changes Sought

see above.

### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

The requested change is not accepted.

The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at [http://www.northtyneside.gov.uk/pls/portal/NTC\\_PSCM.PSCM\\_Web.download?p\\_ID=567485](http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485) which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066725	<b>Name</b>	CLlr Judith Wallace	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM50	<b>Consultation Point</b>	MM174, 175, 179 & 484	<b>Local Plan Reference</b>	Policy S4.3 Sites List
-------------------	-------	---------------------------	-----------------------	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

Please see my comments on Main Modifications 149, 155, 457, 165, 167, 483 and 169. Accordingly, I consider that sites 35 - 41 (Murton Gap) should be deleted from the Schedule, for all the reasons given in those comments; in addition, the participation of the local community in the consultation has demonstrated huge opposition to development on these sites. The same applies to site 45: again, there has been huge opposition from the local community.

#### Changes Sought

see above.

### North Tyneside Council Response

Is response duly made? Yes.

#### Officer Response

It should be noted that no Main Modification related to the proposed allocation of Murton Gap. However, the adjusted housing requirement established through MM165 is based upon robust evidence of the future growth of North Tyneside. Delivery of homes at Murton Gap continues to be required for the housing needs of North Tyneside.

The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at [http://www.northtyneside.gov.uk/pls/portal/NTC\\_PSCM.PSCM\\_Web.download?p\\_ID=567485](http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485) which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.

The Local Plan was prepared with extensive consultation and adjusted in line with feedback from residents: the Main Modifications reflect

	the final point reached following a thorough Examination In Public.
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	589675	<b>Name</b>	Mrs Yvonne Roberts	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM25	<b>Consultation Point</b>	MM174, 175, 179 & 484	<b>Local Plan Reference</b>	Policy S4.3 Sites List
-------------------	--------	---------------------------	-----------------------	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

#### Changes Sought

I would like to see the proposal for the site 113 High Farm Killingworth, be erased. It's a greenfield site that is allocated for 28 houses. Do you not think 2000 houses on the greenfield site of Killingworth Moor is enough? Is this additional greenfield site really necessary? I have just read how the policy is to protect greenfield sites. There are plenty of brownfield areas around Killingworth that could and are also being developed for housing. Enough!

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted. The site identified and its delivery is required as part of addressing the overall housing needs identified for North Tyneside.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	590896	<b>Name</b>	Robert Hall	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM18	<b>Consultation Point</b>	MM174, 175, 179 & 484	<b>Local Plan Reference</b>	Policy S4.3 Sites List
-------------------	--------	---------------------------	-----------------------	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The site of the old primary school site 141 has had its dwelling numbers increased to 8 from 6 this change is rather sudden given that there is now a builders hoarding now around the site? This site is a fraction of the size of the Old Drift Inn site at Seaton Burn 133 which is also down for 8 dwellings which is a brown field site and not greenfield like 141 At least the greenfield site 141 at present forms a natural gap between Wideopen and Seaton burn and keeps a visual separation so the two areas dont merge together

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The alteration to capacity at Site 141 reflects new information concerning the proposed nature of development at this site. This is due to the greater certainty established by the progress undertaken towards its proposed delivery. Any comparison with capacity at other sites where less information is available regarding the ultimate nature of development. However, according to the SHLAA 2016 that land area of Site 141 is 0.30 hectares, whilst the land area of Site 133 is 0.28 hectares.
-------------------------	---



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069153	<b>Name</b>	Laura Hutson	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Sport England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM143	<b>Consultation Point</b>	MM174, 175, 179 & 484	<b>Local Plan Reference</b>	Policy S4.3 Sites List
-------------------	---------	---------------------------	-----------------------	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

Our previous consultation response also queried whether Housing Allocation Site 21 contained a formal playing pitch (this is unclear from aerial photographs) “ if this is the case, this will need to be reprovided for Sport England not to object to development.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The comment is noted; however it repeats a comment made in relation to the Pre-Submission Consultation Draft (November 2015).

<b>Officer Response</b>	The Council provided the following in response to the comment made by Sport England on the Pre-Submission Draft: "This site is part UDP open space and part UDP employment land. Sport England will be a key consultee in determining the suitability of any proposal for development and a planning application must include an assessment to consider the current role, use and accessibility of this area of open space and whether there is a need for alternative provision in the local area. Such an assessment would have to justify the loss of open space and, if necessary, identify new space or improvements to other existing provision. This site will continue to be identified for allocation but, in light of this issue, careful consideration will be necessary in order to deliver a suitable scheme including through site layout, the proposed area for development and overall yield. "
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

## Consultee Details

<b>Consultee ID</b>	1068189	<b>Name</b>	Mr Michael McIntyre	<b>Group Representation?</b>	Yes	<b>Group Numbers</b>	350
<b>Agent ID</b>		<b>Organisation</b>	Monkseaton Action Group	<b>Agent if applicable</b>			

## Comments Details

<b>Comment ID</b>	LPM53	<b>Consultation Point</b>	MM174, 175, 179 & 484	<b>Local Plan Reference</b>	Policy S4.3 Sites List
-------------------	-------	---------------------------	-----------------------	-----------------------------	------------------------

## Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective
---------------	--	---------------	----	---------------------	---

## Representation

## Consultee Comment

Sites 35-41 Murton Gap should be deleted as housing need has not been proven as the statistics used are not sound and require up dating to reflect historical population growth and the recent decision to leave the EU.

## Changes Sought

## North Tyneside Council Response

## Is response duly made? Yes.

<b>Officer Response</b>	<p>The requested change is not accepted. The revised housing requirement is underpinned by robust evidence of the future growth of North Tyneside. The proposed allocation of Murton Gap is not a Main Modification and therefore not subject to this consultation. However, delivery of homes at Murton Gap continues to be required to meet the housing needs of North Tyneside.</p> <p>The Draft Local Plan contained an OAN of 828 dwellings per annum. Evidence was presented to the Inspector at the beginning of the Examination in Public to take account of the 2014 population projections. Following the Examination in Public, where this issue was tested at length with submissions for both a higher and lower figure, the Inspector published advice on 20/12/2016 at <a href="http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485">http://www.northtyneside.gov.uk/pls/portal/NTC_PSCM.PSCM_Web.download?p_ID=567485</a> which suggested an OAN figure of an average of 790 dwellings per annum. The Main Modifications are based on the evidence, the Examination in Public and the Inspector's advice.</p>
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	798830	<b>Name</b>	Miss Janette Robinson	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM22	<b>Consultation Point</b>	MM174, 175, 179 & 484	<b>Local Plan Reference</b>	Policy S4.3 Sites List
-------------------	-------	---------------------------	-----------------------	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

MM44 states that greenbelt land will not be affected, and yet there are proposals to build on greenfield land. What is the difference and why is this? If you build on too much greenbelt/field land then the water table will be disturbed thus not complying with the climate considerations you need to have

#### Changes Sought

Modify the house building proposals and build only on brownfield sites

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	There are no housing allocations on Green Belt land in North Tyneside. Green Belt is a specific form of planning designation that performs a specific role in prevent the merging of large urban area and protecting openness. The Local Plan does allocate areas of greenfield land in sustainable locations where this has been necessary to ensure the overall housing needs of the Borough. A wide range of policy controls are provided through the Local Plan to ensure development that does occur responds to and mitigates issues such as flood risk and environmental protection.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066021	<b>Name</b>	Mr Andrew Whitehead	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Natural England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM40	<b>Consultation Point</b>	MM182	<b>Local Plan Reference</b>	Policy S4.4(a)
-------------------	--------	---------------------------	-------	-----------------------------	----------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

We welcome the reference to impacts the Murton allocation may have on European Protected Sites. However, we still maintain that there needs to be a reference to this within the supportive text of policy S4.4(a) for consistency and to strengthen the link between allocation and strategic mitigation, as well as the link between on-site mitigation proposed and policy DM5.6.

It was indicated this reference would be included in an email to us dated 18 February 2016: “As you have suggested, the Murton strategic site has now been screened in. The HRA has been amended accordingly and I will be adding to the supporting text the paragraph directing to policy DM5.6 that we have on all our screened in policies ( This policy has been identified as having the potential to cause adverse impacts on internationally protected wildlife sites. When implemented, regard should be had to policy DM5.6 that sets out the requirement for appropriate avoidance or mitigation of, or compensation for, any adverse effects .)”

We replied that the inclusion of this section (amongst other amendments) would resolve our concerns with the Murton allocation. Without this section, there is no clear link between proposed SANGS and off-site mitigation as proposed in policy DM5.6. We welcome the reference to policy DM5.6 in policy S4.3 Distribution of Potential Housing Development Sites (MM181) and advise to retain this, but it would also be appropriate to include this reference within the supporting text of policy S4.4(a), to strengthen the link between this specific allocation and strategic mitigation, as well as the link between on-site mitigation proposed and policy DM5.6.

#### Changes Sought

Add to the supporting text of policy S4.4(a) the section that is added to the supportive text of those other policies that have likely significant effects on internationally protected sites: This policy has been identified as having the potential to cause adverse impacts on internationally protected wildlife sites. When implemented, regard should be had to policy DM5.6 that sets out the requirement for appropriate avoidance or mitigation of, or compensation for, any adverse effects . This improves consistency (all policies with likely significant effects should include this section) and provides a clear link between the on-site mitigation proposed for this allocation specifically and the off-site mitigation measures proposed in policy DM5.6, as both types of mitigation might be required to prevent likely significant effects.

#### North Tyneside Council Response

**Is response duly made? Yes.****Officer Response**

MM448 adds the requested sentence againsts all housing sites, including Murton Gap strategic site. Meanwhile MM181 makes specific reference to the screening conclusion in relation to Murton Gap Strategic Allocation and provides a cross reference to Policy DM5.6. No further amendment is considered necessary.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069153	<b>Name</b>	Laura Hutson	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Sport England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM144	<b>Consultation Point</b>	MM182	<b>Local Plan Reference</b>	Policy S4.4(a)
-------------------	--------	---------------------------	-------	-----------------------------	----------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

With regard to Strategic Housing Sites at Murton and Killingworth, our previous comments noted that the Murton site annotation washes across the Rising Sun playing field and that SE would wish to see this facility retained. It was previously suggested that within the plan (in respect on both sites) that improvements and reconfiguration of North Tynesides existing playing pitches will provide sufficient capacity to accommodate the additional pitch demand; in our previous comments we queried this assumption as it would only hold true if the PPS Action Plan were fully implemented and all other factors around pitch supply and demand remained the same. If this is not the case then residents of these strategic sites will not be properly served by playing pitches. Sport England therefore re-states its previous position that the Plan should adopt a precautionary approach and that these major sites should include on-site playing pitch provision (sufficient to meet the need they generate). Should the need for this provision fall away due to the success of the PPS Action plan then the land for the additional housing can be released or retained as open space.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The comment is noted; however it repeats input provided by Sport England regarding the Pre-Submission Draft Plan (November 2015).

<b>Officer Response</b>	The Council previously provided the following response: "The Council would dispute that this proposal washes over the Rising Sun Playing field that is accessed from Kings Road North in Battle Hill and is adjacent to the Rising Sun Country Park. However, a small area of currently disused playing fields are located to the rear of Adderstone Road, New York - which the Indicative Concept Plan washes over. The Murton Gap Open Space assessment considers the needs for open space whilst as part of separate discussions the potential for enhancement of this playing field as part of a reorganisation of Council assets provides a significant opportunity as part of this proposed allocation. The Council is also confident that the Open Space Assessment for the site and core evidence provided through the Playing Pitch Strategy establishes a
-------------------------	---

	sufficiently robust basis on which requirements for playing pitches arising from growth can be met. Whilst it is not considered that new pitches on site would be required, suitable contributions to playing pitch capacity in the Borough will be sought as part of the proposals."
--	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	517819	<b>Name</b>	Liz Bray	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Tyne & Wear Local Access Forum	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM137	<b>Consultation Point</b>	MM182	<b>Local Plan Reference</b>	Policy S4.4(a)		
-------------------	---------	---------------------------	-------	-----------------------------	----------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy		
---------------	----	---------------	----	---------------------	---	--	--

### Representation

#### Consultee Comment

--

#### Changes Sought

MM 182 Page 92 S4.4(a) Add horse riding to point (e) (ii)

### North Tyneside Council Response

**Is response duly made?** No. This comment does not respond to a Main Modification in relation to the Murton Gap site. In response to previous comments made by the Local Access Forum the indicative Concept Plan legend for both Murton Gap and Killingworth Moor has been adjusted to state "Indicative Principle Pedestrian, Horseriding, Cycle Routes and Community Connections".

#### Officer Response

This response is not duly made.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808139	<b>Name</b>	Mr Gerald Fletcher	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM110	<b>Consultation Point</b>	MM182	<b>Local Plan Reference</b>	Policy S4.4(a)		
-------------------	---------	---------------------------	-------	-----------------------------	----------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

Major access road to sites through New York. No details as to what to expect and what plans regarding the school runs.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. This response does not address any proposed Main Modification. The Local Plan sets out an indicative Concept Plan for Murton Gap that includes indicative points of access that would be supported by the Council.

**Officer Response** This response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960257	<b>Name</b>	Murton Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	1010551	<b>Organisation</b>		<b>Agent if applicable</b>	Barton Wilmore		

### Comments Details

<b>Comment ID</b>	LPMM105	<b>Consultation Point</b>	MM182	<b>Local Plan Reference</b>	Policy S4.4(a)		
-------------------	---------	---------------------------	-------	-----------------------------	----------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

As stated above Policy S4.4 (a) envisages the delivery of approximately 3,000 homes during the plan period and it is imperative that the reference to 'approximately' remains, in order to provide this flexibility. Any delivery above 3,000 units could fall within the definition of approximately, but could also fall beyond the plan period depending on delivery rates. Within the Matter Statements our client identified a potential delivery rate of 250 units per year throughout the plan, which would result in an output of 3,250 units over the remainder of the plan period (allowing for adoption of the plan, planning application and site preparation), thus potentially leaving 390 units which would be delivered beyond the plan period. Whilst Policy S4.4 (a) largely remains the same, the Main Modifications document includes the addition of the provision of a 'well-integrated and strategic green spaces for recreation which includes 'Suitable Accessible Natural Green Space' (SANGS)'. Whilst the addition of SANGS is expected by our client, clarity is absolutely essential as to the definition of the standard and inclusion of SANGS within the open space requirement.

The Green Space Strategy (2015) does not define what should be incorporated within SANGS. It does however suggest under the heading of Objective 4 that there will be requirements for the provision of semi-natural green space which would ultimately result in the Murton Strategic Allocation needing to provide an area of natural and semi-natural Green Space of at least 20Ha. Our client would expect that this would equate in an ability to share in its provision alongside its consideration as a SANGS.

Our client expects that the provision of this space will actually exceed the (minimum) requirement of 20Ha, however as neither the Green Space Strategy nor any other supporting documentation submitted with the Local Plan defines the requirement or the specification of SANGS provision, without this being clarified or removed from the policy the uncertainty that remains is unacceptable.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made? Yes.****Officer Response**

The Council anticipate that given the significant strategic green break and wildlife corridor retained as part of the indicative Concept Plan for Murton Gap that appropriate space can be provided to meet the requirements of provision of SANGS within the strategic allocation. Reference is made to guidelines for delivery of SANGS in Main Modification MM460. The draft guidelines were published alongside consultation on this schedule of Main Modifications and the Council seek to finalise the guidelines - in consultation with Natural England and the development industry prior to eventual adoption of the Local Plan.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1059551	<b>Name</b>	Mr W.E. Rochester	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM27	<b>Consultation Point</b>	MM186	<b>Local Plan Reference</b>	Map 20
-------------------	-------	---------------------------	-------	-----------------------------	--------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	Justified; Effective
---------------	--	---------------	--	---------------------	----------------------

### Representation

#### Consultee Comment

MM186 - Policies Map updated from "Blurry" Map 20. North Tyneside "Local Plan" - Murton Gap Strategic Site Murton Fields compromised by 3,000 houses between 2018 and 2032 Some simple facts and modest statistics for England can be applied to Murton Gap estate to highlight the issues. Households in England in 2012 - 23.4 million. Households in England in 2033 - 27.5 million, 17.5% increase. Registered cars in 2015 " 25.8 million or 110% households Pensioners over 65y 26% in 2008 and 33% in 2033 Primary school pupils and nursery children in England 4.38 million in 2015 or an average of 19% of households in 2012/15 Secondary school Children in England 2.7 million in 2015, 3.3 million in 2024 or an average of 12% of households 2012/15. Dog population in 2013 in England 8.5 million or 25% of households Cat population in 2013 in England 7.4 million or 19% of households. Applying these statistics a 3,000 unit housing estate for Murton Gap could therefore foresee:- 3,300 car ownership in households, one third of which could be owned by pensioners. The balance 2,200 car households would be owned by working residents. At least one pouse would depart the estate per household to their place of work via three exits, that is, the two site exits to the A191 New York Road/Rake Lane and the third to A186 at Earsdon. Exercising dogs outside Murton Gap will involve 750 daily car journeys to for example the Rising Sun Country Park or elsewhere, assuming the 750 dogs second daily exercise will be the local Murton Gap Wild Life Corridor. Departing Murton Gap Housing estate by car for work destinations and dog exercise at a peak morning period there could be 2950 car journeys via three exits ignoring the presumed already congested New York village exit. At 10 seconds per car exit equally over three exits without any hold ups, this could take 2.74 hours per exit. This assumes the other 1100 car pensioners choose to exit Murton Gap estate at non peak times of day. The balance of non pensioner spouses in 2,000 households without a car, will need to use public transport to reach their place of work if appropriate, or supermarkets, local shops, primary school with children and to other destinations. A myriad of buses and bus destinations will be needed to meet this requirement. 19% of households (3,000) with children of primary school age accounts for an average of 570 children to travel to the local primary school/nursery within Murton Gap. This will involve more peak car journeys. The pupil capacity for the proposed Murton Gap Primary School will need to be reviewed. 12% of households (3,000) with children of secondary school age accounts for an average of 360 pupils travelling to Killingworth Secondary School or elsewhere. By bus this could require at least 6 buses per morning and afternoon to and from the estate to reach Killingworth or elsewhere, otherwise more cars and car journeys. 570 cats will need to be trained to exercise on the Wildlife Corridor! Air pollution from Motor vehides stationary or otherwise will play a restricting part in life in Murton Gap in 2032. Walking will be mostly restricted to paved areas and tarmac roads with nowhere for children to play locally or local places of interest to attend therefore potentially generating domestic and social problems for the future. The "Potential" Metro Station, elevated to the

level of the existing track would require a multilevel car park for at least 400/500 cars similar to Northumberland Park.

#### Changes Sought

What is the solution? A rather obvious solution is to reduce house building to 1,000 houses or less by 2032. Some of these houses could be spread over the proposed phase locations 1A and 2A alongside the Earsdon Link road and spread over phased zones 1C and 3B near Monkseaton High School. Building in zones 1B, 2B, 2C and 3A would be prohibited. In this way the Murton Green Fields will be retained for free access by the new residents of Murton Gap including the existing residents in Earsdon, Monkseaton, Shiremoor, New York and Murton who already use these areas for recreation. Pedestrian pathways, cycleways and bridleways over Murton Fields including Murton Lane to Murton village, New York village and routes to Monkseaton, Earsdon and Shiremoor would be implemented as identified on the "NT Council Policies Map" shown in clause MM186 as part of the "Local Plan" but with reduced housing capacity. Storing up social problems for the future due to housing density and congestion can be alleviated or avoided. Murton Village and the heritage of Murton Fields can be retained. The Wildlife Corridor can be extended to include the remaining Murton Fields unchanged. The "Potential" Murton Gap Metro station could be avoided. Earsdon Link Road would need to be bridged over the Metro track as a tunnel, the preferred solution, could be subject to flash flooding.

#### North Tyneside Council Response

Is response duly made? Yes.

##### Officer Response

The application of national statistics to a site in North Tyneside of 3,000 homes to be built out over a period up to 2032 is not a robust mechanism for establishing impacts and infrastructure requirements. A wide range of detailed local evidence has been prepared assessing with reference to North Tyneside specifically vehicle trip rates, patient list sizes, pupil generation and open space needs. Issues associated with ecology and wildlife have been assessed specifically with regard to the habitat and species present and initial assessments of the requirement mitigation and where potentially necessary alternative provide considered. These assessments have been made on the basis of delivering 3,000 homes at Murton. The response submitted does not provide any appropriate evidence of direct relevance to North Tyneside and the Murton Gap proposal and does not identify a justification for reducing the capacity of the site to 1,000 homes. In addition a significant focus of this response is in relation to previously aired comments in relation to the Murton Gap strategic allocation – in the main there are no Main Modifications the Murton Gap site that lead to the comments made

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808139	<b>Name</b>	Mr Gerald Fletcher	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM111	<b>Consultation Point</b>	MM186	<b>Local Plan Reference</b>	Map 20		
-------------------	---------	---------------------------	-------	-----------------------------	--------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

Major access road to sites through New York. No details as to what to expect and what plans regarding the school runs

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. This response does not address any proposed Main Modification. The Local Plan sets out an indicative Concept Plan for Murton Gap that includes indicative points of access that would be supported by the Council.

**Officer Response** This response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM75	<b>Consultation Point</b>	MM187	<b>Local Plan Reference</b>	Policy S4.4(b)		
-------------------	--------	---------------------------	-------	-----------------------------	----------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC do not object to the amendments proposed to Policy S4.4(b) in respect of spelling and grammar, nor do they object to the wording 'net' being added in respect of the retail floor space.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM78	<b>Consultation Point</b>	MM189	<b>Local Plan Reference</b>	Map 21		
-------------------	--------	---------------------------	-------	-----------------------------	--------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC support the removal of the original 'blurry' map and support the inclusion of the extract from the Policies Map which provides clarity on the proposed allocation of Killingworth Moor.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM63	<b>Consultation Point</b>	MM199	<b>Local Plan Reference</b>	Housing Trajectory
-------------------	--------	---------------------------	-------	-----------------------------	--------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Consistent with National Policy
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

Modification Number: MM843 (page 77, new paragraphs) and MM199

The proposed modification is considered unsound as it is not positively prepared justified or consistent with the PPG. The main modification relates to new paragraphs explaining the Council's approach to the five year housing land supply calculation. In respect of the housing requirement, 20% buffer and 5% discount rate I refer to our responses to MM155 and MM457 above. The modification identifies a 5.56 year supply as of 1st April 2016.

This is, however, based upon the 'Liverpool' method of dealing with under-delivery since the start of the plan period by spreading it over the remainder of the plan period. The HBF does not consider the use of the 'Liverpool' method to be justified or consistent with the PPG (ID 3-035) and considers the 'Sedgefield method' dealing with the backlog in the first five years to be more appropriate. The use of the 'Liverpool' method also departs from the Council's previous stance upon this issue which supported the use of the 'Sedgefield' method (paragraph 8.20, North Tyneside SHLAA 2016 and paragraph 4.1.32 of the Council's matter 4 examination hearing statement).

The reason for this departure is unknown and not clarified. The approach is also not justified by the evidence, the Council has not indicated any special circumstances to deviate away from the guidance within the PPG and indeed its own evidence set out within the December SHLAA addendum (Addendum of Analysis of Scenarios A to G as considered through the Local Plan Examination in Public) and Housing Needs and Supply Update clearly illustrates, based upon the Council's evidence, that with the phased approach to the housing requirement a five year supply of housing land can be demonstrated utilising the 'Sedgefield' method. The HBF therefore concludes that there is no justification for the use of the 'Liverpool' method and to ensure the plan is positively prepared and consistent with the PPG the Sedgefield method should be utilised.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response**

Please see response to comment ID LPMM64 and Main Modification MM483.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	808367	<b>Name</b>	Mr G Oliver	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	959707	<b>Organisation</b>		<b>Agent if applicable</b>	George F White		

### Comments Details

<b>Comment ID</b>	LPM97	<b>Consultation Point</b>	MM204	<b>Local Plan Reference</b>	New Para after 7.49		
-------------------	-------	---------------------------	-------	-----------------------------	---------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

This paragraph on housing implementation is too vague and imprecise, the wording needs to be specific and measurable with clear indications of what actions/measures will be implemented, and when.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The wording set out draws attention to the range of specific and measurable actions that the Council has set out at various points within the Local Plan and supporting documentation from the additional policy 4.2a, Policy 9.1 and the accompanying Monitoring and Implementation Framework.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM121	<b>Consultation Point</b>	MM216	<b>Local Plan Reference</b>	Policy DM4.6		
-------------------	---------	---------------------------	-------	-----------------------------	--------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>			
---------------	--	---------------	----	---------------------	--	--	--

### Representation

#### Consultee Comment

BDW does not consider it appropriate to set the criteria proposed for executive homes. Applying density caps and minimum bedroom thresholds are outdated and in some cases irrelevant. It is our position that the Council should seek to promote executive developments with a sustainable mix of properties rather than a specific product. It should be noted that an executive home may well be determined by its specification and location rather than simply its size.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The Main Modification proposed in relation to executive housing adjusts the proposed density as a result of discussion and evidence presented to the examination. This response is focused upon the principle of the policy that could equally have been made prior to Pre-submission Draft Local Plan and as part of the examination process.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM65	<b>Consultation Point</b>	MM219	<b>Local Plan Reference</b>	Para 7.71
-------------------	--------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy
---------------	--	---------------	----	---------------------	---

### Representation

#### Consultee Comment

The proposed modification is considered unsound as it is not effective, justified or consistent with national policy. The modification implies, contrary to the modifications set out in MM223, that some sites will be required to provide more than 25% affordable housing. This requires greater clarity. We set out our reasoning as to why this is inappropriate within our matter 12 hearing statement and paragraphs 45 to 48 of our comments upon the pre-submission version of the plan.

#### Changes Sought

It is recommended that the following further changes are made to the modification; 'Based on evidence of viability the Borough-wide target is 25%. [DELETE FOLLOWING] Whilst some sites may achieve less than this due to viability there may be other sites that can achieve more than the 25% target the aim is to achieve 25% overall across the Borough over the life of the Local Plan. '

### North Tyneside Council Response

#### Is response duly made? Yes.

<b>Officer Response</b>	As an element of supporting text and a clear outline of the objectives for the affordable housing requirement within policy and set out at MM223 the Council consider the approach to a 25% target is clear. However, a further Additional Modification to the wording of this paragraph is proposed as follows "Whilst some sites may achieve less than this due to viability there may be other sites [such as those delivered by alternative means of delivery including the Council and Registered Providers] that can achieve more than the 25%."
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM122	<b>Consultation Point</b>	MM219	<b>Local Plan Reference</b>	Para 7.71
-------------------	---------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	
---------------	--	---------------	----	---------------------	--

### Representation

#### Consultee Comment

Contrary to the modifications set out in MM223, this modification implies some sites will be required to provide more than 25% affordable housing. This presents significant uncertainty for developments going forward and requires further clarification.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	As an element of supporting text and a clear outline of the objectives for the affordable housing requirement within policy and set out at MM223 the Council consider the approach to a 25% target is clear. However, a further Additional Modification to the wording of this paragraph is proposed as follows "Whilst some sites may achieve less than this due to viability there may be other sites [such as those delivered by alternative means of delivery including the Council and Registered Providers] that can achieve more than the 25%."
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960257	<b>Name</b>	Murton Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	1010551	<b>Organisation</b>		<b>Agent if applicable</b>	Barton Wilmore		

### Comments Details

<b>Comment ID</b>	LPM106	<b>Consultation Point</b>	MM219	<b>Local Plan Reference</b>	Para 7.71		
-------------------	--------	---------------------------	-------	-----------------------------	-----------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

The Main Modifications suggest that Paragraph 7.71 should be altered to include a new paragraph regarding affordable housing. It states that 'Based on evidence of viability the Borough-wide target is 25%. Whilst some sites may achieve less than this due to viability there may be other sites that can achieve more than the 25% target the aim is to achieve 25% overall across the Borough over the life of the Local Plan'.

Our client has previously made comment as to the over-inflated requirement for affordable housing, with the affordable housing requirement not appropriately considering the reduction in backlog need that housing delivery will have and then more appropriately considering the resulting ongoing and newly created need a growing population requires. However, should a 25% requirement for affordable housing remain, two things need to be in place.

Firstly, that the strategic allocations will be accompanied by a viability assessment that tests the necessary components for delivery. To make it absolutely clear our client is not in agreement with components of the submitted viability assessment and whilst it serves its purpose, these factors will have a significant impact upon the viability of the site (details of such are included within the Statement of Common Ground, but in summary are sales values, profit return and land values). In this regard one of the provisions which will most likely be sacrificed is affordable housing provision if the viability of the scheme is marginal.

Second, the 25% requirement should be seen as an absolute maximum, as this is what has been tested in the viability assessment submitted with the Plan (which our client believes as stated above is even more finely balanced).

#### Changes Sought

Our client would suggest that the affordable housing target should be reduced following the annual monitoring report, due to the consideration of the backlog need being met and therefore the reduction in the provision to account for only ongoing need. To reiterate and in order to provide certainty, the policy and all supporting text must be altered to relate an absolute maximum of 25% provision throughout the plan period.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	As an element of supporting text and a clear outline of the objectives for the affordable housing requirement within policy and set out at MM223 the Council consider the approach to a 25% target is clear. However, a further Additional Modification to the wording of this
-------------------------	--

	paragraph is proposed as follows "Whilst some sites may achieve less than this due to viability there may be other sites [such as those delivered by alternative means of delivery including the Council and Registered Providers] that can achieve more than the 25%."
--	---



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM76	<b>Consultation Point</b>	MM223	<b>Local Plan Reference</b>	Policy DM4.7		
-------------------	--------	---------------------------	-------	-----------------------------	--------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC support the proposed amendments to the affordable housing policy (policy DM4.7) to remove the wording 'at least' which responds to KMC's previous representations and which it now states that: "the Council will seek 25% of new homes to be affordable". KMC also support the word perpetuity having been removed. Furthermore, it supports the inclusion of the following paragraph: "where necessary to assist the viability of proposals, a flexible approach to the tenure mix of affordable housing provision will be considered by the Council". The amendments to the text demonstrate the Council recognises the need to be flexible in their approach to affordable housing.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Comments noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM66	<b>Consultation Point</b>	MM223	<b>Local Plan Reference</b>	Policy DM4.7
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The HBF supports the proposed changes to this policy which removes the reference to the target being a minimum and applies the appropriate threshold of 11 or more dwellings. The deletion of 'or greater than' from criteria b and c are also supported. The proposed amendments conform with our previous comments upon this policy. The HBF does, however, remain concerned with regards to the viability of the 25% target. This is discussed within our comments within examination hearing statement 12 and the submission version of the plan.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** The support of HBF for the proposed modification is noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM67	<b>Consultation Point</b>	MM224	<b>Local Plan Reference</b>	New Heading and Para before 7.77		
-------------------	-------	---------------------------	-------	-----------------------------	----------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

Modification Number: MM224 to 226 The HBF supports the inclusion of these additional paragraphs which provide greater clarity and certainty.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response** The support of HBF for the proposed modification is noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM69	<b>Consultation Point</b>	MM463	<b>Local Plan Reference</b>	New para after 7.88
-------------------	-------	---------------------------	-------	-----------------------------	---------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified
---------------	--	---------------	----	---------------------	-----------

### Representation

#### Consultee Comment

The policy and amendments are considered unsound as they are not justified. The following comments also relate to the supporting text and associated modifications (MM463, MM231). The HBF set out our position in relation to the introduction of the housing standards within our comments upon the submission version of the plan, our matter 12 examination hearing statement (paragraphs 15 to 27) and letter dated 28th February 2017.

We remain firmly of the opinion that the policy is not justified and will have a detrimental impact upon housing delivery and affordability across North Tyneside. The HBF along with other participants at the examination, whom will be tasked in delivering the strategic sites, have provided additional detailed evidence with regards to this policy and proposed modification issue. This evidence identifies our concerns with the policy as well as our recommended modifications. The letter submitted on 28th February and its associated appendices are included alongside this response.

<http://northtyneside-consult.limehouse.co.uk/file/4440636> - HBF Housing Stds MM464.pdf

<http://northtyneside-consult.limehouse.co.uk/file/4440676> - HBF MM464 appendix 2 and 3.pdf

<http://northtyneside-consult.limehouse.co.uk/file/4440637> - HBF MM464- Appendix 1 - Starter Homes Affordability Report.pdf

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The concerns set out by HBF in relation to Policy DM4.9 Housing Standards are noted and a response is provided below. However, attention is drawn to the extent of the Main Modification which was directed at reviewing the potential adverse impacts of the policy upon the viability of development. The general principle and evidence developed in supporting the introduction of the Housing Standards identified within the Local Plan formed part of the Pre-submission Local Plan and was discussed and debated with the HBF and other participants during the
-------------------------	---

relevant hearing session of the Examination in Public.

- Nationally Described Space Standards (NDSS)

The Proposed Main Modifications do not alter the approach of DM4.9 to Space Standards with the exception of introducing a transitional period (in application to all Technical Standards) postponing their introduction after adoption of the Local Plan to 1st October 2018. The general basis and justification for provision of the standard has been outlined by the Council and discussed previously through the hearings of the Examination in Public.

The submission provided alongside the objection of HBF draws particularly upon evidence connected to development examples at Murton Gap and a currently pending planning application at Gosforth Business Park for Persimmon Homes. It is of interest to note this pending application for Starter Homes at Salter's Lane, Longbenton (16/01304/FUL) includes a mix of two and three bed homes and two bed flats. This includes 35 two bed dwellings of 68.6sqm - a floor area 1.4sqm or 0.67sqm per floor below the minimum NDSS of 70sqm. Meanwhile, 61 larger two bed homes of 86.3sqm are significantly above the 79sqm NDSS standard for two bed 3 person homes. Meanwhile, 88 three bed homes are proposed across 6 different house types the smallest of which is 39 homes at 85sqm, compared to an NDSS three bed 4 person requirement of 84sqm.

Reference is made to evidence of the implications of the standard upon affordability and viability. Direct comparison with the house types and values set out within the Resolve106 report (Appendix 1 of HBF representation) is difficult as only the "Moseley" house type is referenced both in the planning application and report. This is quoted as a 3 bed home with a value of £135,000. The 2 Bed Moseley house type proposed at Salter's Lane has two bedrooms and an office, which, at 68.6sqm results in a revenue estimate of £1,966/sqm. Adjustment of the housetype to 70sqm (NDSS) would reduce the revenue per square metre to £1,925/sqm. The Resolve106 report suggests that this home would be available to Starter Home eligible buyers for £101,000.

The lower value revenue identified in the North Tyneside Council Area Wide Viability Assessment 2016 is £1,900/sqm, whilst the revenue of a lower value 2 bed home is fixed at a target value of £130,000. Further review of the Resolve106 Report identifies the lowest value two bed home to be the Alnwick at £120,000 sales price. At £1,966/sqm this property could be no larger than 61sqm. This housetype would fall therefore below the NDSS space standard however this housetype is not proposed at Salter's Road, a proposal promoted as a Starter Home exception site. The Council recognise within its Area Wide Viability Assessment update 2017 that application of NDSS has a potential impact upon the uplift against the existing use value but overall delivery of residential development would remain viable. Despite the concerns raised by the HBF it is not clear that the evidence submitted substantially conflicts with the basis of the Council's assessment.

In relation to the efficient use of land the HBF present evidence that indicates the land take of development at the example site of Murton Gap would increase by 3.6% - with the floor area of 3,000 homes increasing by 5,630sqm from 155,958sqm (15.6ha) to 161,606sqm (16.1ha). At a typical density of 30 dwellings per hectare 3,000 homes would require approximately 100ha of land and the effect of the space standard would increase the built area of that land by 0.56% from 15.6% to 16.1%. If it were assumed the space did not exist to increase that proportion of built floor area the net developed land area would be required to increase by 3ha to 103ha. If the scale of development were reduce to a 100 unit scheme this is equivalent to an increase in net developable area from 3.33ha to 3.45ha. The Council accept an increase in floorspace would increase the amount of land required but even based upon the broad assumptions within this example the additional space is minimal and there is no reason to assume thoughtful approaches to design could not absorb the change. Meanwhile if the example of the house types within the Salter's Lane application were considered the necessary change in floor area would be considerably reduced.

References made to potential review of NDSS within the government White Paper "Fixing the Broken Housing Market" are noted. The

outcome of any such review is as yet unknown but the Council will continue to apply policy at a local level in conformity with the latest national position. It considers that the approach set out within the proposed Policy DM4.9 is suitably flexible to respond to any changes as they arise. The Housing White Paper proposals contain a wider range of issues that will require substantial legislative work before they are enacted. The Local Plan has been prepared with sufficient flexibility to allow for new national planning policy and guidance, legislation and regulation as it emerges.

- Accessibility and Wheelchair User Housing

The updated evidence base necessary to inform the proposed modification to the proportion of homes that should be accessible and adaptable was limited to the assessment of viability of development. The Council was not required to further demonstrate or justify the need that has already been identified and is set out within its evidence supporting the submitted Local Plan.

The assessment of viability provided by the Council and the 2017 Update accompanying the Main Modifications is considered to be robust and appropriately informed by available evidence. The Council welcome additional observations regard the costs of the M4(2) standard identified by the HBF noting it adds approximately £1,100 to the build cost of each plot. The uplift assessed by North Tyneside in its evidence is estimated to be greater than this at an additional £17/sqm resulting in an average impact for the "Major" development typology of £1,600 per plot. In this context the Council considers the assessment undertaken of the impact of the application of the M4(2) standard is precautionary applying a larger impact than may be necessary. However, as the costs applied by the Council are informed by EC Harris report for DCLG in considering the impacts of the technical standards the Council considers it has taken a robust evidence based approach to the assessment and justification of the policy.

Additional points raised by the HBF in relation to viability note that buyers who do not need an adaptable home will be forced to spend more money on features they do not require. In the first instance, in terms of the Council's viability assessment, no revenue uplift is included to balance the costs of M4(2). Meanwhile, in relation to wider needs the Council consider that the HBF are viewing new homes only as a consumer product for single first sale but do not recognise that the buyer will potentially reside in the property for a number of decades or indeed resell the property, which would then perform a key and important role in diversifying and enhancing the overall housing stock of the Borough.

The compound effect of the space standard and accessibility standard is also raised as an issue. The appraisals undertaken by North Tyneside consider both these standards together.

Finally, reference is made to supply chain implications of applying a national standard. The ability to quantify such implications through the viability assessments are unclear but given the Council understands that it has applied a cost uplift for the M4(2) standard some £500 per plot higher than HBF estimates, such implications may be absorbed into this buffer.

Broadly speaking the Council note that no fundamental concerns are raised regarding the assumptions applied through its viability assessment whilst the costs applied to the policy impacts of space standards and accessibility are both appropriate and robust when assessed against the evidence presented by the HBF. The resulting outputs from the viability appraisal models were drawn upon by the Council to justify the revised proportion of homes that should meet the accessible and adoptable standard.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM70	<b>Consultation Point</b>	MM231	<b>Local Plan Reference</b>	Para 7.91
-------------------	-------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified
---------------	--	---------------	----	---------------------	-----------

### Representation

#### Consultee Comment

The policy and amendments are considered unsound as they are not justified. The following comments also relate to the supporting text and associated modifications (MM463, MM231). The HBF set out our position in relation to the introduction of the housing standards within our comments upon the submission version of the plan, our matter 12 examination hearing statement (paragraphs 15 to 27) and letter dated 28th February 2017.

We remain firmly of the opinion that the policy is not justified and will have a detrimental impact upon housing delivery and affordability across North Tyneside. The HBF along with other participants at the examination, whom will be tasked in delivering the strategic sites, have provided additional detailed evidence with regards to this policy and proposed modification issue. This evidence identifies our concerns with the policy as well as our recommended modifications. The letter submitted on 28th February and its associated appendices are included alongside this response.

<http://northtyneside-consult.limehouse.co.uk/file/4440636> - HBF Housing Stds MM464.pdf

<http://northtyneside-consult.limehouse.co.uk/file/4440676> - HBF MM464 appendix 2 and 3.pdf

<http://northtyneside-consult.limehouse.co.uk/file/4440637> - HBF MM464- Appendix 1 - Starter Homes Affordability Report.pdf

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Please see the Council's response to comment ID LPM69 and Main Modification MM463.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958106	<b>Name</b>	James Reid	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Barratt Homes (Newcastle)	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM112	<b>Consultation Point</b>	MM464	<b>Local Plan Reference</b>	Policy DM4.9
-------------------	---------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

As identified within the introduction to this representation BDW objects to the inclusion of Policy DM4.9 which is not justified and will have a detrimental impact upon housing delivery and affordability across North Tyneside. As a result we fully endorse and support the evidence submitted by the HBF on behalf of the industry dated 28 th February 2017.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069028	<b>Name</b>	John Fleming	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Gladman Dvelopments	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM135	<b>Consultation Point</b>	MM464	<b>Local Plan Reference</b>	Policy DM4.9
-------------------	---------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The above modification suggests that from 1st October 2018, 50% of all new market housing are to meet building regulation M4(2) Category 2 - accessible and adaptable dwellings. Requiring 50% of all market dwellings to meet M4 (2) of the Building Regulations is considered to be overly prescriptive particularly where this could affect the viability of development proposals being delivered. Further consideration to paragraph 173 of the Framework needs to be considered so that this policy does not place undue policy burdens on developers that prevent or stall sustainable growth opportunities.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The Main Modification does set out that 50% of market dwellings should meet the option technical housing standard for accessible and adaptable homes. The evidence supporting the justification for this is set out within the Housing Optional Technical Standards Needs study whilst the North Tyneside Area Wide Viability Assessment and subsequent updates in 2016 and 2017 provides analysis of the consideration that has been given to the proposal upon viability of development.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	755686	<b>Name</b>	Matthew Good	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Home Builders Federation	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM68	<b>Consultation Point</b>	MM464	<b>Local Plan Reference</b>	Policy DM4.9
-------------------	-------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified
---------------	--	---------------	----	---------------------	-----------

### Representation

#### Consultee Comment

The policy and amendments are considered unsound as they are not justified. The following comments also relate to the supporting text and associated modifications (MM463, MM231). The HBF set out our position in relation to the introduction of the housing standards within our comments upon the submission version of the plan, our matter 12 examination hearing statement (paragraphs 15 to 27) and letter dated 28th February 2017.

We remain firmly of the opinion that the policy is not justified and will have a detrimental impact upon housing delivery and affordability across North Tyneside. The HBF along with other participants at the examination, whom will be tasked in delivering the strategic sites, have provided additional detailed evidence with regards to this policy and proposed modification issue. This evidence identifies our concerns with the policy as well as our recommended modifications. The letter submitted on 28th February and its associated appendices are included alongside this response.

<http://northtyneside-consult.limehouse.co.uk/file/4440636> - HBF Housing Stds MM464.pdf

<http://northtyneside-consult.limehouse.co.uk/file/4440676> - HBF MM464 appendix 2 and 3.pdf

<http://northtyneside-consult.limehouse.co.uk/file/4440637> - HBF MM464- Appendix 1 - Starter Homes Affordability Report.pdf

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Please see the Council's response to comment ID LPM69 and Main Modification MM463.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM81	<b>Consultation Point</b>	MM464	<b>Local Plan Reference</b>	Policy DM4.9		
-------------------	--------	---------------------------	-------	-----------------------------	--------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC are supportive of the representations made by the Murton Consortium and the HBF on the subject of space standards and have concerns that the onerous application of space standards will affect scheme viability. However it is recognised that the Policy specifies that the application of the standards is subject to site viability.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960257	<b>Name</b>	Murton Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	1010551	<b>Organisation</b>		<b>Agent if applicable</b>	Barton Wilmore		

### Comments Details

<b>Comment ID</b>	LPMM107	<b>Consultation Point</b>	MM464	<b>Local Plan Reference</b>	Policy DM4.9		
-------------------	---------	---------------------------	-------	-----------------------------	--------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>			
---------------	--	---------------	--	---------------------	--	--	--

### Representation

#### Consultee Comment

Our client has made representations elsewhere with regard to both accessible homes and housing space standards and it is not intended to repeat those points here other than to say significant concerns exist and our client believes that Policy DM4.9 as currently worded is prohibitive to the delivery of the Plan and results in a potentially unviable and untenable housing delivery proposal.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** As noted, representations regarding housing standards have previously been made and considered through the Examination in Public. A further detailed response is provided to the matters set out by the HBF at comment ID LPMM68 in relation to MM64.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1058365	<b>Name</b>	Mr Sean Brockbank	<b>Group Representation?</b>	No	<b>Group Numbers</b>	1
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM4	<b>Consultation Point</b>	MM247	<b>Local Plan Reference</b>	Policy DM5.2
-------------------	------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

As someone who has worked in Monkseaton South, I believe that it is the ward in the entire Borough with the least amount of informal green land. Indeed, previous planning applications for development on green land / space near Bromley Avenue was rejected due to this. It seems unsound then to suggest at this point that the ward should shoulder the largest development of any section of the Borough. How is this congruous with previous rulings on green space in the ward?

#### Changes Sought

Re-examination of the previous rulings and a sensible approach that sees a direct correlation between previous decisions and current choices.

### North Tyneside Council Response

**Is response duly made?** No. The response is not in reference to a proposed modification.

**Officer Response** The response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	958023	<b>Name</b>	Mr Ed Williams	<b>Group Representation?</b>	Yes	<b>Group Numbers</b>	100+
<b>Agent ID</b>		<b>Organisation</b>	Murton Action Group	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM33	<b>Consultation Point</b>	MM255	<b>Local Plan Reference</b>	Policy DM5.6
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective; Consistent with National Policy
---------------	-----	---------------	----	---------------------	--

### Representation

#### Consultee Comment

Murton Action Group produced evidence to show that at least 200 dogs used the Murton fields every day. With the development of 3,000 houses there will inevitably be many more dogs with considerably reduced green space. The proposed guidelines for the creation of a SANGS is inadequate to cope with the amount of dogs wanting to use the sites leading to dog owners using their cars to access sites further afield with consequent additional pressure on road infrastructure.

#### Changes Sought

We would like to see North Tyneside Council, (through the masterplanning process), commit themselves to specific SANGS within and adjacent to the Murton fields in collaboration with the dog owners who currently use the site.

### North Tyneside Council Response

**Is response duly made?** Yes. SANGS as a potential form of mitigation are not a Main Modification to policy DM5.6 and are intended predominantly as a mitigation of biodiversity impacts rather than road impacts. However, reference to use of SANGS at Murton Gap strategic allocation is a proposed modification at MM182.

**Officer Response** As noted, SANGS have been included as a proposed modification at MM182 and it is the Council's intention through the ongoing masterplanning process to secure adequate provision of this form of mitigation.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066021	<b>Name</b>	Mr Andrew Whitehead	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Natural England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM39	<b>Consultation Point</b>	MM255	<b>Local Plan Reference</b>	Policy DM5.6
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

Policy DM5.6 Wording has been incorrectly amended. Instead of: "In accordance with European Legislation, proposals that are likely to have adverse significant effects on features of internationally designated sites" It should read: "In accordance with European Legislation, proposals that are likely to have significant effects on the features of internationally designated sites".

This wording is in line with our previous advice (15 December 2015, our ref 170162) and with wording used in international and national legislation on European and internationally designated sites. As explained in our previous advice, the initial screening test as part of a Habitats Regulations Assessment determines whether a project or plan is likely to have significant effects. If Likely Significant Effects cannot be ruled out, an Appropriate Assessment will identify if the plan or project could have adverse effects on site integrity. The current wording of the policy has combined these two separate terms incorrectly ('adverse' and 'significant').

#### Changes Sought

Adapt text to: In accordance with European Legislation, proposals that are likely to have significant effects on the features of internationally designated sites<sup>1</sup> to bring wording in line with European and national legislation and policy.

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Copying error - "adverse" should be removed.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1068941	<b>Name</b>	Gary Watson	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM130	<b>Consultation Point</b>	MM255	<b>Local Plan Reference</b>	Policy DM5.6
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

I would like to make comment under the Main Modifications, DM5.6 page 38-39 section i. Provision of a Suitable Accessible Natural Green Space. This area (the fields between Shiremoor & Murton) to us are one of the few area's of natural green space we have left in Shiremoor, we moved here December 2014 from the older part Of Shiremoor partly because we had lost all our dog walks from our old house as all the fields went one by one from the area at the back of Shiremoor Club. Nothing was flagged up about this local plan when the searches were done for our move & we hadn't even unpacked all our boxes when the draft plan landed on our doorstep. We regularly walk our spaniel (who needs to run & lots of exercise,, as do our children) across these fields through Murton & into Monkseaton. Our parents who have lived in West Allotment for 40+ years come to our house & walk their dogs with us as they have lost all their fields since the Cobalt Business Park was built. As does a friend who used to walk her dog on what was a public rights of way in the fields up from the Stonebrook at Holystone ('was' being past tense as houses are being built there too) you may well say she is close to The Rising Sun but we don't find this ideal for dogs needing to run as they have to be kept on leads around much of the area. For us, The Rising Sun is a nightmare to get to anyway traffic wise and we avoid Cobalt area/Holystone roundabout as much as possible, what used to be a 10 min car ride can now take 30+mins and is no pleasure. Many many neighbours who are elderly and don't drive walk their dogs in these fields, where will they go? This may well impact on their well being. You can't expect people to make a bus journey to the coast to be able to walk their dog properly. We NEED green space still within walking distance.

I hope these comments are taken into account. We consider ourselves quite intelligent but have found navigating around the plans & the modification section somewhat difficult, which I imagine has put many people off responding.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes. This comment responds to the principle of development at Murton Gap which is not subject to a proposed Main Modification.



However, in directing the response to provision of Suitable Accessible Natural Greenspace (SANGS) the response is considered to be duly made as reference to SANGS are added to Policy S4.4(a) under MM182.

**Officer Response**

The Local Plan is required to identify sufficient land to meet the identified needs for housing growth in the Borough. It seeks to do this by identifying the most sustainable sites and ensuring that appropriate protections are in place for the environment and residents' quality of life. The inclusion of measures such as Suitable Accessible Natural Greenspace as part of the Murton Gap proposals forms part of ensuring appropriate mitigation of the effects of development are delivered.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	794139	<b>Name</b>	Gavin Cooke	<b>Group Representation?</b>	No	<b>Group Numbers</b>	1
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM44	<b>Consultation Point</b>	MM255	<b>Local Plan Reference</b>	Policy DM5.6
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	Justified
---------------	--	---------------	--	---------------------	-----------

### Representation

#### Consultee Comment

The 2008 Ambient Air Quality Directive (2008/50/EC) set limits for key pollutants in the air we breathe outdoors. These legally binding limit values are for concentrations of major air pollutants that impact public health, such as particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO2). The directive also sets limit values for a range of other pollutants, such as ozone, sulphur dioxide and carbon monoxide. The limits set in the Ambient Air Quality Directive are closely aligned to the UK air quality objectives. The directive, which is now legally binding mandates an exposure concentration of fine particles in the atmosphere of 20 µg/m3 (AEI) over a three year period. Young children are particularly vulnerable to poor air quality as their lungs are still developing and with reference to the schools situated next to the proposed building site such as Langley First School or Wood Lawn there must be specific impact assessments undertaken with regard to exposure to particles called PM10s and 2.5s which are emitted by heavy lorries before the commencement of projects that could potentially exceed air quality levels specified in EU regulations. Without the provision of a detailed impact assessment North Tyneside Council could be vulnerable to retrospective legal action from environmental groups as well as individuals going to law through the European Court of Justice citing air quality violations and the now established link that poor air quality has to the development of asthma, heart conditions and related lung conditions in young children.

#### Changes Sought

Before any further consideration is given to the Local Plan there should be a specific Environmental Impact Assessment with regard to potential air quality changes for schools near impacted areas 35-41 and with regard to new air quality legislation being introduced by the government in July.

### North Tyneside Council Response

**Is response duly made?** No. The respondents comments relates to ensuring appropriate measures to identify and mitigate air quality measures are in place. These matters within the Local Plan are addressed through Policy DM5.19 for which no Main Modifications are proposed. This response is specifically directed at the implications of development at Murton Gap but again there are no Main Modifications to that proposal that this response addresses.

**Officer Response** This response is not duly made. The specific concerns raised through the responses are noted and the respondent is directed to the requirements placed upon the applicants for development through the Planning Application process.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1066021	<b>Name</b>	Mr Andrew Whitehead	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Natural England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM41	<b>Consultation Point</b>	MM460	<b>Local Plan Reference</b>	Para 8.23
-------------------	--------	---------------------------	-------	-----------------------------	-----------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified
---------------	-----	---------------	----	---------------------	-----------

### Representation

#### Consultee Comment

We welcome the reference to guidelines for the creation of SANGS and note that the guidelines are currently in draft version (December 2016). We welcome consultation on these guidelines before the final version is published. For SANGS to be an effective mitigation measure to prevent adverse impacts upon European sites, the guidelines need to be appropriate. Currently, the draft guidelines lack an evidence base and are not suitable for its intended purpose. The Main Modification is therefore not justified. For instance, the guideline for 2 hectares for a SANGS might not be sufficient, depending on the size of the development. In other areas, such as the Thames Basin Heaths area and South Sunderland Growth Area, a guide of 8 hectares per 1,000 population is used. In addition, SANGS is effective (i.e. reduces the number of walkers and dog walkers from the development using the coast) if it is on site or adjacent to the development. A SANGS that is 2 km from a development, even if it is 20ha in size, may not be appropriate to prevent adverse impacts on European sites. Please note that the Natural England Accessible Natural Greenspace Standard referenced here is not applicable to SANGS, as SANGS serves a specific purpose and is in addition to normal open space requirements. This standard is therefore not an acceptable evidence base.

#### Changes Sought

Gather adequate evidence on the requirements for SANGS to effectively prevent adverse impacts on European site integrity. Amend the SANGS guidelines based on this evidence before the Local Plan is published, so that appropriate mitigation is in place before any development commences. Natural England requests to be consulted before the guidelines are finalised.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	SANGS is identified within the North Tyneside HRA as one form of mitigation for the potential impacts of development upon the SPA. North Tyneside consequently consider that the general principle of including SANGS provision as such a mitigation acceptable in principle within the Local Plan is justified by the evidence provided in the Habitat Regulation Assessment (HRA). The concerns identified by Natural England are noted and the Council is progressing with further development of its Suitable Accessible Natural Greenspace guidelines. A timetable for the completion of the guidance has been agreed with Natural England with the objective of creating a final SANGS guideline by end of May 2017.
-------------------------	--

	<p>The proposed approach being developed will further consider the scale of additional space for SANGs required, informed by the methodology employed by Thames Basin Heaths where an 8 hectare per 1,000 population requirement was arrived at by consideration of the rate of visitors from the population in the area and existing size of the SPA (see Report to the panel for the draft South East Plan, Examination in Public on the Thames Basin Heaths Special Protection Area and Natural England's Draft Delivery Plan. Assessor David Burley MA BPhil DipTP MLI RTPI, February 2007).</p>
--	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	589675	<b>Name</b>	Mrs Yvonne Roberts	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM26	<b>Consultation Point</b>	MM266	<b>Local Plan Reference</b>	Policy DM5.14
-------------------	--------	---------------------------	-------	-----------------------------	---------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

#### Changes Sought

The additional wording 'where appropriate and achievable' is very loose and can easily be used as a get out clause for a landlord/ developer to ignore this essential requirement in respect to flooding issues.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	This statement is in relation to the development of homes on brownfield land and measures that aim to reduce the flow of surface water from the site by up to 50%. As a result this is referencing the significant improvements to surface water management brought about by developing brownfield land in many instances. However, regard must also be given for the potential of existing brownfield land to already display a sustainable or reasonable level of surface water run-off. In such circumstances it may not be appropriate or reasonable to require an additional 50% reduction.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1059551	<b>Name</b>	Mr W.E. Rochester	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM20	<b>Consultation Point</b>	MM272 & 273	<b>Local Plan Reference</b>	Policy DM5.17
-------------------	--------	---------------------------	-------------	-----------------------------	---------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	--

### Representation

#### Consultee Comment

MM272 is the only reference made to "Air Pollution" within the "Local Plan" or the "Main Modifications" and restricts air pollution control to only "Mineral Extraction" Traffic congestion and the consequential air pollution introduced by the "Local Plan" has been overlooked throughout the Documents, the nearest is MM30 which requires "everyone to be healthy and safe" MM272 fails to consider the effects on the population due to vehicle exhaust emissions from traffic congestion as a consequence of building 16,000 plus houses in the region and more specifically in the locality of Murton Gap a proposed estate of 3,000 houses on a green field site. The "Local Plan" does not take into account EU legislation and directives as follows . 1. Air Pollution Directive 2008/50/EC 2. EU "Clean Air Programme for Europe" Document COM/2013/0918 North Tyneside Council do not measure and record air pollution levels within North Tyneside consequently they have no data or information with regards to air pollution in the region, a serious concern for public health in the region.

#### Changes Sought

NTC confirm that pollution levels are unknown to them and air quality management areas do not exist in North Tyneside as confirmed below North Tyneside Council Local Plan Examination in Public Matter 8 " Murton Strategic Site October 2016 EX/HS/8/5 Inspector's Questions g) Are there any Air Quality Management Areas in the vicinity of the site? Is there evidence at a strategic level that the site can be developed without unacceptable harm in terms of air pollution on local residents, schools and the natural environment more generally? 8.2.22 There are no Air Quality Management Areas in the vicinity of the site. At present there are no Air Quality Management Areas in North Tyneside. A strategic air quality study has not been carried out but has been identified as a requirement to inform detailed Masterplans and subsequent Planning Applications to ensure appropriate mitigation of any issues that might arise are incorporated into the design and layout of the site. In a general sense the road traffic and sustainable travel measures proposed and reflected through the indicative Concept Plan have the effect of avoiding severe impact upon traffic in the surrounding community. The evidence provided in the strategic and microsimulation road traffic modelling Matter 8: Murton Strategic Site, page 15 demonstrates that there would not be significant additional harm arising from increased traffic congestion such that issues for health and well-being from resultant air pollution would preclude the allocation of the site. As noted above this is not intended to indicate that further suitable specific mitigations would not be required to accord with the requirements of proposed Local Plan policy S1., S4.4(c) and DM5.19 How can pollution levels be mitigated and

controlled if they are not monitored? North Tyneside Council should comply fully and include the following in "Main Modifications" to the "Local Plan": Air pollution including emissions from vehicle exhausts will comply as follows:- 1. EC Air Pollution Directive 2008/50/EC 2. EU "Clean Air Programme for Europe" Document COM/2013/0918 3. NTC will introduce pollution monitoring and recording stations in the region. 4. Using the results from 3 above pollution levels will be predicted for the future from modelled increases in traffic flows taken from the "Strategic Transport Model." 5. Pollution levels will be published regularly to the media for public information. 6. Movement of offending vehicles will be restricted within areas with high levels of pollution.

**North Tyneside Council Response**

**Is response duly made?** Yes.

**Officer Response**

The respondent mistakenly claims that air pollution is not addressed within the Local Plan. Attention is therefore drawn to policy DM5.19 Pollution and the opening statements to which that states - "Development proposals that may cause pollution either individually or cumulatively of water, air or soil through noise, smell, smoke, fumes, gases, steam, dust, vibration, light, and other pollutants will be required to incorporate measures to prevent or reduce their pollution so as not to cause nuisance or unacceptable impacts on the environment, to people and to biodiversity." Further assessment of the impacts of development proposals and the incorporation of appropriate mitigation is required as part of planning applications. The additional references to traffic congestion are noted and attention is drawn to the extensive evidence base of traffic modelling and public transport studies published to support the Local Plan and its examination. In addition a significant focus of this response is in relation to previously aired comments in relation to the Murton Gap strategic allocation – in the main there are no Main Modifications the Murton Gap site that lead to the comments made

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM127	<b>Consultation Point</b>	MM283	<b>Local Plan Reference</b>	Policy DM6.2
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	--	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM283 (referencing heritage assets)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM128	<b>Consultation Point</b>	MM288	<b>Local Plan Reference</b>	Policy DM6.6
-------------------	---------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	--	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM288 (referencing heritage assets)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1059551	<b>Name</b>	Mr W.E. Rochester	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM21	<b>Consultation Point</b>	MM288	<b>Local Plan Reference</b>	Policy DM6.6
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Positively prepared; Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	--

### Representation

#### Consultee Comment

MM288 Heritage Assets The "Local Plan" Document NT10/11 proposes demolition of New York Forge a community asset recognized by Tyne and Wear asset register HER 2149. The Policies Map shows New York road within the village and alongside the "Forge" as a pedestrian, cycleway and local access, not a route for through traffic from Murton Gap housing estate. The use of Murton Lane and Westminster Avenue as an access to/from Murton Gap housing estate and as a route for construction traffic and residential traffic from 2018 to 2032 and beyond and demolishing the "Forge" has never been put to the Public for Consultation. By widening Murton Lane junction as described and demolishing New York Forge in its setting, will destroy this heritage asset and traffic congestion will disrupt the historic communities of New York and Murton villages. Document NT11/2/2 Outline Framework Arup June 2016 page 48 Key Plan is shown in red as a "Former Blacksmith" This is incorrect, it is a fully functioning business to this day. Please correct the document. Document NT10/11 Transport Impact Report Section 9.3 page 47 proposes to demolish "New York Forge". This is inconsistent with clauses MM288, MM348, MM349 and MM350 North Tyneside Heritage. Document NT10/11 Figure 23 plan page 49 shows demolition of the Forge to allow lorry and vehicle access from this proposed 3,000 unit housing estate at Murton Gap dividing the village of New York. It also proposes two way traffic through New York village thereby defeating the purpose of the New York village bypass built in 1971 and causing unnecessary traffic congestion in the village. Access to Murton Gap via Murton Lane to/from Westminster Avenue will cause further traffic congestion at its junction with Norham Road, an unclassified residential road unsuitable as a primary access road but to carry traffic classified equal to the A191 New York bypass but with no budget to upgrade its status. NT10/11 figure 26 plan page 52 closes western access to/from New York Village at the Wheatsheaf Pubic House. Besides isolating Wheatsheaf business, east bound traffic from Murton Gap to Whitley Bay and N. Shields from Murton Lane heading for and giving way to traffic at the A191 Murton House roundabout will back up into the village with further congestion. Clause MM186 replaces map 20 as a "Main Modification" as map 20 put out for Public Consultation in November 2015, NTC say is "Blurry". Not only that, it is illegible for Public viewing! This replacement Map 20 and its key shows New York Road within the village as a pedestrian route, a cycleway, restricted to allow local residential vehicle access only. This is inconsistent with NT10/11 Figure 23 plan page 49 showing two way traffic. Two way traffic through the village is also shown on the Consortium phased site plan for Murton Gap dated 20th October 2016 again inconsistent with the Policies Map, shown as a pedestrian and cycleway. Document NT11/12 Murton Gap Strategic Development Draft Heritage Statement including clause 8 New York Forge and pages 15-26 confirm New York Heritage and that this Document and clause 8 are inconsistent with the demolition of the

Forge. Document NT11/1/1 Concept Framework Pick Everard November 2015 reference clause 4.3 Murton Gap pages 37 - 42 and clause 4.3.2.1 in particular bullet point 5 states [for road access options to/from Murton Gap along the A191] "Many design options are possible". Clause 4.3.2.2 page 38 bullet point 3 is incorrect and bullet point 4 refers to an option of an access road nearby to the "Hall" [Clearly another inconsistency, Pick Everard has never visited the so called "Hall" as the "Hall" is Murton House Farm, manor house.] Clause 4.3.2.3 page 39 reference plan No 106 shows New York Road as a cycleway, bridleway and pedestrian route. This is reinforced on the Policies Map. Clearly Tyneside Council or their support teams have never visited some of these sites or investigated others road junction options as advised by Pick Everard within the documentation for road access to from the proposed Murton Gap estate. These failures should be corrected in the "Main Modifications" to the "Local Plan" and New York Forge retained as a Public Asset. The above inconsistencies demonstrate that the documents have not been adequately coordinated by their authors, leaving the Public at the time of Public Consultation confused as what is proposed in the "Local Plan" by North Tyneside Council in the environs of New York village. Not only that, these inconsistencies demonstrate that North Tyneside Council has not been thorough and diligent in their investigations and Document presentations to the Public. The use of Murton Lane and Westminster Avenue as a "Rat Run" to/from Murton Gap housing estate and its use for site construction traffic from 2018 to 2032 has never been put to the Public for Consultation. This position should be corrected and new road junction options prepared at this time and diligently considered now. To delay now, awaiting future planning applications is a time much too late for any fundamental review of road junction options within this "Local Plan". Later review will mean decisions will be overtaken by events.

#### Changes Sought

Clause MM288 states "Proposals that affect heritage assets or their settings will be permitted where they sustain, conserve and, where appropriate, enhance the significance, appearance, character and setting of heritage assets in an appropriate manner. Any development proposal that would detrimentally impact upon a heritage asset will be refused permission, unless it is necessary for it to achieve wider public benefits that are necessary outweigh the harm or loss to the historic environment, and cannot be met in any other way." Clearly to demolish New York Forge in its setting is not in keeping with the intent or meaning of the above statement and Clause MM288. North Tyneside Council has failed to demonstrate to the Public that it has considered or reviewed other road junction Options into Murton Gap Estate. North Tyneside Council should therefore demonstrate to the Public that by reviewing Road Junction Options this will safeguard Tyne and Wear Heritage Assets and demonstrate this can be achieved and "can be met another way" New York Forge is a Community Asset recognized by Tyne and Wear asset register HER 2149. To resolve the issues raised in Item 7 above action needs to be taken by North Tyneside Council to follow the advice within the document NT11/1/1 Concept Framework of Pick Everard at Public Consultation in November 2015. ã NTC should diligently consider Options for road junctions onto the A191 and reject the use of Murton Lane and Westminster Avenue through New York village as a through route to/from the Murton Gap Estate. Road junction Options should be prepared, detailed and considered by NT Council. The advantages and disadvantages of each option should be listed and the options put to Public Consultation. Suggested Options are as follows, but not exhaustive:- Option 1. Delete the proposed Murton Gap/Westminster Avenue Junction into New York village as a route for Murton Gap traffic. Retain Murton Lane as a service road to Murton village Refer to document NT10/11 clause 9.4, Rake Lane roundabout figure 24 page 50. Upgrade this Murton Gap housing estate branch arm and roundabout to accommodate traffic that would otherwise have used Murton Lane /Westminster Avenue junction. This roundabout is also shown taking traffic from Murton Gap Estate as shown on the Consortium phasing plan for Murton Gap dated 20th October 2016. Option 2 Delete the proposed Murton Gap/Westminster Avenue Junction into New York village as a route for Murton Gap traffic. Retain Murton Lane as a service road to Murton village Retain Rake Lane roundabout as proposed in NT10/11 clause 9.4 with or without an access arm into Murton Gap housing estate. Upgrade the existing roundabout located at Falmouth Road/Devon Road located at the approximate midpoint between Murton House Farm roundabout and Rake Lane roundabout on the A191 to accept traffic from Murton Gap Estate that would otherwise have used Murton Lane/Westminster Avenue junction. Option 3 Delete the proposed Murton Gap/Westminster Avenue Junction into New York village as a route for Murton Gap traffic. Retain Murton Lane as a service road to Murton village. Retain Rake Lane roundabout to be unchanged as proposed in NT10/11 clause 9.4 with access to Murton Gap. Develop an option for

a road through Murton House Farm stackyard to join the existing roundabout on the A191 at Murton House Farm. It should be noted that Murton House Farm itself is not Grade II listed. Murton manor house only and the entrance gateposts to the manor house from the A191 are listed and both well away from the stackyard. ã ã ã Option 4 Delete the proposed Murton Gap/Westminster Avenue Junction into New York village as a route for Murton Gap traffic. Retain Murton Lane as a service road to Murton village only. Widen Murton Lane at the west end of New York Village and adjacent to the west of the Wheatsheaf Public house where there is adequate space for a new road to join the A191 roundabout at the junction with Norham Road north. Provide a new arm from the existing Norham road roundabout to allow traffic access into/out of Murton Gap Estate. Restrict traffic access into New York village but permit access locally to the Wheatsheaf Public House. Option 5 Combine two or more of the above Options to spread the traffic flows into and out of Murton Gap at these roundabout locations across the length of the A191 between the Wheatsheaf Public House and North Tyneside Hospital. General The above options should be reviewed by the Council listing their Pros and Cons and put to the Public for Consultation. New York Road within the village will be a pedestrian and cycleway as the current Policies Map allowing access to New York village by local residential traffic only. Murton Lane will retain light traffic access exclusively to Murton Village only, also as a cycleway and retaining New York Forge as existing. Local traffic access to/from the west of New York village could remain open for access to the Wheatsheaf and local village traffic only. Upon completion of upgrading Billymill roundabout, Billymill Lane the B1316 from the A191 Murton House farm roundabout will be the principal highway route to reach the coast road A1058 and not Westminster Avenue via Norham Road. Northam Road would continue to carry traffic to/from the Earsdon Link Road to the A1058 coast road. Westminster Avenue will be retained as a local residential road.

#### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The majority of the matters raised within this response are not duly made - referring to matters that cannot be attached to a relevant Main Modification. In general it must be noted that proposals regarding the indicative Concept Plan for Murton Gap remain unchanged from that identified on the Local Plan Pre-submission Draft Policies Map of November 2015 and included on the consultation leaflet distributed to every household in North Tyneside at the same time. The specific reference that is made to the modification is noted and this is the test that would be applied to proposals for planning permission for the proposed loss of any designated or non-designated heritage asset.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

## Consultee Details

Consultee ID	958023	Name	Mr Ed Williams	Group Representation?	Yes	Group Numbers	100+
Agent ID		Organisation	Murton Action Group	Agent if applicable			

## Comments Details

Comment ID	LPMM34	Consultation Point	MM288	Local Plan Reference	Policy DM6.6
------------	--------	--------------------	-------	----------------------	--------------

## Reasons for Support / Objection

Legal?	Yes	Sound?	No	Why Unsound?	Positively prepared
--------	-----	--------	----	--------------	---------------------

## Representation

## Consultee Comment

It is unsound because there is no clear map provided which delineates the area of archaeological and historic value of the land surrounding Murton Village. This delineation should be separate from the broader "conceptual" buffer zone surrounding the village as it is of specific archaeological interest and needs to be protected permanently from development.

## Changes Sought

The Local Plan should include a map which clearly shows the area of archaeological and historic interest as distinct from the conceptual buffer zone.

## North Tyneside Council Response

**Is response duly made?** No. This response whilst making an important point associated with regard to archaeological significance is not considered to be made in response to a proposed Main Modification to DM6.6. Whilst modification MM290 with reference to DM6.7 amends wording associated with preservation of archaeological remains in situ, this comment does not respond to that proposed change.

**Officer Response** This response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	805318	<b>Name</b>	Dr Elizabeth Ashton	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM36	<b>Consultation Point</b>	MM288	<b>Local Plan Reference</b>	Policy DM6.6
-------------------	--------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective
---------------	----	---------------	----	---------------------	----------------------

### Representation

#### Consultee Comment

Item 7 > The Mayor of North Tyneside Norma Redfearn in a letter to me confirms "Council Officers encourage public interest in engaging in informed debate on what are recognised as important matters for the local community and I trust that this debate will indeed take place to ensure the possible development at Murton Gap includes appropriate safeguards to protect the character and environment of the area." There are safeguards to be recognised and implemented. > Contrary to Bellway Homes, Murton Township was never part of Shiremoor. It was a Saxon village comprising four ancient farms, or parcels of land comprising 40 acres each - the land belonging to copyholders and must be safeguarded. Three farms can still be traced and the other was divided and bought and sold down the centuries. It is because it was not part of Shiremoor (the grazing, common land of Tynemouth Priory) that the ancient layout has survived and must be preserved. > The fields which concern me are the unploughed ones on the left hand side of Murton Lane, past the blacksmith shop and before Murton village. > What we see now when examining the fields is a medieval framework (there weren't any hedges in that period) of open fields with a seventeenth century reorganisation superimposed on it - ie the open fields were measured and divided between the owners and hedged around - that is what has been recorded on historical maps available to view today. Again these must be safeguarded. > Murton Lane itself is a survival of a medieval road called North Street which linked the monastery of Jarrow with Lindisfarne. The existing lane gives examples of medieval furlongs - it curves around the furlongs created by oxen which ploughed there from the Middle Ages. The hedges were originally planted when these open fields were enclosed in the 17th century. Because of ploughing carried out on the left hand side of the lane, the plough marks of the teams of oxen have been lost. But the field boundaries are still in tact. Once again these features, Murton heritage and these historic and archeological remains relating to Murton must be preserved. > New York blacksmith shop is important historically as well as an unusual survival. There is a building shown there on maps from the eighteenth century, and given its setting on a crossroads it is very likely a farrier worked there from earliest times, as Murton Lane was a major medieval thoroughfare.

#### Changes Sought

Item 8 > I have grave concerns about proposals by North Tyneside Council to develop the greenfield area around Murton and New York villages which, tragically, includes the demolition of the Forge in New York, a valuable asset to the area and one of significance historically and culturally, as well as it being an important educational resource. This demolition proposal is totally unnecessary because the junction planned for its site would be much more effective leading from the

derelict farm stackyard to the eastern end of Murton House Farm or relocated elsewhere to join the A191 between Park Lane and Foxhunter's roundabout. Although a protected building Murton House itself would not be affected by a new exit onto the existing roundabout, as there is much land available. It is the obvious solution to the road network problem. > To create a new junction in the middle of New York Village would divide the community and create considerably more congestion to that already existing, in addition to robbing the area of a working forge. This proposal should be deleted from the "Local Plan" > In addition, the NT Council Strategic Traffic Impact Report NT10/11 of May 2016 clause 9.3 pages 47 and 48 states clearly that a road through New York Village will require the demolition of New York Forge, a business still continuing to this day. > The NT Council Heritage Report NT/11/12 describe the Forge as an asset recorded in the Tyne and Wear Historic Environment Record (HER) 2149, claiming it as a building of "Interest to the local community", but now the Council, in association with Arup Consultants proposes its demolition! Given the strength of feeling against this by local people " thousands of whom have signed a petition " any decision to take this plan forward must be considered undemocratic and to ignore the will of the public. The specific wording at page 26 of NT11/2/2) with respect to the Blacksmith is "The New York Road / Murton Lane access is currently proposed to be a simple priority crossroads with priority altered to lead Westminster Avenue directly into the site. This matter is of grave concern to the community, both in local and wider contexts and should be deleted from the "Local Plan" Although the issues has been constantly raised by various people, there has been total avoidance of discussion concerning their concerns by officials of the Council. New York Forge is an asset to the village with the potential to be a fascinating gem for the education of children. This would provide an understanding and a vision of the workings of metal forging and the tools used in the 19th century. If all else fails it should be restored like George Stephenson's cottage in Killingworth village. Has NTC, any politician, or anyone considered that failing its demolition or restoration in New York that it should be carefully removed and rebuilt brick by brick following the advice from Heritage England in a location say in Murton Village, with financial contributions made by the Murton Gap Consortium who will benefit greatly from this £900 million housing development? > There are other options for this New York/Westminster Avenue road junction: delete it or relocate it! This new junction should not split the village of New York and therefore North Tyneside Council should review other options. > Treat the New York Forge as the North Tyneside Council Heritage document NT11/12 and respect its heritage in accordance with the Report Section 8 New York Forge. > New York Forge is not a "former Blacksmith" as the N.T. Council Arup Report document NT11/2/2 page 48. It is a working business which is essential to the area and the "Local Plan" should be corrected. > Retain Murton Lane, to Murton Village and the existing Murton Village road to the Wheatsheaf public house. Use the existing roadway as a cycle/pedestrian/equestrian way for public use as detailed in the NTC Policies Map and for Murton Village Riding School and retain the character of New York and Murton Villages. > Clearly North Tyneside Council must now review Murton Gap Development so that house building can be significantly reduced to prevent this land being irretrievably lost to housing having already been sold to developers despite legal promises made. > Murton House farm an 18th century estate is a grade II listed building now with vacant possession and after recent changes of ownership is in the hands of Bellway Homes. Could this be a reason for the consortium not wanting to consider development of the nearby roundabout, even though there is derelict land adjacent to the listed building? This should be investigated by the Inspector > The Mayor confirms to me that following the conclusion of the Local Plan examination there will be an ongoing process over at least the remainder of 2017 where detailed elements such as this access arrangement will be considered and ultimately agreed. As proposals are advanced there will be engagement with local communities in relation to the detailed proposals for Murton Gap as part of preparation of a Detailed Development Framework and Masterplan. Currently it is anticipated that this will take place during mid to late summer 2017. Subsequent planning applications that will be submitted by the landowners and developers at Murton Gap will also be subject to statutory consultation and only gain final approval through approval by the Council's Planning Committee. > Please ensure me that the "Local Plan" is updated, it will engage with the Public and their concerns long before the Detailed Development Framework and Masterplan is complete.

#### North Tyneside Council Response

**Is response duly made?** No. This response is directed to MM288 but does not reference any component of the Main Modifications proposed to Policy DM6.6 Heritage Assets. The focus of this response is in relation to previously aired comments in relation to the Murton Gap strategic allocation - no Main Modifications to proposals affecting this site are relevant to the content of this response.

<b>Officer Response</b>	<p>This response outlines a range of concerns and issues with the potential development of Murton Gap. It is not considered to be duly made in relation to the Main Modifications proposed. The matters set out are all addressed through evidence presented alongside the pre-submission and submitted Local Plan and considered as part of the Examination in Public. The ongoing planning process to ensure such matters are further considered and addressed is in place and additionally has been considered through the examination process.</p> <p>While the Local Plan outlines new road infrastructure to manage extra traffic, detailed plans of where access roads will be located have not yet been prepared and agreed. There are no plans to demolish the Forge.</p>
-------------------------	--



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960389	<b>Name</b>	Barbara Hooper	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Historic England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM129	<b>Consultation Point</b>	MM290	<b>Local Plan Reference</b>	Policy DM6.7
-------------------	---------	---------------------------	-------	-----------------------------	--------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	--	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

With regards the main modifications, we welcome the changes made as follows: MM290 (referencing heritage assets)

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	517819	<b>Name</b>	Liz Bray	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Tyne & Wear Local Access Forum	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM138	<b>Consultation Point</b>	MM298	<b>Local Plan Reference</b>	Para 10.15
-------------------	--------	---------------------------	-------	-----------------------------	------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	---

### Representation

#### Consultee Comment

We would suggest the following small but helpful amendments to the proposed modifications (shown in *italics*) to reinforce our advice and give Public Rights of Way, non-motorised access and the Rights of Way Improvement Plan more prominence in planning for North Tyneside.

#### Changes Sought

MM 53 Page 29 S1.4 add to point (e) *‘encouraging accessibility and walking, cycling, horseriding and public transport, in accordance with the Tyne & Wear Rights of Way Improvement Plan, “1.. The identity 'Transport North East' has been established for transport delivery at a NECA level, including the regional Rights of Way Improvement Plans*

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	Additional Modifications have been proposed and previously published by the Council in response to previous comments from the Local Access Forum. In particular AM331 of the schedule of modifications published in September 2016 references the role of the Public Rights of Way Improvement Plan. The combined Main and Additional Modifications mean the adopted Local Plan will fully address the points set out by the Local Access Forum.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM82	<b>Consultation Point</b>	MM303 & 450	<b>Local Plan Reference</b>	Policy S7.3 (Public Transport)		
-------------------	--------	---------------------------	-------------	-----------------------------	--------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC note the amendments to bullet point 4 of criterion f (now f iv), where it now states: "iv. Additionally, potential sites for new stations, whether on the existing rail network, on routes re-opened for passenger traffic and/or extensions to the network, will also be supported where appropriate. This includes proposals relating to both the Metro and heavy rail and will be linked to new development wherever possible. Specifically this includes potential sites for new Metro stations at Killingworth Moor and Murton Gap, linked to the strategic allocations identified in the Local Plan." KMC are pleased that the word 'potential' for new stations is included and that it will support extensions to the network where appropriate. The word 'potential' recognises that the provision of a new Metro Station at Killingworth Moor, may not be the only option in contributing to sustainable transport.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

**Officer Response** Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1063818	<b>Name</b>	Mr Gordon Harrison	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Nexus	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM29	<b>Consultation Point</b>	MM303 & 450	<b>Local Plan Reference</b>	Policy S7.3 (Public Transport)
-------------------	--------	---------------------------	-------------	-----------------------------	--------------------------------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	No	<b>Why Unsound?</b>	Effective
---------------	-----	---------------	----	---------------------	-----------

### Representation

#### Consultee Comment

The proposed modification is supported where it safeguards the Benton South West Curve for strategic transport purposes, and provides support for a potential Metro extension connecting Percy Main and Northumberland Park via Cobalt. However Nexus does not support the proposed change to the opening wording of Policy 7.3 from "The Council, working with partners, will seek a comprehensive, integrated, safe, accessible public transport network" to "The Council will support its partners who seek to provide a comprehensive, etc. This modification could be construed as placing responsibility for delivery of infrastructure such as metro stations at Murton Gap and Killingworth Moor on to Nexus. The joint position statements agreed between the Council and Nexus in 2016 made it clear that any new station development would only take place as a consequence of adjacent development, and that feasibility work will take place jointly in partnership with the Council.

#### Changes Sought

Reversion to previous wording in respect of joint responsibility for the introduction of any new Metro stations as are necessary to facilitate developments at Killingworth Moor and/or Murton Gap.

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The requested amendment, reverting to the previous text for this element of policy S7.3 is not accepted. The Council are keen to continue to work with Nexus, as a key partner of the Council, who deliver public transport services for residents, visitors and businesses in North Tyneside. The proposed modification does not alter the responsibility placed upon developers of the strategic sites of Murton Gap and Killingworth Moor to provide potential new metro stations or alternative adequate bus provision - pending the identification of an alternative funding source " as set out within the Site Specific Infrastructure Delivery Plan and expressed in the Joint Position Statement with Nexus.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	960172	<b>Name</b>	Killingworth Consortium	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	960168	<b>Organisation</b>		<b>Agent if applicable</b>	Bilfinger GVA		

### Comments Details

<b>Comment ID</b>	LPMM79	<b>Consultation Point</b>	MM304	<b>Local Plan Reference</b>	Policy S7.3 (The Road Network)		
-------------------	--------	---------------------------	-------	-----------------------------	--------------------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	--	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

KMC raise no object to the inclusion of the Transport Improvements Schemes and Junctions Symbol in conjunction with Policy S7.3.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	517819	<b>Name</b>	Liz Bray	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Tyne & Wear Local Access Forum	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM139	<b>Consultation Point</b>	MM305	<b>Local Plan Reference</b>	Policy S7.3 (Pedestrians, Cyclists and Horse-Riders)
-------------------	--------	---------------------------	-------	-----------------------------	--

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	---

### Representation

#### Consultee Comment

We would suggest the following small but helpful amendments to the proposed modifications (shown in *italics*) to reinforce our advice and give Public Rights of Way, non-motorised access and the Rights of Way Improvement Plan more prominence in planning for North Tyneside.

#### Changes Sought

MM 305 page 148 S7.3,3 Add “The Council, working with its partners, will seek to protect and enhance its existing network of routes and provide a network of safe, convenient, direct and accessible routes for horse-riders , pedestrians, cyclists, horse-riders and other non-motorised modes of transport with reference to the Tyne & Wear Rights of Way Improvement Plan , [2](#)”

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	Additional Modifications have been proposed and previously published by the Council in response to previous comments from the Local Access Forum. In particular AM331 of the schedule of modifications published in September 2016 references the role of the Public Rights of Way Improvement Plan. The combined Main and Additional Modifications mean the adopted Local Plan will fully address the points set out by the Local Access Forum.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1063818	<b>Name</b>	Mr Gordon Harrison	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Nexus	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM31	<b>Consultation Point</b>	MM311	<b>Local Plan Reference</b>	New Para after 10.20		
-------------------	--------	---------------------------	-------	-----------------------------	----------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	-----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

Nexus supports the additional paragraph and map and the intention to protect the Benton South-West curve from development in support of any future expansion of rail services to Newcastle International Airport.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

**Officer Response**      Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1063818	<b>Name</b>	Mr Gordon Harrison	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Nexus	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM30	<b>Consultation Point</b>	MM311	<b>Local Plan Reference</b>	New Para after 10.20		
-------------------	-------	---------------------------	-------	-----------------------------	----------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	-----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

Nexus supports the proposed Main Modification which provides clarity as to the council's position regarding the safeguarding of corridors and alignments for potential use as transport corridors.

#### Changes Sought

--

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	Response noted.
-------------------------	-----------------



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	517819	<b>Name</b>	Liz Bray	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Tyne & Wear Local Access Forum	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM140	<b>Consultation Point</b>	MM333	<b>Local Plan Reference</b>	New Para after 10.41
-------------------	--------	---------------------------	-------	-----------------------------	----------------------

### Reasons for Support / Objection

<b>Legal?</b>	No	<b>Sound?</b>	No	<b>Why Unsound?</b>	Justified; Effective; Consistent with National Policy
---------------	----	---------------	----	---------------------	---

### Representation

#### Consultee Comment

We would suggest the following small but helpful amendments to the proposed modifications (shown in *italics*) to reinforce our advice and give Public Rights of Way, non-motorised access and the Rights of Way Improvement Plan more prominence in planning for North Tyneside.

#### Changes Sought

MM 333 Page 154 new para 10.41a Add at end: “Existing Planning Guidance on Rights of Way, for major and minor developments, will also be incorporated with minor updating.”

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The Local Plan sets out at DM7.3 the general principles for planning and consideration of development in relation to ensuring adequate accessibility and safeguarding existing routes. The plan also refers to Supplementary Planning Document 12, Transport and Highways, which has been recently reviewed and is due to be adopted during 2017. This provides further reference to the actions to be taken in relation to Public Rights of Way and the involvement of the Council's Public Rights of Way officer.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	900234	<b>Name</b>	Henry Stamp	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPM99	<b>Consultation Point</b>	MM348	<b>Local Plan Reference</b>	New Para after 10.70		
-------------------	-------	---------------------------	-------	-----------------------------	----------------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	-----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

MM 348 proposes a change to policy on the adequate provision of community services and guarding against unnecessary loss (which I welcome) but this reinforces observations I made at the Inquiry about the loss of such uses on 2 sites, not reflected in the MMs.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes.

<b>Officer Response</b>	The response is considered to be in support of the modification. Reference to points made specifically in relation to sites discussed within the hearings and points previously made are not considered to require a change to this modification.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	900234	<b>Name</b>	Henry Stamp	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM98	<b>Consultation Point</b>	MM485	<b>Local Plan Reference</b>	Policy AS8.10		
-------------------	--------	---------------------------	-------	-----------------------------	---------------	--	--

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>			
---------------	-----	---------------	-----	---------------------	--	--	--

### Representation

#### Consultee Comment

MM 485 has blue stars for buildings underused (which is acceptable) but this approach has not be used for North Shields in the MMs.

#### Changes Sought

### North Tyneside Council Response

Is response duly made? Yes.

<b>Officer Response</b>	The response is considered to be in support of MM485 but in reference to any application in North Shields is not made in relation to a Main Modification.
-------------------------	---

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	546048	<b>Name</b>	Andy Kahn	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>	805618	<b>Organisation</b>	Port of Tyne	<b>Agent if applicable</b>	Lambert Smith Hampton		

### Comments Details

<b>Comment ID</b>	LPMM73	<b>Consultation Point</b>	MM465	<b>Local Plan Reference</b>	Policy AS8.12
-------------------	--------	---------------------------	-------	-----------------------------	---------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

We note additional wording has been added to Policy AS8.12 to provide increased flexibility with regards to alternative proposals at the Fish Quay. This is in accordance with our representations dated December 2015 which noted that it may be necessary to introduce other uses into the area in order to support necessary improvements to the jetty.

#### Changes Sought

Whilst we support the Council's intention to provide more flexibility to the policy, we believe that point b.iii, which refers to the 'adverse impact' of alternative proposals upon the amenity of neighbouring properties and businesses, is unnecessary. The wording of point b.iii duplicates policy wording relating to amenity contained in Policies S1.4, S1.2 and DM.3 of the Local Plan. As such, we believe that its inclusion is unnecessary and should be deleted from the modifications. Its inclusion also places undue emphasis on the likely impacts of an alternative development at the Fish Quay in close proximity to existing dwellings, which should be considered on its merits with regards to the more general policies in the plan.

### North Tyneside Council Response

#### Is response duly made? Yes.

<b>Officer Response</b>	Whilst reference is made to the preservation of amenity in other sections of the Local Plan at this particular section the criteria is considered to aide the application and understanding of the policy and the intention of the Council in this regard and at this location. The inclusion of the criteria meanwhile does not prevent alternative proposals being considered on their merits, which would include the impact of the proposal upon amenity as set out.
-------------------------	--

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	444259	<b>Name</b>	S Matuszewski	<b>Group Representation?</b>	Yes	<b>Group Numbers</b>	3
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM2	<b>Consultation Point</b>		<b>Local Plan Reference</b>	n/a
-------------------	-------	---------------------------	--	-----------------------------	-----

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	-----	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

#### Changes Sought

Dear Sir, Because we live at 176A High Street West, Wallsend NE28 8HZ. We think for the local residents on the High St. West our end on Map 25 coloured Pink Portugal Place, the traffic should be diverted and more green parts around.

### North Tyneside Council Response

**Is response duly made?** No. The response is not in reference to a proposed modification.

**Officer Response** Response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	466526	<b>Name</b>	Mr. John Young	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM35	<b>Consultation Point</b>		<b>Local Plan Reference</b>	All Main Modifications
-------------------	--------	---------------------------	--	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>	Yes	<b>Sound?</b>	Yes	<b>Why Unsound?</b>	
---------------	-----	---------------	-----	---------------------	--

### Representation

#### Consultee Comment

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** Yes. Submitted form noted to be in response to Main Modifications "- in total".

**Officer Response** Response noted.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	1069153	<b>Name</b>	Laura Hutson	<b>Group Representation?</b>		<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	Sport England	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM141	<b>Consultation Point</b>		<b>Local Plan Reference</b>	n/a
-------------------	---------	---------------------------	--	-----------------------------	-----

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

I would reiterate our previous suggestion around Policy S1.2 Spatial Strategy for Health and Well-Being. Sport England considers that the built environment can have a huge bearing on whether people are physically active “ and keeping fit and active is a major factor in whether communities are healthy. In conjunction with Public Health England, we have updated our design guidance on this area. You can find Active Design at the following location on our website; <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/> The guidance includes a model policy which we consider would fit well into this section of the Plan “ please reconsider including it in this section.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The comment is welcomed, however, it does reiterate comments made on the Local Plan Pre-Submission Consultation Draft (November 2015). The Council provided a response to the comments made. The comment is not in relation to a proposed modification.

**Officer Response** The Council's response to the comment as previously made: " It is agreed that the built environment can assist in people's activity levels. The model policy within the Active Design is noted. It is considered that the principles of that model policy are addressed via several policies in the Local Plan, e.g. Design of Development, Green Space Provision and Spatial Strategy for Health and Wellbeing."

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	794139	<b>Name</b>	Gavin Cooke	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>		<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM42	<b>Consultation Point</b>		<b>Local Plan Reference</b>	n/a
-------------------	--------	---------------------------	--	-----------------------------	-----

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

The 2008 Ambient Air Quality Directive (2008/50/EX) set limits for key pollutants in the air we breathe outdoors. These legally binding limit values for a range of other pollutants, such as ozone, sulphur dioxide and carbon monoxide. The limits set in the Ambient Air Quality Directive are closely aligned to the UK air quality objectives. The directive, which is now legally binding mandates exposure concentration of fine particles in the atmosphere of 20ug/m3 (AEI) over a three year period. Young children are particularly vulnerable to poor air quality as their lungs are still developing and with reference to the schools situated next to the proposed building site such as Langley First School or Wood Lawn there must be specific impact assessments undertaken with regard to exposure to particles called PM10s and 2.5s which are emitted by heavy lorries before the commencement of projects that could potentially exceed air quality levels specified in EU regulations. Without the provision of a detailed impact assessment North Tyneside Council could be vulnerable to retrospective legal action from environmental groups as well as individuals going to law through the European Court of Justice citing air quality violations and the now established link that poor air quality has to the development of asthma, heart conditions and related lung conditions in young children.

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The respondents comments relates to ensuring appropriate measures to identify and mitigate air quality measures are in place. These matters within the Local Plan are addressed through Policy DM5.19 for which no Main Modifications are proposed. This response is specifically directed additional at the implications of development at Murton Gap but again there are no Main Modifications to that proposal that this response addresses.

**Officer Response** This response is not duly made.



## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

Consultee ID	816473	Name	Helen Sinclair	Group Representation?	No	Group Numbers	
Agent ID		Organisation		Agent if applicable			

### Comments Details

Comment ID	LPMM37	Consultation Point		Local Plan Reference	n/a
------------	--------	--------------------	--	----------------------	-----

### Reasons for Support / Objection

Legal?	Yes	Sound?	Yes	Why Unsound?	
--------	-----	--------	-----	--------------	--

### Representation

#### Consultee Comment

#### Changes Sought

### North Tyneside Council Response

**Is response duly made?** No. The response received outlined below is noted but does not relate to a single or multiple Main Modification of the Local Plan. "" North Tyneside council has my full support in building affordable housing on any suitable land including Murton. There is a desperate need for more council housing particularly 2 bedroom houses. It is worrying to think of the housing situation and it needs to be addressed now. ""

**Officer Response** Response is not duly made.

## Local Plan Pre-Submission Draft – Comments and Response Schedule

### Consultee Details

<b>Consultee ID</b>	959522	<b>Name</b>	Melanie Lindsley	<b>Group Representation?</b>	No	<b>Group Numbers</b>	
<b>Agent ID</b>		<b>Organisation</b>	The Coal Authority	<b>Agent if applicable</b>			

### Comments Details

<b>Comment ID</b>	LPMM5	<b>Consultation Point</b>		<b>Local Plan Reference</b>	All Main Modifications
-------------------	-------	---------------------------	--	-----------------------------	------------------------

### Reasons for Support / Objection

<b>Legal?</b>		<b>Sound?</b>		<b>Why Unsound?</b>	
---------------	--	---------------	--	---------------------	--

### Representation

#### Consultee Comment

--

#### Changes Sought

The Coal Authority has no comments to make on the Main Modifications proposed.

### North Tyneside Council Response

**Is response duly made?** No. Response does not make reference to any particular proposed main modification or whether the Coal Authority agrees or disagrees with them. It is not possible to interpret the response.

**Officer Response** Response noted. It is the Council's assumption that the Coal Authority has read the modifications and is satisfied with what is proposed. However, as the response is that the Coal Authority have “no comments to make”, the Council are not able to formally make that assumption. [Coal Authority were approached with the request for further clarity to be provided].