

Representations to Green Belt Study
Mr Dixon | August 2015

Representations to Draft Stage 1: Green Belt Study consultation

On behalf of:

Mr Dixon

August 2015

Prepared by:

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Introduction

1. We have been instructed to make the following representations to Draft Stage 1: Green Belt Study consultation. These representations have been prepared having regard to paragraph 182 of the National Planning Policy Framework (March 2012)(NPPF). Paragraph 182 states that for a plan to be found “sound” it should be:
 - Positively prepared
 - Justified
 - Effective
 - Consistent with national policy
2. These representations are made on behalf of Mr Dixon, who supports a review of the Green Belt and proposes land at Whitley for removal from the Green Belt (site plan at Appendix 1) for residential development.
3. The site is located on the eastern edge of General Area ‘South 5’, defined as an area to the west of Whitley. Whitley is identified as a Designated Service Village and, due to its close proximity to the Strategic Road Network, is considered to be suitable for sustainable growth.

Q3 (GB) Using the information within Table 8 of this study, do you have any comments on the approach by which General Areas could be defined as ‘weakly’ or ‘more strongly’ fulfilling the five national purposes of the Green Belt (as defined within NPPF Paragraph 80)?

4. The methodology is considered to follow best practice as a starting point for reviewing Green Belt; however, there is a concern in relation to the expansion of villages.
5. Paragraph 54 of the National Planning Policy Framework (NPPF) states that “*In rural areas ... local planning authorities should be responsive to local circumstances and plan housing to reflect local needs*”. The NPPF goes on to state that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are smaller groups of settlements, development in one village may support services in a village nearby” (paragraph 55).

6. This needs to be considered in light of paragraphs 84 – 86 of the NPPF to promote sustainable patterns of development.
7. Linked to this is the discounting of “less strategic features” defined within Table 2 (page 5 of the Stage 1 Green Belt Study) as potential Green Belt boundaries. In smaller, rural settlements a Green Belt boundary amendments that is reliant on features “likely to be permanent” (Table 2 Definesible Boundaries, page 27 of the Study) are unlikely to be in keeping with the scale and character of the settlement.
8. Furthermore, the NPPF does not stipulate the use of *existing* boundary features and the creation of a strong defensible Green Belt boundary by means of a new landscaped buffer has been accepted by an Inspector in relation to the *‘Planning For The Future’: Core Strategy And Urban Core Plan For Gateshead And Newcastle Upon Tyne 2010-2030* (e.g. see paragraph 161 of the Inspector’s Final Report, Appendix 2).
9. It is considered that around existing rural settlements a much more finely grained approach should be taken to assessing whether sites are fulfilling the five national purposes of the Green Belt.

Q4 (GB) Do you have any comments on the approach to defining purpose 5 of the Green Belt Review?

10. The approach as set out in *Table 12 Assessment Criteria for Purpose 5* is generally supported, as is the acknowledgement of the regeneration priorities in Designated Service Villages.

Land to west of Whitley – Green Belt Assessment

11. The proposed site has been assessed against the purposes of the Green Belt as set out in paragraph 80 of the NPPF and the Draft Green Belt Study.
12. **Purpose 1: To check the unrestricted sprawl of large built-up areas** – the extension of Whitley to the west would not result in any coalescence due to the physical separation of the settlement from the main conurbations of West Yorkshire. The scale of the proposed site would not result in sprawl of the built form, though it is accepted that a new boundary would have to be established.
13. **Purpose 2: To prevent Neighbouring Towns from merging into one another** – the development of the site would not impact on the “less essential gap” identified (page 65, Green Belt Study Appendix A). Development would not reduce the existing separation between the settlements. Furthermore, the development of the site would not result in any visual or perceptual coalescence between Whitley and Womersley.
14. **Purpose 3: To assess in Safeguarding the Countryside from Encroachment** – development adjacent to the settlement will ensure that there is a “backdrop of existing development” (page 66, Green Belt Study Appendix A) and is therefore unlikely to be visually intrusive or detrimental to the existing character and form of the village. The area has a semi-urban character due to the proximity of the Strategic Road Network.
15. **Purpose 4: To preserve the setting and special character of historic towns** – Whitley does not have a Conservation Area and the site does not impact on any historically important views.
16. **Purpose 5: Assisting in Urban Regeneration by encouraging the recycling of derelict and other urban land** – Knottingley and settlements along the A19, including Whitley, are considered to be a Regeneration Priority Area. Green Belt land within the area is therefore connected to, in close proximity with and sometimes

contiguous with the Regeneration Area and therefore Green Belt at this location is considered to have a role in directing development towards brownfield and derelict land.

Appendix 1

Location Plan

Land at Whitley



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Location Plan



Appendix 2

REPORT ON THE EXAMINATION INTO 'PLANNING FOR THE FUTURE':
CORE STRATEGY AND URBAN CORE PLAN
FOR GATESHEAD AND NEWCASTLE UPON TYNE 2010-2030
Document submitted for examination on 21 February 2014
Examination hearings held between 3 June – 4 July and on 15 October 2014
File Ref: PINS/M4510/429/4

Report to Gateshead Council and Newcastle City Council

by Martin Pike BA MA MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 24th February 2015

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

**REPORT ON THE EXAMINATION INTO 'PLANNING FOR THE FUTURE':
CORE STRATEGY AND URBAN CORE PLAN
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Abbreviations Used in this Report

AA	Appropriate Assessment
AAP	Area Action Plan
BREEAM	Building Research Establishment Environmental Assessment Methodology
CSUCP	Core Strategy and Urban Core Plan
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
ELR	Employment Land Review
Framework	National Planning Policy Framework
GVA	Gross Value Added
HA	Highways Agency
IDP	Infrastructure Delivery Plan
LDD	Local Development Document
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LP	Local Plan
MM	Main Modification
MoU	Memorandum of Understanding
MSA	Mineral Safeguarding Area
NGP	Newcastle Great Park
PPG	Planning Practice Guidance
PSA	Primary Shopping Area
ONS	Office for National Statistics
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SEP	North East Strategic Economic Plan
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SLR	Strategic Land Review
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System
UDP	Unitary Development Plan

Non-Technical Summary

This report concludes that the Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne provides an appropriate basis for the planning of the combined area, providing a number of modifications are made to the plan. Gateshead Council and Newcastle City Council have specifically requested me to recommend any modifications necessary to enable the plan to be adopted. The Main Modifications to address this are listed below.

Apart from removal of the North Chopwell housing site, all of the modifications listed below were proposed by the Councils but where necessary I have amended detailed wording and/or added consequential modifications. I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Deleting the phased release of Green Belt housing sites so that sufficient land is available to meet short term needs;
- Removal of the housing site at North Chopwell;
- Adjusting the treatment of retail and other development outside city and town centres to be consistent with national policy;
- Updating the approach to sustainable construction to reflect emerging national policy;
- Clarifying the approach towards heritage assets, biodiversity and flood risk to be consistent with national policy;
- Ensuring the approach to mineral safeguarding and energy mineral development accords with national policy;
- Clarifying the role of masterplans and phasing plans in securing the timely delivery of infrastructure.

Introduction

1. This report contains my assessment of the Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne (CSUCP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework (the Framework) makes clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authorities have submitted what they consider to be a sound plan. The basis for my examination is the Proposed Submission CSUCP published for consultation in September 2013.¹
3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act, the Councils requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that are necessary for soundness all relate to matters that were discussed at the examination hearings. Following these discussions, the Councils prepared a schedule of proposed main modifications and carried out a sustainability appraisal; this schedule has been subject to public consultation. I have taken account of the consultation responses in coming to my conclusions in this report, and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that have been undertaken. Where necessary I have highlighted these amendments in the report.
5. Many local residents feel that the consultation undertaken during preparation of the Plan was flawed and that proper community engagement did not take place. There are claims that some households did not receive leaflets that were being distributed, that attendance at the 'drop-in' events was poor because of belated notification, that the information provided was inadequate, misleading and difficult to understand, and that the Councils were not sufficiently transparent and responsive to local opinion.
6. The evidence suggests that the consultation process was extensive, thorough, lengthy and designed to reach the whole community. During the seven

¹ In practice the examination focused on the February 2014 Submission Document which includes modifications made by the Councils following the September/October 2013 consultation on the Proposed Submission version. However, because there was no consultation on these modifications, it is necessary to consider all the Main Modifications made since the Proposed Submission stage.

consultation stages over 150 events were held and many other methods of communication were used; on two separate occasions a leaflet or letter was sent to every household in the Councils' areas. It is almost inevitable, in my experience, that a few glitches will occur in a process as extensive as this, and it is clearly regrettable if some individuals were missed out. But there is no evidence of widespread problems.

7. The results of the process do not support the assertions of inadequacy and lack of transparency. A total of 59,000 comments have been received by the Councils, including over 33,000 at Proposed Submission stage from over 3,500 individuals; in my view this represents a good level of engagement by the local community. The legal test is that the Council's Statement of Community Involvement has been complied with; there is clear evidence that it has been exceeded.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Councils complied with any duty imposed on them by section 33A of the 2004 Act. The duty requires local planning authorities to co-operate with other Councils and bodies to address strategic cross-boundary issues when preparing Local Plans.
9. The very fact that Gateshead and Newcastle City Councils have jointly prepared a single plan for their combined areas is a strong demonstration of compliance with the duty. There was no compelling evidence that the two Councils had failed to co-operate on strategic cross-boundary issues – whilst small differences of approach and outcome are apparent on some matters, these appear to have had no significant effect on the overall strategy and do not threaten its implementation. Government advice in Planning Practice Guidance (PPG) indicates that a joint plan can be an effective means of addressing cross-boundary issues; the CSUCP serves as a commendable example of joint working. Moreover, the agreement with North Tyneside Council that Newcastle will seek to reduce out-migration to its neighbour is a further example of co-operative working.
10. Mechanisms for co-operative working have also been established with five other authorities in the North East region and have been formalised in a recently completed Memorandum of Understanding (MoU). Despite criticisms that the MoU is only an operational document and has no legal standing, it is the type of arrangement promoted by PPG. There is concern that the currently planned level of housing provision for the wider area significantly overestimates the demand as a result of each local authority seeking to meet its own needs. This is discussed later, but does not in itself amount to a failure of co-operation. All other authorities are behind Gateshead/Newcastle in their plan preparation and the final housing numbers are yet to be determined. And each other authority will have to justify its own housing provision at examination, as is the case here with Gateshead and Newcastle.
11. There is evidence of joint working producing effective outcomes on a range of other strategic matters including various City Deal projects, the Howdon sewage treatment works, transport corridors and education. Whilst not all issues have been resolved, regular dialogue is on-going. Wider co-operation

amongst North East authorities also takes place in other spheres that have implications for strategic planning, notably through involvement in the North East Local Enterprise Partnership (LEP) which recently published the North East Strategic Economic Plan (SEP). All of these examples demonstrate that the section 33A duty has been met.

Assessment of Soundness

MAIN ISSUES

12. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified nine main issues upon which the soundness of the Plan depends.

Issue 1 – WHETHER THE OVERALL SPATIAL STRATEGY IS SOUND IN PRINCIPLE HAVING REGARD TO THE CONTEXT AND NEEDS OF THE AREA

13. The first part of the CSUCP describes the main characteristics and attributes of Gateshead and Newcastle in a spatial portrait. It then sets out a vision that by 2030 the area will be a more prosperous, attractive and sustainable place to live and work, with improved quality of life and thriving communities. The vision, and the strategic objectives which flow from that vision, are derived from an extensive evidence base of socio-economic and environmental studies and the results of community engagement throughout plan preparation.
14. Like many core strategies, the Plan starts with an overarching spatial strategy (policy CS1). To achieve the Plan's vision this policy establishes the overall scale of development as 30,000 new homes, 22,000 new jobs and 150 hectares (ha) of employment land, all to be directed to sustainable locations. It then sets out the principles by which this will be achieved. The presumption in favour of sustainable development and the aim of focussing the majority of development in existing built up areas are wholly consistent with the Framework and are widely supported. So too is the priority given to the urban core for retail, office, education, leisure and other major development. The focus on key employment areas as the main location for employment development, and the aim of re-balancing the housing stock by delivering homes supported by jobs and services, also attract broad support in principle.
15. However, there is substantial public opposition to the proposed scale of housing development and to the Plan's strategy of allocating Green Belt land to accommodate development that cannot be located within the urban area. Other points of contention include the capacity of the urban areas to accommodate housing and employment development, and the implications of the proposals on transport infrastructure, biodiversity and the environment. Finally there are detailed objections to many of the individual site allocations proposed, especially those involving Green Belt land.
16. In general terms, the overarching spatial strategy of policy CS1 accords with the broad thrust of national policy as set out in the Framework and is sound. However, a conclusion on the proposed scale of development, the loss of Green Belt land and many other elements that have attracted objection cannot be reached until the detailed arguments are addressed in the remainder of this

report. On a procedural point, policies CS1 and CS19 refer to the boundary of the Green Belt being defined on the Proposals Map; under current Regulations the reference should be to the Policies Map. **MM1** and **MM24** make the necessary changes. There is no mention in this report of cartographic changes to the Policies Map; these are a consequence of the modifications made throughout the report and do not require a specific mention in each case.

Issue 2 – WHETHER THE SCALE, LOCATION AND RANGE OF HOUSING PROVISION IS SOUND HAVING REGARD TO LOCAL NEEDS AND CONSTRAINTS AND THE REQUIREMENTS OF NATIONAL POLICY

Objectively assessed housing need

17. The assessment of housing need should be based on the functional housing market area, as defined by a range of factors including the areas within which a high proportion of people move house and travel to work. Housing market areas often overlap and do not always coincide with local authority boundaries. The Strategic Housing Market Assessment (SHMA) indicates that Gateshead and Newcastle exhibit a high degree of self-containment in terms of household moves, but less containment (especially in Gateshead) in terms of employment. The study also identifies a greater degree of self-containment when North Tyneside is included, reflecting the strong migratory and commuting linkages between it and Newcastle. Consequently, while most of the detailed analysis relates to a housing market based on Gateshead and Newcastle, the evidence base also considers the interactions with North Tyneside in particular, as well as the wider area.
18. The Framework states that the SHMA should identify the scale, mix and tenure split of housing need over the plan period; PPG advises that Department for Communities and Local Government (DCLG) household projections should be the starting point for estimating overall need. The SHMA focuses primarily on the need for affordable housing, relying on the Councils' separate demographic studies from St Chad's College to determine the full objectively assessed need. The Submission Plan is founded largely on 2011-based Office for National Statistics (ONS) population projections and DCLG household projections. Although these are interim projections which only go to 2021, the latest St Chad's demographic study extends them to 2030 using assumptions consistent with the official projections. The extended 2011-based household projections estimate growth of 30,500 households between 2010 and 2030.
19. PPG advises that account should also be taken of the latest ONS population estimates. These are 2012-based projections which were released during the examination. They show much slower population growth (almost 20,000 fewer persons by 2030 compared to the extended 2011-based projections). Such a significant change is not altogether surprising, for the last four sets of ONS population projections show large variations. The 2008-based projections estimate growth of 43,300 persons between 2010 and 2030; the 2010-based figure is 25,200, the 2011-based figure is 52,400, and the 2012-based figure is 33,000 persons. Moreover, there is not necessarily a direct relationship between the growth in population and households. Comparing the 2008 and 2011 projections, some 2,000 fewer households are forecast by the 2011 projection yet the population is estimated to be about 9,000 persons higher.

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20. Trying to draw rational conclusions from these widely fluctuating projections is not straightforward, though analysing certain components of the projections helps. There is much greater volatility in the estimates for Newcastle than for Gateshead, stemming mainly from differing assumptions about the scale of international migration.² As the figures produced by the Councils during the examination show, higher net international migration into Newcastle constitutes the major part of the difference between the 2011- and 2012-based projections.³ The figures also show that, unlike the 2011 projection, the 2012 projection would result in a decline in working-age population over the plan period, which is not a desirable outcome.
21. PPG states that adjustments may be made to household-projection based estimates of housing need based on alternative assumptions relating to the underlying demographic projections. For Gateshead the projections of population change, and the individual components of that change, have remained relatively stable so there is no reason to make adjustments. Under the 2011-based household projections, growth of 9,500 households is forecast over the plan period.
22. Newcastle City Council proposes to adjust the 2011-based forecasts in two ways. Firstly, it anticipates a reduction in international in-migration because the recent rapid growth in the number of international students (which is projected to continue in the 2011-based figure) is likely to reduce to about half its former rate; this equates to a reduction of around 10,000 international migrants over the plan period. It is pertinent that the lower growth projected in the 2012-based population forecast for Newcastle is predicated on a significant reduction in international migration. Thus it is reasonable to assume that at least some of the reduction shown in the 2012 population projection corresponds to the international student adjustment made by the Council to the 2011-based projection.⁴
23. Secondly, a common feature of both the 2011- and 2012-based projections is out-migration from Newcastle to surrounding authorities, notably North Tyneside. With the agreement of North Tyneside Council, the CSUCP aims to reduce this outflow (and the associated in-commuting) by providing additional housing closer to existing and potential employment opportunities in the urban core, thereby reducing travel. In broad terms the reduction in internal out-migration is expected to offset the lower international in-migration. Applying both these changes to the 2011-based demographic model for Newcastle produces growth of about 19,600 households over the plan period, slightly lower than the 21,100 obtained directly from the 2011 baseline projections.
24. Adding the two Councils' preferred strategies together gives an overall growth of 29,100 households, which is slightly below the 30,500 figure taken from the extended 2011-based DCLG household forecasts.

² Over the period of the projections, changes have been made to the way that international migration is allocated across the nations and regions of the UK, so the fluctuation is the result of methodological change as well as actual population flows.

³ The 2012 figures also show a reduction in natural change, but this is largely a consequence of fewer migrants producing a lower level of births.

⁴ Whilst it is unlikely that the ONS reduction in international migration, which is based on national trends, is directly related to the particular local circumstances at Newcastle, the net effect is similar to the adjustment made by the Council.

25. Residents' groups argue that household projections which are aligned to the 2011-based population projections substantially over-estimate the housing need. They produced alternative household need figures derived from the 2012-based projections which were mostly around 12,000-13,500 new dwellings, less than half the need identified by the Councils. These were obtained by applying national household sizes and rates of change to the population figures, which is an inherently less accurate process than the area- and age-specific household formation rates used in the St Chad's models and does not provide a robust method for calculating household growth.⁵
26. In any event, in advance of DCLG 2012-based household projections it is not possible to make reliable predictions on how the lower level of population growth will be reflected in household growth. This is amply illustrated by changes which arose from the 2011-based household projections. The September 2011 draft Core Strategy proposed 36,000 (gross) new houses to meet projected household growth of 32,500, which was based on old projections of a steeper decline in average household size (and to accord with the now revoked Regional Spatial Strategy (RSS)). Following publication of the 2011-based household projections, which predict a much slower decline in household size, projected household growth has dropped to 30,500.
27. Even if the 2012-based household projections do mirror the slower growth of the 2012 population projections, it is likely that they would be perpetuating the more gradual drop in household size that is largely a consequence of the recession. Given the substantial reduction in housing need that has already been factored into the assessment to reflect larger household sizes, there is a strong argument that the decline in average household size will begin to return to the longer term trend as the economy recovers from the recession, creating a need for more rather than fewer new homes.
28. Residents' groups also argue that because the 2012-based population projections cover the entire plan period and are based on a more thorough analysis of 2011 Census data, they are inherently more robust than the interim 2011-based projections. This is a valid point, but has to be considered in the context of the widely fluctuating official projections for Newcastle since 2008 which militate against unqualified reliance on any one particular projection. Moreover, PPG indicates that housing projections do not automatically become outdated every time new projections are issued. For these reasons it is necessary to test the results of the demographic analysis against a range of other factors.

Market signals and employment trends

29. PPG advises that the household and population projections are only a starting point, noting that the housing need number may need to be adjusted to reflect relevant market signals. Although evidence from market signals is limited, it is broadly consistent. The decline in household formation apparent at the 2011 Census has led to an appreciable rise in concealed households since the 2001 Census, consistent with the slower decline in household size. Both

⁵ The St Chad's methodology seems robust because the model generates results which are consistent with official ONS/DCLG projections. For example, by accurately modelling the official 2011-2021 population and household forecasts, the basis for extending the 2011-based projections to 2030 appears sound.

Councils embarked on large-scale demolition of low-demand housing stock in the 2000s and there was a substantial decline in the rate of new house-building during the height of the recession (2008-2011). Consequently in recent years the net additions to the housing stock have been very small, though there are signs of an increase over the past year or so. The SHMA confirms that the housing market has been subdued in recent years, with declining sales volumes and average house prices falling to a low during 2011 but picking up slightly since.

30. Opinions differed about whether the sluggish housing market is simply a response to low demand caused by the severe economic downturn or whether it stems from a lack of deliverable housing land. Whilst the recession is probably the main factor, there is some evidence that the lack of a range of housing sites attractive to the market has constrained the supply. In practice it matters little: the important point is that the most recent demographic projections are largely based on trends over the past five years that represent a very low point in the economic and house-building cycle. Consequently, they project similarly low levels of growth over the plan period. With the economy slowly recovering, and expected to continue to recover, it is reasonable to assume that the projections are likely to underestimate the need for housing rather than, as many local objectors submit, to overestimate it.
31. The Councils commissioned economic and employment projections from Cambridge Econometrics which provide a sensitivity test for the demographic projections. Based on a growth rate of 2.18% per annum, slightly above the historic North East average, some 22,000 new jobs are forecast over the plan period, the vast majority of which will be taken by workers resident in the plan area. Overall it is forecast that the level of self-containment will increase slightly, resulting in a small reduction in the proportion of in-commuting. The first St Chad's study concludes that the demographic and economic projections are broadly in balance.
32. St Chad's regards the economic growth projection as "fairly ambitious". However, it echoes the conscious decision by the Councils to seek a level of growth that is appropriate to the role of Newcastle and Gateshead, the regional capital and main conurbation, as the driver of the North East economy. For some time the North East had been the worst performing of the English regions and whilst a recovery is now under way, it is from a low base (as the SEP acknowledges). Newcastle and Gateshead lie at the heart of the region and are vital to its economic success. Optimising the opportunities for new housing and economic development within or close to Newcastle and Gateshead ensures that best use is made of the services and facilities of the urban core and the wider conurbation: it is an inherently sustainable strategy.
33. Concern was expressed that many other North East authorities are also adopting growth strategies and that there is insufficient demand from the region to accommodate the aggregate impact of widespread housing and economic growth, leading potentially to half-finished developments and poor use of resources. The evidence does not support this, with most nearby authorities ostensibly seeking to meet their own needs based on a continuation of recent migration trends, but in any event these matters will be tested once these other plans are subject to examination.

34. Representors from the development industry point out that the housing need figure has been reduced by about 6,000 dwellings during preparation of the CSUCP and argue that it should be increased, or at least that the house-building target should be expressed as a minimum. However, this earlier scenario was derived from projections which focused on the pre-recession period of higher growth and a faster decline in household size. Just like the recent projections which are unduly influenced by the downturn, this scenario does not properly reflect the whole Plan period; it is also somewhat out of date.
35. Drawing all these threads together, it is apparent that the Councils have carried out a thorough and objective analysis of housing need. It is based on the latest available (2011) DCLG household projections and has been adjusted to take into account particular changes in patterns of migration that are expected to occur in Newcastle, resulting in a slight reduction from the DCLG-based figure. It is consistent with the relevant market signals and a forecast based on employment growth. The housing need figure does not reflect the lower population growth that is projected in the recent 2012-based population estimates. However, the 2012 estimates project forward more of the recessionary years than any other and do not constitute a robust platform for population growth over the Plan period. In the absence of compelling evidence to the contrary, the Councils' housing need figure is sound.
36. The Courts have held that the objectively assessed housing need is a figure derived from the available evidence base which is free from policy influences. It has also been established that the dwelling requirement included in a Local Plan can differ from the objectively assessed need to take account of policy interventions. It might be argued that the retention of population that currently moves to North Tyneside is a policy intervention, and that the consequences of this change should not be included in the calculation of objectively assessed need. In these circumstances the objectively assessed housing need figure would be appreciably lower, though exactly how much lower is not clear because the calculation has not been made. But the dwelling requirement would not change because there remains a need to provide additional dwellings for the population that previously would have migrated to North Tyneside.

Proposed scale of housing provision

37. Policy CS10 proposes a gross housing requirement of 30,000 dwellings, 19,000 at Newcastle and 11,000 at Gateshead. Allowing for anticipated demolitions over the plan period, the net increase in housing stock amounts to 25,500 dwellings, 17,000 at Newcastle and 8,500 at Gateshead. This is lower than the preferred housing need figure of 29,100 (19,600 for Newcastle and 9,500 for Gateshead). Two further adjustments are made to the dwelling requirement which effectively amount to additions to the housing stock.
38. The first concerns student housing and relates only to Newcastle. Between 2010 and 2020 some 8,000 bedrooms in purpose-built accommodation for students will be built, which has the effect of freeing-up for conventional households roughly 2,000 dwellings previously occupied by students. The second adjustment is a reduction in vacancy rates to 3% by 2020, which increases the Gateshead supply figure by 1,000 dwellings and Newcastle by

600. A 3% vacancy rate is usually taken as the minimum necessary for the efficient 'churn' of the housing market. The Councils justify this reduction on the basis that most of the low demand stock has been (or is about to be) demolished, and that they are committed to schemes which bring empty properties back into use. Nevertheless, getting down to this minimum level by 2020 in an area which has historically suffered from high vacancy rates is ambitious and should be monitored closely.

39. Taken together, the effective supply of housing in Newcastle increases by 2,600 and that in Gateshead by 1,000. This brings the total net supply up to 29,100 dwellings, the housing need figure that has been used in the CSUCP. Thus the housing need and the projected housing supply are in balance.

Identification of housing land – urban areas

40. The next matter to address is the identification and deliverability of the gross housing requirement of 30,000 new dwellings. The Councils rightly seek to provide as much housing land from within the existing urban areas and their Strategic Housing Land Availability Assessments (SHLAAs) estimate that 72% of the dwelling requirement will come from urban land sources (including land already allocated at Newcastle Great Park). The SHLAAs appear to be robust: many organisations and groups were involved in their preparation and the Councils took a rigorous approach to site deliverability. Testing of the land supply at examination identified some changes to the availability of individual sites, though these are within the normal variation for schedules that change on a regular basis.⁶
41. Objectors had two main areas of concern about the SHLAAs. The first is the deliverability of sites in low and low-mid areas of demand, where viability is a significant issue. However, many of these sites are in public ownership and the Councils have demonstrated a strong commitment to obtaining finance and bringing them forward. There is evidence of successful joint venture partnerships with the private sector and, given the Councils' willingness not to always require the best financial reward, there is a reasonable prospect that most of these sites will deliver.
42. The second frequently expressed concern is that greater capacity exists in the urban area than has been identified in the SHLAA studies. Objectors identified a number of sites believed to have development potential, but mostly these failed the stringent tests of the Framework. In Gateshead it was suggested that under-used open spaces could make a significant contribution to the urban land supply, but the Council has not considered these because a review of public open space is not intended until the next stage of plan preparation. From what I observed on my visits there may well be potential for some development on open land of limited recreational or amenity value, though it is not possible to predict the amount that might be suitable.
43. Each Council took a different approach to windfalls and to discounts for sites

⁶ For example, Newcastle produced a partial up-date to the SHLAA in June 2014 which reviewed large sites only. Four sites have been removed from the 2013 schedule with the loss of 520 units; two new sites with a capacity of 188 units have been added, and the capacity of Newcastle Great Park sites has increased by 348 units. Including other minor variations, the net change is an increase in supply of 123 units.

that do not come forward. In Newcastle, where the SHLAA adopts a size threshold of 5 dwellings, a windfall allowance of 50 dwellings per annum is made over the remaining plan period, which is based on average small site yields over the past 10 years. A small additional allowance is also added to address the potential for residential conversions to upper floors within the historic Grainger Town area of Newcastle city centre. The Newcastle SHLAA then applies a 10% discount to SHLAA sites in lower value areas and the urban core in recognition of the greater risk of lower than expected build rates and non-implementation.

44. In Gateshead, where a lower size threshold of 3 dwellings is adopted, a more conservative windfall allowance of 50 dwellings per annum for the first five years is included in the urban site capacity, on the basis that the windfall yield beyond this period is uncertain. On the other hand, no discount to the identified supply has been applied, Gateshead Council arguing that land similar to that discounted in Newcastle is predominantly in public ownership where delivery is more certain. While this may be so, the absence of any discount does place securing the full urban supply at some risk. However, the prospect of some as yet unidentified housing land coming from the review of public open spaces at Gateshead is a potential additional source of supply that helps to offset the risk of under delivery.
45. Taken in the round, both approaches produce broadly similar results. Each SHLAA makes a small (3%) net allowance within the total urban capacity for unidentified sites. Given the rigorous approach taken by both Councils to identifying specific SHLAA sites, the studies appear robust. The Newcastle SHLAA identifies total urban capacity of 13,001 dwellings, a shortfall against the identified gross need of roughly 6,000 dwellings. For Gateshead the identified urban supply amounts to 8,594 dwellings, some 2,400 less than the gross need. These shortfalls represent the scale of housing development that the Councils propose to meet from land currently in the Green Belt (specified as Growth Areas in the Plan).

Identification of housing land – Green Belt

46. All land outside the urban area is part of the Tyne and Wear Green Belt. Both Councils established early in plan preparation that some development outside the urban area would be necessary if they are to meet their objectively assessed housing needs in sustainable locations. They undertook a strategic land review (SLR) which, as a first stage, assessed the extent to which parcels of land contribute to the five Green Belt purposes. Many sites were rejected because they make too valuable a contribution to the Green Belt; others were subsequently discarded because they are not suitable for other planning reasons or are not available for development. The second stage examined potential sites in greater detail, in some cases changing site boundaries to better reflect the suitability evidence or to take account of views expressed following consultation on the first stage. The final stage reviewed previous results in light of the reduction in the overall level of housing need, initial ecological assessments and the results of the stage two consultation.
47. There is criticism that the selection of sites relies too heavily on land put forward by landowners and developers, leading some objectors to allege that the Plan reflects developer interests rather than the interests of the

communities it should serve. It is true that many sites are being promoted by landowners and developers, but this is a common occurrence and often stems from the "call for sites" process. Moreover, sites promoted in this way usually satisfy the 'available' and 'viable' tests of the Framework, increasing their chances of being selected. PPG indicates that authorities should include a call for potential sites when identifying sites and broad locations, so in this (and other) respects best practice has been followed.

48. There is also criticism of the way that individual sites were scored at the initial stage, especially from objectors who argue that different results would have occurred if certain parcels of land had different boundaries. The Councils tried to avoid such a possibility, though in my experience an objective methodology which relies on somewhat arbitrary categorisations of boundary lengths is likely to be susceptible to occasional anomalies. Nevertheless, the main purpose of the first stage was to undertake an initial sieving of potential areas of land. More refined analysis, on an iterative basis, was conducted at subsequent stages to ensure that a wide range of planning considerations was taken into account. Overall there is no compelling evidence that the SLR process was so fundamentally flawed as to be unsound.
49. Most of the representations submitted to the CSUCP object to the loss of Green Belt land. As well as strong resistance to housing development on any of the plan area's Green Belt and countryside, there are widespread concerns about the extra traffic that would be generated, the loss of wildlife and biodiversity, the impact on existing services and infrastructure, the loss of good agricultural land and the increased risk of flooding. The arguments that the assessment of housing need is too high, and that greater capacity exists within the urban area, are also common themes. All these points are valid and have been addressed by the Councils, both during plan preparation and at this examination. Consideration of their relevance to individual allocations occurs later under issues 7 and 8.
50. At the heart of the Framework is a presumption in favour of sustainable development (paragraph 14). For land in the Green Belt, which is subject to specific policies of restriction, it is not sufficient to apply the usual 'planning balance' between meeting objectively assessed needs (as sought by paragraph 47) and the adverse impacts of doing so. The Framework states (paragraphs 83-85) that Green Belt boundaries should only be altered in exceptional circumstances through a review of the Local Plan. Authorities are required to take account of the need to promote sustainable patterns of development by considering the consequences of channelling development towards existing urban areas, towards inset towns and villages, or towards locations beyond the Green Belt. Boundaries should be defined to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development, and should not include land which it is unnecessary to keep permanently open.
51. These matters have been addressed. The capacity of the urban areas has been carefully assessed, many inset towns and villages are designated as Growth Areas, and development beyond the Green Belt has been regarded as unsustainable to meet Newcastle's and Gateshead's needs. The Councils have determined that the Green Belt Growth Areas are the most sustainable locations outside the urban area which are consistent with the CSUCP's spatial

strategy (policy CS1) of creating thriving communities and a more prosperous economy. For these reasons the Councils contend that exceptional circumstances exist.

52. In October 2014 the Secretary of State and the Planning Minister issued revised PPG which stresses that the Framework should be read as a whole and that need alone is not the only factor to be considered when drawing up a Local Plan. The revisions indicate that, when considering how to meet the identified housing need, constraints such as Green Belt may restrain the ability of an authority to meet its need. Many objectors argue that the PPG revisions and associated press release signal greater protection for the Green Belt and necessitate a re-assessment of the CSUCP. This matter was discussed at the final hearing session, when the Councils argued that the process they adopted when reviewing the Green Belt was consistent with the PPG. Both Councils expressly considered the revised guidance but decided not to change the Plan.
53. Clearly the revised PPG stresses the great importance of protecting the Green Belt but, by using the word "may", it does not direct planning authorities to a particular outcome.⁷ As indicated above, sustainable development is at the forefront of the Councils' approach and they have determined that Green Belt releases are a necessary component of the sustainable development of their areas, as set out in policy CS1 "Spatial Strategy and Sustainable Growth". Alternative strategies have been tested and found to be less sustainable. Thus in principle exceptional circumstances exist and, subject to my conclusions on individual allocations under issues 7 and 8, the chosen strategy is sound.

Phasing and five year land supply

54. PPG states that local planning authorities should have an identified five-year housing supply at all points during the plan period. Policies CS3 and CS4 of the Submission Plan propose to release Green Belt sites only when they are needed to maintain a five year land supply for each Council, the aim being to prioritise development within the existing urban area. Whilst in principle this is a commendable strategy, it became apparent during the examination that because both Councils currently have a sizeable shortfall of deliverable housing land from the urban area,⁸ Green Belt land would be required as soon as possible. It was also unclear how, in practice, the policies would operate if a number of Green Belt sites came forward at the same time.
55. Based on forecasts of the likely rates of delivery from individual Green Belt sites, some of which are very large and will take time to come on stream, the Councils now propose to delete from policies CS3 and CS4 the reference to the five year land supply, requiring instead that phasing is determined on a site-by-site basis. Adopting this approach will enable each Council to achieve its five year land supply at the earliest opportunity. The requirement for separate masterplans and phasing plans is appropriate as each has a different purpose. And it is right that each Neighbourhood Growth Area, and Village Growth Area sites which are adjacent, should be masterplanned together to ensure that

⁷ "...take account of any constraints such as Green Belt, which indicate that development should be restricted and which **may** restrain the ability of an authority to meet its need." (PPG: Housing and economic land availability assessment, paragraph 045 - my emphasis).

⁸ 'Deliverable' as set out in the Framework means having a realistic prospect of delivery within five years. The calculation includes the buffer sought by national policy.

infrastructure delivery is co-ordinated. The references in the text to "a phasing plan" and "a legal agreement" should be plural, both for consistency with "masterplans" and to allow for multiple developer involvement. **MM2, MM5, MM6, MM7** and **MM8** make these changes and are necessary if the Plan is to be positively prepared and effective. Similar provisions are included in the modified policies for individual site allocations.

56. I fully understand objectors' concerns that this change could be viewed as taking pressure off the Councils to maximise the early delivery of urban land. However, the evidence demonstrates that both sources of supply are needed urgently if the Framework's objective of boosting significantly the supply of housing is to be met. The early release of land from the Green Belt should ensure that both Councils can demonstrate a five year land supply (plus the 20% buffer for persistent under-supply that the Framework requires) soon after the Plan is adopted.
57. The combined effects of the recession, demolitions of low-demand dwellings and a constrained recent land supply has resulted in a substantial post-2010 shortfall which also has to be made up. PPG advises that, where possible, any undersupply should be dealt with in the first five years of the plan period. Whilst this appears to be feasible in Newcastle within 5 years of the Plan's adoption, it is likely to take longer in Gateshead because of large scale demolitions in recent years. There is potential for the speedier delivery of urban sites in Gateshead if more public funding was to become available, though the Council is already committed to substantial investment through its partnership arrangements. Another option for overcoming the shortfall quickly would be to release a greater number of Green Belt sites, but removing the shortfall does not justify the loss of more Green Belt land than is necessary. Consequently the modified strategy of allowing all Green Belt sites to be released on adoption of the Plan is the best that the Councils can reasonably do to address the undersupply; it is also the most sustainable approach.

Safeguarded housing land

58. Paragraph 85 of the Framework indicates that, where necessary, Councils should identify areas of safeguarded land between the urban area and the Green Belt to meet longer-term development needs beyond the plan period. Some developers argue that by not identifying safeguarded land, there is no evidence that the CSUCP is capable of enduring beyond the plan period and consequently it is unsound.
59. Two points are especially relevant. Firstly, it is evident that some large allocations (Newburn Riverside, Metrogreen, Newcastle Great Park) will provide a substantial number of houses after 2030. The SHLAA also identified sites that will not become available until late in the plan period and will continue to provide houses beyond it. Secondly, there is no clear evidence of need after 2030. The objective assessment of housing need required a balanced judgement to be reached between a range of factors that had significant elements of uncertainty and often pulled in different directions. In circumstances where some land is already identified for development after 2030, and the need beyond 2030 cannot reasonably be predicted, the "necessary" test of the Framework is not satisfied. Thus the absence of safeguarded land does not make the Plan unsound.

Range of housing

60. The requirement that 60% of new private housing should be suitable for families is based on substantial evidence of a shortage of 3-4 bedroom properties and the need for mid-market family dwellings to help stem the migration of family-forming households out of the conurbation. Some developers argue that the 60% requirement is inflexible and that the proportion should adapt in line with market requirements, though there was no evidence that it would cause problems or render schemes unviable. Moreover, policy CS11 seeks 60% of family housing across the Plan area, so it is a strategic requirement that does not apply to every individual site. **MM13** rectifies an error in the Proposed Submission Plan in which the percentage breakdown of homes by bedroom sizes was incorrect.
61. Newcastle City Council is seeking 75% of family homes on its Neighbourhood and Village Growth Area sites. This is based on a reasoned calculation that, to provide 60% overall, a higher proportion is necessary in peripheral locations because much of the supply from the high density urban core will be smaller homes. The concern from the house-building industry has greater force here because the proportion is higher and relates directly to individual site allocations. Nevertheless there is no evidence that compliance would prove difficult: most developers acknowledged their intention to provide at least this proportion of family homes on Green Belt sites, and the supply delivered at Newcastle Great Park is around 90% of three-or-more bedroom dwellings. Given the evidential basis for the policy and its alignment with the important objective of rebalancing the City's housing stock, the requirement is sound.
62. There is widespread support for most other requirements of policy CS11. The clause encouraging the provision of Lifetime Homes and Wheelchair-Accessible Homes strikes an appropriate strategic balance between highlighting this important need whilst not making it a specific requirement that could compromise viability. A similar argument applies to the clause seeking increased choice for the elderly: many different types of accommodation are required and it is not feasible to set specific targets in a strategic policy.
63. The SHMA calculates a requirement for 242 affordable homes a year, which includes elimination of the affordable housing backlog over 5 years. The Proposed Submission Plan included figures from an earlier SHMA so **MM14** provides the up-to-date requirement and tenure split. Based on the anticipated housing delivery, the SHMA recommends a 15% target for affordable housing, which would meet the current level of identified need across the plan area. The viability study indicates that most sites should be able to bear this level of provision, but that higher levels would begin to have a negative impact on deliverability. The 15% target is included in policy CS11; the concern that it is inflexible is not justified because the clause requiring 15% affordable housing is qualified by viability considerations.
64. The recent Gypsy and Traveller Accommodation Study identifies a marginal surplus of pitches in 2013 and calculates that future need would be met by turnover on the existing 20-pitch site at Gateshead. This differs from the position in the Proposed Submission Plan, which identified a need for additional pitches; **MM15** provides the necessary update. Given the low number of unauthorised encampments in recent years, there is insufficient

need for a transit site. Consequently, as required by the Framework, policy CS12 seeks to retain the existing provision and sets out criteria to assess the suitability of any future sites for which a need is subsequently identified.

Issue 3 – WHETHER THE SCALE AND LOCATION OF EMPLOYMENT DEVELOPMENT IS SOUND HAVING REGARD TO LOCAL NEEDS AND CONSTRAINTS AND THE REQUIREMENTS OF NATIONAL POLICY

Objectively assessed employment need

65. Various studies have been used to determine the scale of growth in jobs over the plan period. The most up-to-date uses Cambridge Econometrics/St Chad's employment projections based on broad economic sectors, which forecasts a 7% increase equating to 22,000 new jobs between 2010 and 2030, roughly 14,000 in Newcastle and 8,000 in Gateshead. Most of the growth is anticipated in the business/financial services and retail/distribution/transport sectors, and over 70% of this is expected to occur in Newcastle. These projections have been tested against a range of other data. As noted in the previous section, when assessed against the population projections it was found that the two are broadly compatible, though a small adjustment has been made between Gateshead and Newcastle to reflect differences in historic growth rates.
66. There is concern that the employment forecast is over optimistic, being based on a growth rate (2.18% pa GVA) that is higher than the rate over previous decades. Some objectors argue that the economic and social problems of the area, the low skills base and poor health, coupled with technological changes, justify a lower jobs forecast. However the 22,000 jobs are consistent with the growth strategies of both Councils, which seek to reverse the decline of the late 1900s and to promote the area as the capital and economic driver of the North East region. The forecast is significantly lower than that produced in 2010 to inform the RSS, demonstrating that the projection takes account of slower employment growth following the recession. Moreover, the projection envisages a slower rate of growth than is forecast in the SEP, which uses an increase of 2.25% pa GVA and aspires to 100,000 new jobs (an 11% increase in employment) across the region by 2024.
67. The studies predict that more than half the increase in jobs will be needed to cater for the increase in employment rate (from 90% to 94%) likely to occur in the recovery from the recession. It is also predicted that the vast majority of the increase in jobs will be taken by workers resident in the plan area, resulting in a small reduction in the rate of in-commuting (though there will be a marginal increase in the actual number of in-commuters). These and other factors suggest that the projected employment growth is sustainable. It is at the low end of a range of forecasts, which militates against an even lower figure, yet it takes a relatively cautious stance to the recovery from the recession, particularly when compared with the more aspirational approach in the SEP.

Employment land requirement and supply

68. The Employment Land Reviews (ELR) for each Council use various growth scenarios, job densities, floorspace/plot ratios and historic take-up rates to

translate the job growth forecasts into employment land requirements. The land estimate is highly sensitive to the assumptions used, though the process followed is generally consistent with best practice advice. Each ELR expresses the employment land requirement as a broad range: between 82ha-120ha for Newcastle and between 70.5ha-120.5ha for Gateshead. The higher figures are based on past take-up rates which, the Councils acknowledge, are unlikely to be achieved because of the relatively slow recovery from the recession and the switch to sectors with higher job densities or which do not require employment land. Consequently a figure at the bottom of the range of need is sufficient: policy CS6 seeks a minimum of 150 hectares of employment land.

69. Overall the ELRs identify, in quantitative terms, a supply of employment land that is sufficient to meet the minimum identified need. However this includes some small, piecemeal sites and land which is constrained, suggesting that the effective supply is somewhat lower. In Newcastle, because of the reallocation of UDP employment land at Newburn Riverside and Newcastle Great Park to residential use, it is unlikely that a suitable large site could be found in the city for a major investor seeking to relocate or expand. To widen the range of employment sites in Newcastle and to help deliver the economic growth strategy of the Plan, there is a strong case on qualitative grounds for a modest employment allocation on Green Belt land outside the urban area. The chosen site is at Newcastle airport, which would provide a prestigious 'solus' site for a single user and would contribute to the growth aspirations of the airport.
70. In Gateshead, following the reallocation of employment land to housing at locations such as Metrogreen, the ELR update indicates that there is a small employment land shortfall against the minimum identified need. The ELR explores the benefits to the local economy of building on the strengths of Gateshead's premier employment locations which have good access to the strategic highway network. Most of the prime industrial estates have limited capacity and are not capable of extension. The exception is Follingsby, the plan area's main distribution park, which is almost complete but where there is potential to expand to the south onto the Green Belt. Although the allocation exceeds the amount of land required, it responds to the strong market demand for a distribution site close to the strategic road network. Moreover, alternative locations in the wider area have been investigated but found not to meet operator requirements or serve Gateshead's needs.
71. One of the methods promoted in the Framework for boosting the supply of housing is to re-designate undeveloped or unviable employment land. This approach has been fully exploited in the Plan. Securing the optimum residential use of all available urban land has led to a small employment land requirement which can only be met on sites in the Green Belt. The two employment allocations have been selected following the application of sustainable development objectives and are consistent with the spatial strategy in policy CS1; each site also has significant other benefits. Thus in principle the exceptional circumstances test of Green Belt policy is satisfied.
72. Detailed consideration of both sites appears under issues 7 and 8. A modification is necessary to policy CS6 (**MM9**) to clarify that the 150 hectares of employment land is a net figure which is to be identified to meet the gross requirement, which includes office floorspace.

Office development

73. Almost a third of the employment land supply is required for offices. Because of the current oversupply of office provision, all the projected 512,000 sq m of office floorspace is expected to come from within the urban area apart from the 'solus' site for a single user, for which no deliverable urban site exists. In accordance with the Framework, the urban core is identified as the focus for office floorspace, with policy CS6 also directing 'a limited amount' to Team Valley, Newcastle airport (the 'solus' site) and Metrogreen. **MM10** adds the necessary precision, indicating that around 25% of office floorspace would go to these specified locations outside the urban core. This gives an appropriate choice of sites to meet a range of business needs and ensures that economic growth is not compromised by qualitative limitations in the type and location of supply.

Issue 4 – WHETHER THE PLAN ESTABLISHES A SOUND FRAMEWORK FOR RETAIL DEVELOPMENT AND THE URBAN CORE*Retail development*

74. There is broad support for the hierarchy of retail centres identified in policy CS7. To protect these centres the Proposed Submission Plan included, amongst other matters, a presumption against any retail development outside the defined centres. This goes beyond the requirements of the Framework, which applies a sequential test and, for larger schemes, an impact assessment to all proposals for town centre uses outside existing centres. **MM11** removes this presumption and is necessary to ensure policy CS7 accords more closely with national policy.
75. The Framework allows floorspace thresholds for the impact assessment to be set locally, provided they are proportionate. Policy CS7 proposes this in general terms, seeking an impact assessment where there could be a significant adverse impact on a designated centre. The modified text (**MM12**) provides the required explanation and states that the Councils intend to establish local thresholds in subsequent LDDs, so whilst the Plan lacks precision at this stage, it is a reasonable approach for a core strategy. The expansion of Newcastle retail centre is addressed by policies UC2 and NC2 (see below); because the Plan must be read as a whole, the contention that the tests of policy CS7 could be misinterpreted is without merit.
76. An up-dated retail study forecasts capacity for an additional 36,750 sq m (net) of comparison goods floorspace by 2020. This is based on a limited redistribution of market shares to Newcastle city centre following a proposed extension to the primary shopping area (PSA) and the redevelopment of Trinity Square in Gateshead. Whilst the study predicts almost double this capacity to 2030 as a result of growth in population and expenditure, it cautions against further large scale expansion of the centres on the grounds that it would be more realistic to apportion longer term expenditure growth to the then-expanded existing floorspace. Moreover, forecasting retail growth more than 8-10 years ahead is inherently uncertain.
77. This approach is sensible. Whilst it is important to bolster the attractiveness of Newcastle as the regional capital, a careful balance has to be struck

between allocating new provision to enable this to happen and ensuring that the existing PSA does not suffer decline from over-provision. Though much of the centre appears vibrant and has benefitted from recent investment, some areas are run down and have high vacancies. The planned extension of the PSA into the northern part of East Pilgrim Street is a proportionate response. Because the quantum of floorspace is based on a strategic capacity study rather than a specific impact test, Newcastle City Council accepts the inclusion in policy UC2 and associated text of an additional safeguard that requires an impact assessment to be undertaken for retail proposals at East Pilgrim Street. The Council also acknowledges that, to be consistent with the retail evidence, the 50,000 sq m floorspace in policies CS2, UC2 and the text should be expressed as a gross rather than net figure. **MM3, MM4, MM26, MM27, MM28** and **MM30** include the necessary amendments.

78. The argument that retail proposals at East Pilgrim Street should also be subject to the sequential test is not accepted. The retail evidence makes a convincing case for limited retail expansion of the city centre for which, to accord with the Framework, a suitable site should be allocated. As to concerns about possible inconsistencies between the approach to East Pilgrim Street in policies UC2 and NC2, it is not necessary for NC2 to also include a reference to the impact test because NC2 is a detailed policy relating to the area's linkages, distribution of uses and comprehensive design. There is greater merit to the point about the associated text in paragraph 16.21, for the penultimate sentence does refer to the sequential test but not to the impact assessment. For clarification I propose to add at the end of this sentence "though an impact assessment is required by policy UC2." A similar uncertainty applies to the process by which East Pilgrim Street is to become part of the PSA: the modification to paragraph 16.21 states that this would be achieved through a review of the Plan, whereas this is omitted from paragraph 14.25. For consistency I propose to add at the end of the relevant modification to paragraph 14.25 "through a review of the Plan". **MM27** and **MM30** include these modifications.
79. The restriction on banks and other Class A2 uses in the primary retail frontages of Newcastle city centre is intended to protect the compact core shopping area and avoid dilution of retail activity. Policy NC1 allows changes from Class A1/A3 to other uses where there would be a significant contribution to the vitality and viability of the centre, which is a less stringent approach than the blanket restriction of the Unitary Development Plan (UDP) policy. Because the primary retail frontages are tightly defined, covering a relatively small area of the city centre, and because there is some flexibility which should not unduly restrict Class A2 uses, on balance the policy is sound.
80. The policy protecting retail uses in the central area of Gateshead, GC1, uses the term "retail centre" which causes uncertainty about the precise area to which the policy applies. **MM46** substitutes the conventional term "Primary Shopping Area" to ensure consistency between the policy and the Policies Map. To avoid misunderstanding, it also substitutes the imprecise term "non retail uses" with "non A1 uses". These are necessary for the policy to be effective.
81. I note the objection to the statement in paragraph 12.10 that the Councils will consider controlling the proliferation of unhealthy food outlets in subsequent plans. However, there is clear evidence of poor health in Gateshead and

Newcastle which is partly caused by unhealthy eating, and easy access to clusters of unhealthy food outlets exacerbates the problem. In principle, therefore, such an approach is sound.

Urban core

82. The urban core as defined in the CSUCP extends far beyond the primary shopping areas of Newcastle and Gateshead to include most of the sub-areas and opportunity sites targeted for specific growth and investment. It also includes areas of non-town centre uses (such as housing) where significant change is not anticipated over the plan period. There is concern that, particularly in Newcastle, the urban core is too extensive and that non-retail town centre uses such as leisure and offices would be allowed in peripheral areas without having to undergo the sequential and impact tests sought by the Framework.
83. An underlying principle of the long established "town centres first" policy is to attract development that generates large daily movements (offices, hospitals, universities/colleges, cultural and leisure uses) to central locations that are accessible by a range of transport modes. If the centre is too tightly defined there is a risk of some uses being forced out to more peripheral, less accessible locations. Given the importance of the urban core of Newcastle and Gateshead as the regional capital and engine of the North East economy, the argument that the boundary should be widely defined to accommodate a range of uses which stimulate growth is convincing. Recent and on-going investment in leisure and office uses in regeneration areas on the edge of the traditional city centre boundaries, notably along the River Tyne, demonstrates that the approach is working. Moreover, the urban core boundary is not significantly more extensive than that in the respective UDPs.⁹ It may be that the urban core is more widely defined than would result from a strict interpretation of national policy, but there are sound reasons for this.
84. Policy UC5 defines a network of primary and secondary pedestrian routes across the urban core which links the main facilities and attractions and is the focus for future improvement. The argument that Morden Street should be identified as a secondary route is not supported by the evidence. Footfall along Morden Street is substantially below the threshold necessary to merit inclusion in the policy and, although the data is quite dated, there is no obvious reason for a significant increase in recent years. The Councils have proposed a few additions to the routes identified in policy UC5 as a result of new evidence (**MM29**), which appear justified.
85. An existing mail delivery operation within the Stephenson Quarter Key Site is concerned that the site's allocation for office-led mixed-use development could threaten their business. Newcastle City Council owns the property in question and has given an assurance that the business can continue to operate until an alternative location is found. In any event, the continued operation of the business would not be contrary to policy D2, which supports a range of ancillary uses on the site. An owner of the adjacent Forth Yards site, which is

⁹ The main difference is an extension of Newcastle's urban core eastwards into Ouseburn, an emerging growth area for small businesses, creative industries and the cultural sector. On the other hand, a sizeable area to the north-west of the city has been removed from the former city centre. Other minor changes have been made.

proposed as a Development Opportunity Site, believes that Forth Yards should also be a Key Site and thereby have greater priority for investment. However, Key Sites are central to the strategy for the urban core and must be deliverable in the short to medium term. Forth Yards has many constraints, multiple ownerships and viability issues and is therefore regarded as a longer term opportunity. There is no evidence that Forth Yards is capable of more immediate development, so the strategy is sound.

86. The remaining policies of the urban core, which address a wide range of detailed matters relating to the distribution of land uses, movement, green infrastructure, urban design and the public realm, attracted very little objection and are sound. They include the provision of 380,000 sq m of office floorspace prioritised on five key sites, and about 3,750 new homes. For certain sites within the urban core of Gateshead, the requirement for a drainage strategy to reduce flood risk and protect water quality had been omitted. **MM46, MM48** and **MM49** make the necessary additions.
87. The largest residential site is allocated to the south of central Gateshead as an "Exemplar Neighbourhood" of 1,000 homes in a relatively high density, mixed use sustainable development. One criterion of policy SG2 sought a scheme "in line with Building for Life 12 ...". Because the interpretation of this criterion lacked precision, **MM47** rephrases it to require a scheme "that achieves 'green' against all Building for Life 12 questions". This is quite an onerous requirement which would usually be aspirational rather than prescriptive, though because it relates to an exemplar development and as most of the land is owned by the Council (giving assurance about viability), it is acceptable.

Issue 5 – WHETHER THE APPROACH TO TRANSPORT, CLIMATE CHANGE AND FLOOD RISK IS JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY

Transport

88. The CSUCP sets out a strategic approach to transport in policy CS13 which is supplemented by consideration of the transport impacts of specific proposals within the site allocation policies. Because large amounts of new housing are proposed to the west of the conurbation, a major concern is the ability of the A1 western bypass (one of the most congested sections of dual carriageway in the country) to accommodate the additional traffic generated. The Highways Agency (HA) objected to the Submission Plan on the grounds that the evidence base did not demonstrate to its satisfaction that the impacts of strategic allocations on the A1 could be satisfactorily mitigated.
89. The HA subsequently carried out additional transport modelling which suggested a likely need for provision of an additional lane along the A1 for much of its length to cope with the increased demand (most of which will come from general traffic growth rather than the allocation sites). Subject to the inclusion of this requirement in policy CS13 and paragraph 11.33, the HA withdrew its objection. It stated that the Government is firmly committed to increasing the capacity of this section of the A1; indeed, widening of the stretch close to Dunston Hill has commenced. Further phases are being developed alongside the Newcastle City Deal and feature prominently in the SEP. **MM16** and **MM17** provide the necessary revision to policy CS13 and

paragraph 11.33 in respect of A1 widening. The HA also confirmed its belief that A1 junction improvements to accommodate development flows could be achieved, funded in part by developer contributions.

90. Certain compromises have been required to make the A1 widening deliverable at the present time. Physical constraints necessitate slightly reduced carriageway widths and a consequent reduction in speed to 50mph, and the bridge across the River Tyne will remain as dual carriageway. For these and other reasons there is much local scepticism that the A1 improvements will be sufficient to cater for the increased usage over the plan period. However the HA considers that the improvements set out in modified policy CS13 will be adequate. It also believes that it is not necessary to delay bringing forward the strategic allocations prior to full A1 widening, though each proposal will be required to demonstrate through a detailed transport assessment that its traffic impacts can be satisfactorily mitigated. Whilst local concerns are understandable, there is no compelling evidence that the necessary strategic highway improvements cannot be achieved.
91. Turning to the local road network, there is limited information in the CSUCP about the nature of the highway improvements essential to delivery of the major housing and employment allocations, especially to the west of Newcastle. Inclusion in site-specific policies of the phrase "*mitigation of the cumulative traffic impacts of the proposed development on the highway network*" should ensure that the necessary local highway improvements are secured. Nevertheless, the phrase lacks the detail which would help local people understand what improvements will take place.
92. There is particular confusion among residents of north-west Newcastle about two proposed new roads through the Green Belt which are shown on the Policies Map but barely mentioned in the Proposed Submission Plan. Newcastle City Council has plans for an outer orbital link between the A69 at Throckley and the A1 at North Brunton, designed to improve connectivity between the main radial routes (A1/A696/A69) and to Newcastle airport. In earlier versions of the Plan, when the housing allocations were much larger, most of this road was routed through the proposed housing sites. The reduced allocation in the Callerton area now results in some short sections of this "indicative access road" crossing open countryside to link the separate development parcels.
93. I understand residents' confusion, for the failure of the Proposed Submission Plan to explain the reasoning behind the access road, which is listed as an essential scheme in the Infrastructure Delivery Plan (IDP), is inexplicable. This is addressed to some extent in **MM18**, which states that the need for these new routes will be assessed as part of the masterplanning process for housing and employment sites. In view of the uncertainty that remains, I consider the need for individual sections of this road later when dealing with the site allocations for Callerton and Newcastle airport.
94. The criticism that the Plan has paid insufficient regard to public transport accessibility, particularly in peripheral housing and employment locations, has to be seen in context. The urban area, where sustainable transport links are already in place, is accommodating as much development as it can over the plan period. The availability of public transport was a key consideration in the

identification of urban extensions and village growth areas, and for those locations where public transport is limited, there are cogent other reasons for the choice of sites. Whilst traffic and car usage will undoubtedly increase as a result of these peripheral developments, no feasible alternative strategy for accommodating the desired level of growth has been propounded.

95. As to the argument that the Plan fails to adequately promote access to public transport networks, this is a key objective of policy CS13 and would partly be achieved by measures such as a more integrated public transport network, new park and ride facilities, management of car parking and protection of footpaths and cycle routes. Nevertheless it is also appropriate to require measures to promote and enhance public transport as an integral part of new development; **MM16** adds a specific requirement to this effect to clause 3 of policy CS13. I acknowledge that increased provision for cycling is an important element of the modal shift strategy, but this is suitably addressed in both policy CS13 and in the site-specific allocation policies.

Climate change

96. Policy CS16 proposes a range of measures aimed at minimising energy demand and the impacts of climate change. The Submission Plan refers to current house building construction standards in the Code for Sustainable Homes which are about to be phased out by the Government and replaced by mandatory national standards. To ensure that the policy remains relevant in future, **MM20** seeks compliance with the level of sustainability required by Government schemes or guidance. For the same reason, the reference to the current non-residential building standards (BREEAM) is also deleted. Similar adjustments are made to the Exemplar Neighbourhood policy, SG2 (**MM47**).
97. The policy also sets out a hierarchy aimed at maximising the use of renewable or low carbon energy; this gives priority to the development of, or connection to, a decentralised energy scheme. The hierarchy then refers to other renewable energy solutions, and lastly to low carbon energy solutions. Many developers argue that this is over-prescriptive and places additional costs on development, potentially rendering schemes unviable, without recognising viability as a valid consideration. However, the associated text does recognise that technical and financial considerations should be taken into account when assessing compliance with the policy.
98. Studies have identified zones of high heat demand that have potential for large scale decentralised energy networks which, it is argued, would be technically feasible and viable; indeed, work on implementing such schemes is underway. Consequently there is justification for including decentralised energy at the head of the hierarchy. The inclusion of renewable and low carbon solutions lower down the hierarchy establishes a reasonable sequence for examination. The Councils propose to qualify low carbon solutions by "*in accordance with current Government standards*"; this demonstrates that, if other solutions are not feasible or viable, the bottom rung of the hierarchy should not impose significant additional costs on development. And rather than "maximise" the use of renewable or low carbon energy, a more appropriate test is "optimise". Policy CS16 as modified by **MM20** is sound.

Flood risk

99. The purpose of policy CS17 is not to prevent all development in areas that are subject to risk of flooding, as some objectors contend, but to set out a strategic approach to ensure that flood risk is avoided where possible, and that development does not increase flood risk elsewhere. Whilst the policy is generally sound, it does not mention the sequential test and exception test that are an important part of national policy. These tests are added to the policy and text by **MM21** and **MM22**.

Issue 6 – WHETHER THE STRATEGIES FOR THE NATURAL AND BUILT ENVIRONMENT AND RESOURCE MANAGEMENT ARE CONSISTENT WITH NATIONAL POLICY

Place making

100. The promotion of high quality design and local distinctiveness in policy CS15 is an appropriate strategic approach to the delivery of successful place-making. The part of the policy that seeks to sustain and safeguard the historic environment is broadly acceptable, though it omits any reference to the test in the Framework which requires consideration of the significance of heritage assets. **MM19** makes the necessary adjustment to the policy.

Green infrastructure and biodiversity

101. Objectors argue that the application of policy CS18, which aims to protect, enhance and manage a range of green infrastructure and biodiversity assets, militates against development of greenfield sites which would cause harm to such assets. Consideration of the specific impacts of individual development allocations follows under issues 7 and 8. At the strategic level, policy CS18 establishes a mostly appropriate framework to guide detailed policies in LDDs for the various components of green infrastructure and the natural environment. The criticism that the Plan fails to give sufficient protection to specific species (such as red kites) is pertinent to the use of the term "*biodiversity action plan habitats and species*", which is unduly narrow. The term used in the Framework is "*priority habitats and species*" and **MM23** makes the required adjustment to policy CS18.

Green Belt

102. Policy CS19 sets out the approach to protecting the altered Green Belt following the boundary revisions proposed in the CSUCP to accommodate housing and employment needs. It is wholly consistent with the Framework and is sound.

Minerals and waste

103. The approach to mineral resources in the Submission Plan is broadly consistent with the Framework, though there is a lack of clarity about the treatment of Mineral Safeguarding Areas (MSAs). Modifications to policy CS20 (**MM25**) indicate that the whole of the plan area is a MSA, whilst revisions to the minerals key diagram provide more specific information about the minerals to which safeguarding applies. The modifications indicate that Areas of Search

(as sought by PPG where, as here, site-specific knowledge of mineral resources is uncertain) will be defined in subsequent LDDs. Policy CS20 also provides criteria for prior extraction of minerals where non-mineral development is proposed within a MSA. The site-size threshold of 1ha is common to Tyneside authorities and seems reasonable. Because the MSA covers the entire plan area, there is little to be gained by identifying buffer zones to safeguard against sterilisation by proximal development.

104. Policy CS20 sets out the approach to non-energy mineral extraction, yet despite the existence of coal reserves across the plan area it does not refer to energy minerals. The Framework requires planning authorities to indicate areas where coal extraction may be acceptable; it also provides criteria for determining applications for coal extraction. In the absence of specific information about acceptable areas for coal extraction, a further addition to policy CS20 (included in **MM25**) states that proposals for energy minerals development will be determined in accordance with national policy. This is necessary to make the Plan sound.
105. Policy CS21 presents a strategic approach to waste management and accords with the National Planning Policy for Waste published towards the end of the examination. There is concern about the identification in paragraph 13.24 of Crawcrook Quarry as the priority location should additional landfill capacity be required during the plan period. The quarry is an existing extraction and landfill site, albeit not currently operational, so the reference in the Plan is justified. Nevertheless I note that there is no current intention to use the site for waste, and a recent study indicates that a shortfall in capacity is unlikely before 2030. As to the suggestion of a 2 mile buffer to residential development, there is no evidence that a specific buffer is necessary.

Issue 7 – WHETHER THE NEWCASTLE SITE ALLOCATIONS ARE SOUND

106. The analysis of housing and employment sites in Newcastle and Gateshead is predicated on my finding that in principle, following the assessment processes addressed under issues 2 and 3, the Councils' proposals to release land from the Green Belt to meet objectively assessed housing and employment needs are sound and satisfy the exceptional circumstances test of the Framework. The purpose of the site-specific appraisals below is to establish whether the most sustainable sites have been selected having regard to the extent of harm to the Green Belt, suitability and accessibility factors, and the other considerations to be weighed in the balance. I will also consider whether the detailed policy criteria are sound.
107. The Framework states that the essential characteristics of Green Belts are their openness and permanence. Loss of openness is directly proportionate to the scale of development, and as all Green Belt alterations conflict with permanence, there is unlikely to be any reason to distinguish between sites on these grounds.¹⁰ As to the purposes of Green Belts, the Councils rightly found no differences in the effect on historic towns or urban regeneration. In terms of urban sprawl, the type of site matters: by definition Neighbourhood Growth

¹⁰ Obviously the larger the site the greater will be the loss of openness, but because each individual dwelling will cause a similar loss of openness on whichever Green Belt site it is built, differences between sites in terms of openness are not material.

Areas cause urban sprawl whereas Village Growth Areas do not. Perhaps the main differences are found in the extent to which sites encroach into the countryside and contribute to the merging of settlements. Where relevant, these differences are identified in the analysis below.

108. Newcastle has much less Green Belt land and fewer villages than Gateshead between the built up area and its administrative boundary. Consequently Newcastle City Council has determined that urban extensions are the most sustainable option for providing the bulk of the housing need that cannot be delivered within the urban area.

Newcastle-wide allocation policy changes

109. Newcastle City Council has made four modifications to the Proposed Submission policies which apply to the housing allocations in its area. The requirement for each site to have a masterplan and a phasing plan is clarified, the purpose of the drainage strategy and any necessary education provision is added, and greater flexibility is afforded to mitigation for noise and visual impact by the use of the word "measures" in place of "buffers". In a few cases some of the criteria which apply to each policy had been omitted (for example, the provision of open space and archaeological assessments at Newbiggin Hall and the protection of ecology at Throckley); where necessary, the missing criteria have been added to the policy. These modifications (**MM31, MM32, MM33, MM34, MM39, MM40** and **MM41**) apply to each allocation apart from Newcastle Great Park, which is treated individually, and are necessary to make the CSUCP sound.

Newburn Riverside – policy AOC1

110. A former riverside power station within the urban area at Newburn has undergone extensive reclamation for employment use and is allocated for this purpose in the UDP. However take-up has been slow due to competition from Enterprise Zone sites in North Tyneside and difficult connectivity to the A1. The Framework seeks to avoid the long term protection of employment sites where there is no reasonable prospect of delivery, so re-allocation of the undeveloped half of the site for housing is consistent with national policy. The full allocation is expected to provide at least 1,000 homes, but as development is unlikely to be possible before 2022 unless a covenant can be lifted, the capacity of 500 dwellings by 2030 is justified.
111. Constraints include protection from surrounding industrial uses, poor connectivity to existing communities and services, and further remediation to ensure compatibility with residential use. The evidence indicates that these matters, along with local concerns about the increase in traffic, flooding and loss of wildlife, can be adequately mitigated. Policy AOC1 sets out the requirements for a coordinated approach to site development and infrastructure provision and should ensure the provision of a viable and successful new neighbourhood.

Lower, Middle and Upper Callerton – policy NN1

112. The largest urban extension comprises three separate sites between the A69 and A696 radial routes where the neighbourhoods of North Walbottle, Westerhope and Newbiggin Hall abut the countryside. Initially the Callerton

allocation had an identified capacity of 6,500 homes; this was reduced to 3,000 in the Submission Plan in response to a lower assessment of housing need, substantial public opposition and a better appreciation of what can be delivered by 2030.

113. Upper Callerton, a former opencast coal site restored to agriculture, would extend north from Newbiggin Hall estate onto relatively open farmland that slopes down towards the Ouseburn. The A696 dual carriageway would form a robust north-western boundary, leaving a small but noticeable gap to Woosington village and a much larger gap to Newcastle airport and Ponteland beyond. Consequently, as well as urban sprawl and encroachment into the countryside, there would be a slight but appreciable merging of settlements. The north-west and west boundaries would comprise narrow belts of woodland and well defined field boundaries, satisfying the criteria of the Framework.
114. Middle Callerton would extend the conurbation into the gently sloping and slightly more enclosed countryside north-west of Stamfordham Road. Development would eradicate the gap to the small village of Callerton, though because the Ouseburn runs along the western boundary, a wide buffer to the village would be required to minimise flood risk. Boundaries would follow well established features such as rural roads and the edge of Westerhope golf course.
115. Lower Callerton would involve urban sprawl and loss of open countryside west of North Walbottle Road. It would significantly reduce the gap between North Walbottle and Throckley, leaving a narrow break of about 500-600m, but the separate identity of Throckley would be maintained. There would also be a slight diminution of the gap to Walbottle village, though the A69 would provide a robust boundary to the conurbation. Boundaries would follow established features apart from the short west boundary, where a substantial landscape buffer is proposed alongside the existing footpath across a field.
116. Overall the countryside is pleasant but not of especially high landscape quality, and the agricultural land quality is mostly moderate. The new boundaries to the Green Belt would generally be robust and, with reinforcement where necessary, should endure. Thus there is nothing of special importance that merits particular protection in the context of the Newcastle urban fringe. Physical constraints include overhead power lines and gas pipelines, a risk of flooding on parts of the sites, and road noise from the A69 and A696; these are all capable of mitigation. Access to existing services and facilities would be acceptable from parts of all three Callerton sites, though much of each site would be beyond catchments based on walking distance. Nevertheless the large scale of this allocation would in time generate sufficient demand to support some on-site provision, which would greatly enhance accessibility and sustainability.
117. The substantial local opposition to these sites reflects most of the matters identified above – urban sprawl and coalescence of settlements, loss of countryside and agricultural land, inadequate local services and infrastructure, and increased flood risk. Other matters of concern include loss of wildlife, poor public transport accessibility, and impact on public rights of way. Where it is possible for these matters to be mitigated they are addressed by policy NN1. The policy is thorough and should ensure the creation of a sustainable

new community which is comprehensively masterplanned and phased and integrates appropriately with the surrounding area. Overall the harm to the local area would be proportionate to the scale of development and there are no overriding constraints; accordingly the Callerton allocation is sound.

118. The Submission Plan includes a new link road through the countryside between the Lower, Middle and Upper Callerton sites which would connect westwards to the A69 at Throckley and northwards to the A696 at Callerton Parkway. The two sections between the three proposed sites would improve movement around the north-western fringe of Newcastle and take traffic off Stamfordham Road, which at times is congested. These links are therefore necessary on both highway and planning grounds. However, there seems to be little purpose to the link from Upper Callerton to the A696. The road would run parallel to the A696 dual carriageway, crossing farmland and a belt of woodland alongside the Ouseburn. A readily accessible alternative access to the A696 exists at the Newbiggin Lane junction, which appears to have ample capacity. With very little traffic forecast to use this northern link, the loss of countryside and intrusion into the Green Belt are not justified; consequently it has been removed from the Policies Map.
119. The developers of the Callerton sites argue that the westwards link road to the A69 at Throckley is also not justified. From the limited evidence available it seems that relatively little traffic would use this section, so the case on highway capacity grounds is not strong. However, the alternative route via the B6528 is circuitous and goes through parts of Walbottle and Throckley. In light of the acknowledgement in paragraph 11.41 that the need for new routes through the Green Belt will be assessed at master-planning stage (**MM18**), this link should be retained as a possible new route to allow more detailed analysis to take place. Even if the road is not essential on traffic grounds, there may be a strong case on planning grounds for the additional connectivity it would bring and the relief of congestion on other parts of the road network. As currently phrased the link to the A69 is a requirement of policy NN1; **MM32** includes the addition of "if appropriate" so as not to prejudice the future decision.
120. Extending the boundary of both Middle and Upper Callerton to the Ouseburn or developing the gap between the two, as sought by the developer consortium, would provide substantially more dwellings than are required and, in the absence of need, the exceptional circumstances test would not be met. For reasons given earlier, safeguarding land in the Callerton area for longer term housing development is also not necessary.

Kingston Park/Kenton Bank Foot – policy NN2

121. A series of smaller allocations would extend the urban area at Kingston Park/Kenton Bank Foot, providing 800 dwellings in total. The countryside is generally open and flat and is crossed by roads and the Metro line, giving it a fragmented quality and limiting its landscape value. The western sites would reduce the gap to Woolsington village: in order to retain a suitable open break (around 400m), the outer boundary would cut across a field to ensure that development extends no further than Bullock Steads. The central site is bounded to the north by an established sports ground, while the smaller eastern site is partially contained by Newcastle Falcons rugby stadium.

Subject to buffer planting along the stretches of boundary to the Green Belt that are ill-defined, which is a requirement of policy NN2, the boundary permanence sought by the Framework would be achieved.

122. There is good access to a wide range of services and facilities in the local area, and all parts of the allocation would be within easy walking distance of the Metro line and bus routes. Consequently this is among the most sustainable of all Newcastle allocations. There is concern about increased traffic on local roads which at times are congested, but provided suitable mitigation of traffic impacts is achieved (a criterion of policy NN2), there is no evidence that the traffic generated by this (and other) allocations could not be satisfactorily accommodated on the network. The concerns about a lack of capacity at the local schools would also be addressed by the policy NN2 requirement to make appropriate education provision.
123. The objections to the loss of agricultural land, the impact on wildlife and the loss of the open land setting for the existing community are common to most urban extensions and there is no evidence that they apply with any additional force at Kingston Park/Kenton Bank Foot. Constraints such as the risk of flooding, drainage capacity and noise from the rugby stadium and transport routes can be adequately mitigated and are among the requirements of policy NN2. Because the sites are in different ownerships, a comprehensive approach to their masterplanning and phasing is essential to ensure that a coordinated and sustainable development takes place. On this basis the allocation is sound.

Newbiggin Hall – policy NN3

124. The Newbiggin Hall allocation comprises a narrow wedge of sloping countryside which projects into the urban area alongside the A696. Because it is completely surrounded by existing or proposed built development, the need for robust boundaries is largely irrelevant and the effects of urban sprawl and loss of countryside would be comparatively slight. And for the same reason, access to local services and facilities is good, making this another highly sustainable proposal.
125. The two main local concerns are the impact on open space and wildlife, and road access. The importance of Newbiggin Dene for wildlife and as a local amenity is recognised in the Development and Capacity Framework, which shows a substantial tree belt and wildlife corridor on the western edge of the main parcel of land; the protection of this area is a requirement of policy NN3. There is no direct access to the main road network from the largest of the development parcels, but a route via Oulton Close and Etal Way, whilst not ideal, appears capable of accommodating the scale of development proposed. The smaller parcels do have a main road access and could be developed independently; nevertheless, the policy NN3 requirement for comprehensive masterplanning remains appropriate to ensure a consistent approach to the provision of local facilities and infrastructure.

Newcastle Great Park – policy NN4

126. Land for a large mixed-use development abutting the A1 to the north of Newcastle (Newcastle Great Park - NGP) was removed from the Green Belt in

the 1998 UDP. The allocation proposed 2,500 dwellings, which were expected to be built some years ago, and 80ha of employment land. Progress has been slow, with about 1,400 dwellings and less than half the employment land being developed by 2014. Preparation of the CSUCP provided an opportunity to review the balance between housing and employment land at NGP to better reflect current demands and likely future trends. Because of the greater need for housing land, the Plan proposes to change the remaining UDP employment allocation (NN4a) to residential use. This, coupled with higher than anticipated densities, should enable the provision of around 3,300 more dwellings on existing NGP land by 2030. There is widespread support for these revisions, which are wholly consistent with the Framework.

127. Accompanying the new housing will be a comprehensive range of facilities and services including a district shopping centre, primary and secondary school, health provision, recreation/open space and a park and ride site. Some of these facilities already exist and, in time, NGP will become a highly sustainable community. To build on this success and provide greater patronage for shops, public transport and so on, the CSUCP proposes two extensions to NGP which would encroach into the surrounding Green Belt and countryside. A sizeable expansion site (NN4b) is allocated to the west of the existing NGP boundary formed by Brunton Lane/Dinnington Road, which would provide 500 dwellings by 2030 and a similar number beyond the Plan period. A small site for 100 dwellings (NN4c) lies in the north-east corner abutting the A1 junction.
128. The western expansion site is a tract of mainly flat and largely featureless farmland of average agricultural value and moderate landscape quality. However, it would extend NGP towards an area of high landscape value which includes Woolsington Hall historic park and garden. The park/garden is bounded by a substantial tree belt which, in combination with the small open break to the housing site and a suitable buffer along the western edge of the site, would be sufficient to preserve its setting. The site would also come close to Newcastle airport (which abuts Woolsington Hall), leaving a gap of under 400m to land allocated mainly for airport-related employment uses. This is just about sufficient to maintain a meaningful separation between the urban edge and the airport.
129. The outer boundaries to the site follow existing field boundaries which, whilst not especially strong features, would be supplemented by landscaping within the development. The alignment of the southern boundary with the southern edge of NGP Cell D is appropriate and, because the land is at risk of flooding, the boundary should be robust. Overall, whilst the landscape impact and loss of countryside would be substantial, they would be proportionate to the scale of the development.
130. The western expansion site is not controlled by the NGP developer consortium and during the examination it became apparent that policy NN4 was not sufficiently robust to be confident that suitable connections and road links to the existing facilities of NGP would be achieved. Even with proper access and linkages, much of the western expansion site would be beyond easy walking distance of the NGP district centre; consequently the provision of direct road links is paramount. The wording of policy NN4 and the associated text was the subject of much discussion during the examination and, as revised by **MM35** and **MM36**, should facilitate the comprehensive development of the

western expansion site (NN4b) as an integral part of NGP. Accompanying these revisions are one amended map (**MM37**) and one new map (**MM38**) which use the new NGP terminology and are necessary for the effective implementation of this allocation.

131. The small allocation in the north-east corner (NN4c) would at one point reduce the gap between NGP and the village of Hazlerigg to about 250-300m. A similar separation is proposed at other parts of this gap and is just about sufficient to maintain the separate identity of the village. The development of this restored quarry would have limited effect on urban sprawl and loss of countryside, and subject to appropriate boundary definition (as sought by policy NN4) there would be relatively little impact on the landscape. The wildlife value of the cultivated fields which make up the gap to Hazlerigg is not high, though they do connect to a local wildlife site to the west; there would be adequate separation to maintain any value these fields have as a wildlife corridor.
132. The main constraint with this small site is access, which is proposed directly from the A1 North Brunton roundabout. The HA is concerned about the cumulative impact of all development in the wider area that would use this junction with the A1, which currently suffers from tail-backs at peak times. Nevertheless the HA believes that an acceptable solution can be found, and there is no evidence to the contrary. Appropriate traffic mitigation is a requirement of policy NN4.
133. The revised policy restricts the development of both NGP extension sites until after 2020 to ensure that appropriate infrastructure is in place. The developer of NN4c argues that phasing this site is unnecessary because the small, self-contained development could make a useful contribution to the housing need much sooner. Subject to the necessary highways improvements and other infrastructure being provided as part of the development, the earlier release of site NN4c is likely to be acceptable. **MM35** makes the required addition to the text, which adequately addresses this matter.

Dinnington – policy NV1

134. The medium-size village of Dinnington, which is north of the city and close to the airport, has two sites allocated on its western edge for 250 dwellings. As with many village locations, the main effect is encroachment into the surrounding countryside. In this case both sites are used as paddocks for horses, so the loss of typical urban fringe uses would have limited landscape impact. The boundaries of the larger southern site, in particular, are not currently well defined but would be supplemented by woodland planting in accordance with policy NV1. Both sites would take access from Front Street, which is a bus route, and are close to the village centre on Main Street. Consequently they are accessible and sustainable locations for development.
135. Many local residents object to the scale of development proposed, believing that it would overwhelm the village and destroy its character. They argue that the previously-developed Donkey Field site in the heart of the village, which could provide 160 dwellings, is sufficient to meet the needs of the settlement. There is no certainty that Donkey Field will be developed, however – it has been available for many years and, because of poor ground conditions,

requires subsidy. In any event, new family housing (as sought by policy NV1) would help to address the imbalance in population structure caused by a high proportion of elderly households and would better sustain the existing facilities.

136. There is no evidence that the volume of traffic generated by the developments would cause significant problems in the village, nor that drainage from the sites would lead to a risk of flooding. Residential amenity and other detailed matters would be addressed at the design stage. I appreciate that a Neighbourhood Plan is being progressed, but I have not been advised of its contents and do not believe that it has reached the stage where it should be afforded substantial weight. Overall the scale of development proposed for Dinnington is proportionate and the allocation is sound.

Hazlerigg/Wideopen – policy NV2

137. Two sites yielding 500 dwellings are proposed at the large villages of Hazlerigg and Wideopen which straddle the A1 just north of Newcastle Great Park. The larger site on the western edge of Hazlerigg is a flat and featureless parcel of agricultural land that is well contained by the Morley Hill Farm complex to the west and Coach Road to the south. As well as the loss of countryside there would be a slight narrowing of the gap to NGP to the south, though the intervening local wildlife site would prevent any further merging of settlements.
138. The smaller site to the south of Wideopen is a flat cultivated field with strong boundaries on all but its southern edge, where the limit to development would align approximately with the southern extent of housing west of the A1. Substantial landscaping would be required, in accordance with policy NV2, to provide a robust and permanent boundary and prevent further diminution of the small gap to the cluster of development around the A1 junction.
139. Both developments would be within walking distance of many of the services and facilities in the two villages and take access from Coach Road, which is a bus route; they would also have excellent access to the main road network. The main constraint is aircraft noise on the western site, which is almost in line with the runway at Newcastle airport. Studies have indicated that some mitigation (such as noise attenuation, acoustic ventilation and the orientation of buildings) would be required to ensure that internal and external noise is reduced to an acceptable level, though updated noise contours suggest that aircraft noise may be lower than previously predicted. Similar levels of noise exist across other parts of these villages and there is no evidence of an unacceptable living environment being experienced by current residents.
140. Overall these sites would involve loss of countryside which is not of high landscape value. They are in highly sustainable locations and the identified constraints are all capable of mitigation. Moreover, the allocations attracted relatively little public opposition. Accordingly policy NV2 is sound.

Throckley – policy NV3

141. Throckley is a large village which lies a short distance west of the Newcastle conurbation. Most of the proposed 550 dwellings would be built on a site north of the village between Hexham Road and the A69 dual carriageway; a

small number would go to a site south of the village fronting Newburn Road. The larger site comprises relatively low grade agricultural land which has been reclaimed following coal mining operations. It slopes down from both north and south to a small stream across the centre. The predominantly open landscape is of moderate quality and the existing roads which define the site would form robust boundaries. There would be no appreciable closing of the gap westwards to Heddon on the Wall.

142. The small southern site is a pasture field which slopes quite steeply in places. It would extend the village marginally into the narrow gap to Newburn, though there would only be slight merging of settlements as the boundary coincides with the limit to development on the other side of the road. Landscaping on the south-east boundary, as sought by policy NV3, would provide a defensible limit to the settlement. Overall the Throckley sites would not result in loss of highly attractive countryside or high value agricultural land and would have moderate impact on the landscape.
143. Throckley has a good range of local facilities and services which are accessible from both sites, and there is likely to be sufficient capacity in the relatively new primary school to serve both developments. Public transport is available on both main routes through the village, enabling travel to Newcastle and other locations, and there is easy access to the strategic road network. Consequently the village is a highly sustainable location for new housing. Despite strong local objections, I do not accept that the scale of development proposed would cause undue harm to the character of the village, community identity or local amenity. The impact on wildlife would be limited and concern about flooding on the northern site would be addressed at design stage, as required by policy NV3. Thus in principle the Throckley allocations are sound.
144. The exact position of the road access to the Throckley North site has yet to be determined. Newcastle City Council's preferred access is close to the A69 junction, around the brickworks east of the site, but control of all the necessary land has not been achieved. Two potential alternative accesses are from Hexham Road. The southern route past the primary school would be direct and close to the village centre, but agreement with the owner of the required land is uncertain. The western route identified by the developer would involve a circuitous new road across fields west of the site. Despite arguments that the available frontage land (following demolition of two dwellings) is not wide enough, the Council is satisfied that an access which meets its highway standards could be achieved; based on the evidence submitted, I agree. However, the western route would involve further loss of Green Belt land which, though not contrary to policy, is undesirable.
145. Access to Throckley North from the east is clearly preferable and should be vigorously pursued by all parties. If it is not achievable, then the direct southern access off Hexham Road should be explored and I urge the parties (including the Council) to find a solution. The western Hexham Road access is very much a last resort, though the fact that it could be delivered justifies inclusion of this allocation in the Plan. **MM41** reflects the potential need to investigate alternative accesses and is required to make policy NV3 sound.

Newcastle International Airport – policy KEA1

146. There is widespread support for the role of the airport as a key driver of economic growth for Newcastle/Gateshead and the wider region. Substantial areas of land within the airport site are allocated in the UDP for a mix of airport-related and general employment uses. These areas (sites KEAa, KEAb and KEAc) are retained in the CSUCP, the main change being a relaxation in the uses permitted on the large Southside site KEAc from airport-related development to predominantly air freight and warehousing.
147. In addition, the Plan proposes a new allocation in the south-eastern corner of the airport land (KEAd) for a single B1 user. This would meet an area-wide requirement for a solus site for a large organisation requiring a high quality environment. This land is currently in the Green Belt; as well as encroaching into the countryside, the development would intrude into the small open break between Newcastle Great Park and the airport. The Submission Plan proposed a 14ha unrestricted B-class allocation that would have substantially reduced this gap. During the examination it transpired that part of the gap has high ecological value, constraining the development, so the allocation has been reduced to 10ha to protect biodiversity and minimise the loss of Green Belt. It has also been restricted to B1 use to ensure it would meet the identified need. No other employment site in the Plan area is capable of meeting the specialist demands of a solus B1 user, and as modified the allocation is sound. **MM44** makes the revisions required to policy KEA1, the associated text revisions are **MM42** and **MM43**, and **MM45** is the amended plan.
148. The Policies Map identifies a short new road between the airport and the solus site to which there was no specific reference in the Submission Plan. This is part of the Airport Link Road, necessary for access to the solus site and as part of the orbital link road from the A696 through NGP to the A1 North Brunton junction. Because this is such a critical element of infrastructure it should be a specific requirement of policy KEA1; **MM44** includes the necessary addition. I note that funding for the Airport Link Road is uncertain, with a first bid to the LEP having been unsuccessful, but in view of the support from the airport and 7 local authorities, a revised business case with a much improved cost-benefit ratio and the fact that the necessary land is owned by the airport, there seems a reasonable prospect of delivery in the medium term.

Omission sites - Newcastle

149. Land to the west of Salters Lane passed the Councils' first stage assessment but was discounted at the second stage largely because of its impact on Gosforth Park Nature Reserve and Site of Special Scientific Interest (SSSI). Since then the site has been significantly reduced in size to minimise the ecological impact and risk of flooding; as a result an objective assessment of Green Belt impact using the Councils' criteria is not available. The latest proposal for 260-300 homes would clearly involve urban sprawl and countryside encroachment, resulting in moderate harm to the Green Belt. In terms of accessibility, there are major employment opportunities adjacent and reasonably good access to public transport, but the site is slightly detached from local services and facilities, including those in North Tyneside. And its reduced size is likely to limit the prospect of facilities being provided on site. Taking Green Belt and accessibility considerations together, the site is not

preferable to many of the allocated sites in Newcastle though it does fare better than some.

150. Natural England has indicated that it would be unlikely to object to the reduced proposal as adequate mitigation and environmental enhancements would protect the SSSI. However, this does not mean that there would be no ecological impact from the development; there is concern about matters such as loss of part of an important wildlife corridor and the (albeit limited) impacts on the SSSI. The risk of flooding is another major concern. There was serious flooding on the site in 2012 which caused the Environment Agency to revise its Flood Map; part of the proposed housing area lies within Flood Zone 2 and abuts Flood Zone 3. Although dwellings are not prohibited in Flood Zone 2, it remains a zone which is at risk and the Framework advises that development should be directed to areas where the risk from flooding is least. None of the Plan's allocated sites affect biodiversity (let alone an SSSI) to the same extent, and for all Green Belt sites where flooding is an issue, development within Flood Zone 2 can be avoided. For these two reasons the Salters Lane site is less sustainable than all the CSUCP allocations and its omission from the Plan is sound.
151. The sports ground at Bullock Steads, which lies between the Kingston Park allocation and the Ouseburn, was discounted at an early stage because its ten pitches are in active use. Northumbria University has indicated that the land is likely to become surplus to its requirements during the Plan period. However the site remains an important resource until sports use ceases, particularly given the deficiency in provision in the wider area. The Framework makes clear that in these circumstances replacement provision would be required, so allocating the site now would be contrary to national policy. And even if safeguarded land was required, which it is not, the future of these sports pitches is too uncertain to justify consideration of an alternative use at present.
152. Land in the Green Belt south of Callerton Parkway is promoted for mainly employment use as an alternative to site KEA1d at Newcastle airport. The land was discounted at the stage one SLR assessment because parts of it are subject to flooding. Development as shown on the illustrative plan would also substantially reduce the gap between Woosington village and the airport, leaving an appreciably smaller gap than would remain between site KEA1d and the airport. The argument that the land would provide much needed sites for small and medium enterprises carries little weight because many other opportunities exist across the city and, with the relaxation of airport employment site restrictions, at Newcastle airport.
153. At the examination Callerton Parkway was also promoted for a solus user. A site of about 10ha is required for this purpose; whilst the total land available outside the flood risk area exceeds this, it is in two parcels separated by the Metro line. This would undoubtedly reduce its attractiveness for a solus user even if, as was suggested, the building could be provided on one side of the Metro line and parking on the other. It is true that the site is much more accessible by public transport than site KEA1d, being close to a Metro station and a bus service, and that access is assured, but these are insufficient to outweigh the greater harm to the Green Belt and the disadvantage of a split site for a single user. Consequently the omission of this site from the Plan is

sound.

154. Land west of Walbottle was discounted at the stage three assessment because part of the site is constrained by proximity to a scheduled ancient monument and a gas pipeline, and because the remainder would only make a limited contribution to the identified housing need. It would also substantially reduce the gap to Throckley, leaving about 200m separation across Walbottle Dene. The Council did not find this to be harmful because the residual gap across the Dene would be defensible; this might be so, but in my view the reduction to only 200m represents an appreciable loss of the separation between these settlements and is a further reason for this site being omitted from the Plan.

Issue 8 – WHETHER THE GATESHEAD SITE ALLOCATIONS ARE SOUND

155. As with consideration of the Newcastle sites, the analysis which follows is predicated on my finding that in principle, following the assessment processes addressed under issues 2 and 3, the Councils' proposals to release land from the Green Belt to meet objectively assessed housing and employment needs are sound and satisfy the exceptional circumstances test of the Framework. Exactly the same factors apply as are outlined in paragraphs 106-107.

Gateshead-wide allocation policy changes

156. Gateshead Council has made two modifications to the detailed criteria which apply to the Neighbourhood and Village Growth Areas sites in its area. Acknowledging concern from Sport England, and to be consistent with the approach in Newcastle, open space, sport and recreational facilities have been added to the list for which provision should be made, subject to there being a need for such facilities. And to reflect the revisions to policies CS3 and CS4, the requirement for comprehensive planning has been replaced with development having to accord with approved masterplans and phasing plans. These modifications (**MM50, MM52, MM54, MM55, MM57, MM58, MM59** and **MM61**) are necessary to ensure the plan is sound.

Metrogreen – policy AOC2

157. There is broad support for this extensive long-term regeneration opportunity between the River Tyne and the A1. Indeed, the main criticism is that the housing development should be built out more quickly than forecast, potentially obviating the need for some Green Belt releases. However the 213 hectare site is in a wide range of uses and ownerships and clearly requires the detailed planning and co-ordination that the proposed AAP would provide. Policy AOC2 and the associated text set out the overall strategy for the area and identify the main constraints and opportunities.

158. The exact number of houses likely to be built during the plan period is difficult to estimate and depends in part on the speed with which the AAP is progressed. The estimate of 850 dwellings is based on an average of 85 a year from 2020, which seems a robust forecast at this early stage. The integration of a more outward facing Metrocentre into the wider area is an important objective which, as the centre owner acknowledges, requires much further work; the AAP is an appropriate vehicle for taking this forward. Thus the approach in policy AOC2 is sound.

Dunston Hill – policy GN1

159. For much of its length the B6317 Whickham Highway forms a strong boundary to the established neighbourhood of Dunston Hill as it extends towards the top of the hill; the few dwellings on its south-western side are within and washed over by the current Green Belt. The proposed large scale (530 dwelling) development would extend the conurbation across this road and represent urban sprawl. It would also be a clear encroachment into the attractive farmland beyond the existing settlement, though not all the site is countryside - the eastern part is a nursery depot and car park. The proposal would not appreciably reduce the gap to nearby Whickham or to the more distant village of Sunnyside, nor would it unduly diminish the finger of Green Belt land that extends northwards as far as the A1.

160. The site is in a highly sustainable location. It is close to the Metrogreen and Team Valley employment and retail opportunities and has good transport links to central Gateshead and Newcastle. There is a range of local services and community facilities nearby and good access to the recreation opportunities in the surrounding countryside. The imminent widening of the A1 will ease congestion on the main roads close to its junctions, assisted by a park and ride facility to be provided as part of the development. Local highway improvements would also be sought to mitigate the traffic impacts and, in combination with the additional capacity on the main road network, Gateshead Council believes that the development would not unduly increase traffic on Whickham Highway or rat-running on the local roads. Whilst local opinion is sceptical, there is no cogent evidence that unacceptable traffic conditions would arise.

161. The proposed boundary crosses fields rather than following readily recognisable features, but the aim is to create a strong defensible Green Belt boundary by means of a new landscaped buffer on the western edge of the site. The Framework does not stipulate the use of *existing* boundary features so in principle this approach is not contrary to national policy. However, in the north-western corner of the site there are strong field boundaries, defined by a small bank and thick hedgerow with trees, a short distance west of the artificial boundary line across the field. The narrow triangle of land gained by extending the site to this established boundary would not cause a perceptible erosion of the gap to Whickham, which is at its narrowest along Whickham Highway, and would use a small parcel of land which otherwise would have little utility. This minor variation to the boundary is shown on **MM51**.

162. There are no similar features close to the undefined section of boundary between the plantation and the Council land. Extending the site to the line of the Whickham Grand Lease Wagon route, as promoted by the developer, would still leave a sizeable length which is poorly defined and would result in a significant extension of the site into the countryside.¹¹ Thus along this section the boundary proposed in the Submission Plan is preferred.

163. The concerns about wildlife would be mitigated by the provision of 30 hectares

¹¹ As shown on the original Development Deliverability Framework produced by the developer. The later submission that this extension be retained as parkland which is protected from built development has little merit – if the land is to remain open then there is a compelling case for it staying in the Green Belt.

for habitat creation close to the hilltop outside the site. Many other issues, including the impact on the adjacent Conservation Area and the amenity of residents living on the south-western side of Whickham Highway, relate to detailed design matters and are capable of resolution. Overall the loss of countryside and farmland and the impact on the landscape, which would be similar to many urban extension sites in Newcastle, have to be set against the highly sustainable location and good access to services. Subject to the minor variation of the boundary in the north-west corner of the site, policy GN1 is sound.

Chopwell – policy GV1

164. Chopwell is a former mining village in the south west of the Borough with an elongated form and dispersed pattern of settlement linked by a spine road that meanders down the side of the Derwent valley. All three proposed housing sites would encroach into the countryside, but there would be no effect on the merging of settlements or urban sprawl. Because of Chopwell's relative isolation from the main employment, retail and service opportunities of the Gateshead/Newcastle conurbation, the suitability of the village for additional housing and the sustainability of individual sites are key considerations.
165. The proposed housing is aimed at regenerating a village which has a disproportionate number of small, pre-war terraced houses and a shortage of newer stock suitable for families. This has led to substantial out-migration, particularly of working age population, and high vacancies in local shops and primary school, undermining the vitality of the village. One large central, non-Green Belt site (Heartlands) has been available for decades but has not proved attractive to developers, though Gateshead Council is now promoting this through its joint venture vehicle. The Council believes a range of additional sites is required to boost the regeneration initiative, though it is uncertain about the take-up and does not want to undermine delivery of the Heartlands scheme or saturate the market.
166. Notwithstanding the difficulty in securing the Heartlands development, the principle of regenerating Chopwell by promoting some additional housing land is sound. The most sustainable site is Middle Chopwell, an area of amenity grassland west of the village centre which is bounded by mature woodland and is very close to shops and community facilities. Despite local concerns, there is no evidence of significant traffic problems in the village and suitable drainage measures would ensure that surface water run-off does not increase the risk of flooding lower down the slope of the Derwent valley. The requirement for a blue/green corridor is an 'additional' rather than a 'main' modification, and the concerns about flood risk are adequately dealt with by clauses 6 and 7 of policy GV1. Although this site would provide the greatest competition to the Heartlands, both are owned by Gateshead Council who wish to see the long-established site developed first.
167. South Chopwell, which would extend the southern part of Chopwell westwards, is the only site of the three with current developer interest. It is within an area of small pasture fields between the village and Milkwellburn Wood and has limited ecological value which could be mitigated. Sufficient separation from the Wood would ensure no significant impact on foraging wildlife. Although visible on the sloping valley side, it would consolidate development in

the southern part of Chopwell and would not have a major impact on the character of the landscape; the gap to Blackhall Mill would be maintained. Parts of the site would be a considerable distance from the shops and facilities in the centre of the village, though no further than some existing dwellings. The control of surface water from this site is particularly important given its proximity up-slope from the flooding close to the valley bottom at Blackhall Mill, but there is evidence that a robust SuDS strategy can be implemented.

168. North Chopwell would represent a small but significant extension of the village into the surrounding countryside. It lies at the junction of two regional landscape character areas: the Derwent Valley in which Chopwell lies, and the Upland Plateau which includes the high ground between the Derwent and Tyne valleys. I observed on my visits that apart from a strip fronting Ramsay Road, most of the site has greater affinity with the Upland Plateau than the Derwent Valley, as it is hidden from the latter by the topography. The Zone of Theoretical Visibility in the landscape study supports this analysis, demonstrating that views of the site would be predominantly from the north and not from Chopwell itself. Thus the existing Green Belt boundary, which runs along the back of the houses fronting Ramsay Road, has strong justification in landscape as well as Green Belt terms.
169. Whilst the North Chopwell site is reasonably close to the shops and services in the centre of the village, the existing surfaced footpath route is particularly steep for pedestrians (even for Chopwell) and not practical for everyone in the community. With cycle use also affected by the gradient, a high proportion of trips to the village facilities are likely to be by car. The access onto a narrow stretch of Greenhead Road is technically feasible but not ideal, especially as this is a main route northwards from the village. And the complex hummocky nature of the site would make it difficult to build on, requiring substantial cut and fill. Environmental concerns, including drainage and ecology, could be satisfactorily mitigated. Overall, the Council regards the North Chopwell site as the most challenging of the three to develop.
170. The Development Framework for Chopwell refers to "a sense of the village leaking out into its surroundings rather than working as a whole".¹² Apart from a strip along the Ramsay Road frontage, the North Chopwell site (even if reduced in scale as recently proposed) would cause a further leakage, and one that would extend the village into a recognisably different part of the landscape. The notion that the village's urban form would be improved by linking the isolated Greenhead Terrace and North Terrace with the dwellings on Ramsay Road is questionable, but even if this were beneficial, it could be achieved by frontage development on Ramsay Road. The proposed site extends appreciably beyond this into the surrounding countryside. Coupled with the uncertainty about the scale of development necessary to regenerate Chopwell and the difficult site conditions, there is insufficient justification for the removal of this site from the Green Belt. **MM52** makes the necessary deletion from policy GV1 and **MM53** revises the allocation map.
171. The deletion of North Chopwell reduces the housing provision by 80 homes and results in a small shortfall against Gateshead's overall housing target. However, this is offset to some extent by small increases in the yields of other

¹² Development Framework for Chopwell, page 4

sites (Dunston Hill, Highfield and Sunnyside) and the possibility of some additional delivery from Gateshead's urban open spaces. Furthermore, the evidence from the development industry suggests that the density assumptions used to calculate the numbers of dwellings are conservative, implying that some of the "approximate" figures stated in the allocation policies might be exceeded. In these circumstances it is not necessary to find a replacement site for North Chopwell to meet the housing need.

172. Policy GV1 includes a requirement for a new surfaced footpath between the North and Middle Chopwell sites. I saw on my visit that the intended route follows an informal path through woodland and is very steep in places. Moreover, it would duplicate the existing footpath a short distance to the east which connects Ramsay Road with the village centre. With the removal of the North Chopwell site from the Plan, there is no need for an additional footpath. Its deletion is part of **MM52**.

Crawcrook – policy GV2

173. Although located at the north-western edge of the borough, the former mining village of Crawcrook has good transport links with Gateshead and Newcastle and has developed as a commuter settlement for the conurbation. Both proposed sites would encroach into the countryside around Crawcrook, though the village extensions would be contained by well-defined existing features. The larger Crawcrook South site is an attractive area of undulating arable and grazing land with patches of scrub and woodland; development would slightly reduce the gap to Greenside to the south, though this is not identified as a strategic gap in the Gateshead UDP. Crawcrook North is a gently sloping arable field with no distinguishing features and, therefore, of limited landscape quality.
174. Crawcrook has a good range of shops, services and community facilities; these would be readily accessible from both sites by pedestrian and cycle links through the adjoining residential areas. There are frequent bus services to employment and retail sites in Newcastle and Gateshead, and good road access via the A695. Current peak-time congestion on this route would be mitigated by junction improvements, including at the Blaydon roundabout, funded by these and other developments along the A695 corridor. Studies submitted by potential developers demonstrate that concerns about traffic, drainage and ecology can be adequately mitigated. The evidence points to both sites being attractive to the market.
175. The boundary to the Crawcrook South site excludes the field which contains "Hill 60", a valued and well used local recreational resource. The recent failure of the application to have this designated a Village Green reduces the protection that would otherwise have been conferred upon this land, but the overall deficit of recreational space in Crawcrook is a strong argument for its retention as open space. Gateshead Council intends to reassess the future use of this land, and whether to designate it as 'local green space' under paragraphs 76-77 of the Framework, at the next stage of the Local Plan. In the meantime it is appropriate to exclude it from the development site. Nevertheless, the very strong boundary to the settlement formed by the A695 is a convincing argument for removing Hill 60 from the Green Belt. The boundary to the Crawcrook North site is less clear cut given the line of houses

along Stannerford Road a short distance to the north. However, the presence of Ryton Football Ground and other undeveloped land in the gap to these houses is sufficient justification for the boundary proposed in the Plan.

176. Subject to the Hill 60 land being retained predominantly in open use to offset the impact of Crawcrook South on the relatively attractive terrain, these allocations would not cause undue harm to the countryside or landscape and would represent proportionate and sustainable extensions to the village. In the absence of any overriding constraints or adverse impacts, policy GV2 is sound.

Highfield – policy GV3

177. Highfield is a somewhat fragmented village that has grown over complex undulating terrain on the northern slope of the River Derwent. The modest site proposed would consolidate development at the elevated western edge of the village. It comprises steeply sloping rough pasture with patches of scrub and some small groups of trees. Whilst the development would encroach into the surrounding countryside, there would be no loss of productive agricultural land and limited impact on the local landscape.
178. The village is joined to the larger settlement of Rowlands Gill, upon which it depends for many of its services. The site fronts the B6315 Smailes Lane/ Hookergate Lane, along which there is half hourly bus service to nearby settlements and the Newcastle/Gateshead conurbation. There are a few local shops, a primary school and a small industrial estate close to the proposed site. Overall it is a moderately sustainable location for limited development. Local concerns about traffic, parking on Smailes Lane, residential amenity and drainage are detailed design matters that are capable of resolution.
179. Highfield is surrounded by countryside that is valued for its wildlife and the boundaries of the proposed site have altered as knowledge about the impact on ecology has evolved. The Submission Plan proposed to release land for 55 dwellings, but a subsequent ecological study demonstrates that the site could be extended to the south west without having undue impact on local wildlife designations and the Strother Hills SSSI. The field boundaries which define the site are quite insubstantial, but would be strengthened by suitable buffer planting as part of the development to provide a strong future Green Belt boundary. The revised site would accommodate about 70 dwellings; **MM55** and **MM56** incorporate these changes and are acceptable.

High Spen – policy GV4

180. High Spen is an elongated and somewhat sporadic former mining village in the west of Gateshead borough. Two sites are proposed for development. The larger (High Spen East) would consolidate the northern part of the village by extending eastwards onto steeply sloping arable fields which are bounded by strong established hedgerows. High Spen West would be a small westward projection onto unused scrub and allotments. In each case there would be a noticeable encroachment into the countryside and, particularly with High Spen East, some impact on landscape character.
181. The new boundaries to the Green Belt would mostly follow established features and would be reinforced by landscape buffers. The promoter of High Spen

East argues that the boundary in the north-east corner should include the whole field eastwards to Pawston Cottage, but I saw on my visit that there is a substantial steep bank along the proposed boundary line and houses to the east of this would be significantly more exposed and elevated in the landscape. The proposed alignment also represents a more logical rounding off in this corner of the village, so a boundary that follows the topography rather than the existing field boundary is preferred.

182. The proposed housing would assist in supporting facilities in the village, including local shops which were defined 'at risk' in a recent health check, and a primary school that has a few surplus spaces. The settlement is close to and has similar public transport accessibility to Highfield, and is a sustainable location for the scale of development proposed. Concerns about traffic, school capacity, flood risk, impact on wildlife and residential amenity are addressed by the criteria of policy GV4 and are capable of resolution at detailed design stage. On balance, the sustainability benefits of the proposal outweigh the loss of countryside and landscape quality; consequently policy GV4 is sound.

Kibblesworth – policy GV5

183. The development at Kibblesworth would be on sloping agricultural land and would form an arc around the western edge of the village. It would represent a prominent encroachment into the countryside, though the landscape affected is not of particularly high value. There would be no appreciable diminution of the gap to the Gateshead urban area to the north, and though the development would extend the village towards Sunnyside, the gap is very wide and not regarded as strategic in the Gateshead UDP.
184. Given its small size, Kibblesworth has a reasonable range of local facilities including a primary school, shop/post office and community centre. Its location close to the Gateshead urban area and to Birtley gives it good accessibility to a wide range of employment and retail opportunities. Concern about increased traffic would be addressed by improvements to the local road network, while the imminent works to the A1 should reduce congestion at nearby junctions. A suitable drainage system incorporating storage should help to alleviate current surface water problems at the south-western edge of the settlement.
185. An important aim of the new housing is to safeguard existing facilities in Kibblesworth, but this has to be balanced against the desire to limit the scale of expansion so as to maintain the character of the village. The policy GV5 restriction of 225 dwellings would represent about a 50% increase in village population. The two sites could potentially accommodate a higher number of dwellings, though mitigation in the form of substantial landscape and ecological buffers and flood risk alleviation will reduce the developable area. In the absence of hard evidence to determine a level of new housing that would underpin local services but not harm village character, the proposed increase seems a proportionate approach. Accordingly policy GV5 is sound.

Ryton – policy GV6

186. Ryton is a large village that has grown from its agricultural and mining origins into a popular commuter settlement in the Tyne valley. It has a wide range of

shops and community services and good accessibility by public transport and cycle to the employment and large-scale retail opportunities of the Gateshead/Newcastle conurbation. There is widespread local concern that the large scale development, in combination with other housing served by the A695, would cause serious additional congestion particularly at the Blaydon roundabout. Although traffic along this corridor would undoubtedly increase, junction improvements to mitigate the impact are required by policy GV6 (and the equivalent policies for other Village Growth Areas along this route). The evidence from the preliminary transport feasibility study suggests that the additional traffic could be accommodated without undue congestion.

187. The development would adversely affect the local landscape by building on higher ground on the edge of the settlement, though substantial buffer planting along the southern edge of the site would lessen the impact. The wildlife value of this agricultural land is mainly confined to established hedgerows along field boundaries and peripheral scrub and woodland. These could mostly be retained, and there would be ample land within the landscape buffer to ensure that ecological impacts could be satisfactorily mitigated. Issues such as flooding and unstable ground conditions can be dealt with as part of the detailed site design.
188. In addition to the loss of countryside there would be some encroachment into the small gap to Crawcrook, though the most important part of the gap would remain undeveloped and the robust boundary along Woodside Road would prevent any merging of the two settlements. There would also be a slight lessening of the gap south-west to Greenside, though the perception of a relatively wide gap would remain. Moreover, the A695 bypass to Ryton and Crawcrook would form a very strong southern boundary to restrict further expansion. Overall this is a proportionate and logical 'rounding-off' of a village in a highly sustainable location, and policy GV6 is sound.
189. The allocation comprises two main parcels of land in separate ownerships, with each parcel having access to the existing road network. The two prospective developers argue that the parcels should be developed independently and that there is no need for a connecting road link on highway capacity grounds. That may be so, but such a link would have clear wider benefits in facilitating movement across the southern part of Ryton (including potentially by bus) and lessening traffic in the heart of the village. There is no justification for the notion that the link would compromise a high quality design for the site. I share Gateshead Council's view that, in the interests of good planning, the requirement to provide a continuous link road across the site is sound. To be consistent with other allocations, the revised map at **MM60** shows the allocation as a single site.
190. The developers argue that the site capacity has been underestimated (especially in the western part of the site) and that the 550 dwelling limit in policy GV6 should be increased. The ecological evidence suggests that the agricultural fields in the western part of the site have no greater wildlife interest than those elsewhere, so the Council's notional limit on the capacity of this part of the site is not supported on ecological grounds. Nevertheless, a wide landscape buffer along the southern boundary and around the reservoir is desirable to mitigate the landscape impact. Landscape buffers might also be designed to reinforce the well-used north-south footpath routes that follow

field boundaries further east, thereby mitigating the loss of pleasant routes to the wider countryside.¹³ Consequently, whilst there is no compelling evidence that the overall site capacity is too low, there may be benefit from a slightly higher number of houses on the western part of the site and slightly fewer in the central and eastern parts than is shown in the development framework. Ultimately this is a matter for the masterplanning of the site.

Sunniside – policy GV7

191. Sunniside is a sizeable village with a reasonable range of shops and other facilities. It is in an accessible location on the A692 a short distance south of the Gateshead built up area. The main road through the village carries high levels of commuter traffic and results in significant peak-time congestion. This, coupled with the lack of a school, has led to Gateshead Council proposing a relatively small amount of new development in the village on two sites east of the centre where the additional traffic would have least impact. Moreover, mitigation of the traffic impacts on the A692 is one of the requirements of policy GV7.

192. The small site in the north-east of the village would impinge marginally on the gap to Whickham though, because this gap is much narrower to the west, there would be no sense of the settlements merging. The land is a mix of large residential gardens, paddocks and a nursery and the proposed northern boundary would be a defensible limit to further extension into the countryside. The main impact of the site west of Pennyfine Road would be loss of countryside, but as the land lies between the settlement and ribbon development along Pennyfine Road, the landscape quality is not high and the sense of encroachment would not be substantial. The Council proposes a minor boundary adjustment (**MM62**) to reflect the availability of an additional property fronting Pennyfine Road, which marginally increases the yield from the site. Overall these limited additions to Sunniside are an appropriate response to the village's constraints and are acceptable.

193. A sizeable tract of land to the west of the Pennyfine Road site was investigated by the Council at the early stages of plan preparation and is promoted by a developer. One of the claimed merits of this site is that it would provide part of a bypass to Sunniside which has for many years been considered desirable to relieve traffic in the village centre. There is also the possibility of providing land for a school. The Council decided against a larger scale expansion of Sunniside for a number of reasons, including uncertainty about the viability of a development-funded bypass, the adverse impact on the Tanfield railway tourist attraction and the likelihood that a Sunniside bypass would merely divert congestion to other parts of the A692 corridor. Whatever the merits of a developer-funded bypass, the currently promoted scheme would provide much less than half the potential route and there is no compelling evidence that the rest of the road could be achieved. On this basis alone the decision not to allocate the land west of the Pennyfine Road site is sound.

South of Follingsby Lane – policy KEA2

194. The ELR identified a specific need for additional land which would build on the

¹³ These footpaths, which follow existing hedgerows, are not shown to be retained in the indicative block layout in the Ryton Development Framework.

success of Gateshead's strategic employment locations, particularly in the growth sector of distribution and logistics. Such a use requires good access to the motorway network; with no land available for expansion at Team Valley, and the Metrogreen area identified for mixed uses, the only potential site in the borough is at Follingsby where the existing distribution park is nearing completion. Other locations outside the borough were investigated but none was found to meet the identified need.

195. The site comprises flat agricultural land to the south of Follingsby Industrial Park and is bounded by Follingsby Lane to the west, the River Don to the south and the former Leamside railway line to the east. Thus its boundaries would follow well defined physical features that are permanent, as sought by national policy. A short distance south of the River Don is the northern edge of Washington, so the development would encroach into the relatively narrow gap separating the industrial park from the town. The river is an important wildlife corridor which requires a wide ecological buffer to be provided along the southern edge of the site; this would help to limit the incursion into the open break to Washington. Other constraints, including traffic impacts and drainage, are addressed by policy KEA2 and can be adequately mitigated.
196. The countryside is pleasant though not of high landscape value, the agricultural land is of moderate quality and there would be some detriment through the merging of settlements. Set against these factors are the specific nature of the need for employment land, the attractiveness of this location to the market and the absence of realistic alternatives. On balance the allocation is sound.

Omission sites - Gateshead

197. Land to the west of Barlow Lane, Winlaton was assessed by Gateshead Council at stage two of the SLR process and rejected because its steep slope, poor public transport accessibility and significant distance from local facilities would discourage the use of sustainable modes of transport. It was also considered that housing on the upper part of the steep valley side would have significant landscape impact when viewed from the north. I agree, and for these reasons I do not accept the argument that the Winlaton site would be less damaging to the Green Belt and landscape character than certain Village Growth Area allocations. Moreover, the promoter's analysis fails to consider the regenerative benefits of the village proposals that are an important element of the Council's strategy. Overall there is no compelling evidence that the Council's rejection of this site is unsound.
198. Land at Longshank Lane, Birtley was discounted at the stage one assessment because of its impact on the Green Belt. It was felt to represent sprawl by extending the urban area of Birtley, to encroach into the countryside and to reduce the strategic gap to Gateshead. Whilst individually these impacts are not particularly severe, they are all relevant and in combination they amount to greater harm to the Green Belt than is found at the allocated sites. In addition, the site does not have good public transport accessibility to key services, and (as at Winlaton above) would not have the regenerative benefits of many village locations. Gateshead Council's rejection of this site, both as an allocation and as safeguarded land for future development, is justified.

199. A site at Greenside was rejected at the stage one assessment as being too small to contribute to the strategic housing needs of the borough. It is divided into two small plots: one contains a large store/stable block and the other is occupied by a smaller structure. Based on an appeal decision in 2010, the landowner argues that the site should be removed from the Green Belt. That Inspector observed that the development before him would not cause any additional harm to the openness or visual impact of the Green Belt, but dismissed the appeal on the grounds that any review of its boundaries should take place through the Local Plan process.
200. I agree with my colleague that the openness and visual amenity of the Green Belt at Greenside are compromised by the existing buildings. I also accept Gateshead Council's argument that because the CSUCP is making strategic allocations, very small sites have not been fully investigated. But this does not mean that the housing contribution from small previously developed sites such as this should be ignored.¹⁴ I was advised that there may be potential for 20-30 dwellings on similar sites across the borough. Because the Council is preparing its Local Plan in two stages, it should consider whether very minor Green Belt adjustments to sites such as this are warranted at the next stage of plan preparation.
201. A number of sites failed the stage one Green Belt assessment carried out jointly by the Councils in 2011 and were subsequently promoted late in the selection process, after the detailed suitability and sustainability analysis had been carried out. Because these sites have not been subject to detailed analysis by Gateshead Council, or to public consultation, a proper comparison with the preferred locations cannot be made. Consequently it is not appropriate to consider them in detail at this examination; they are addressed briefly below.
202. Two parcels of land off Scotland Head, Winlaton would represent a significant projection into the countryside south of the settlement and would appear prominent in the landscape as housing encroached onto the upper slopes of the Derwent Valley. In addition, the western parcel is not wholly contiguous with the existing settlement boundary, and neither parcel would utilise strong boundary features to define the southern limit to development. Even if this land has better access to services and facilities than some of the Village Growth Areas (which is not clear from the partial evidence available), it would not have the regeneration benefits of the latter. Overall there are compelling reasons for excluding it from the Plan.
203. Land to the east of Stargate Lane, Stargate is part of Ryton and lies within the strategic gap to Stella and Winlaton, both parts of the Gateshead urban area. Because the Council regards incursion into the strategic gap to be a critical shortcoming, the site did not progress beyond the stage one assessment. The existing Green Belt boundary is drawn tightly around the eastern edge of Stargate and includes typical urban fringe uses such as a playing field, allotments and rough pasture fields. The proposed housing development would remove part of the allotments and pasture and would enclose the

¹⁴ The Framework gives greater opportunity for the redevelopment of previously-developed Green Belt sites than existed previously. During the examination the Council granted planning permission for a dwelling to replace the existing store/stable block on the larger of the two plots at Greenside.

playing field, thereby encroaching into the strategic gap by more than is necessary for the dwellings alone. As with the Winlaton site above, the claims about the site being more sustainable than other Village Growth Areas have not been rigorously tested because of the late submission. Moreover, the regeneration benefits that apply to the other Gateshead village allocations have not been fully considered. For these reasons, together with the importance of protecting the strategic gap, the omission of this site is sound.

204. Two sites at Eighton Banks were submitted very late in the CSUCP process. A narrow strip of former quarry land east of Galloping Green Road had been rejected by Gateshead Council as part of a larger parcel because it would reduce the strategic gap to Springwell Village and Washington. This gap is narrow and important to retain. Whilst (unlike many other sites) there would be no loss of agricultural land, there is no evidence that this site would be inherently more sustainable than other sites selected, or that it would have the regeneration benefits of some locations. A small parcel to the rear of Larch Close/The Hawthorns is maintained as public open space by the Council and identified as such in the UDP. The local area is deficient in open space provision, which is a significant factor against the development of this small site; moreover, there is no evidence that it would have greater sustainability benefits than the sites allocated.

Issue 9 – WHETHER THE MECHANISMS FOR INFRASTRUCTURE PROVISION, IMPLEMENTATION AND MONITORING ARE SUFFICIENTLY ROBUST TO ENSURE THE EFFECTIVE DELIVERY OF DEVELOPMENT

205. In the Proposed Submission Plan, policy DEL1 failed to indicate that viability considerations may be pertinent to all the criteria identified, including affordable housing and the provision of facilities and services. The Councils addressed this with a revised policy (**MM63**) that establishes a strategic yet comprehensive framework for securing delivery of the infrastructure necessary to cater for new development. The separate Infrastructure Delivery Plan is a detailed and largely costed study of the main infrastructure projects required to support the development proposed in the CSUCP. Together these provide a positive and robust delivery strategy.

206. As indicated earlier, there remains concern that some housing schemes in lower value urban areas are not viable, as demonstrated in the Viability and Deliverability Report. But most sites in these areas are in public ownership, and the Councils have a good track record of delivering investment in such locations. Crucially policy DEL1 establishes the correct approach: infrastructure that is necessary to make the development acceptable is a mandatory requirement, whilst viability can be taken into account when assessing other impacts and non-essential facilities and services.

207. The Monitoring Framework (Appendix 3 of the CSUCP) identifies a comprehensive range of indicators for which data will be collected, but for a large number of these no target has been set. Furthermore, there is no indication of remedial actions to be taken if the policies of the CSUCP are not being implemented successfully. A revised Monitoring Framework (**MM64**) addresses this matter and provides an appropriate and proportionate system for determining the effectiveness of delivery of CSUCP policies.

Assessment of Legal Compliance

208. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Core Strategy and Urban Core Plan is identified within the approved Gateshead LDS (March 2013) and Newcastle LDS (December 2013) which set out expected adoption dates of December 2014 (Gateshead) and Winter 2014/15 (Newcastle). The CSUCP's content and timing are broadly compliant with the LDSs.
Statement of Community Involvement (SCI) and relevant regulations	SCI updates were adopted in January 2013 (Gateshead) and April 2013 (Newcastle) and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM).
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (November 2013) sets out why AA is not necessary.
National Policy	The CSUCP complies with national policy except where indicated and modifications are recommended.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
Public Sector Equality Duty	The CSUCP complies with the Duty.
2004 Act (as amended) and 2012 Regulations	The CSUCP complies with the Act and the Regulations.

Overall Conclusion and Recommendation

209. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

210. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Core Strategy and Urban Core Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Inspector

This report is accompanied by the Appendix containing the Main Modifications.