

Our Ref	Respondent	Representative	Chapter	Policy	Para/ Criterion	Support /Object	Submitted Comments
ST0322	Shirley Ford		09 Planning for our Built Environment	D02	a	objection	The local plan should be designed to help us achieve emissions reductions across all sectors, and therefore should include a carbon emissions analysis of all the different potential versions of the local plan.
ST2095	Yasmin Otterson		09 Planning for our Built Environment	D02	e	Objection	<p>The most important issue in the world right now is Climate Change. This is why I must object to your ideas and plans in the South Tyneside Draft Local Plan. Deleting areas of Green Belt to build houses is not acceptable. It will destroy the habitats of wildlife, flowers, hedgerows, grass, bird habitats and most importantly trees. The General Design Principles Policy D2 states:</p> <p>'Where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form'</p> <p>The 'development' being a priority over trees will lead us further into the problems we have created to Climate Change. This Local Plan is an opportunity to embrace scientific knowledge we are all aware of and plan something that will protect us from destroying our planet.</p> <p>I cannot support Policy D2.</p>
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	a	objection	Part A of this policy states that development proposals will be supported where they can demonstrate that the proposals are "sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, and have particular regard to BREEAM or its successors". It is considered that the policy wording should include sufficient flexibility which recognises Building Regulation standards with regards to climate change and energy efficiency. The policy wording should simply seek to 'encourage' regard to BREEAM or its successors and the use of sustainable design and construction.
ST2111	Nicola Reed		09 Planning for our Built Environment	D03		Observation	Policy D3 seeks to secure the Building for Life quality mark and its successors and sets the policy requirement which major development proposals should meet. Part A of the policy requires new homes to "respond to natural features and provide gardens and other open space". Part B of the policy goes on to require "where appropriate, incorporate outdoor amenity space, such as gardens or balconies". Following the inclusion of Part B of the policy, it is considered that the provision of gardens should be removed from Part A of the policy. It is also unclear through the policy what is meant through the "retention of natural features". Although it is clear that this policy would be considered on a

							<p>case by case basis based on the context of an application site, it should be made clearer within the policy what natural features are sought to be retained by this policy.</p> <p>It is noted that part c of this policy seeks to minimise overlooking between surrounding dwellings. Do the Council intend to introduce standard in relation to separation distances which would assist with applying this principle in practice or will this be left to an officer judgement on a case by case basis during determination.</p> <p>Part D of this policy requires developments to "consider design for adaptation so that properties can accommodate occupants' changing needs and lifestyles". It is unclear in relation to residential developments whether this is a policy requirement in addition to Policy H11 of the Plan. This should not be an additional policy burden on residential developers and where this aspect of the policy is applied should be clearer within the policy or the supporting text. For developments not with Use Class C3, it is unclear what standard is required for this policy and how it should be applied to proposals.</p> <p>The Householder SPD identified within Part E of the policy was last updated in 2014. Are there any intentions to update this SPD during the progress of preparation of the Local plan?</p>
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	Para 09.07	Observation	<p>Paragraph 9.7 of the plan states that "there will be occasions when a site is considered to be so important in terms of its location within a town or village, that it will warrant special attention in terms of design". The paragraph goes on to state that in those occasions applicants will be encouraged to agree a site specific design brief. We consider that to further assist with speed and efficiency of applications, such locations that are considered important in terms of design should be influenced within the policies map and supported by an evidence base to support the need of these locations to be prioritised in terms of design and this should be subject to public consultation.</p>
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	Para 09.10	objection	<p>Paragraph 9.10 seeks to maximise the use of innovative construction technologies, pre-fabrication elements and sustainable materials alongside the use of recycled materials. It is considered that this aspect should be "encouraged" within developments and applied "where appropriate". It is acknowledged that the local authority seek to see sustainable design principles being applied to developments however this should be appropriate to the development and should take into account</p>

							development viability as well as any other future implication such as long term maintenance.
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	Para 09.09-09.30	Observation	A general comment about this section is that these paragraphs should be better linked to the policies in which they apply. It appears as though they are a bolt on thought at the end to what the general aims of the plan policies are but should be linked to the policies.
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	Para 09.25	Observation	It is considered that this paragraph would be better placed in the housing chapter, particularly given its link with Policy H11. It is not considered that this paragraph is best placed amongst policies regarding the built environment. The paragraph links with policy H11 of the plan, to which our comments and views have already been provided.
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	Para 09.32	objection	Paragraph 9.32 of the plan refers to the retention of trees as part of a development layout. It is considered that this paragraph should also acknowledge and make reference to the fact that retention of existing tree should be considered against their value. This paragraph also makes reference to the felling of existing trees prior to permission being sought for a development may require replacement planting prior to permission being granted. It should be acknowledged that should trees not be afforded a protection status, a landowner has the right to alter the existing trees and vegetation on their property. We welcome the flexibility in the application of this approach.
ST2111	Nicola Reed		09 Planning for our Built Environment	D02	Para 09.35	objection	It is considered that paragraph 9.35 would be better placed within the housing chapter given that the aspects set out in this policy relates primarily to the internal design of new homes and does not affect the external appearance or built environment. It is unclear how the requirements set out under paragraph 9.35 will be judged during the determination of a planning application based on the validation requirements of an application. We would make the following comments in relation to the bullet points listed in this paragraph: - Has good ceiling heights and room sizes and incorporates adequate storage space - it is unclear how this aspect will be assessed during determination and it is assumed that developers should address this aspect within their design statements for developments to demonstrate that there is appropriate internal space to ensure new dwellings are suitable for residents and their everyday requirements. It should be noted that large scale house builders such as Persimmon develop new homes which respond to market demand and would not be able to sell homes

							<p>which did not appeal to the target audience.</p> <p>- Is dual aspect except in exceptional circumstances - we do not consider it possible to provide dual aspect across all dwellings proposed within a development given the structure and context of sites as well as compiling with other policies contained within the Plan. It is also unclear what is meant in this instance in relation to dual aspect.</p> <p>- Good insulation from noise and vibration - those schemes in close proximity to noise sourced will be accompanied by a noise assessment which will outline appropriate mitigation, where necessary, and may include for appropriate glazing and ventilation.</p>
ST2112		Neil Westwick	09 Planning for our Built Environment	D02	a	objection	<p>Our client is concerned about the reference to BREAAAM or its successor under draft Policy D2(a). There is no national requirement that new developments have to be BREAAAM rated. Furthermore, our client does not consider it is reasonable that the Local Plan could then be relying on a future successor to BREAAAM that no one has seen and any cost implications could not have been taken into account in the Local Plan viability assessment work.</p> <p>To ensure a sound Plan that has been positively prepared and is based on appropriate evidence, in accordance with the NPPF (para. 35), our client seeks the following change to Policy D2(a):</p> <p>“We will support proposals where the applicant can demonstrate that proposals:</p> <p>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, where appropriate. and have particular regard to BREAAAM or its successor.”</p>
ST2112		Neil Westwick	09 Planning for our Built Environment	D02	d	objection	<p>As advised in response to Policy S2, our client considers that a requirement to retain all of the existing trees on a site could result in an onerous and inflexible approach. This is because there could be occasions where it is preferable to replace existing trees rather than protect them, for example if they are of low value or are dead, dying or diseased.</p> <p>Our client respectfully requests the following change to Policy D2(d):</p> <p>“Where trees are present on a proposed development site, the landscaping scheme should make provision for the retention of existing trees, where possible and appropriate, recognising their existing habitat, that are important by virtue of their significance within the local landscape.”</p>

ST2112		Neil Westwick	09 Planning for our Built Environment	D02	h	objection	<p>In addition, whilst recognising the purpose of Policy D (h) in seeking to ensure development is inclusive and accessible for all, and the value of the Lifetime Neighbourhoods principles, our client wishes to emphasise that NPPF Paragraph (f) and footnote 46 state that in creating places that are safe, inclusive and accessible, “planning policies should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties”. (Lichfields emphasis)</p> <p>To ensure a sound Plan that is consistent with the NPPF (para. 35), it is requested that Policy D2 (h) is amended as follows:  “Are inclusive and accessible for all in accordance with the principles of Lifetime Neighbourhoods, having particular regard to the needs of an ageing population, where there is an identified need.”</p>
ST2112		Neil Westwick	09 Planning for our Built Environment	D03		objection	<p>Our client is concerned about the expectation of draft Policy D3 that major applications should demonstrate their proposals achieve the place-making essentials required to provide everything that should be expected of a new community and also encourage developers to seek the ‘Built for Life’ quality mark or its successor.</p> <p>Whilst our client recognises the importance of providing all the place-making essentials, concern is raised about whether they would be feasible and viable in all instances, especially should future changes be made to the document.</p> <p>Guidance keeps changing and the Design Council’s website recognises that the ‘Building for Life 12’ could have a lifespan of 7 to 10 years. It’s third edition was published in January 2015 and hence it is already nearly 5 years old. The South Tyneside Local Development Scheme (May 2019) anticipates that the Local Plan will be adopted in June / July 2021. As such, by the time the Plan is adopted ‘Building for Life 12’ could be approaching the end of its lifespan. Our client does not consider it is reasonable that the Local Plan could then be relying on a future iteration of this document which no one has seen and its cost implications would not have been taken into account in the Local Plan viability assessment work.</p> <p>To ensure a sound Plan that has been positively prepared and is based on appropriate evidence, in accordance with the NPPF (para. 35), our client requests that Policy D3 is either deleted, given that design requirements are covered by Policy D2, or that the following changes are made to Policy D3</p>

							<p>“With regard to new housing developments, and in line with the principles of the Design Council’s Building for Life 12 or its successor, we believe that new housing should be attractive, functional and sustainable. Therefore, in addition to the broader design requirements of Policy D2, we will therefore expect seek for major applications to demonstrate that their proposals achieve the place-making essentials required to provide everything that should be expected of a new community and also encourage developers to seek the Built for Life quality mark or its successor.</p> <p>Proposals for new homes should, where appropriate...”</p>
ST2112		Neil Westwick	09 Planning for our Built Environment	D02	9.23	objection	Our client suggests that paragraphs 9.23 and 9.37 are deleted given their reference to Lifetime Homes.
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ST2112		Neil Westwick	09 Planning for our Built Environment	D02	9.3	objection	<p>Paragraph 9.30 requires that proposals should be accompanied by plans detailing all existing and proposed hard and soft landscaping. However, it would not be possible to submit a detailed landscaping with an outline planning application in advance of any site layout being fixed, hence why landscaping is a reserved matters. Our client therefore suggests the following change to this paragraph:</p> <p>“We consider landscape as an integral part of all development and proposals should be accompanied by plans detailing all existing and proposed hard and soft landscaping affected by or to be incorporated into the scheme a landscape strategy providing the hard and soft landscaping principles. The detailed landscaping scheme will then be agreed with the council through a condition or a reserved matters application.”</p>
ST2117	Church Commissioners	Richard Swann	09 Planning for our Built Environment	D02		Comment	3.74 As noted above, there is no viability document provided as part of the evidence base supporting the PPSTLP, therefore it is not possible for us to consider the implications of this policy fully. We note criteria ‘a’ - BREAAAM, ‘d’ – Trees/landscape, and ‘h’ – Lifetime homes would all likely have an impact on viability and these should be factored in as part of the viability testing. Therefore we reserve the right to comment further until we have seen and reviewed the viability testing and the report.

ST2117	Church Commissioners	Richard Swann	09 Planning for our Built Environment	D03		Objection	<p>3.75 Although our Client is supportive of the aims of Building For Life (BfL), they do not consider that this should form a basis for decision making and that reference to BfL should be removed from the policy.</p> <p>3.76 The BfL standard is produced by the Design Council. It is not government policy and is intended to be a guide only for developers. Furthermore, the Design Council website states that BfL has a lifespan of 7 to 10 years. The latest guidance was published in January 2015 and is nearly 5 years old. By the time the plan is scheduled to be adopted by Summer 2021, which will mean that the guidance is 6.5 years old and will be close to the end of its lifespan. If the plan does not progress as scheduled, this will further impact the lifespan of the policy. The policy does not take into account the impact of viability either of any changes that may occur due to the implementation of BfL on developments. Although it is noted that the policy makes mention of successor documents, as this is an unknown at this stage, any potential viability impacts cannot be measured currently but have the potential to be significant and could undermine housing delivery in the borough.</p> <p>3.77 Although our Client supports the underlying principles of BfL and strives for good design in all their development, they consider that the policy either needs to be deleted or significantly amended to remove mention of BfL.</p>
ST2176	Neil Westwick	Hellens Land and Maplehill Property Ltd	09 Planning for our Built Environment	D02	a	objection	<p>Our client is concerned about the reference to BREAAAM or its successor under draft Policy D2(a). There is no national requirement that new developments have to be BREAAAM rated. Furthermore, our client does not consider it is reasonable that the Local Plan could then be relying on a future successor to BREAAAM that no one has seen and any cost implications could not have been taken into account in the Local Plan viability assessment work.</p> <p>To ensure a sound Plan that has been positively prepared and is based on appropriate evidence, in accordance with the NPPF (para. 35), our client seeks the following change to Policy D2(a):</p> <p>“We will support proposals where the applicant can demonstrate that proposals:</p> <p>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, where appropriate. and have particular regard to BREAAAM or its successor.”</p>

ST2176	Neil Westwick	Hellens Land and Maplehill Property Ltd	09 Planning for our Built Environment	D02	d	objection	As advised in response to Policy S2, our client considers that a requirement to retain all of the existing trees on a site could result in an onerous and inflexible approach. This is because there could be occasions where it is preferable to replace existing trees rather than protect them, for example if they are of low value or are dead, dying or diseased. Our client respectfully requests the following change to Policy D2(d): “Where trees are present on a proposed development site, the landscaping scheme should make provision for the retention of existing trees, where possible and appropriate, recognising their existing habitat, that are important by virtue of their significance within the local landscape.”
ST2176	Neil Westwick	Hellens Land and Maplehill Property Ltd	09 Planning for our Built Environment	D02	h ix	objection	In addition, whilst recognising the purpose of Policy D (h) in seeking to ensure development is inclusive and accessible for all, and the value of the Lifetime Neighbourhoods principles, our client wishes to emphasise that NPPF Paragraph (f) and footnote 46 state that in creating places that are safe, inclusive and accessible, “planning policies should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties”. (Lichfields emphasis) To ensure a sound Plan that is consistent with the NPPF (para. 35), it is requested that Policy D2 (h) is amended as follows: “Are inclusive and accessible for all in accordance with the principles of Lifetime Neighbourhoods, having particular regard to the needs of an ageing population, where there is an identified need.”
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ST2186	Alastair Willis	Buckley Burnett Limited	09 Planning for our Built Environment	D02	a	objection	<p>Our client is concerned about the reference to BREAAAM or its successor under draft Policy D2(a). There is no national requirement that new developments have to be BREAAAM rated. Further, our client does not consider it is reasonable that the Local Plan could then be relying on a future successor to BREAAAM that no one has seen and any cost implications could not have been taken into account in the Local Plan viability assessment work.</p> <p>To ensure a sound Plan that has been positively prepared and is based on appropriate evidence, in accordance with the NPPF (para. 35), our client seeks the following change to Policy D2(a):</p> <p>“We will support proposals where the applicant can demonstrate that proposals:</p> <p>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, where appropriate and viable. and have particular regard to BREAAAM or its successor.”</p> <p>As advised in response to Policy S2, our client considers that a requirement to retain all of the existing trees on a site could result in an onerous and inflexible approach. This is because there could be occasions where it is preferable to replace existing trees rather than protect them, for example if they are of low value or are dead, dying or diseased.</p>
ST2186	Alastair Willis	Buckley Burnett Limited	09 Planning for our Built Environment	D02	d	objection	<p>Our client respectfully requests the following change to Policy D2(d):</p> <p>“Where trees are present on a proposed development site, the landscaping scheme should make provision for the retention of existing trees, where possible and appropriate, recognising their existing habitat, that are important by virtue of their significance within the local landscape.”</p>
ST2186	Alastair Willis	Buckley Burnett Limited	09 Planning for our Built Environment	D02	h	objection	<p>In addition, whilst recognising the purpose of Policy D (h) in seeking to ensure development is inclusive and accessible for all, and the value of the Lifetime Neighbourhoods principles, our client wishes to emphasise that NPPF Paragraph (f) and footnote 46 state that in creating places that are safe, inclusive and accessible, “planning policies should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties”. (Lichfields emphasis)</p> <p>To ensure a sound Plan that is consistent with the NPPF (para. 35), it is</p>

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ST2186	Alastair Willis	Buckley Burnett Limited	09 Planning for our Built Environment	D03	objection	<p>Our Client is concerned about the expectation of draft Policy D3 that major applications should demonstrate the place-making essentials required to provide everything that should be expected of a new community and also encourage developers to seek the ‘Built for Life’ quality mark or its successor.</p> <p>Whilst our client recognises the importance of providing all the place-making essentials, concern is raised about whether they would be feasible and viable in all instances, especially should future changes be made to the document.</p> <p>Guidance is evolving and the Design Council’s website recognises that the ‘Building for Life 12’ could have a lifespan of 7 to 10 years. It’s third edition was published in January 2015 and hence it is already nearly 5 years old. The South Tyneside Local Development Scheme (May 2019) anticipates that the Local Plan will be adopted in June / July 2021. As such, by the time the Plan is adopted ‘Building for Life 12’ will be approaching the end of its lifespan. Our client does not consider it is reasonable that the Local Plan could then be relying on a future iteration of this document which no one has seen and its cost implications would not have been taken into account in the Local Plan viability assessment work.</p> <p>To ensure a sound Plan that has been positively prepared and is based on appropriate evidence, in accordance with the NPPF (para. 35), our client requests that Policy D3 is either deleted (given that design requirements are covered by Policy D2) or that the following changes are made to Policy D3:</p> <p>“With regard to new housing developments, and in line with the principles of the Design Council’s Building for Life 12 or its successor, we believe that nNew housing should be attractive, functional and sustainable. Therefore, in In addition to the broader design requirements of Policy D2, we will therefore expect require major applications to demonstrate that their proposals achieve the place-making essentials required to provide everything that should be expected of a new community and also encourage developers to seek the Built for Life</p>

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ST2186	Alastair Willis	Buckley Burnett Limited	09 Planning for our Built Environment	D02	9.3	objection	Paragraph 9.30 requires that all proposals should be accompanied by plans detailing all existing and proposed hard and soft landscaping. However, it would not be possible to submit a detailed landscaping scheme with an outline planning application in advance of any site layout being fixed, hence why landscaping is a reserved matters. Our client therefore suggests the following change to this paragraph: "We consider landscape as an integral part of all development and proposals should be accompanied by plans detailing all existing and proposed hard and soft landscaping affected by or to be incorporated into the scheme a landscape strategy providing the hard and soft landscaping principles. The detailed landscaping scheme will then be agreed with the council through a condition or a reserved matters application as appropriate."
ST2189	Chris Thomas	Outdoor Advertising Consultant	09 Planning for our Built Environment	D06	-	Comment	These representations are submitted on behalf of the British Sign and Graphics Association in response to Policy D6 and the supporting text of the above draft Local Plan. The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended).
ST2189	Chris Thomas	Outdoor Advertising Consultant	09 Planning for our Built Environment	D02	Para 9.43-	Comment	We have carefully considered the proposed policies within this draft Local Plan and are content that they are sound. However we would point out that the reference to the Regulations in paragraph 9.43 of the supporting text is vastly out of date. The reference should be to the 2007 Regulations (as above). We would suggest that a reference might also be made here to Planning Practice Guidance 'Advertisements' which contain much useful advice and guidance on advertisements control.

ST2278	Daniel Stone	Project Manager	09 Planning for our Built Environment	D02		Objection	<p>2. Objection to Policy D2: General Design Principles (Strategic Policy)</p> <p>We will support proposals where the applicant can demonstrate that proposals: a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, and have particular regard to BREEAM or its successor; This policy is insufficiently detailed to enable the council to secure any improvement over a business as usual construction approach and will not secure the radical reduction in carbon emissions demanded by national legislation and planning policy. This is confirmed by paragraph 9.11 of the plan which confirms that new development will be built to Building Regulations Part L standards. As discussed in greater detail in the RTP1 / TCPA Climate Change Guide and in The GBC Policy Playbook, the Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. In light of the legal and policy requirements set out above, such energy efficiency standards should be set at the maximum level allowed by viability requirements for each category of new development. In the Reading Local Plan examination for example, the Inspector appears to have accepted the following policy, for full carbon neutrality for major residential development.</p> <p>Example policy – Reading Local Plan Policy H4: Standards for New Housing<sup>9</sup> New build housing should be built to the following standards, unless it can be clearly demonstrated that this would render a development unviable: ... c. All major new-build residential development should be designed to achieve zero carbon homes. d. All other new build housing will achieve at a minimum a 19% improvement in the dwelling emission rate over the target emission rate, as defined in the 2013 Building Regulations. The Planning and Energy Act 2008 also enshrines the power for Local Planning Authorities to set binding “Merton” policies, requiring developments to generate a specific percentage of their energy needs from on-site renewable energy. Supported by the legislative requirements set out above, South Tyneside Council should set binding energy efficiency and on-site renewable standards for new development as well as a carbon offsetting regime to secure off-site carbon reductions. Such requirements should be set at the maximum possible level of emissions abatement for each category of new development, on the basis of a robust and holistic viability assessment</p>
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							that takes into account other needs such as affordable housing requirements. Regarding viability considerations, analysis carried out for the West of England Authorities (Bath and North East Somerset, Bristol, North Somerset, South Gloucestershire) suggest that it is possible to achieve net zero regulated carbon emissions from a combination of energy efficiency on site carbon reductions and allowable solutions for an additional capital cost of between 5-7% for homes and non-domestic buildings. Achieving net zero regulated and unregulated emission is likely to result in a cost impact of 7-11% for homes. Such evidence should be used to support South Tyneside's policies being zero carbon, or as close to zero carbon as possible, taking into account the area's building stock and market conditions. Policy D2 should also be amended to require commercial developments to achieve BREEAM Excellent. The current wording is insufficiently strong, and just requires commercial developers to "have regard" to the BREEAM assessment regime.
ST2285	Gillan Gibson		09 Planning for our Built Environment	D01		Support	Our Strategic Approach for the Built Environment (Strategic Policy) - CPRE supports Policy D1
ST2285	Gillan Gibson		09 Planning for our Built Environment	D02		Support	General Design Principles (Strategic Policy) - CPRE supports D2
ST2285	Gillan Gibson		09 Planning for our Built Environment	D03		Support	Promoting Good design with new residential developments (Strategic policy) - CPRE supports D3
ST2285	Gillan Gibson		09 Planning for our Built Environment	D04		Support	Alterations and Extensions to residential buildings - CPRE supports D4
ST2285	Gillan Gibson		09 Planning for our Built Environment	D05		Support	Shopfronts - CPRE supports Policy D5
ST2285	Gillan Gibson		09 Planning for our Built Environment	D05		Support	Advertisements - CPRE supports Policy D6
ST2428	Howard Lawrence	Resident	09 Planning for our Built Environment	D03		Comment	Policy D3 Reference is made in Policy D3 merely 'to encourage' developers to adopt BFL12 standards. This is unsatisfactory, inadequate and lacks the ambition to achieve the best for the residents of South Tyneside.

							I believe that as a very minimum, BFL12 standards must be insisted upon, but preferably that South Tyneside Council should develop/adopt its own minimum Design Guide.
ST2499	David Herbert		09 Planning for our built environment	D02		Objection	<p>The Local Plan in Policy D2: General Design Principles (Strategic Policy) states;</p> <p>I will support proposals where the applicant can demonstrate that proposals:</p> <p>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, and have particular regard to BREEAM or its successor;</p> <p>This policy is insufficiently detailed enough to ensure any improvement over a continuation of the present building standards in construction and will not secure the radical reduction in carbon emissions demanded by national legislation and planning policy. This is confirmed by paragraph 9.11 of the plan which confirms that new development will be built to Building Regulations Part L standards</p> <p>The RTPi / TCPA Climate Change Guide and in The GBC Policy Playbook, the Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. The highest standards of energy efficiency allowed should be mandatory for new developments.</p> <p>The Planning and Energy Act 2008 also gives power for Local Planning Authorities to set binding policies, requiring developments to generate a specific percentage of their energy needs from on-site renewable energy. Solar Panels should be installed on all suitable roofs as a minimum.</p>
ST2506	Mark Gabrele	Chris Martin	09 Planning for our built environment	D02		Objection	<p>5.14.1 Policy D2 – General Design Principles (Strategic Policy)</p> <p>5.14.1.1 Our Client supports the overall flexibility of this policy and is committed to providing well-designed developments which integrate with and complement the character of their area. We note however that Part D requires the retention of existing trees on development sites. Whilst ideally trees should be retained if possible, this may not always be feasible in order to provide development on site in a high quality and coherent manner. To ensure that the policy is sound by being effective, this should make clear that existing trees should be retained where possible although it should contain flexibility to address instances where tree loss is unavoidable.</p>

							5.14.1.2 We also note that Part F mentions a requirement for public art. We would strongly query why such provision would be necessary to ensure development is acceptable. We therefore believe such a requirement is unjustified and object to its inclusion. As such, we request that it is deleted.
ST2516	Dave Hutchinson		09 Planning for our built environment	D01		Support	<p>East Boldon Neighbourhood Forum agrees with the sentiment expressed in this section concerning the importance of good design and appropriate layout standards, and that these are necessary in order to protect and enhance the quality and value of our environment.</p> <p>It welcomes the priority given in sub sections 9.1 to 9.4 to the importance of achieving good design and in particular to 'local distinctiveness', and the recognition that 'The quality of architecture and design are both relevant to the impact that development will have on the character of the area'.</p> <p>East Boldon Neighbourhood Forum believe that the distinctiveness of our villages must be protected and this section should be expanded to deal with that aspect more comprehensively.</p> <p>The East Boldon Neighbourhood Forum welcomes the acknowledgement that 'Local Plans, including Neighbourhood Plans, should develop robust and comprehensive policies that set out the quality of development that is expected for the area', and that 'such policies should be based on stated objectives for the future of the area and an understanding and an evaluation of its defining characteristics.</p> <p>With regard to sub section 9.5 East Boldon Neighbourhood Forum also share the belief that securing good design is central to good planning and it is essential that new schemes are built to appropriate design and layout standards.</p>
ST2516	Dave Hutchinson		09 Planning for our built environment	D02		Support	<p>East Boldon Neighbourhood Forum fully agrees with the principles set out under Policy D2, especially in respect of designs which:</p> <p>b) enhance the local setting and reinforce local identity, and give sensitive consideration to their surroundings.</p> <p>d,e,f) the importance of retaining existing natural features and trees/shrubs, and the crucial role of high quality landscaping.</p> <p>g) achieving good movement within the site and good integration with surrounding streets and open spaces.</p> <p>h) adopting the principles of Lifetime Neighbourhoods.</p> <p>l) seek to improve the character and quality of the area.</p>

ST2516	Dave Hutchinson		09 Planning for our built environment	D02		Objection	<p>However, we believe without more comprehensive guidance to developers, the principles set out in this section may fail to be achieved and the opportunity to deliver the type of homes and communities that are need for the future, and which the people of South Tyneside so richly deserve, may be missed.</p> <p>Given the scale of the development envisaged throughout the Boldons and Cleadon, the issues concerning distinctiveness of our villages, the sensitivity associated with developing existing Green Belt land, and the Climate Change Emergency declared by the Government and South Tyneside Council, we think sections D2 and D3 falls short of dealing with design principles comprehensively and in a way which sets out what is expressly required in order to address these important aspects. The Forum respectfully contend that South Tyneside Council should adopt a Design Code/Guide which would steer future development in a clear and unambiguous way, and provide for the creation of well designed places and sustainable homes, which are future proofed and appropriate to the needs of all . Many Local Authorities have adopted such documents, and the Design Guide issued to elected members of South Tyneside Council, is a document of some merit in its own regard.</p>
ST2516	Dave Hutchinson		09 Planning for our built environment	D03		Objection	<p>Reference is made in Policy D3 merely ' to encourage developers to seek' BFL12 standards. This is unsatisfactory, inadequate and lacks ambition to achieve the best for the residents of South Tyneside.</p> <p>East Boldon Neighbourhood Forum believe that as a very minimum, BFL12 standards must be insisted upon, but preferably that South Tyneside Council should develop/adopt its own minimum Design Guide, as suggested and set out in our comments in section D1 and D2 above.</p> <p>For clarity, East Boldon Neighbourhood Forum intend to produce our own design code and guide as an integral part of the Neighbourhood Plan so that the recommendations of NPPF are adequately addressed.</p> <p>We welcome the point made in sub section 9.6 regarding the effect of our built environment on health and wellbeing.</p> <p>We also welcome sub section 9.7 but would ask that reference is made to the emerging Neighbourhood Plan(s) and the possibility that master planning may be a component. For clarity, East Boldon Neighbourhood Forum is considering this approach for sites within the Forum Area.</p> <p>We support in principle the point made in sub section 9.9 to 9.20.</p> <p>Would ask that reference is made to the means by which developers are expected to adequately communicate how they will achieve these</p>

						<p>objectives.</p> <p>With regard to sub sections 9.22 to 9.24, we believe the changing demographics and needs of an aging population should be dealt with more robustly and the Local Plan should set out explicit requirements regarding this aspect. A Design Guide would do much to communicate what is needed.</p> <p>We also welcome the emphasis on the Public Realm and the need for sensitively designed Landscape, points 9.26 to 9.32 . East Boldon Forum supports the general principle set out in this section. The Forum believes that new development should retain existing landscape features including trees, plants, streams and water courses, and these should be enhanced where possible to create 'green corridors' linking the development to the adjoining countryside. We believe the landscape and open space proposals within any development must be carefully designed to create such a series of interconnected spaces which, where possible, allow pedestrians, including those with mobility impairments and parents with children in prams or buggies, and cyclists the facility to move around within a safe and attractive environment. The Neighbourhood Plan for East Boldon will seek to establish a number of green spaces to that end. We also believe that creating streets that are wide enough to support meaningful landscaping through the inclusion of grassed and tree lined verges is an important feature and would ask that this section (LANDSCAPE), is expanded to include these aspects. The role gardens can play in helping to mitigate the loss of habitat and helping to promote wildlife is an important also an important consideration. We request that requirements reflecting best practice should also be referred to and set in this section.</p>
ST2516	Dave Hutchinson		09 Planning for our built environment	D04		<p>Objection</p> <p>Support in principle but with reservations East Boldon Neighbourhood Forum support in principle the criteria set out in the policy but would point out that section D4 should be inserted elsewhere in the text. Its present position confuses the information set out in the sub sections which naturally flows from policies D2 and D3. The policy D4 should be adjacent to subsection 9.21 and moved elsewhere for clarity.</p>
ST2516	Dave Hutchinson		09 Planning for our built environment	D05		<p>Support</p> <p>As most of the shops in East Boldon are Victorian or Edwardian and lie within the Conservation Area, East Boldon Neighbourhood Forum is supportive of the policies. It is particularly important in an historic village setting that the shops should retain active frontages, both day and night.</p>

ST2516	Dave Hutchinson		09 Planning for our built environment	D06		Objection	East Boldon Neighbourhood Forum supports the policy, especially in relation to any advertising proposals within the Conservation Area. However, specific reference should have been made to address smaller scale, local advertising ie A-boards, bill boards, DIY signs, & general street clutter etc.
ST2527	Story Homes	Lichfields	09 Planning for our built environment	D02		Objection	<p>Our client is concerned about the reference to BREAAAM or its successor under draft Policy D2(a). There is no national requirement that new developments are required to be BREAAAM rated. Further, our client does not consider it is reasonable that the Local Plan could then be relying on a future successor to BREAAAM that is not yet fully realised or implemented. There may be future viability and deliverability implications which cannot be taken into account in the Local Plan viability assessment work. It does not constitute a robust approach to the application of Design Principles. In addition to the concerns raised about BREAAAM, our client is also concerned about part (h) of Policy D2 which relates to the need for homes to be inclusive and accessible for all in accordance with the principles of Lifetime Neighbourhoods. Additionally, Policy D3 encourages developers to seek the Built for Life quality mark and Policy H11 requires new developments to achieve various Technical Design Standards. Our client has serious concerns about the feasibility, build cost, affordability and viability of delivering these measures and they are not convinced that the implications have been considered by the Council in detail. Furthermore, no evidence has been provided by the Council of a need for accessible and adaptable dwellings, which is contrary to the NPPF (footnote 46). To ensure a sound Plan, that is based on appropriate evidence and consistent with the NPPF, it is requested that part (h) of Policy D2 is deleted and that the following changes are made to Policy D2(a):</p> <p><i>“We will support proposals where the applicant can demonstrate that proposals:</i></p> <p><i>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, where appropriate. and have particular regard to BREAAAM or its successor.”</i></p> <p>As advised in response to Policy S2, our client considers that a requirement to retain all of the existing trees on a site could result in an onerous and inflexible approach. It should be noted that there remain occasions where it is preferable to replace existing hedgerows and trees</p>

						<p>rather than protect them, particularly if they are of low value, dead, dying or diseased.</p> <p>Our client respectfully requests the following change to Policy D2(d):  <i>“Where trees are present on a proposed development site, the landscaping scheme should make provision for the retention of existing trees, where possible and appropriate, recognising their existing habitat, that are important by virtue of their significance within the local landscape.”</i></p>
ST2527	Story Homes	Lichfields	09 Planning for our built environment	D03	Objection	<p>Our clients are concerned about the expectation of draft Policy D3 that major applications should demonstrate their proposals achieve the place-making essentials required to provide everything that should be expected of a new community and also encourage developers to seek the ‘Built for Life’ quality mark or its successor.</p> <p>Whilst our client recognises the importance of providing place-making essentials, concern is raised about whether they would be feasible and viable in all instances, especially should future changes be made to the document.</p> <p>Guidance keeps changing and the Design Council’s website recognises that the ‘Building for Life 12’ could have a lifespan of 7 to 10 years. Its third edition was published in January 2015 and hence it is already nearly 5 years old. The South Tyneside Local Development Scheme (May 2019) anticipates that the Local Plan will be adopted in June / July 2021. As such, by the time the Plan is adopted ‘Building for Life 12’ could be approaching the end of its lifespan. Our client does not consider it is reasonable that the Local Plan could then be relying on a future iteration of this document which is not yet fully realised or implemented. There may be future viability and deliverability implications which cannot be taken into account in the Local Plan viability assessment work.</p> <p>Policy DM3(d) also refers to designing dwellings for adaptation to meet occupants’ changing needs and lifestyles. As advised in response to Policies DM2 and H11, the Council does not appear to have considered the feasibility, build cost, affordability and viability of delivering such measures, neither has a need be identified.</p> <p>To ensure a sound Plan that has been positively prepared and is based on appropriate evidence, in accordance with the NPPF (para. 35), our client requests that Policy D3 is either deleted, given that design requirements are covered by Policy D2, or that the following changes are made to Policy D3:</p>

						<p><del>“With regard to new housing developments, and in line with the principles of the Design Council’s Building for Life 12 or its successor, we believe that new housing should be attractive, functional and sustainable. Therefore, in addition to the broader design requirements of Policy D2, we will therefore expect seek for major applications to demonstrate that their proposals achieve the place-making essentials required to provide everything that should be expected of a new community and also encourage developers to seek the Built for Life quality mark or its successor.</del></p> <p><i>Proposals for new homes should, where appropriate...”</i></p> <p><del>(d) Consider design for adaptation so that properties can accommodate occupants’ changing needs and lifestyles.</del></p> <p>Our client suggests that paragraphs 9.23 and 9.37 are deleted given their reference to Lifetime Homes.</p> <p>With regard to paragraph 9.7, our client is concerned by the reference to unspecified sites which are considered “important in terms of its location within a town or village, that it will warrant special attention with regards design.” The Council has not identified the settlements or sites it considers warrant the approach of a site-specific design brief. The introduction of this requirement without some form of reference will serve only to delay the delivery of the site. Our client objects to paragraph 9.7 and requests that it is deleted in its entirety along with the first sentence of paragraph 9.8.</p> <p>Paragraph 9.30 requires that proposals should be accompanied by plans detailing all existing and proposed hard and soft landscaping. However, it would not be possible to submit a detailed landscaping scheme with an outline planning application in advance of any site layout being fixed, hence why landscaping is dealt with through a reserved matters application. Our client therefore suggests the following change to this paragraph:</p> <p><i>“We consider landscape as an integral part of all development <u>and proposals should be accompanied by plans detailing all existing and proposed hard and soft landscaping affected by or to be incorporated into the scheme a landscape strategy providing the hard and soft landscaping principles. The detailed landscaping scheme will then be agreed with the council through a condition or a reserved matters application.</u>”</i></p> <p>Paragraph 9.35 bullet point 3 states that the Council will seek to ensure that both new build and change of use:</p>
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							<p><i>"Is dual aspect except in exceptional circumstances"</i></p> <p>The inclusion of this point is overly prescriptive and the use of "exceptional circumstances" is wholly inappropriate in these circumstances. This approach is inconsistent with good design practices and the Council's aspiration to make the "most efficient use of land" (Policy H5). As such, the following amendments are sought to the wording of the supporting text:</p> <p><i>"where appropriate <del>is</del> is dual aspect <del>except in exceptional circumstances</del>".</i></p>
ST2531	David Herbert		09 Planning for our built environment	D02		Objection	<p>The Local Plan in Policy D2: General Design Principles (Strategic Policy) states;</p> <p>I will support proposals where the applicant can demonstrate that proposals:</p> <p>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation, and have particular regard to BREEAM or its successor;</p> <p>This policy is insufficiently detailed enough to ensure any improvement over a continuation of the present building standards in construction and will not secure the radical reduction in carbon emissions demanded by national legislation and planning policy. This is confirmed by paragraph 9.11 of the plan which confirms that new development will be built to Building Regulations Part L standards</p> <p>The RTPI / TCPA Climate Change Guide and in The GBC Policy Playbook, the Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. The highest standards of energy efficiency allowed should be mandatory for new developments.</p> <p>The Planning and Energy Act 2008 also gives power for Local Planning Authorities to set binding policies, requiring developments to generate a specific percentage of their energy needs from on-site renewable energy. Solar Panels should be installed on all suitable roofs as a minimum.</p>
ST2531	David Herbert		09 Planning for our built environment	D02		Objection	<p>The Local Plan in Policy D2: General Design Principles (Strategic Policy) states;</p> <p>I will support proposals where the applicant can demonstrate that proposals:</p> <p>a) Are sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation,</p>

						<p>and have particular regard to BREEAM or its successor;</p> <p>This policy is insufficiently detailed enough to ensure any improvement over a continuation of the present building standards in construction and will not secure the radical reduction in carbon emissions demanded by national legislation and planning policy. This is confirmed by paragraph 9.11 of the plan which confirms that new development will be built to Building Regulations Part L standards</p> <p>The RTPI / TCPA Climate Change Guide and in The GBC Policy Playbook, the Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. The highest standards of energy efficiency allowed should be mandatory for new developments.</p> <p>The Planning and Energy Act 2008 also gives power for Local Planning Authorities to set binding policies, requiring developments to generate a specific percentage of their energy needs from on-site renewable energy. Solar Panels should be installed on all suitable roofs as a minimum.</p>
ST2460	Sonia Ali		09 Planning for our built environment	D02		<p>Objection</p> <p>The General Design Principles -POLICY D2 states: Where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form The 'development' being a priority over trees is not acceptable. I therefore object to Policy D2</p>
ST2505	Martyn Earle	Chris Martin	09 Planning for our built environment	D02		<p>Objection</p> <p>20.1 Policy D2 – General Design Principles (Strategic Policy) 20.1.1 Our Client supports the overall flexibility of this policy and is committed to providing well-designed developments which integrate with and complement the character of their area. We note however that Part D requires the retention of existing trees on development sites. Whilst ideally trees should be retained if possible, in order to provide development on some sites in a high quality and coherent manner, tree loss may be required. To ensure that the policy is sound by being effective, this should make clear that existing trees should be retained where possible although it should contain flexibility to address instances where tree loss is unavoidable. 20.1.2 We also note that Part F mentions a requirement for public art. We would strongly query why such provision would be necessary to ensure development is acceptable. We therefore believe such a requirement is</p>

							unjustified and object to its inclusion. As such, we request that it is deleted.
ST2505	Martyn Earle	Chris Martin	09 Planning for our built environment	D03	e	Objection	<p>21.0 Policy D3 – Promoting Good Design with New Residential Development (Strategic Policy)</p> <p>21.1 Again, our Client supports the overall approach to this policy and the promotion of good design. This is consistent with the core principles of the NPPF. Nevertheless, they object to Part E of the policy which refers to ‘SPD 9: Householder Developments or any successor document’.</p> <p>21.2 Although this may be well intentioned, reference to a Supplementary Planning Document (SPD) within a development plan policy effectively gives the SPD the weight of a development plan policy. The NPPF and PPG are clear that it is not the role of SPDs to produce policy or become policy, rather their role is to explain more fully development plan policies. Thus, the approach in Part E is unsound as it is inconsistent with national policy. Instead, reference to the SPD (or its successor) should be made in the supporting text (rather than in the policy itself) and it should be clear that its role is to explain the development plan policy in more detail. Given that the SPD appears to relate to householder development would, in any event, query its relevance.</p> <p>21.3 We also note that many of the SPDs currently published are dated and reference superseded (or soon to be superseded) development plan policies. The Council’s published Local Development Scheme (LDS) (May 2019) highlights that these SPDs will be reviewed in due course. This therefore raises the point of the worth of referring to them within the Local Plan given that they are highly likely to be replaced/updated.</p>
ST0322	Shirley Ford		09 Planning for our Built Environment	D02	a	objection	The local plan should be designed to help us achieve emissions reductions across all sectors, and therefore should include a carbon emissions analysis of all the different potential versions of the local plan.