

Our Ref	Respondent	Representative	Chapter	Policy	Para/ Criterion	Support /Object	Submitted Comments
ST2527	Story Homes	Lichfields	10 Planning for our Heritage Assets	HE01		Objection	<p>Although our client recognises the importance of conserving and enhancing the natural environment, they consider that the wording of draft Policy HE1 should be consistent with the NPPF (para. 184). As such, the following amendments are sought to the wording of this policy and its supporting text:</p> <p>Paragraph 10.7: <i>“Development proposals which affect the historic environment will need to sustain the Borough’s local distinctiveness and character by safeguarding, conserving and, and where appropriate, enhancing designated and undesignated heritage assets and their settings.”</i></p> <p>Policy HE1: <i>“We will support development proposals that conserve protect, preserve and, where appropriate, enhance the Borough’s varied historic, and architectural character and heritage, visual appearance and contextual importance of our heritage assets and their setting, <u>appropriate to their significance.</u>”</i></p>
ST2527	Story Homes	Lichfields	10 Planning for our Heritage Assets	HE04		Objection	<p>Although our client supports the relevance of draft Policy HE4 where proposals would affect a known or potential archaeological site, they wish to ensure that its text remains consistent with the NPPF (paragraphs 189 and 197). As currently worded, the text is considered to be more onerous than national policy.</p> <p>It is therefore requested that the wording of this policy is amended as follows:</p> <p><i>“Development that would affect a known or potential archaeological site, whether designated or non-designated, would require the results of a desk-based assessment to be submitted as part of the planning application. An archaeological evaluation may also be required to identify the most appropriate course of action. Proposals on sites where archaeological interest has been established by a previous find recorded in the Historic Environment Record will <u>may</u> not be determined until the potential impact of the proposed development on archaeological deposits and remains has been adequately assessed and evaluated, and any adverse impacts will be avoided, minimised or mitigated. In the absence of adequate information, applications will <u>may</u> be refused. <u>The pre-determination assessment work will be proportionate to the asset’s importance and the work required will be no more than is sufficient to</u></i></p>

							understand the potential impact of the proposal on their significance". Opportunities for information gain and investigations as part of proposed development will be maximised <u>sought, where appropriate</u> , and added to the Tyne & Wear Historic Environment Record."
ST2527	Story Homes	Lichfields	10 Planning for our Heritage Assets	HE05		Objection	Story Homes is concerned that the wording of draft Policy HE5, in relation to development affecting non-designated heritage assets, is more onerous than the NPPF. There is no requirement within paragraph 197 of the NPPF for applicants to demonstrate that the public benefits of the development need to outweigh any harm of loss of the non-designated heritage asset. Instead the NPPF requires a balanced judgement. To ensure a sound Plan that is consistent with the NPPF (paragraphs 35 and 197), the following amendments are sought to the wording of this policy: "In determining applications that would result in substantial harm to, or the total loss of, a non-designated heritage asset or its setting, applicants will be required to demonstrate that the public benefits of the development would outweigh any harm or loss of the heritage asset, based on its significance. <u>a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</u> "
ST2111	Nicola Reed		10 Planning for our Heritage Assets	HE01		Observation	This policy states that "development proposals should make a positive contribution to strengthening links between culture and the historic environment". It is unclear how the Council intend for this to be applied in when this aspect of the policy will be applied. Further clarification should be included within the policy or supporting text.
ST2516	Dave Hutchinson		10 Planning for our Heritage Assets	HE01		Support	The policy acknowledges the contribution the historic environment can play regarding quality of life, by giving people a sense of place and identity. East Boldon Neighbourhood Forum looks forward to being consulted on the Council's proposed Heritage Strategy. The Local List of Heritage Assets has not been revised since November 2011 – this needs to be reviewed and updated as a matter of urgency.
ST2516	Dave Hutchinson		10 Planning for our Heritage Assets	HE02		Support	East Boldon Neighbourhood Forum acknowledge the importance of South Tyneside's World Heritage Site.
ST2516	Dave Hutchinson		10 Planning for our	HE03		Support	East Boldon Neighbourhood Forum support the general principles set out in this Policy, and the supplementary paragraphs referring to Conservation Areas are particularly relevant.

			Heritage Assets				Reference is made to the Council's Conservation Area Management Plans and Character Appraisals – East Boldon's version of these documents were produced in 2009 and 2006 respectively, and are in urgent need of review.
ST2516	Dave Hutchinson		10 Planning for our Heritage Assets	HE05		Support	Support with reservation Whilst supporting this policy, East Boldon Neighbourhood Forum notes that the Local List of Heritage Assets has not been revised since November 2011 – this needs to be reviewed and updated as a matter of urgency.
ST2516	Dave Hutchinson		10 Planning for our Heritage Assets	HE06		Support	It is noted that none of the Designated Heritage at Risk Structures are located within the East Boldon Neighbourhood Forum area (South Tyneside Grade II Listed Buildings at Risk report).
ST2111	Nicola Reed		10 Planning for our Heritage Assets	HE02		objection	The first sentence of this paragraph should be amended to state that policies will be encouraged to "conserve, promote and where possible enhance its Outstanding Universal Value...". The current wording suggests that any proposals affecting the site should conserve, promote and enhance the value of the site. NPPF does not require all 3 aspects to be met as part of the consideration of applications. This policy currently states that "development that would cause substantial harm to the significance of the World Heritage Site will be allowed only in wholly exceptional circumstances. This part of the policy should be amended in line with NPPF para 195 which states "where a proposed development will lead to substantial harm (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh harm or loss..." It is noted that the current policy wording refers to exceptional circumstances however it is considered that the wording should be brought more in line with NPPF to ensure that the exceptional circumstances in this instance are clear and compliant with national policy.
ST2111	Nicola Reed		10 Planning for our Heritage Assets	HE04		objection	This policy requires investigations as part of a proposed development to be added to the Tyne and Wear Historic Environment Record. This should not be a blanket requirement of archaeological investigations. Firstly, the policy should refer to other opportunities for investigations to be recorded such as within university libraries. In addition to this, the wording suggests that any form of investigation should be published and recorded in the

							Historic Environment Record. Any requirement of this sort should be proportionate to the investigation undertaken.
ST2111	Nicola Reed		10 Planning for our Heritage Assets	HE05		objection	The first paragraph of this policy should include for a minor amendment to the wording which would state that "development will be expected to conserve and, where possible and appropriate enhance the character, appearance..." It is acknowledged that the inclusion of the term "where possible" includes some flexibility however it should be acknowledged that this aspect of the policy may not be appropriate, depending on the level at which a development will affect a non-designated heritage asset.
ST2112	Neil Westwick		10 Planning for our Heritage Assets	HE01		objection	Although our client recognises the importance of conserving and enhancing the natural environment, they consider that the wording of draft Policy HE1 should be consistent with the NPPF (para. 184). As such, the following amendments are sought to the wording of this policy and its supporting text: Policy HE1: "We will support development proposals that conserve protect, preserve and, where appropriate, enhance the Borough's varied historic, and architectural character and heritage, visual appearance and contextual importance of our heritage assets and their setting, appropriate to their significance."
ST2112	Neil Westwick		10 Planning for our Heritage Assets	HE01	10.7	objection	Although our client recognises the importance of conserving and enhancing the natural environment, they consider that the wording of draft Policy HE1 should be consistent with the NPPF (para. 184). As such, the following amendments are sought to the wording of this policy and its supporting text: Paragraph 10.7: "Development proposals which affect the historic environment will need to sustain the Borough's local distinctiveness and character by safeguarding, conserving and, and where appropriate, enhancing designated and undesignated heritage assets and their settings."
ST2112	Neil Westwick		10 Planning for our Heritage Assets	HE04		objection	Although our client supports the relevance of draft Policy HE4 where proposals would affect a known or potential archaeological site, they wish to ensure that its text remains consistent with the NPPF (paragraphs 189 and 197). As currently worded, the text is considered to be more onerous than national policy. It is therefore requested that the wording of this policy is amended as follows: "Development that would affect a known or potential archaeological site,

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ST2112	Neil Westwick		10 Planning for our Heritage Assets	HE05		objection	<p>Our client is concerned that the wording of draft Policy HE5, in relation to development affecting non-designated heritage assets, is more onerous than the NPPF. There is no requirement within paragraph 197 of the NPF for applicants to demonstrate that the public benefits of the development need to outweigh any harm of loss of the non-designated heritage asset. Instead the NPPF requires a balanced judgement.</p> <p>To ensure a sound Plan that is consistent with the NPPF (paragraphs 35 and 197), the following amendments are sought to the wording of this policy:</p> <p>"In determining applications that would result in substantial harm to, or the total loss of, a non-designated heritage asset or its setting, applicants will be required to demonstrate that the public benefits of the development would outweigh any harm or loss of the heritage asset, based on its significance. a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."</p>
ST2170	Natasha Rowland		10 Planning for our Heritage Assets	HE01	10.06	support	<p>NT supports the recognition in this paragraph that Souter Lighthouse is amongst the finest heritage assets in the district and we specifically endorse the recognition in HE1 that the Borough's heritage assets should also be recognised for their contribution to our cultural identity and tourism offer.</p>

ST2170	Natasha Rowland		10 Planning for our Heritage Assets	HE01		support	NT supports the recognition in this paragraph that Souter Lighthouse is amongst the finest heritage assets in the district and we specifically endorse the recognition in HE1 that the Borough's heritage assets should also be recognised for their contribution to our cultural identity and tourism offer.
ST2176	Neil Westwick	Hellens Land and Maplehill Property Ltd	10 Planning for our Heritage Assets	HE01		objection	Although our client recognises the importance of conserving and enhancing the natural environment, they consider that the wording of draft Policy HE1 should be consistent with the NPPF (para. 184). As such, the following amendments are sought to the wording of this policy and its supporting text: Policy HE1: "We will support development proposals that conserve protect, preserve and, where appropriate, enhance the Borough's varied historic, and architectural character and heritage, visual appearance and contextual importance of our heritage assets and their setting, appropriate to their significance."
ST2176	Neil Westwick	Hellens Land and Maplehill Property Ltd	10 Planning for our Heritage Assets	HE01	10.07	objection	Although our client recognises the importance of conserving and enhancing the natural environment, they consider that the wording of draft Policy HE1 should be consistent with the NPPF (para. 184). As such, the following amendments are sought to the wording of this policy and its supporting text: Paragraph 10.7: "Development proposals which affect the historic environment will need to sustain the Borough's local distinctiveness and character by safeguarding, conserving and, and where appropriate, enhancing designated and undesignated heritage assets and their settings."
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ST2186	Alastair Willis	Buckley Burnett Limited	10 Planning for our Heritage Assets	HE01		objection	<p>Although our client recognises the importance of conserving and enhancing the natural environment, they consider that the wording of draft Policy HE1 should be consistent with the NPPF (para. 184). As such, the following amendments are sought to the wording of this policy and its supporting text: "We will support development proposals that conserve protect, preserve and, where appropriate, enhance the Borough's varied historic, and architectural character and heritage, visual appearance and contextual importance of our heritage assets and their setting, appropriate to their significance."</p>

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ST2285	Gillan Gibson		10 Planning for our heritage assets	HE01		Support	Our Strategic Approach for Heritage Assets (Strategic Policy) - CPRE supports Policy D1
ST2285	Gillan Gibson		10 Planning for our heritage assets	HE02		Support	World Heritage Sites - CPRE supports HE2
ST2285	Gillan Gibson		10 Planning for our heritage assets	HE03		Support	Development Affecting Designated Heritage Assets (Strategic Policy)
ST2285	Gillan Gibson		10 Planning for our heritage assets	HE04		Support	Archaeology - CPRE supports Policy HE4
ST2285	Gillan Gibson		10 Planning for our heritage assets	HE05		Support	Development Affecting non- Designated Heritage Assets (Strategic Policy) - CPRE supports Policy HE5
ST2285	Gillan Gibson		10 Planning for our heritage assets	HE06		Support	Heritage at Risk - CPRE supports HE6