



Dear Ms Lawless,

Please find below the response from Newcastle Green Party to the city's Development and Allocations Plan (DAP). We would like to thank you for the opportunity to comment on the plan and look forward to participating if future consultations during its development. This is crucial for the future of our city and we feel strongly that sustainable development, in line with international agreements like the Paris Climate Agreement, Covenant of Mayors, and the UN's Sustainable Development Goals, will be vital in ensure our city adapts to the challenges of the 21<sup>st</sup> Century.

Whilst the Green Party does not feel that 'economic growth' should be the most important measure of the success of our city, we understand that the National Planning Policy Framework (NPPF) and regional competition for local authority income dictates to some extent the short-term direction the council must take. We also understand that there are inevitably requirements for new infrastructure, housing stock, industrial and commercial land, and social facilities in our city. Good planning and design are therefore essential to avoid conflicts between social, economic, and environmental concerns.

There will always be competing demands on the finite resource of land in our city, but unsustainable patterns of development (including on prime agricultural land and important natural habitats) must be avoided at all costs. Once gone, those resources are lost forever. Low density urban sprawl makes sustainable lifestyles difficult, and means that inefficient use of land leads to high demand and high associated house prices. Land must be used efficiently to ensure that local needs, such as housing and employment, are facilitated without prejudicing long-term aims such as carbon reduction and climate change adaptation. Spatial patterns of development must also ensure that the city can meet the sustainable transport and energy objectives set out in its strategies for climate change, air pollution, and the Core Strategy.

Sustainable development will be achieved through planning by creating places that facilitate a sustainable low carbon economy. Achieving this requires a recognition that policies addressing all aspects of planning, including construction, housing, energy, transport, food, waste, water, health, the economy, and natural habitats are interconnected. We would therefore like to draw attention to the need for this joined-up thinking in the final version of the DAP, and to comment on the contents of specific policies within the plan. We hope that there will be consideration for their inclusion in the final version.

Yours,

Alistair Ford, Newcastle Green Party

**DM1** – we wish to object to the wording of this policy.

We recognise that employment is vital to ensure the viability of our region and city, but emphasise that that employment must be sustainable and green. Whilst we recognise the council's duty to bring forward sufficient land for development, demand for new urban land can be minimised through higher densities of development, re-use of small local sites for dense infill development, and mixed-use development within urban areas. We also understand the link between the location of employment and the demand for travel. The past decades have seen a dramatic rise in the distances being travelled, and a shift towards the use of less equitable and unsustainable modes of travel. The Green Party adopts a policy of accessibility rather than mobility in transport, with objectives to reduce the need for travel, and journey lengths, through planning.

The Transport Planning Society commented in 2014 that “the integration of land-use and transport planning is weak and growing weaker”. We therefore press the council to include, in DM1, policies that govern the selection of employment sites based on their environmental and societal impacts, alongside their economic benefits. The adoption of integrated land-use and transport planning must be a priority, ensuring full consideration is given to the impacts of new employment sites on transport infrastructure, and the accessibility of these sites to residential areas (and thus the labour market). High density mixed-use development would make access by walking and cycling modes much more achievable, whilst the adoption of high density development clustered around public transport hubs would reduce over-reliance on the private car.

**DM3** – we object to this policy on the current wording.

The Green Party full support the need to protect local retail centres, believing that the provision of local services and retail, and the concept of a ‘walkable neighbourhood’ are a vital cornerstone of sustainable development. We also, however, understand that the “vitality and viability” of a centre is dependent on a number of factors, including the proportion of locally-owned independent businesses, mix of uses, and accessibility. We would therefore encourage the council to include some wording about the protection of independent local businesses under DM3, and to consider the impact of any new development on the independent sector and character of an area. For example, Shields Road in the east of the city has been unduly affected by large-scale retail centres at either end which have damaged the viability of this once-thriving area.

As with policy DM1, the provision and protection of retail sites must be done in conjunction with other planning concerns and adverse environmental impacts which may arise from such development. The spatial relationship between retail centres and their customer base must be considered, given the large number of transport journeys which are for shopping trips. High density and mixed-use development around retail centres would ensure vitality and viability of retail centres

without adding to road traffic, air pollution, and CO2 emissions. The city's most vibrant existing retail areas (e.g. Chillingham Road, West Road, Gosforth High Street) are in high density residential areas with large pedestrian catchments. This ensures vibrancy and vitality based on walking and cycling journeys, reducing the reliance on private car trips. These streets also have frequent bus services linking to the more distant residential areas.

There is already strong guidance along these lines in the Core Strategy (CS13) with Paragraph 5.12 recognising the importance that "development is located in the most sustainable locations, accessible by a choice of travel modes including public transport, walking and cycling (Policy CS13). This is to reduce the need for people to travel, minimise levels of congestion, improve road safety and meet climate change reduction targets. "

**DM5** – we object to the wording of this policy and wish to suggest changes.

In line with earlier comments, the location and nature of housing development in relation to employment sites, school locations, local retail centres, and local services has a large impact on the demand to travel. The location and design of new residential development has potential for a large impact on the city's transport infrastructure and the mode choice of travellers, and thus the viability of sustainable transport. It is vital, therefore, that housing locations are selected based on their potential to adhere to CS13 and to uphold the council's stated policies on climate change mitigation and air pollution.

The Green Party strongly believes in the provision of green belts to contain urban sprawl, maintain the separation of settlements, encourage urban regeneration, and ensure compact cities. The location and density of development has the potential to mitigate against the adverse impacts of additional housing and population and careful consideration must therefore be given to the location of housing sites in the city. We believe the council should move towards a more active role in assembling land, providing infrastructure, and drawing up spatial plans, bearing in mind the integrated nature of development as highlighted in DM1 and DM3.

We would therefore like to suggest that the wording of DM5 is changed to include "subject to an assessment of environmental impacts including those on air quality, CO2 emissions, land-take, and loss of natural habitat". We would also urge the council to undertake proper land-use transport assessment of all new development sites in light of experiences such as the Blue House roundabout proposals in 2016, brought about as a result of projected increases in traffic because of badly-sited residential developments away from public transport infrastructure and without local services or amenities.

**DM7** – we object to the wording of this policy and wish to suggest changes.

We suggest that minimum space standards are based on the 'Parker Morris' standards, to improve residents' quality of life, ensure that homes are accessible, and are built to the Lifetime Homes

standard so that they are able to accommodate changing personal circumstances and growing families. These standards should enable anyone with a disability to live in any home in Britain.

**DM10** – we fully support this policy but object to current wording and suggest some changes.

We suggest the inclusion of an additional point, in line with CS13, that “Development will be required to: 1) ensure that walking and cycling are the natural choice for all local journeys”.

Under 3, we would suggest adding “and that those walking journeys are direct, safe, and clearly-signposted.”

**DM11** – we fully support this policy but object to current wording and suggest some changes.

“Promotion and facilitation” of public transport is insufficient to ensure, as per CS13, modal shift away from the private car to public transport. Given that people make travel decisions based mainly on time and monetary factors, public transport must be the fastest and cheapest option to get to a destination.

We would therefore like to propose the wording is changed to:

“1. Major development will be required to prioritise public transport by ensuring that access by public transport to the Urban Core and other key local facilities is faster and more direct than by car.”

We would also like to recommend the council explores the development of additional park and ride facilities to the existing ones listed. This could be ‘micro park and ride’ sites on key bus or Metro corridors with 10 or 20 car parking spaces to remove vehicular traffic from the city centre.

**DM12** - we object to the current wording and propose changes.

We strongly oppose the inclusion of any policy that assumes the provision of car parking in new developments. In order to ensure that other modes are considered before private car, parking policy should be set to only provide parking where other options cannot facilitate travel. Therefore we would suggest changing the wording to:

“Development will be required to: 1. Provide safe, secure and useable cycle parking, and only provide vehicle parking where access cannot be provided by other modes.”

We would also push the council to consider explicitly stating the intention to adopt a review of

parking charges in the city, and the development of a Workplace Parking Levy, to ensure that private car travel is made less attractive than walking, cycling, and public transport (in line with CS13).

**DM20** - we object to the current wording and propose changes.

The design of development is vital to ensuring the achievement of sustainability objectives. Having sufficient standards in place will ensure that developers are required to build to sufficient quality to ensure wider environmental impacts are minimised and social inclusion is maximised. We would therefore like to suggest the following wording for DM20:

“Development will be required to deliver high quality and sustainable design by:

1. Retaining buildings of architectural and historic merit, including assemblages of buildings which create or contribute to coherent and attractive townscape.
2. Taking full advantage of site features and opportunities to improve the character and quality of an area.
3. Integrating development into its setting with regard to the scale and pattern of surrounding buildings and spaces.
4. Enhancing the appearance of the City from major movement corridors.
5. Accommodating an appropriate mix of use to:
  - Minimise the need to travel
  - Provide opportunities for local enterprise
  - Foster community cohesion

New housing developments should ensure that new and existing residents have access to local retail and community facilities within walking distance (<400m).

6. Taking a comprehensive and co-ordinated approach to development.
7. Incorporating green infrastructure as an integral part of design, maximising its contribution to ecosystem services for managing flood, drought and heat; maximising tree planting, where appropriate, and providing for its long term maintenance.
8. Incorporating measures to address the impacts of climate change and adverse microclimatic conditions.
9. Ensuring buildings are designed to be adaptable for future re-use, whether via change of use, adaptations to increase accessibility, subdivision, extension or joining adjacent buildings.
10. Integrating mechanical plant, refuse and cycle storage into the design of a building.
11. Using high quality materials and detailing appropriate to the character of the area.

12. Minimising the impact of development upon the local and global environment, in construction and use, through selection and sourcing of materials, construction practices, and sustainable design. (see policy CS16, Climate Change)

13. Ensuring that pedestrian and cycle accessibility is maximised in the design and layout of developments by:

- Creating legible, interconnected street layouts with filtered permeability to prioritise non-motorised modes.
- Providing safe cycle and pedestrian routes throughout the development with an appropriate level of segregation from motorised transport and an appropriate level of informal surveillance.
- Ensuring that routes from residential streets to public transport services and strategic cycle routes are clear, convenient and direct.

14. In the case of housing, developing at appropriate densities according to context:

- Within 400m of local retail centres, strategic transport corridors and transport hubs: moderate to high density (>50 dwellings per hectare)
- Elsewhere: moderate density (>35 dwellings per hectare)
- Lower-density development will be permissible only in circumstances where moderate densities would be insensitive to context.

Higher-density development should be in an appropriate format in order to respect the context and make most efficient use of land. In higher-density areas, terraced houses or lower-rise flatted development will be preferred to detached houses.

**DM23** – we object to the current wording and wish to suggest changes

Whilst we support the broad direction of this policy, it is important that a high-quality environment also considers amenity for non-human residents (biodiversity), safety of local residents, and potential provision for renewable energy generation within residential areas. This will include the design of buildings as well as the layout of developments themselves.

We therefore suggest that point i. be updated to include (with careful consideration given for alterations which will decrease energy use or provide renewable microgeneration”.

We also suggest policy 23, “Residential Amenity” should contain extra sections relating to sustainable transport:

vi: minimising the likelihood of vehicular traffic accidents via the provision of safe cycle and pedestrian routes with an appropriate level of segregation, filtered permeability to prioritise non-motorised modes and create safe streets for children’s play, and traffic calming measures.

vii: ensuring that pedestrian and cycle routes, streets, and public spaces have an adequate level of informal surveillance by the use of outward-facing design.

viii: designing for nature, ensuring the provision of habitats (including trees and wildflower areas) within residential areas.

In addition, we suggest the adoption of a further set of policies on the required standards for residential properties being constructed in the city. Too much new housing is of a poor quality, for example with inadequate space and light, or poor energy performance. This is not only a problem for the occupants, it also increases opposition to new provision. We would therefore suggest the adoption of new policies to require:

a) Minimum space standards based on the 'Parker Morris' standards, to improve residents' quality of life, ensure that homes are accessible, and are built to the Lifetime Homes standard so that they are able to accommodate changing personal circumstances and growing families. These standards should enable anyone with a disability to live in any home in Britain.

b) Comfort standards addressing ergonomics, sound, privacy and light, so that homes are places of retreat.

c) Consideration of energy efficiency and greenhouse gas emissions, and design to avoid overheating during summer months without reliance on energy intensive cooling systems, taking account of projections for our changing climate.

d) Water sensitive design, with a per person consumption target of 100 litres per person per day, the use of rainwater and grey water recycling where appropriate. As a minimum, developments must achieve a neutral impact on surface water runoff, or where conditions don't allow this discharge from the site must be limited, to reduce flooding (see DM25). Drainage design must take account of climate change, for example in preparing for a 1 in 100 year storm event. Care must be given to ensure that plants such as trees are given adequately sized pits to increase their resilience to climate change.

e) Use of low-impact materials, especially reused and recycled materials, to minimise the lifecycle embodied greenhouse gases, energy, water and other resources used in the construction of buildings and over the lifecycle of the materials.

f) Consideration of the importance of the built environment for other species such as lichens, birds, bats and insects, avoiding impacts where possible and enhancing the local ecology as part of the local planning policy.

g) Provision of facilities to make sustainable lifestyle choices the easiest choice for occupants, for example in the provision of recycling bins and cycle parking.

**DM24** – we object to the current wording and wish to suggest changes

We support the council's ambitions to protect the environment of our city but note that environmental protection seems only to be considered in relation to human health. We would

therefore suggest that the council should include impacts on the environment that may affect the natural world and impacts on biodiversity. The words “climate change” are also conspicuously absent from the environmental protection being offered, despite this being one of the major environmental threats our city faces.

We therefore suggest that the wording of DM24 is altered to state that “Development will address any environmental impacts that would arise by demonstrating that:

- i. it has assessed the potential for increases in CO<sub>2</sub> and other greenhouse gas emissions that will contravene council policies on climate change mitigation;
- ii. it has minimised the impact on the local ecosystem and biodiversity.”

**DM25** – we oppose the wording as it stands

Whilst the importance of SuDS and urban greenspace within developments is recognised, the important role of existing green space in undeveloped areas (such as farmland and woodland) is not recognised within this policy. Retention of this land, including natural wetlands, ponds, and other permeable surfaces, is vital to reduce flood risk in light of future climate change.

We therefore suggest an additional point under DM25 that states:

- vi. minimising development on existing greenspace where it has a potential for reduction in flood risk at catchment scale.

**DM26** – we support the principle of this policy but object to the wording as it stands.

The protection of existing green infrastructure is vital as the city grows, and that green infrastructure itself is one of the big attractors for our city. It is therefore not sufficient to simply provide alternative provision for green assets which are of a much lower standard, have lower biodiversity value, or will take many years to reach the value of the green infrastructure being lost. We would therefore propose rewording to state:

“Development will be required to protect, maintain and enhance existing green infrastructure assets and where appropriate contribute towards the delivery of new and/or enhanced green infrastructure assets by: 1. Ensuring development proposals minimise any loss of green infrastructure assets. 2. Ensuring that if loss is unavoidable, alternative provision which maintains or creates new green infrastructure assets of equal value to health, climate protection, and biodiversity is equally accessible; 3. Ensuring that economic benefits are not given excessive weight over the other benefits and ecosystems provided by existing green infrastructure.



**DM28** – we support the broad principles of this policy, but sufficient weight must be given to the protection of biodiversity and the natural habitat in face of increasing development. To that end, development of a wider biodiversity and natural environment cabinet post, underpinned by appropriate officer support, should be prioritised and given due prominence in planning decisions.

**DM29** - we oppose this policy as currently worded and suggest changes.

This policy does not ensure that the loss of local open space is mitigated against in a democratic way, or that the council's own objectives on Page 4 of the DAP are met. There is limited evidence that people in the community are able to have meaningful impact on local decisions on open space, and allocation of the city's parks to a charitable trust without further consultation will add to this problem. We suggest that parks should be explicitly protected in the DAP, and that other local amenity spaces are similarly protected.

**DM32** - we object to this policy as written.

Extraction of fossil fuels within the city of Newcastle should not be allowed. Such extraction is not in keeping with the city's own climate change mitigation strategy, or the internationally-agreed Paris Agreement. We therefore propose changing the wording to include:

The extraction of minerals will only be permitted subject to such proposals having no unacceptable adverse impacts on:

- 1) National greenhouse gas emissions and the ability of the UK to meet its climate change mitigation obligations.