

Jane Tuck
Planning Officer
North Tyneside Council
Cobalt Business Park
North Tyneside NE27 0BY

28/09/2016

Dear Jane

Response to application 16/01304/FUL | Proposal for the erection of 238 Starter Home Dwellings (C3) with associated open space, landscaping, car parking associated access and infrastructure | Land At Salters Lane Longbenton NEWCASTLE UPON TYNE

Thank you for agreeing to allow us an extension to the deadline to respond to this application. The Natural History Society of Northumbria, on behalf of our 1,300 members, objects to this application as it is:

- Contrary to the Local Plan and not suitable for residential use.
- Is on land at risk of flooding with an out-of-date flood risk assessment.
- Contains contradictory information.
- Does not adequately address ecological mitigation.
- The design is not sympathetic to adjacent Area of Local Landscape Significance and no attempt has been made to mitigate for this.
- In combination with other nearby planning applications it will have a cumulative significant impact on traffic which has not been considered in the traffic impact assessments. Information regarding pedestrian and cycle movements is misleading.

Below we have set out our detailed reasons for our objection. We request to speak at the Planning Committee.

Yours sincerely



James Littlewood
Director

NHSN Detailed Reasons for Objection to application 16/01304/FUL | Proposal for the erection of 238 Starter Home Dwellings (C3) with associated open space, landscaping, car parking associated access and infrastructure | Land At Salters Lane Longbenton NEWCASTLE UPON TYNE

1. Contrary to the emerging Local Plan, not suitable for residential use and no identified need

This site has been identified as B1 employment use in the Local Plan. There have been two planning applications approved for this site since 2008, which is evidence that the site is suitable for business use and the Council appears willing to grant permission for business uses which are not B1 (eg D2/A3). One of the reasons that employment related development has not come forwards earlier on this site is due to the focus on the Enterprise Zones on the Silverlink and Cobalt Business Parks for employment use. Most of the land on these sites has been developed and the emerging Core Strategy emphasises that the focus over the next 15 years will shift to the western area of the borough to Gosforth Business Park and the nearby Indigo Business Park. It would therefore be anticipated that employment uses will come forwards for this site over the period of the emerging Local Plan. We note that the applicants' employment land report (prepared by Frank Knight) only considered need and demand in the short-term whereas the emerging local plan is considering the period up to 2030.

The applicant claims that housing has not been considered for this site in the planning process, this is not quite true. An early draft of the emerging Core Strategy did consider housing development on the Gosforth Business Park but this was dropped as the plan has progressed – which indicates that there are more suitable housing sites available in the borough and that Gosforth Business Park is needed for employment uses in the future. The NPPF makes clear that the purpose of the Local Plan is to direct development to the most suitable/sustainable locations. Granting permission for this development would therefore be contrary to NPPF.

The proposed housing development is not connected to any existing neighbourhood, being surrounded by a factory, offices and a busy dual carriageway. We do not believe that this is a suitable location for residential housing, especially as starter homes are likely to contain a high percentage of young families. In 2011 the applicant proposed building houses on land opposite the road to this site as part of Newcastle Council Core Strategy – this was not accepted by Newcastle Council. As part of their scoring of development sites it became clear that this area is poorly served by services for residents.

For the proposed development the nearest metro station and neighbourhood shops are 1.5km and 1.2km walking distance away respectively. The nearest primary school is 2km walking distance and the nearest GP is 2km walking distance. It should be noted that at present there is no safe pedestrian or cycle crossing of the A189 in order to enable residents of the proposed development to reach the local

facilities at West Moor (which are closest). We cannot see any proposal in the application to provide a safe crossing. Without a safe crossing of a busy 4-lane highway we consider that the travel plan and traffic assessments submitted with this application are invalid.

The emerging North Tyneside Core Strategy has identified sufficient land to meet the housing needs for the borough up to 2030 – and at the current rates of house building this allocation will not come close to being built out during the period of the plan. There is therefore no identified need for additional housing provision in the borough above and beyond that in the emerging Local Plan.

2. Risk of flooding with an out-of-date flood risk assessment

We note that the Flood Risk Assessment carried out by Queensberry was completed on 16 Feb 2016. In June 2016 we advised Persimmon Homes, Environment Agency and the Local Planning Authority that the proposed housing in Area 3 is in a very high risk flood area, with significant surface water flooding occurring 3 times since 2011 (this is not 1:100 years!). We submitted photographic evidence of this flooding.

Our information post-dates the Flood Risk Assessment which must now be considered based on out-of-date information. In particular, the risk assessment for surface water flooding is considered as “medium” (it should be “high”) and the Environment Agency wrote that they did not have any records of flooding on the site, which is no longer true.

We believe that the frequency and depth of flooding in Area 3 makes this area unsuitable for development of any kind and have previously advised that this area should be set aside as a SUDS and ecological mitigation scheme to accompany any development of the business park. We therefore object to this application due to flood risk.

We also note that in the Statement of Community Involvement, the applicant has summarised the discussions that we had with them, but they failed to mention that we raised the issue of flooding with them (we would question why this was omitted).

The Flood Risk Assessment proposes the creation of 3 SUDS schemes (one for each area) in order to ensure that greenfield run-off rates are not exceeded. This is mirrored in the Ecological Impact Assessment which states that SUDS will provide habitat for wetland species. [Also repeated in the Planning Support Statement]. However the Landscape Master Plan submitted with the application shows no SUDS at all. Which is correct? Either the Landscape Master Plan is incorrect or the flood risk and ecological mitigation is incorrect. The Council should refuse this application because it contains misleading and contradictory information.

We would also like to point out that Queensbury also carried out a Flood Risk Assessment for Persimmon Homes in 2010 in relation to land across the A189 from this site. In it they stated that there was no significant flood risk and that the site was suitable for housing development. In 2012 the site was inundated and has since been re-categorised as flood risk and unsuitable for housing development.

3. Contains contradictory information

The Flood Risk Assessment proposes the creation of 3 SUDS schemes (one for each area) in order to ensure that greenfield run-off rates are not exceeded. This is mirrored in the Ecological Impact Assessment which states that SUDS will provide habitat for wetland species. [Also repeated in the Planning Support Statement]. However, the Landscape Master Plan submitted with the application shows no SUDS at all. Which is correct? Either the Landscape Master Plan is incorrect or the flood risk and ecological mitigation is incorrect. The Council should refuse this application because it contains misleading and contradictory information.

4. Does not adequately address ecological mitigation

The application does not adequately address the mitigation required to compensate for the ecological impact of the proposed development and should therefore be refused:

“An area of offsite mitigation will be identified” (p15 of Planning Statement). There is no qualifying statement to say how large this area will be (or alternatively how much wildlife it could support). We consider that on this basis it is not possible for the Council to determine whether the ecological impact will or will not be adequately mitigated.

The issue of cat predation on the wildlife in the adjacent SSSI is significant and is identified by the applicant as an ecological constraint. In our discussions with the applicant they suggested that a covenant be applied prohibiting cat ownership, however in these discussions the applicant admitted they had no way of checking or enforcing this, making it meaningless. We therefore consider that the proposed mitigation for cat predation will be completely ineffective at preventing cat ownership which will result in a negative impact on wildlife in the SSSI. In particular, there is a winter wildlife feeding station close to the boundary of the SSSI, nearest to the proposed development.

The Ecological Impact Assessment states that SUDS will provide habitat for wetland species, however the Landscape Master Plan submitted with the application shows no SUDS at all. Which is correct? Either the Landscape Master Plan is incorrect or the ecological mitigation is incorrect. Either way it is impossible for the Council to determine the application as it stands.

5. The design is not sympathetic to adjacent Area of Local Landscape Significance and no attempt has been made to account for this (or mitigate).

The area of land adjacent to the proposed development, to the west and in the City of Newcastle is identified in the *Newcastle Character Assessment 2009* as an Area of Local Landscape Significance (ALLS), one of only sixteen across the city, and the largest. ALLS are considered to be an exclusive list of the strongest character and best quality rural landscapes across Newcastle, in particular due to strong historical,

ecological and visual values. The *Newcastle Character Assessment 2009* lists one of the 'Don'ts' for this particular ALLS as 'allowing intrusive development'. The following paragraphs from the *Newcastle Character Assessment 2009* make clear that development in or adjacent to these areas should not negatively effect ALLS:

"This document is about protecting and reinforcing the identity and distinctiveness of Newcastle's landscapes and townscapes and ensuring that new development respects what is there and what is valued and makes the city a better place." Foreward

"Newcastle's core strategy recognises a need for character assessment as a tool to promote sustainable development. (Policy CS 14 See Para 3.5 below). This interim planning guidance meets the requirement set out in the core strategy and will ensure that the character studies and guidance prepared by Newcastle City Council are treated as a material consideration in the course of the planning and development process." Para 2.1

"An area with strongly positive character will be one where the emphasis should be on retaining and protecting that character." Para 5.1

The applicant has failed to mention that the proposed development is adjacent to an Area of Local Landscape Significance, nor have they made any attempt to screen the development from the surrounding landscape or to design their properties to fit the historic parkland landscape that they are adjacent to. As a consequence, the proposed development would have a significant negative impact on an adjacent Area of Local Landscape Significance and should be refused.

6. In combination with other nearby planning applications it will have a cumulative significant impact on traffic which has not been considered in the traffic impact assessments.

The A189 adjacent to this development is already significantly congested with peak-hour morning traffic into Newcastle regularly tailing back 1.5km from Haddrick Mill to the proposed development site. This is before the construction of significant new housing in this general area which has already been granted permission (eg 366 housing units at White House Farm, 450 units at Scaffold Hill, 50 units from site near Killingworth Lake). In addition, Bellway have submitted an application to add a further 100 units at White House Farm.

The transport assessment has used 2015 traffic data and has applied a generic (national) increase in traffic for 2020. It has not factored in the additional traffic that will be generated by nearby developments and has therefore underestimated the traffic volumes and potential impact of traffic from this development on the road network.

There will clearly be a cumulative impact of traffic from these developments on already congested roads. The applicants' assessments have not factored in these cumulative impacts.

7. Information regarding pedestrian and cycle movements is misleading

It should be noted that at present there is no safe pedestrian or cycle crossing of the A189 in order to enable residents of the proposed development to reach the local facilities and employment opportunities at West Moor (which are closest).

We cannot see any proposal in the application to provide a safe crossing. Without a safe crossing of a busy 4-lane highway we consider that the travel plan and traffic assessments submitted with this application are invalid as they have assumed that pedestrians and cyclists can cross the A189 adjacent to the development. In fact, pedestrians would have to walk/cycle south to Heathery Lane to cross the A189 and then walk/cycle north to reach West Moor – this is an additional distance of 1.2 miles (ie they would have to walk/cycle 1.2 miles to reach the opposite side of the A189 adjacent to the development). This distance has not been factored into the models and assessments used in the transport assessment and thus the conclusions that are reached are invalid, for example it is not correct to state (p26):

P26 “The site offers good connections to a comprehensive network of pedestrian and cycle infrastructure in the vicinity of the site.”

P17 “Importantly, the site will provide key corridors between the internal network and the surrounding Highway and pedestrian networks.”

We believe that the transport assessment is deliberately misleading regarding this issue. On p9 the assessment considers Pedestrian & Cycle Accessibility and goes to great length to identify all the pedestrian/cycle infrastructure nearby but does not mention that there is no crossing of the A189 adjacent to the development which would mean that residents wishing to access employment or services to the north and east will have to walk/cycle an extra 1.2 miles to reach these facilities. It is impossible to believe that a qualified transport professional could not have known this and accounted for it, so we can only conclude that this information has been deliberately omitted in order to create a more favourable case for the development.

We would request that the transport assessment is withdrawn and resubmitted with correct cycle/pedestrian information, modelling and conclusions.

Given the additional 1.2 miles we also question the modelling assumptions regarding the % of journeys that would be taken on foot/cycle and thus whether there would be more traffic generated than the assessment is suggesting.