

Policy 30

Id No Respondent

405 Acomb Estate

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The following objections are lodged;

- 1 It is unclear what the average proposed growth rate is. Different figures appear in the Plan and in the Background papers;
- 2 Gross figures, not net figures should be used. This needs to be worked back through Policies 28 and 29 also;
- 3 There should be an increase in the housing numbers allocated in Tynedale. It must be remembered that the District is one of the largest in the Country. We can see no justification for the numbers being so low. The numbers as proposed are likely amongst other things to increase problems of affordability, not reduced them as required by Policy 32;
- 4 As noted in our objection to Policy 28, the issue of holiday and second homes in Northumberland and County Durham needs to be addressed and appropriate allowances made.

In addition a holding objection is lodged for clarification purposes, Policy 30 sets a brownfield housing target of 60 % up to 2008 and 65 % by 2016. We assume that these rates apply to the gross provision outlined in Policy 28 and not the net provision in Policy 30.

Following on from the above, it is likely that Policies 28, 29 and 30 will have to be updated as a new PPS3 is expected before the end of the year and certainly in advance of the EiP. It is important that the policies considered by the EiP are prepared in the light of the latest advice, not that some years old.

155 Aggregate Industries UK Ltd

Aggregate Industries UK Ltd supports the regional dwelling requirements but comments that the policy does not address the question of the proximity of such developments to building materials (both for dwellings themselves and the related infrastructure).

97 Alnwick District Council

This is of most concern to the Council.

Overall Strategy - RSS has moved towards "City Region" approach placing conurbations of Tyne & Wear and Teesside at its core and focusing majority of development in urban areas.

RSS has been produced on the basis of Option L4 in Technical Background Paper 1. This strategy is to "reduce economic disparities with development focused within both conurbations and town in the city regions" This overall focus reflects sustainability principles but the Council's view is that the extent of this focusing on the conurbations and towns does not. The focus remains too heavy and places unrealistic restrictions on development in rural Northumberland particularly if the objectives of Policy 8 are to be realized.

Population Projections - Technical Background Paper 1 seems to overstate the overall fall in North east population and misjudge changes in sub regions. Latest information from office of national Statistics gives a different figure for population projections between 2004 and 2021, some 5000 less than the Regional Assembly predicts. It is accepted it is probably not sustainable for Northumberland to grow in population as Tyne & wear declines but Blyth valley is projected to grow by 2700 people. The RSS shows Blyth valley as being part of the City Region so growth must be encouraged. It is acknowledged continued growth in rural is not sustainable and reduction in population growth is being planned for. Rural districts are committed to reducing unsustainable development and have introduced interim Planning policies to deal with this. However, rural districts in Northumberland must be allowed to maintain a stable population and should be treated differently to the more urban south east

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of the county. It is simplistic to assume reducing house building rates in rural Northumberland will slow or stop population decline. They are different housing markets the result will further problems and overheating within the rural housing market

Changes in population structure - ONS shows predicted and real changes in Alnwick district of a 19% drop in people up to retirement age and 39% increase in retired population. This could have serious implications for sustainability of local businesses and communities in general.

These changes are partly due to lack of affordable housing and the council is trying to generate more affordable housing through cross subsidy on market housing sites. An allowance for second holiday homes in North Northumberland should be built into the annual dwelling provision rates. A significant proportion (4.7%) of dwellings in Alnwick are used as holiday homes so reducing available supply for permanent residential occupation.

Push/Pull relationship between Northumberland and Tyne & Wear - It will be ten years before the Pathfinder area is strong enough to retain people, so reducing house building rates in rural areas means the pull factors are reduced with no corresponding reduction in push factors. This will have the effect of increasing demand for, and hence prices of houses in Alnwick.

Commuting Patterns - The assembly seems to believe a significant number of people commute to Tyne & Wear when in fact only 12% commute including 7% to Newcastle.

18% Commute in. If housing numbers are reduced this will increase as there will be no houses for those in work.

Annual dwelling provision proposed by the Assembly- Figures for the first two periods are intended to reflect those set out in the adopted Northumberland County structure plan first alteration. The submission draft figures reflect those e in the amended |Structure plan but he Council were operating under the restrictions set out in RPG1. As the RSS will replace the RPG it is hard to see the logic in allowing the development of the region over the next 17 years to be influenced by a document with a very short shelf life produced on the basis of outdated restrictions the will be obsolete as soon as the RSS is adopted.

The need for increased provision in Alnwick - The Council is trying to generate more affordable housing but it hard to see how this will be possible if one of the main methods of providing such housing is constrained to the extent proposed. If houses cannot be provided for those in work the population will continue to age and if businesses cannot meet their labour needs they will not relocate to the area.

Recommended Change - The Council requests the following housing figures for the District:
2004-2011 - 120, 2011-2016-100, 2016-2021-90.

These figures would allow a managed reduction in house building but allowing the Council to deliver affordable housing and regenerate the rural community.

12 Alpha Recovery

If in order to promote the subject site for redevelopment an element of housing is required, then Policy 30 which allows only 240 dwellings per year 2004-2011 is over-restrictive as a district total. By its nature the district does not have enough previously developed land to meet the target of 60% Brownfield by 2008 and so inevitably would need to look to Greenfield sites for a source of urban capacity. Top of the list should be mixed-use sites which could secure employment by offering some residential as a pump primer.

To remove this objection the figures for the district should be revised upwards.

M&J Burke own this site on the northern edge of Killingworth on the eastern edge of Burradon Village known as Camperdown and potentially accessed via some Council land from the new roundabout serving the Wimpey and Barratt development known as Greenhills off the A1056

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Killingworth Road. The site is allocated in the adopted Tyne and Wear Green Belt in the North Tyneside UDP Policy E 20/1 and as a Site of Local Conservation Interest Policy E12/3. However the site is previously developed land being the former Burradon Colliery and Seaton Burn Wagonway. The former colliery spoil heap has been subject of reclamation scheme. The site has a pond which could be incorporated into any redevelopment. The site has been a licensed landfill site for the disposal of inert construction waste with a clay cap. They are therefore substantial land owners with strategic sites in the RSS area.

As the subject site is promoted for housing development, then Policy 30 which allows 420 dwellings per year 2004 - 2011 is over restrictive as a district total. By this nature the district does not have enough previously developed land to meet the target of 60% brownfield by 2008 and so inevitably would need to look at Greenfield sites for a source of urban capacity.

To remove this objection the figures for the district should be revised upwards.

135 Arcot Consortium

given Cramlington will continue to be a sustainable community catering for long term economic expansion of the Tyne and Wear Conurbation, and economic regeneration of South East Northumberland (through the creation of new jobs), the town is considered an appropriate location for additional new housing beyond 'indigenous growth'. The town has a proven record in providing good quality traditional family housing in an attractive environment close to job growth. The demand and aspiration for this type of housing is well established and will increase if the population change envisaged in RSS is delivered.

3.12 In respect of the housing requirements the Arcot Consortium wish to seek clarification in respect of the following matters:

- The economic strategy for RSS is based on a GVA increase of 2.8% yet the housing is based on a more cautious growth rate of between 2.4% and 2.5% (RSS compared against the Housing Technical Paper). Which rate has been used; and
- Various figures within Policy 30 fail to add up either horizontally or vertically and some of the average figures are a mis-representation (e.g. Blyth Valley's average is actually 248.5 units per annum not 240 units per annum on the basis of the three phases on the plan). The 240 figure simply on arithmetical grounds and to allow for rounding should be increased to 250.

426 Ashdale Land and Property Company

It is considered that para 3.69 should identify the importance of developing undeveloped land at Newcastle Airport, the Prestige Employment Sites as a focus of economic activity and the A1 (T) as part of the Regional Transport Corridor in providing positive changes in the economy.

They recommend that Policy 30 should be amended and include the housing figures that follow the Bronze/Silver 1 growth scenario as outlined in Technical Paper 4 (Housing).

166 Banks Development Division

Dwelling Provision

We feel that the policy regarding dwelling provision in particular fails to provide a strategic framework for new housing proposals in the region. From a developer's point of view there is considerable uncertainty as to how the policy will be applied. There is too great an emphasis in the region on housing renewal pathfinder areas. These should be supported in principle but not to the extent that they undermine regional growth.

The RSS wrestles with the issue of regional growth. It clearly does not wish to constrain growth which is still badly needed in the region despite a positive economic period in the first half of this decade. Growth is supported via a City-Region policy. However it is ironic that the lack of housing number allocation for Newcastle is currently constraining housing investment in the city. The aspiration of city-led growth is not supported by the detail and the implementation.

The housing section of the RSS sees the relationship between growth and housing as predominantly one-way, i.e. economic growth causes housing need. In reality new housing is an engine for growth a point which should be recognised by RSS. New housing stimulates growth in at least two ways. Firstly it provides a wider choice of living accommodation which attracts people to live in the region. New people bring new skills and new resources to the region. The lack of housing choice has been to some extent ameliorated by the recent boom in new housing, especially city living, but there is a long way to go before the region can compete with any other English region. The second and most overlooked way in which new housing boosts the economy is the level of investment required to carry out the development and construction work. There is a real sense reading the RSS that the authors have missed this point. It is a popular misconception that developers are speculators who add little to the process and take much away. It is important that RSS does not fall into this trap.

The Banks Group commissioned Fairhurst & Partners to carry out a simple analysis of the housing numbers in draft RSS to see how many of the housing units were already accounted for either by planning permissions or adopted allocations.

It was demonstrated that within the region 49% of the housing numbers are already spoken for. In two districts the allocation is already completely spoken for. This gives local authorities a compelling reason to refuse planning permission for new brownfield housing proposals – a lack of need. In Wear Valley there are significant brownfield sites which will become available in the RSS period.

We recommend that the housing section of the RSS is redrafted to include some indication of how new housing schemes will be considered once a local authority exceeds or is likely to exceed its housing provision figure either in total or for individual years. Would an over provision in 2005-2007 continue to have a negative effect on new permissions in 2010?

Our view is that within the urban areas, and on land which is not allocated for another purpose, there should be a presumption that new housing schemes will be acceptable in principle. The issues of design and density will have to be dealt with on a site by site basis. This policy approach is actually no different to the system which operated until very recently. Such sites were described as windfalls. They had generally been allowed for in the development plan, but importantly they were not refused due to lack of need. The important difference is that until recently such sites did not make up a great proportion of new housing completions, largely because there was a steady flow of greenfield releases which were more attractive to the volume house builders and the market. Now greenfield sites are unlikely to be released and the market looks more favourably on brownfield city living. The capacity of the Tyne, Wear and Tees conurbations to yield new housing is phenomenal, although it will be tempered by limitations in demand.

RSS seeks to justify its housing provision on the grounds of a projected population figures which are themselves affected by a certain level of economic growth. This figure should act as a minimum provision, not as a ceiling. We are very concerned that dwelling provision sets a limit to new housing on brownfield city sites which is way below what the natural demand will be over this period. The effect of this would surely be to limit the growth of the region. Another ill effect of this policy could be to concentrate the number of new houses in the hands of a small number of organisations. This will encourage manipulation of the market at the expense of the house purchaser.

The environmental impact of concentrating development on city centre brownfield sites is considered to be positive. This approach reduces the need to travel. It leads to the regeneration of areas such as the Ouseburn in Newcastle which has been run-down for decades. It would support existing facilities and shops as well as leading to a clean up of industrial pollution.

It is no exaggeration to say that the last five years have seen a revolution in planning for housing in the North East. It would be ironic if regional planning guidance which kick started a brownfield revolution in the North East now became the vehicle to undermine and reverse it.

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257 Bellway Homes NE Division

Supports policy 30 in so far as it increases the annual dwelling provision for Sedgefield Borough from 230 -260, 2004-2011.

Bellway has a legal interest in a large site suitable for residential use allocated in the Sedgefield Borough Urban capacity Study at Ferryhill which is likely to become a source of capacity before 2011.

Sedgefield Borough Council accepted in a recent public inquiry (3 Aug 05) that it could not demonstrate a 5 year supply of housing planning permissions nor a 10 year supply including local plan allocations as set out in Keith Hill statement and the new paragraph 42a of PPG3 issued in January 2005

It is therefore essential that sites such as Ferryhill are brought forward in LDF's and provision made for this in the RSS

347 Bellway, Persimmon, Miller, Yuill

It is noted however that whilst in policy 30 - Dwelling Provision, four of the five local planning authorities in the Tees Valley area are allocated a net annual house building rate significantly in excess of the figures contained in the Tees Valley Structure Plan the equivalent figure for Stockton is actually less than the structure plan. The reason for this projected reduction in house build rates in Stockton is not explained and is wholly unacceptable. Stockton has the largest population and economic base of any of the five authorities in the Tees Valley and this bias will undoubtedly persist throughout the revised plan period. Ideally we would seek an increase in the overall housing requirement for the Tees Valley authorities to allow for higher build rates in Stockton on Tees as higher build rates will more effectively reduce out-migration.

177 Berwick-upon-Tweed Borough Council

All of the issues identified within paragraphs 3.57 - 3.61 apply to the rural areas as well as the city regions. This however is not translated through to policy, with the new dwelling provision identified in Policy 30, particularly for Berwick-upon-Tweed. It fails to recognise the need to provide housing which meets people's needs and aspirations, to diversify the dwelling stock, support economic growth, contribute to balancing the housing market, reduce the need to travel and pressure in an area of high demand, and the satisfactory provision of affordable housing to meet local needs. New dwelling provision is not just about houses.

It has been argued that the North East exhibits a polycentric settlement pattern based on the two city regions. Berwick is unique in that it lies at the extremity of the city region of Tyne and Wear and also at the edge of the city region of Edinburgh to the north. It is peripheral to the north east of England and is perceived as being remote from the critical social and economic mass of the Tyne and Wear conurbation, although Newcastle upon Tyne is only 60 miles to the south. The city of Edinburgh lies 60 miles to the north, and is arguably more accessible by road, but it falls within the overarching governance of the Scottish Parliament, supported by the Scottish Executive. The Edinburgh City Region is a dynamic social and economic entity, acknowledged nationally and regionally as a significant driver of prosperity and competitiveness. Population growth between 1991 - 2002 were at over 10% (West Lothian), with a rapidly expanding local economy employment growth in Lothian has surpassed the 1994 Structure Plan projected figure of 402,000 jobs for 2005 by 1999 and is still growing. Forecasts now point to further net growth of 43,000 jobs between 2000 and 2015 to over 448,000 jobs by 2015.

The consequence of these spatial relationships is that within the English planning framework, development is subject to constraint, ignoring Berwick's potential to attract investment from its adjoining region. Berwick's special Sub-Regional location requires a more imaginative response to its potential to support sustainable growth, for the benefit of both "regions of interest". This unique position must be acknowledged through an appropriate approach within the RSS.

Berwick in this rural sub-regional role requires intervention, investment and a policy framework that will at least sustain existing population levels, in the short term and, over the lifetime of the Development Plan, encourage sustainable population growth. The framework must stem the

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net outward migration of the younger population, balance the housing market by critically examining the role and capacity of the housing stock, particularly in connection with:

- Second/holiday homes (where Berwick has the highest percentage within the whole region, 8.5% of its housing stock falling within this category).
- Affordable housing (where recent reports indicate an identified need of 223 affordable units per annum within the Borough).
- Vacancy rates (which at 5.7% are significantly higher than the regional and national averages).

The RSS allocations will render the area uncompetitive and create conditions which, at best will result in social economic and environmental stagnation and at worst, population decline and its consequences.

The principles underpinning the RSS are to achieve a step change in the economic performance and competitiveness of the region. It aspires to faster economic growth, with the conurbations providing the focus for economic activity and the area's workforce. It is unreasonable to argue against these principles, given the structural difficulties still to be addressed in Tyne and Wear and Tees Valley. At issue is the potential impact this regional approach will have on Berwick-upon-Tweed given its particular geo-political location.

The dwelling allocation for the Borough within the submission RSS generally reflects that within the Adopted Northumberland County and National Park Joint Structure Plan 2005. However this document was developed within the bounds of the then Regional Planning Guidance 1, it was agreed by the Panel from the outset of the Structure Plan EIP that as the RSS was being formulated the Structure Plan would not challenge the RPG1 figures for Northumberland, in the belief that new and adequate research would be undertaken in the forthcoming production of the RSS. To allow the Structure Plan, which was based upon figures within a now outdated RPG1 to determine the strategy for the next phases of the RSS, is a flawed approach.

It is acknowledged that population growth within rural areas at the expense of growth within the urban areas is not the way forward, however to assume that reducing dwelling provision in the rural areas of Northumberland will support population growth in the urban areas is one dimensional and unproven.

Population estimates provided by the North East Regional information Partnership (NERIP) project that the Borough's population will remain static over the forecast period to 2021. It indicates a decrease of 24.5% of the 0-19 age range, a fall of 14.3% within the 20-29 age range, a large decline of 35.3% of the 30-44 age group the main economically active, the 45-64 age group have an overall increase of 6.5%. However the most noteworthy forecast is an increase of 54.4% - 3,100 individuals, within the over 65 age group. Unless a proactive strategy is adopted these forecasts will have a significant impact on the Borough, including its long term sustainability and the viability and vitality of its housing market. The most significant trend, the loss of population below the 45 age group, will impact upon economic viability, the principle reason for this loss of population is the out migration in search of employment and affordable housing.

Migration origin and destination statistics from the 2001 Census indicate overall net in-migration to the Borough. The majority of in migration (65%) is external to the Region. 35% of in migration is from north of the Border, with only 16% of in migration originating within the Tyne and Wear conurbation, 18% from Northumberland and 4% from the rest of the North East of England.

The Borough Council has recently adopted an Interim Planning Policy Statement - Housing (Dec 2004) emphasising the commitment to achieving sustainable development. The recent Urban Housing Capacity Study identifies a significant range of previously developed sites and buildings

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within the urban areas which could arguably be considered as more sustainable than some of the greenfield sites adjacent to the conurbations.

The proposed allocation of an annual average of 60 dwellings will not allow the authority to meet its objectives of providing for a balanced housing market, a housing need of 223 affordable units per annum has been identified. The RSS recognises the issue of affordable housing in Policy 32 improving inclusivity specifically acknowledging the problems faced by Berwick-upon-Tweed and other rural areas in Northumberland. However the mechanism for the Authority to achieve this level of provision is constrained by the allocated figure.

The above issues all support the requirement for an increase in the housing allocation for the Borough. Existing commitments are being built out at over 100 dwellings for the period 2004-2011 (which are extant approvals), 85 dwellings per annum over the period 2011-2016 (showing a managed slow down) and 70 dwellings per annum in the period 2017 - 2021. These figures will permit a managed reduction in house building acknowledging the spatial strategy whilst providing a mechanism for the Borough to meet its needs both socially and economically. This increase in allocation will not undermine the aspirations of the conurbations, Berwick-upon-Tweed at the extremity of the city region will have little impact on the overall housing market within the conurbations, however this small, in comparative terms, increase will have a significant effect on the borough's ability to meet its objectives.

Paragraph 3.72 and last part of Policy 30 Housing densities which justifies a different approach to PPG3 on housing densities is supported and welcomed.

40 Blyth Valley Council

Depending on the outcome of the several public inquiries into major housing sites in our district the housing land requirement for Blyth Valley may not be enough to enable the authority to achieve its twin objectives of the regeneration of Blyth town through the major mixed use regeneration of the Estuary and the completion of Cramlington New Town. The Council has resisted a major greenfield site (850 dwgs) on the edge of Blyth at a recent public inquiry due to the impact this may have on regeneration proposals for Blyth. However, if this site is approved on appeal the housing requirement will not be sufficient. The Council particularly object to the reduction in the build rate in the third phase 2016-21 when the output from the estuary study sites could be at its highest. Arbitrary housing land requirement figures should not be allowed to prejudice major regeneration initiatives. The Council will therefore be seeking an increase in the build rate from 205 to 240 in the period 2016-21.

73 Bowey Homes Ltd

If in order to promote the subject site for redevelopment an element of housing is required, then policy 30 which allows only 240 dwellings per year 2004-2011 is over-restrictive as a district total. By its nature the district does not have enough previously developed land to meet the target of 60% brownfield by 2008 and so inevitably would need to look to Greenfield sites for a source of urban capacity. Top of the list should be mixed use sites which could secure employment by offering some residential as a pump primer. To remove this objection the figures for the district should be revised upwards.

A review of land was undertaken by Castle Morpeth in the Urban Capacity Study published in March 2002. This states that in reference to Pegswood, 'the areas to be considered are primarily the terraces at the east end of the settlement where significant demolition has recently been carried out and where further demolition is likely...this could be incorporated into the coalfield regeneration strategy.' Phase 1 of the subject site is a redevelopment of the east block of terraced houses and phase 2 is part of the former pit head. It is therefore a PDL site. It meets the criteria of 42a of PPG3. There is a small greenfield element which because it lies within the cartilage of PDL is allowed as part of the planning unit by

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PPG3.

Pegswood passes the tests in para 31 of PPG3 in that it is:

- (1) In a location accessible to jobs, shops and services by modes other than the car
- (2) the capacity of infrastructure exists
- (3) development would build communities
- (4) there are no insurmountable physical or environmental constraints.

Bowey Homes wished to object to the 140 dwellings per annum, 2004-2011 in Policy 30 which might otherwise stifle such sites coming forward to regenerate areas such as Pegswood. To remove this objection the dwelling numbers should be revised upwards.

14 Brian Cazaly Ltd

Para 3.72 recognises that 30-50 hectares from PPG3 can be varied due to specific criteria and locational strategy “where densities could be lower to diversify the dwelling stock and better plan for mixed communities”. Such is the case at Nedderton.

The dwelling provision contained in Policy 30 has not changed from 175 2004-2011, 160 2011-2016, 110 2016-2021 for Wansbeck per annum. This compares similar districts such as Sedgfield where an increase from 230-260 per annum has been made based on representations from Durham County Council that a stable population target is insufficient and more growth should be planned. BLC believe this is also the case for Northumberland and Wansbeck dwelling provision numbers should be increased.

129 C D J & R Peat

Of particular concern is the low annual average dwelling provision allocated to Teesdale, in comparison to the remaining Districts in County Durham. The average annual net additions of 70 for Teesdale, although increased from the Consultation Draft RSS, appears to be based on the previous County Durham Structure Plan 1991-2006 figures. However before the introduction of the Planning and Compulsory Purchase Act 2004 a Key Issues Paper was published by Durham County Council.

This Issues Paper published in July 2004 proposed a partial review of the Structure Plan for the period 2004-2016. Part of its intended strategy was to strengthen the role of Barnard Castle as Teesdale Districts main town. It is our view that the RSS should carry forward this strategy.

248 C A B E

C A B E remain significantly concerned about the apparent contradiction in the RSS between its stated aims of delivering sustainable communities, protecting the natural environment and improving accessibility, and statements made in these paragraphs which advocate lower density housing solutions [p90 para. 3.71-3.72] to object to this policy.

There is an inaccuracy in referring to PPG3 and the interpretation placed on densities [para. 3.71 p90] where national advice actually suggests a range of residential density of 30-50 dph as a minimum and not as an average. We are aware the imminent review of the PPG3 in the form of a PPS on housing but would expect to see density retained as an important tool to be used in the delivery. This reference should be corrected together with the multiple references to ‘high’ density, where this remains a relative term.

Where there are references made to typical residential, densities C A B E would wish to see the Regional Spatial Strategy being explicit [absolute or set out in a range] rather than vague. C A B E would wish to challenge the assumptions made in the Regional Spatial Strategy about the role that ‘executive housing’ plays in attracting entrepreneurs to the region, since there does not seem to be any evidence base for this policy. On the contrary, research by C A B E and others

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shows that urban density housing can help to support facilities and infrastructure that can make an area more attractive to people looking for a place to live. Additional use of density as an appropriate tool for delivering sustainable communities is contained in the recent CABE document;

Commission for Architecture and the Built Environment [2005] Better Neighbourhoods: Making Higher Densities Work [Corporation of London / CABE, London].

There is the need to reinforce the priority for the importance of the context, both locational and physical, and how this will influence density. As mentioned in reference to other policies, the ambiguity over specific guide densities and site characteristics could be adequately addressed through the application of graduated levels relating to proximity to public transport nodes, town centres and requirements for mixed uses, densities and parking provision. As stated above in our comments on policy 29, the aim should be to achieve high quality, well designed housing at a density that supports sustainability objectives, not focusing on lowering density levels.

As the policy is currently drafted, CABE would have significant objections.

CABE welcomes the alterations to paragraph 3.82 [p97], which now draws attention to the need for good design as now required in PPS1. However, we would welcome a separate policy in section 3C on good design. Whilst we would not wish to see the Regional Spatial Strategy replicate PPS1 any more than it should any other PPS/G we feel that there should be a specific policy on design to compliment the suite of policies on the Historic Environment, Landscape etc.

Care should be taken when writing any such design policy to ensure the cross cutting nature of good design is recognised and it is not promoted as an add-on. CABE are pleased to see that 'promote high quality design in all development and

redevelopment' has been added to the list of key objectives p98 para. 3.86]. We are also pleased to see 'sustainable construction and design principles' has also been added. However, it is disappointing to note that our request of the 3rd February, reiterated above, for a specific policy on design has not been actioned.

428 Campaign To Protect Rural England

CPRE North East broadly supports the principle of concentrating housing provision in the two conurbations.

We recognise that regenerating inner cities to improve their liveability complements the regeneration of rural settlements to improve their viability.

In our view, it is market-led construction of commuter and executive housing in rural fringe settlements which both damages inner city regeneration and creates affordability problems in rural communities.

However, we are concerned that there should be sufficient flexibility in the housing allocations so that adequate affordable housing can be built in rural districts. Criteria need to be established so that this can be achieved without either excessive market house-building in rural areas or over-reliance on an 'exceptions' policy approach.

The targets for development on previously developed land in bullet point (b) are the absolute minimum that should be should acceptable. Targets of 75% plus should be possible if adequate funding to bring previously developed land back into use is made available.

Delete bullet point (d) referring to replacements off-site due to rebuilding at lower density. The myth that high-density equals low quality or low status needs to be demolished. The 80% replacement target should give adequate leeway on density reduction even with all rebuilding on site.

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Add bullet point:

(f) A special case must be made for every location where it is considered that newbuild housing should be at a lower density to protect an area's characteristics. For example, in areas of older traditional housing where the size, both of the houses and their gardens contribute to the character of the locality, retention may be preferable and density considerations should not be used as an excuse to demolish and redevelop.

Amend last paragraph:

Local Development Frameworks should provide for a minimum density of 30 dwellings per hectare and set out criteria to define exceptional circumstances where the provision of lower densities

16 Camtech Properties Ltd

Support as far as it increases annual dwelling provision for Sedgfield Borough from 230-260 dwellings, 2004-2011. Camtec has legal interest in a 22ha site at Woodham, Newton Aycliffe suitable for mixed use including residential use for which representations have been made to Sedgfield LDF Key Issues Report. Sedgfield Borough Council accepted a recent public enquiry (3 Aug 05) that it could not demonstrate a 5 year supply of housing permissions nor a 10 year supply including local plan allocations as set out in Keith Hills statement and the new paragraph 42a of PPG3 Jan 05. It is therefore essential that sites such as Woodham are brought forward in LDFs and provision made for this in the RSS.

211 Castle Morpeth Borough Council

With regard to dwelling provision, Policy 30 proposes that the targets as set out in the policy reflect the housing market restructuring method, with a higher proportion of dwelling provision according to the urban centres with a view to sustaining population in these centres. Accordingly the following net additions to the dwelling stock for Castle Morpeth are proposed:

140 dwellings per annum up to 2011, 125 dwellings per annum 2011 to 2016 and 95 dwellings per annum 2016 to 2021. The figures up to 2016 are broadly in line with the recommendations of the Structure Plan Panel Report and are intended to bring about in stabilisation of the population. These figures are based on a high completion rate to begin with, followed by a reduced rate, to allow population levels to adjust back to 2002 levels by 2016. The Council considers that it is vital that these figures are a minimum and that they should not be reduced particularly as the coalfield area within Castle Morpeth is part of the Northumberland Housing Market Restructuring Area.

With regard to the period post 2016, the submission draft RSS continues to support the reduction of dwellings per annum to 95. The Council considers that housing provision needs to be similar to the first period to be consistent with the aspirations of economic growth in the region. It is likely that such growth would lead to in-migration from outside the region and Northumberland should be expected to accommodate its share of this in-migration. The Council therefore requests that the period 2016 to 2021 should be amended to 140 dwellings per annum to reflect this requirement.

244 Centrepoint

2.1 Centrepoint welcomes the revised quotas for dwelling construction across County Durham and the increased flexibility this offers district councils to deliver affordable housing

2.4 There are however still some concerns that these quotas are already significantly populated by a substantial number of planning applications that have already been granted

2.5 In County Durham we have seen a significant increase in the application for and granting of planning permission for new developments since 2002. Many of these applications have been granted by district councils before they could develop a robust affordability policy to stipulate

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affordable provision as part of the planning application

2.7 It is our understanding that as a result of the phased approach to the quota system, there are some districts in County Durham who have already granted applications amounting to their first and in some cases, second period targets. This is clearly a concern

2.8 Whilst we recognise that the plan, monitor, manage approach will allow the district councils to be more proactive in responding to the changes in the housing market; economy and homelessness. We believe the Regional Spatial Strategy should highlight the importance of affordable housing within the evaluations presented to the Regional Assembly at the end of each planning period. Without such guidance it is our belief that the provision of affordable housing will only be successfully secured after current planning permissions have been served

352 Church Commissioners for England

The Commissioners have read and support the concerns expressed by the HBF in respect of the following matters:-

- The overall housing figure
- The reduction in the total housing provision over time to reflect lower levels of growth up to 2021
- The reduced and more cautious growth rate used to determine housing provision

Paragraphs 3.71 and 3.72 appear to reluctantly acknowledge that the provision of 'so called executive housing' will have an important role to play in attracting and retaining population. Surprisingly there is no reference to the findings of the 'Regional Housing Aspirations Study – Final Report – March 2005' that was prepared by Nathaniel Lichfield and Partners on behalf of One North East and the North East Regional Assembly. It is accepted that such housing is under-represented in the region and that LPAs – in their LDFs – should include specific criteria where densities could be lower to diversify the dwelling stock and better plan for mixed communities. In paragraph 3.71 it is concluded that:-

'There will be no need for locational exceptions for 'executive housing' or types under represented in the housing stock as these should be subject to the RSS locational strategy and sequential approach.'

For the reasons already stated in this submission it is considered that the application of policies in the RSS relating to the locational strategy, sequential approach and the release of Green Belt land will not allow for the provision of 'executive housing/aspirational housing' in locations accessible to the existing and proposed major employment sites. It is considered that the above sentence should be deleted from paragraph 3.71 and should be replaced by the following:-

'LDFs should identify any specific requirements for 'executive/aspirational housing' that might arise particularly as a result of the development of Prestige Employment Sites and the need to provide such housing in close proximity. In some cases this might involve the development of green field or Green Belt land where this is the most sustainable option.'

282 City of Durham Trust

Object to figures for net annual additions for Durham District, which the Assembly is requested to revisit in view of the Authority's recent and current laissez faire policy towards house numbers, which has resulted in completion totals well in excess of Structure and Local Plan allocations. (Its LDF document admits that it could soon have completed the future total allocation in the RSS.) This is a case of reducing the annual total. If the problem is not grasped, the alternative is a compound of exponential trend ("demand") in subsequent rounds of housing allocation.

90 Corbridge Village Trust

No change in dwelling provision as indicated in consultation draft

Support policy 30e) to support area characteristics

Id No Respondent**Policy 30**

441 David Barlow Homes Ltd

It is contended that the overall housing provision for the Region as a whole is being suppressed by the use of a proposed GVA of 2.5% for housing, in comparison to the proposed GVA for wider economic growth of 2.8%. Given the important role the housing market has in economic growth it is considered that a reduced housing GVA rate will have a detrimental effect on the regions economy.

Whilst Technical Paper 1 and 4

outline the scenarios considered when developing up the approach to be taken, it is not considered that there is a sufficiently strong evidence base within the papers to support this stance. It is considered that the implications of a reduced GVA for housing needs to be robustly assessed at the EIP, with clear evidence base to support the implications. It is our view that a comparable rate of 2.8% should be used to support the regional growth rate, with the housing numbers increased to reflect such a higher rate. This increase should then be distributed in accordance with the location strategy within emerging RSS and the comments below in respect of North and South Tyneside below.

There is a disparity in the amount of employment land allocation and housing allocation in respect of North Tyneside, as raised in connection to policy 18. The low housing numbers set against the high employment land allocation will lead to difficulties in providing for employers needs. The overall increase in housing numbers for South Tyneside from Interim RSS is welcomed, however the reduction over the RSS period from the Consultation Draft is not supported. The overall increase will provide an economic boost for the town, and will support the step change that will be brought about by the development of the Prestige Employment site, but it is considered that the higher employment allocation needs the higher housing figures to support it.

349 Defence Estates

DE consider that Policy 30 should also require Local Development Frameworks to provide sufficient flexibility to allow MOD requirements for housing to be met for the MOD estate. MOD requirements for housing should not therefore be restricted by district housing targets or plan phases and development should be acceptable at locations that support the operational use of the MOD establishment.

335 Derwentside District Council

Support increased dwelling provision for County Durham between 2004 -2011. Concern over reduction of annual build rates in 2011-2016 and 2016-2021

28 Durham Cathedral

Lowered housing figures for Stockton-on Tees are noted along with their front loading. Earlier comment about land in built up area of Wolviston being identified as a contributor to the provision of developable sites is reiterated and Chapter will be pressing for this through the LDF process.

Durham housing provision is noted and comments throughout RSS about necessity for sustainable locations for development of various kinds. It is note that Durham City Housing Needs survey identifies need to provide over 500 affordable units per annum which suggests a substantial increase in total provision. Cathedral supports provision of housing to meet local needs and increase in car parking since capacity for coach and car parking will still be a major constraint on the City's ability to become a more significant tourist destination. Even when planned parking provision is operational capacity will not have increased significantly since 1990 and is like to remain a major constraint on tourism and retail.

Salisbury, a similar sized cathedral city to Durham, has 2800 city centre spaces and 1300 Park & Ride spaces. Two more Park & Rides are planned with over 1000 extra spaces. Salisbury has recently won a national coach operators award for parking provisional Chichester has 3,500 spaces within 5 minutes of city centre. Coach access provision to Durham is in no way adequate. Government encourages use of group transport but Durham has one drop off and pick up point near World Heritage Site and severely inhibiting group visitors to City Centre finding a free space at the tiny two coach drop off point and asking visitors to find a different pick up point deters coach operators from visiting the city.

Id No Respondent**Policy 30**

Cathedral can contribute to the increase in parking through its landholdings. RSS should acknowledge need to increase parking if it is to achieve its other policies are to be achieved.

- 91 Durham City Council
Durham City Council welcomes the increased dwelling provision, between the Consultation Draft and Submission Draft (from 140 to 175 per annum) for the district for 2004 - 2021 (set out in Policy 30) but would prefer the RSS to acknowledge the need to respond to areas of housing market demand within the region (in accordance with emerging Government Policy - set out in the ODPM Consultation Paper: Planning for Housing Provision), and which will more effectively relate to the stability of County Durham's population, as well as delivering regeneration, affordability and limited growth in the City of Durham district.
- 202 Durham County Council
Durham County Council supports the figure of 20,000 net additions to the housing stock 2004-21 in the Submission Draft RSS, based on a greater allowance for net in-migration, to combat natural decline in population. In contrast to the Consultation Draft, which meant population decline for the County, the Submission Draft RSS now plans for population stability in County Durham and this is strongly supported. However, it is suggested that the RSS should explicitly acknowledge the need for future flexibility in its approach to housing distribution and the phased release of sites to respond to the dynamics of the housing market, regeneration and affordability issues, as more up to date information becomes available.
- 812 Easington Council
Express concern that whilst the allocations to Co. Durham in the first period of draft RSS generally seek to maintain existing development rates, these are reduced in later periods of the plan. Allocations in these later phases should be subject to rigorous assessment under the 'plan, monitor, manage' approach, at the appropriate time. Therefore, RSS should explicitly acknowledge need for future flexibility in its approach to housing distribution to enable a phased release of sites.
- 98 English Heritage
Para 3.72 Support - Reference to the need to safeguard more substantial properties, many in traditional suburbs, from subdivision is welcomed, as is reference to the protection of local character.
- 200 Environment Agency
Policy 30
Some housing developments will require additional or improved water supply and sewage drainage systems. Is this covered under Policy 30 c) "ensure that the necessary new or improved infrastructure and services are provided and coordinated with the development of new housing"? It is not clear if this relates just to transport infrastructure or whether gas, water, electricity etc are included. Water infrastructure also needs to be co-ordinated with the development of new housing. A 'utilities infrastructure' bullet similar to Policy 13h) could be inserted.
- 163 Friends of the Earth North East
We provisionally support the housing supply figures in policy a); we do not support the statement about densities contained in the last paragraph (see comments on Policy 29).

The statement in policy b) about targets for previously developed land is quite inadequate. Other RSSs identify a PDL target for each strategic planning area (e.g. Yorkshire and the Humber Policy H1 and Table H1), and this should be done for the North East. Secondly, whilst the analysis in the Technical Paper is not comprehensive, it does show (i) poor or deteriorating sub-regional performance table 10 which is not adequately explained in terms of particular mitigating local circumstances; and (ii) obvious opportunities via the urban capacity studies table 14 that would permit PDL performance way beyond the suggested regional targets ('60% by 2008 and 65% by 2016') - for example, 94% in Tyne & Wear, and 86% in Tees Valley. Since other UK authorities are demonstrating for the next decade forecasts of up to 100% PDL housing provision, it is essential that NE RSS sets far more challenging targets. Since table 14 also reveals the considerable sub-regional variance in PDL opportunities, it will be necessary for RSS to establish targets for individual authorities.

Id No Respondent**Policy 30**

- The fourth outcome should be changed to read, ‘70% of new dwellings to be built on previously developed land or through conversions by 2008, and 75% by 2016. Exceptions to be clearly consistent with sustainable development.’

At the end of the fifth outcome should be added, ‘with no development taking place at a density of less than 25 dwellings per hectare

329 Friends of the Earth South Tyneside

South Tyneside Friends of the Earth strongly supports the setting of a regional target for the construction of housing on previously-developed land and through the reuse of existing buildings. However, we feel that the RSS targets of 60% by 2008 and 65% by 2016 are unacceptably low. The North East has an extremely poor record in this respect. Only the East Midlands and the South West perform worse. Regions like the North West and South East were already exceeding 60% construction on previously-developed land in the period 1999-2002. The provisional estimate for 2003 for England was 66%, which is above what the North East is seeking to achieve by 2016.

South Tyneside Friends of the Earth recommends that point b) is amended to read, ‘meet the regional target for housing development on previously developed land and through the reuse of existing buildings, of 70% by 2008 and 75% by 2016.’ We would also support an average density of 50 dwellings per hectare or higher. We are concerned at the freedom being given to local authorities to build at a lower density where they deem it appropriate. As a minimum, the RSS must state that 30 dwellings per hectare is the very lowest density that will be permitted.

195 Grainger Trust

With reduced demolition and building rates, sustainable development and regeneration in some areas may be stifled. It is, therefore, necessary to raise these rates again. Average annual net additions to the dwelling stock for the years 2004-21 have been restructured slightly across the region

These rates have dropped in the mid to long term from the previous 2004 Consultation Draft RSS levels:

Concerns also exist regarding the high number of existing commitments that are at risk of swallowing up the whole housing allocations in some districts.

Support is given to the policy approach to densities at the end of this policy and the first sentence in paragraph 3.72, as it recognises the need for lower densities in certain circumstances to achieve a better housing mix. However, the setting of a blanket, district wide density rate of 30-50 dwellings per hectare is seen as inappropriate, as it may not provide the correct densities for specific areas. A more flexible approach to housing densities is recommended, where district wide density rates need not be applied.

The Government consultation paper ‘Planning for Housing Provision’ was released in July 2005 and now needs to be taken into account in the RSS policies. Of particular importance are paragraphs 1.23 –1.28, ‘Responding to the Housing Market’. These highlight the need to take account of the housing market so that housing targets have regard to housing demand and also to consider the wider impacts of targets on the housing market. It is also seen as essential to address the longer-term effects on the housing market, because of the time lag between price changes and supply responses. Therefore, improving the supply of appropriate land over the longer term would allow developers and local authorities to plan with greater certainty.

Where housing markets cover more than one local authority there is a need for the authorities to work together to tackle the housing issues they are facing. This collaboration, as noted in paragraph 2.1, will result in local authorities becoming more responsive to changes in the market over time. Also it can be seen that many local authorities have been focusing exclusively on achieving their housing numbers, without seeing this in the context of the wider housing market. This can be detrimental to their own and other housing markets, with either over or under provision.

Id No Respondent**Policy 30**

The proposed approach will aim to have a fifteen year time horizon for land allocation, with the most sustainable sites allocated in the short to medium term, as well as taking a longer term view by identifying broad areas for future development. A more responsive monitoring and review process will also be provided, with a five year rolling supply of developable land. This will ensure that developers have the flexibility to respond to changes in market conditions and therefore should be encouraged in the RSS. GT plc recommend that these strategies are integrated into RSS

policies to ensure that a flexible and responsive housing market exists.

Technical Background Paper No.4: Housing, table 14 shows the large 'overhang' of permissions and allocations for Sedgfield, Castle Morpeth and Alnwick, which could cause serious problems for their short and medium term development potential. GT plc also notice the lack of information in the housing paper on house price movements, which needs to be rectified to adhere to recommendations in the consultation paper 'Planning for Housing Provision'. Although this is mentioned in Technical Background Paper No.5: Rural (paragraphs 3.8 and 3.9), GT plc recommend that this is expanded and brought into the Housing Technical Paper.

147 Hartlepool Borough Council

Whilst the proposed allocation for Hartlepool reflects to some extent past development rates and future housing aspirations, there is a concern that the figures in Policy 30 for Hartlepool and for the Tees Valley as a whole threaten to constrain the economic regeneration potential of the Tees Valley, within the context of the overall Locational Strategy.

We therefore support the objection being made by the Joint Strategy Unit (JSU) on behalf of the Tees Valley Joint Strategy Committee to the net dwelling provision for the Tees Valley in Policy 30 and the request that this should be increased from 29,000 to 32,000 dwellings

160 Highways Agency

In 2003/04 approximately 8000 dwellings were built, it is assumed that this will increase to 10,000 per annum for the rest of the RSS period (approx 27% for the Tees Valley, 19% for Durham, 9% for Northumberland and 45% for Tyne & Wear/annum). Housing regeneration initiatives will help improve existing housing stock and thus reduce the need to build more. Annual demolition rates will vary from 4,000 to 2,650. Figures have been produced for all 23 districts for annual net additions to the housing stock, for the three established phases. In total for the NE these are on average about 6,500 /annum. Approx. 65% by 2016 on brownfield sites and with an average density of at least 30/ha in accordance with the provisions of PPG3 (Note not all local authorities within the region have completed their housing capacity studies. Local authorities should consider re-use of unneeded employment land but need careful consideration as economic development is crucial to the future of the region

111 HM Prison Service

2.5. Of particular concern is the low annual average dwelling provision allocated to Teesdale, in comparison to the remaining Districts in County Durham. The average annual net additions of 70 for Teesdale, although increased from the Consultation Draft RSS, appears to be based on the previous County Durham Structure Plan 1991-2006 figures. However before the introduction of the Planning and Compulsory Purchase Act 2004 a Key Issues Paper was published by Durham County Council.

2.6. This Issues Paper published in July 2004 proposed a partial review of the Structure Plan for the period 2004-2016. Part of its intended strategy was to strengthen the role of Barnard Castle as Teesdale Districts main town. It is our view that the RSS should carry forward this strategy.

Id No Respondent**Policy 30**

424 Home Builders Federation

The HBF objects to Policy 30 on a number of grounds.

We note paragraph 3.67 of the draft RSS sets a lower, more cautious growth rate of 2.5% per annum to determine housing provision. However, we also note that paragraph 2.11 in Technical Background paper 1 on Development Options suggests the rate of growth chosen for housing provision is 2.4%. Which rate has been chosen?

Our concern with allocating only net dwellings to each District can be drawn from Table 12 and paragraph 3.22 of the Background paper No.4. In the year 2002/03, 3,855 net dwellings were provided in the region whilst in the following year that figure rose sharply to 6,429. Although from this table it appears that the rate of house building almost doubled, Table 9 in that paper shows this was not the case. Given demolition rates fluctuate so much, it is essential that indicative gross build rates be shown in Policy 30 to enable the industry to plan for future change.

Policy 30 sets a brownfield target rate of 60% up to 2008 and 65% by 2016. We assume these rates apply to the gross provision outlined in Policy 28 and not the net provision in Policy 30.

Technical Background Paper No.4, Tables 20, 21 and 22 provide the detail on the methodology used to establish the overall net housing provision and then distribute the allocations to fit presumably with the location dispersal option L4 – is this the case?. If so, it needs to be stated more clearly in this part of the RSS.

With reference to those tables, we also note that no allowance has been made for the increasing number of second homes, particularly in more rural parts of County Durham and Northumberland – why not? The issue of second homes formed part of the Northumberland Structure Plan debate in 2004 and should be tabled as a discussion matter at the RSS EiP.

With respect to tables 20, 21 and 22, there appears to be no economic forecasting at District level to support the distribution strategy. We trust this will form part of the ongoing OneNE research and reserve our right to comment on that work in our submission to the EiP Housing Round Table.

451 Marchday Group

The Marchday Group question whether the average net additions to the dwelling stock identified in Policy 30 and specifically relating to Darlington are sufficient to satisfy market requirements, local housing need and projected accelerated GVA growth.

The RSS recognises in paras 3.57 - 3.61 the importance of providing sufficient housing provision throughout the North East in sustainable locations and in paras 3.59 the "availability of high quality housing and living environments will therefore be essential in facilitating and in supporting economic growth by helping to attract and retain the regions workforce". Marchday also support the recognition in para 3.51 that "such an approach is essential to deliver and maintain sustainable communities and in serving thriving regional and local economies".

Given these important paras directly relate to both dwelling construction and provision, then it is contested that policy 30 should be cross - referenced back to these objectives and a degree of flexibility should be introduced that does not limit supply to the identified figures. By adopting such a prescriptive approach to dwelling provision may mean that local need is not fully satisfied, as the basis for Policy 30 is to set a rigid limit to average annual net additions to the dwelling stocks by district.

Id No Respondent

Policy 30

The policy fails to recognise that the North East contains a number of sub-regions which differ quite substantially in their requirements for planning policy through Local Development Frameworks. Whilst clearly some sub-regions within the North East suffer from housing market failure, this is not the case with regard to Darlington. Darlington is a settlement which for a number of reasons, including its geographical location close to North Yorkshire means that it does not suffer from significant areas of housing market failure. Furthermore, Darlington's social and economic character means that it may require greater levels of housing supply across all need bands than other locations throughout the North East in order that it may fully achieve the renaissance it is deserving of. Policy 30 needs to reflect this requirement for a degree of flexibility.

In addition, Marchday doubt whether it is at all appropriate to adopt a capacity approach to dwelling provision for Darlington rather than one that allows a greater degree of flexibility based on up to date locally based need assessments expressed through Local Development Framework Documents.

Para 3.73 recognises that it is critical to respond to changing circumstances ensuring that targets for the re use of previously adopted land are met. Unfortunately policy 30 as drafted may result in this important objective not being satisfied.

In order to ensure that Darlington's Local Development Framework is able to reflect a policy framework that truly reflects local circumstance and need requires policy 30 in this particular case to reflect a more flexible approach to local housing delivery. The balance between ensuring housing supply does not prejudice either local housing market or the supply of Urban Capacity Studies, Employment Land Studies, Employment Land Studies and Housing Need Assessments.

Marchday also question whether policy 30 presents a true and correct hosing provision figure for Darlington. This is on the basis that the RSS places considerable emphasis on encouraging Darlington's renaissance and that greater levels of local housing across all need bands may be required to limit long distance commuting to the town from its wide local catchment. It is therefore likely that housing need will exceed the town's identified average net additions. It is also likely that all housing supply for Darlington can be accommodated on previously developed sites without the need to allocate Greenfield development opportunities and in a way that will positively contribute to the urban renaissance of the town generally.

205 Member of Parliament

Oppose: The RSS does not appear to have any stated methodology for the allocations of housing increases made to the Alnwick District and Berwick Borough, which appear arbitrary and inadequate.

There is no evidence that the refusal of very small housing developments in North Northumberland will directly encourage larger developments on brownfield sites within Tyneside. It is much more likely to lead to:

- (a) increased demand for existing housing stock; and
- (b) the transfer of such developments into neighboring parts of the Scottish Borders and East Lothian, where no comparative restrictions will be in operation: the Berwick area, in particular, is more effected by the Scottish economy than the Tyneside economy.

Id No Respondent

Policy 30

I believe the allocation figures are insufficient for the needs of the Alnwick District and Berwick Borough for the following reasons:

3.55 states that the regional population is growing. Figures also show a net migration from urban to more rural areas.

The RSS does not appear to mention the general trend in the UK for an increase in single-person households

3.58 proposes that housing development is concentrated within the 2 city regions.

3.61 states that not every demolished dwelling will be replaced, leading to a reduction in housing stock in some areas.

Alnwick District Council and Berwick upon Tweed Borough Council both have housing crises, with no available council housing in Alnwick and very little in Berwick.

2.130 states that there is a lack of affordable housing in rural areas, exacerbated by the low wage rural economy.

This is exacerbated by the high incidence of holiday homes in the Alnwick and Berwick areas mentioned in 2.146

3.79 Alnwick, Berwick and Castle Morpeth are identified with the most significant problems of affordability of housing.

I believe these allocations are inadequate and will do little or nothing to address the problems of affordability and availability of housing within the Berwick upon Tweed and Alnwick areas. I would like to see these provisions increased to address the serious housing problems facing these areas.

453 Member of Public

Support setting of regional target for construction of housing on previously developed land and reuse of existing buildings.
RSS targets of 60% by 2008 and 65% by 2016 are too low

point b) should be amended to read :

"meet regional target for housing development on previously developed land and through the reuse of existing buildings, of 70% by 2008 and 75% by 2016"

Support build density of 30-50 dwelling per hectare. As a minimum the RSS must state 25 dwellings per hectare is the very lowest density that will be permitted

291 Member of Public

To promote the subject site for redevelopment an element of housing is required, then policy 30 which allows only 120 dwellings per year 2004-2011 is over restrictive as a district total. By its nature the district does not have enough previously developed land to meet the target of 60% Brownfield by 2008 and so would inevitably need to look to Greenfield sites for a source of urban capacity. Top of the list should be mixed use sites which could secure employment by offering residential as a pump primer.

To remove this objection the figures for the district should be revised upwards.

549 Member of Public

Strongly support. However, objections as Friends of the Earth South Tyneside

289 Member of Public

Object to policy which seeks only 420 dwellings 2004-2011. The demand in north Tyneside has traditionally outstripped supply. This will be exacerbated by the trend towards moratoria in Newcastle & Gateshead because of the Pathfinder and in a move by South Tyneside to do likewise. The demand on Sunderland and North Tyneside will therefore increase well beyond 420 per year.
To remove objection either the moratoria should be prevented/stopped and/or the numbers adjusted.

Id No	Respondent	Policy 30
442	Member of Public	<p>Of particular concern is the low annual average dwelling provision allocated to Teesdale, in comparison with the remaining Districts in County Durham. The average annual net additions of 70 for Teesdale, although increased from the Consultation Draft, appears to be based on the previous County Durham Structure Plan 1991-2006 figures. However before the introduction of the Planning and Compulsory Purchase Act 2004 a Key Issues Paper was published by Durham County Council.</p> <p>This Issues Paper published in July 2004 proposed a partial review of the Structure Plan for the period 2004-2016. Within this part of the suggested strategy it was proposed to strengthen the role of Barnard Castle as Teesdale Districts main town. It is our view that the RSS should carry forward this strategy for County Durham and particularly Teesdale that was proposed in the July 2004 Key Issues paper.</p>
418	Member of Public	<p>As the subject site is promoted for housing development, this policy which only allows 640 dwellings per year, is over-restrictive as a district total.</p>
273	Member of Public	<p>The dwelling numbers provision in the LDF's is one that is already the subject of debate and as such I would contend is premature to allocate numbers. It also seems to miss totally the issue of where people actually want to live and work. Also thanks to ODPM issuing another consultation on Housing for Provision one does get the impression that one hand doesn't know what the other is doing. I haven't read that one yet but no doubt it will contradict or not fully engage with RSS regardless of what it claims to do. I am totally convinced this numbers game for each patch is destined to be a shambles as you cannot dictate exact numbers as then it is more of a USSR programme planning for people. The issue of densification of up to 50 dwellings per hectare I understand but are we so spatially limited to have to insist on this. If we have 5,000 hectares of employment land sitting around do we have to drive density as hard as it is a very good way for developers to increase their own profit without giving the community the space it needs or aspires to. If we are told there are 3,000 less homes needed in the next 15 years or so then why do we have issues of affordability?</p>
186	Member of Public	<p>Of particular concern is the low annual average dwelling provision allocated to Teesdale, in comparison with the remaining Districts in County Durham. The average annual net additions of 70 for Teesdale, although increased from the Consultation Draft, appears to be based on the previous County Durham Structure Plan 1991-2006 figures. However before the introduction of the Planning and Compulsory Purchase Act 2004 a Key Issues Paper was published by Durham County Council.</p> <p>This Issues Paper published in July 2004 proposed a partial review of the Structure Plan for the period 2004-2016. Within this part of the suggested strategy it was proposed to strengthen the role of Barnard Castle as Teesdale Districts main town. It is our view that the RSS should carry forward this strategy for County Durham and particularly Teesdale that was proposed in the July 2004 Key Issues paper.</p>
131	Member of Public	<p>The 2001 Census showed an overall population decline in the North East of 3.8%. However in more recent years this decline has slowed and by 2003 the population began to increase again, in particular within County Durham.</p> <p>The Consultation Draft RSS showed County Durham as the only sub-region expected to plan for population decline. However, we are aware that this has now been revised and the RSS now plans for a stable population for County Durham.</p>

Id No Respondent**Policy 30**

Population estimates for Mid-2004 published by the Office of National Statistics show that the population of County Durham increased by 3,200 from the previous years estimates. There is no evidence to show that this increase will not continue within the RSS period.

Evidence from local Chartered Surveyors and Estate Agents suggests that there is a high demand for housing within County Durham, particularly in Teesdale. This demand should be reflected within the RSS.

Of particular concern is the low annual average dwelling provision allocated to Teesdale, in comparison with the remaining Districts in County Durham. The average annual net additions of 70 for Teesdale, although increased from the Consultation Draft, appears to be based on the previous County Durham Structure Plan 1991-2006 figures. However before the introduction of the Planning and Compulsory Purchase Act 2004 a Key Issues Paper was published by Durham County Council.

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132 Member of Public

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184 Member of Public

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185 Middlesbrough Council

The housing allocations to the four sub regions does not prioritise the urban areas of the Tees Valley and Tyne and Wear. This is contrary to the RSS locational strategy as set out in policy 5, which seeks to concentrate the majority of new development within the conurbations and main towns of the city regions, particularly within the core areas.

The reduction in Middlesbrough's housing allocation, from 5950 dwellings in the consultation draft RSS to 5780 dwellings is considered unacceptable. It conflicts with the locational strategy that seeks to concentrate the majority of new development in the conurbations and main towns, particularly within the core area of the Stockton Middlesbrough Initiative. Middlesbrough's housing allocation needs to reflect its strategically important role at the core of the city region and the principles of sustainability. Middlesbrough currently receives the highest level

Id No Respondent**Policy 30**

of daily net in-flows in the Tees Valley for employment purposes. By concentrating new housing development within the core areas the need to travel for employment will be minimised, creating more sustainable development pattern. Additionally, Middlesborough has consistently achieved a higher proportion of new housing on brownfield land compared to its neighbors.

An analysis of Middlesborough's potential housing supply to 2011 reveals a potential oversupply of over 1000 dwellings. The current RSS phasing could delay the development of key regeneration sites, including Greater Middlehaven, Hemlington Grange and the Middlesborough College sites. The relocation of Middlesborough College to Greater Middlehaven is central to the successful redevelopment of this regional brownfield mixed use site. The regeneration benefits include an iconic building, bringing 11000 students to the site to help popularise and populate Greater Middlehaven and improved educational facilities. The relocation is dependent on the future redevelopment of the College's existing sites at Longlands, Marton and Kirby for residential purposes, which will help to diversify housing choice in Middlesborough.

Policy 30 sets out an upper limit for the amount of net additional housing that each local authority can develop between 2004 and 2021.

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|-----|-----------------------------------|--|
| 272 | Middlesbrough Town Centre Company | Policy establishes housing allocations in the period 2004/2021. It wrestles with problem of trying to avoid extrapolating historical housing allocations while recognizing that in the period 2011 current permissions will dominate the actual pattern of spatial development. This section recommends an annual average allocation of 340 dwellings for Middlesbrough. While these figures understandably cover a wide range of differing sites they clearly are important in a town centre context as there is now a growing interest in flat/apartment development in the town centre. It is imperative that these desirable developments, from a sustainability point of view, are not constrained merely by housing allocations. This issue will apply, and is likely to be more significant, on key Brownfield mixed use sites such as Middlehaven. While recognizing that this kind of strategic policy must set a framework it would be useful to specifically make reference to housing numbers within established urban centres being viewed as "windfall" allocations up to an agreed level which falls outside of normal allocations. |
| 334 | Morpeth Town Council | Broadly supports policy. However, there should be more flexibility to allow for local small scale housing led regeneration schemes of up to 150 houses or so. The dwelling provision must be flexible enough for adequate affordable housing to be built to ensure Morpeth remains a viable and sustainable community |
| 130 | Namulas Pension Trustees | <p>Of particular concern is the low annual average dwelling provision allocated to Teesdale, in comparison with the remaining Districts in County Durham. The average annual net additions of 70 for Teesdale, although increased from the Consultation Draft, appears to be based on the previous County Durham Structure Plan 1991-2006 figures. However before the introduction of the Planning and Compulsory Purchase Act 2004 a Key Issues Paper was published by Durham County Council.</p> <p>This Issues Paper published in July 2004 proposed a partial review of the Structure Plan for the period 2004-2016. Within this part of the suggested strategy it was proposed to strengthen the role of Barnard Castle as Teesdale Districts main town. It is our view that the RSS should carry forward this strategy for County Durham and particularly Teesdale that was proposed in the July 2004 Key Issues paper.</p> |

Id No Respondent**Policy 30**

It is our view that greater housing provision needs to be made in County Durham and particularly in Teesdale and its main town of Barnard Castle and also its sustainable serviced settlements i.e. those which have a range of services and facilities to sustain limited development” as defined in policy 5.6 of the adopted Teesdale District Local Plan e.g. Cotherstone, Eggleston, Evenwood, Hamsterley, and Staindrop

39 North Yorkshire County Council

Both RSS for the North East and Yorkshire and the Humber identify the links between the two regions, focusing on importance of the Tees Valley as a centre for employment and services, a source of housing demand on the surrounding rural area and the role of the A1/ A19/ East Coast Mainline transport corridor.

In relation to the Tees Valley city region, the North East Assembly propose that development should remain focused on the urban area. This is welcomed and reflects the strategic approach that has been adopted in North Yorkshire and Teesside over many years. However, a key element of the strategy for the North East is its commitment to significantly higher levels of economic growth than have been experienced in the past. In contrast to the proposed regeneration and development of the Tees Valley economy, annual net house building rates show a progressive decline to 2021, from 2,065 dw/year to 2011 to 1,410 after 2016. This compares to net completion rates since 1996 which have averaged approximately 1,700 dw/year. There is therefore concern that significantly higher levels of economic growth on Teesside may generate pressure on the housing market in the adjoining areas of North Yorkshire.

However, the retention of population within the Tees Valley is not solely an issue of the scale of development, but reflects issues of housing type and location and wider issues about the physical and social environment. Proposals in the submission draft RSS to address these wider issues are therefore welcomed. However, it will be important to ensure that the range of housing provided in the Tees Valley reflects the needs of the community.

222 Northumberland County Council

Whilst the dwelling provision figures for Northumberland for the two periods 2004-11 and 2011-16 are accepted as they are broadly consistent with the recently adopted Northumberland Joint Structure Plan First Alteration, the County Council object to the reduction in dwelling provision for the third period 2016-21 period as it does not appear to be consistent with the aspirations for increased level of growth in the region and population projections for the County.

47 Northumberland Estates

The requirement for the rural districts like Alnwick and Berwick is that they should plan for local growth - that has been the aim of county Structure Plan and previous RPG. RSS has drastically limited future growth in Alnwick and Berwick based on an unrealistic assumption that they will significantly assist in reducing population decline in the conurbations. They are however very different housing markets. North Northumberland requires to be treated differently from the urban south east of the country which is closely linked with Tyneside in terms of employment and housing markets. Occupiers of new housing in Alnwick and Berwick are largely from within the districts with only a small proportion from the conurbations. Reducing allocation in Alnwick would have an insignificant effect in reducing migration from Tyne and Wear, but would be harmful to the rural areas and restrict rural regeneration objectives.

Stemming urban - rural migration is an overstated problem in RSS. The quantity of urban rural migration beyond the immediate commuter belt is relatively small. The key issue is to retain population within the region, and part of the solution to that includes retaining the opportunities for housing and business beyond the two main conurbations. RSS needs to recognise the threat that if the region does not offer those opportunities they will be sought outside of the region.

While it is a laudable aim to produce commuting key ways to achieve that is through improved public transport provision, traffic measures to reduce private car travel and encouragement of new businesses in rural service centres. Beyond 20 miles relatively few people commute. RSS also recognises a move towards more flexible working particularly in IT and business related jobs which does not require increasing numbers of people to live near to their workplace. This is a trend which will continue to grow throughout the RSS plan period.

The following specific issues for Alnwick District are not adequately addressed by RSS:- the need to provide homes for its workforce, as well as affordable houses: the need to sustain the economy: the need to counter the trend of an increasingly aged population: the need to provide for increasing enterprise and businesses attracted to rural areas and lifestyle: the need to retain young people who are likely to be lost to the district and region by inadequate provision of affordable and starter homes: the need to offset the loss of housing stock to second homes whilst not discouraging tourism as a key economic driver.

The RSS figures are simply unrealistic - what is the point of stating the figure of 95 houses per year in the period 2004 - 11 when the actual figures, because of existing planning permissions, are known to exceed 120 per year. The proposed reduction to 60 per year would be extremely harmful to the district, failing to meet its own needs and leading to population and economic decline in the period to 2021. The reductions proposed are not sustainable and unacceptable - a 50% fall from current levels. In absolute terms the numbers required are small and will have a negligible effect on the region but a catastrophic effect on rural communities in Northumberland. Suppressing development at the levels proposed for rural areas will simply exacerbate problems of affordability in areas such as Alnwick which has an identified requirement for over 300 affordable houses in the next five years.

Object to allocation for Alnwick which should be increased as follows:

2004-11 - 120

2011-16 - 100

2016-21 - 100

Object to allocation for Berwick which should be increased as follows:

2004-11 - 90

2011-16 - 80

2016-21 - 80

Reduce allocation from Newcastle upon Tyne. Increase allocation in North Tyneside to match new housing development with economic growth,

Id No Respondent

Policy 30

particularly within A19 corridor and to allow restructuring of housing markets - Many of the conditions in Newcastle's Pathfinder apply equally to inner areas of North Tyneside and they are a contiguous housing market. Over reliance on Newcastle will be detrimental to economic growth and housing restructuring in north Tyneside.

Object to allocation for North Tyneside which should be increased as follows:

480 480 480

Object to allocation for Newcastle which should be decreased as follows:

600 700 700

136 Northumberland National Park

The Draft RSS, in Policy 30, includes dwelling provision by district area, taking on what was previously the role of structure plans. As with the Adopted Joint Structure Plan, there is no figure proposed for dwelling provision for the National Park. This is supported, as the National Park has a very small housing stock and further housing provision in the National Park would be at a level that is not of any regional significance (less than 4 additional dwellings per annum). Additionally, the very limited level of housing provision in the National Park should not form part of the individual district allocations.

The implementation of the City Region strategy, has been interpreted in the Draft RSS by an overall reduction in the net additions to the housing stock in Northumberland from 850 dwellings per annum for 2004-2011 to 600 dwellings per annum for 2016-21. The figures for 2004-2016 reflect those of the recently adopted Joint Structure Plan. The National Park Authority is not presently aware of any reason such as demographic evidence to require any change in the figures given for housing provision to 2016 for Northumberland. This matter was tested fairly recently at the Examination in Public of the Joint Structure Plan. There is no objection to other planning authorities making a case for a level of provision over and above that set out in the RSS and Structure Plan.

The significant reduction in housing provision in Northumberland proposed for the period 2016-21 is a matter for concern. The reduction in the annual rate of housing development is particularly marked in Alnwick, Berwick upon Tweed and Tynedale Districts. This will have implications for future development of the 'National Park Gateway settlements' of Wooler, Rothbury, Bellingham and Haltwhistle. The overall affect of this policy also needs to be explored in terms of demographic change, as the trend towards reduction in average household size and continued growth in second and holiday homes could mean that whilst the net housing stock increases, the population of the area does not.

A general reduction in the rate of household formation could also have an economic affect in the area and hinder efforts to achieve sustainable rural development and affect the viability of local communities. In this regard, the level of housing provision proposed could be contrary to the aims of RSS Policies 1 and 5. This internal contradiction in the RSS requires thorough testing at the Public Examination.

A further factor requiring consideration is that in each of the above districts, the level of housing commitments (housing completions, local plan allocations and dwellings with planning permission) is high. This means that with the level of new housing proposed, any move towards achieving a more sustainable pattern of development within rural areas will have to wait for the commitments to be taken up and future allocations to be made. This is reflected in the fact that each of the District Councils has produced interim development control policies in

Id No Respondent

Policy 30

respect of housing. In Berwick upon Tweed district for example, the level of commitments presently equate to a dwelling supply of about twenty years based upon the figures contained in the RSS. Consideration should also be given to moderately increased allocations to be made in agreed sustainable locations such as the key rural service centres to drive forward a more sustainable overall distribution of development.

Whilst the Draft RSS includes a number of positive policies in respect of sustainable rural development, the proposed distribution of housing development could render them ineffective over the life of the plan, as an effective restraint would be applied to the development of rural communities. It is also difficult to see how the affordable housing needs of the area will be met when much affordable housing is provided as a percentage of market housing developments. It is unclear at this stage whether developers/land owners would accept the high levels of affordable housing provision that would be necessary to meet housing need in their developments. If not, it is unlikely that very much housing would come forward at all in rural areas.

The full implications of the distribution of housing development must be tested fully at Public Examination. It is acknowledged that the real and significant problems of the urban areas have to be addressed, but that this should not be at the expense of the rural areas and particularly remote rural areas such as the Northumberland National Park, and the rural service centres that support it.

The North East Assembly, as a public body, has to work within the duty placed on it by Section 62 of the Environment Act 1995 to have regards to the purposes of designation of the National Park in carrying out their work. The RSS therefore should not be in opposition to National Park purposes, by creating conditions where the purposes cannot be achieved.

338 Northumberland Tyne & Wear NHS

Para c welcome. Call for health services to be part of this however.

152 PD Ports (Victoria Harbour)

Notwithstanding the objection to the reduction in the overall figure for the North East, PD Ports consider that the submission draft provision for the Tees Valley authorities to 2021 allows their scheme at Victoria Harbour to progress as envisaged, although it is tight in the early phase based upon calculations of current supply. Crucially, the phasing and control of other nonstrategic sites, through RSS and future LDF policy will dictate whether the RSS strategy is successfully implemented.

128 Pennyman Trust and Farrow Trust

Of particular concern is the relatively low annual average dwelling provision, in Policy 30, allocated to Middlesbrough, in comparison with the remaining Authorities in Tees Valley and the fact that this provision has been reduced from the Consultation Draft. Middlesbrough is the major population centre within the Tees Valley and as such has good public transport links to employment and the highest level of services

At the previous Tees Valley Structure Plan EIP the panel recommended an increase in the housing requirement to Middlesbrough of 300 dwellings and a further 900 dwellings on greenfield land south of Middlesbrough to meet future longer term growth. My clients wish to see a continuation of this strategy within the RSS while not prejudicing regeneration initiatives.

Id No Respondent

Policy 30

42 Redcar & Cleveland Borough Council

Policy 30 on Dwelling Provision sets out revised figures for average annual net additions to the housing stock for the period 2004 – 2021. The figure for the region has been reduced by 3,500 and that for Tees Valley has been reduced by 1000 to 29,070. The net annual rate for Redcar and Cleveland is 280 which gives a total for the period of 4760.

Whilst the locational strategy for the RSS is to focus new development into the conurbation of the city regions, this is not reflected in the housing allocations set out in Policy 30. The allocations have been apportioned according to current population rather than the strategy set out in Policy 5. It is recommended that a higher allocation should be sought for the Tees Valley City Region under Policy 30.

Within the allocation for Tees Valley, the strategy for focusing development within the conurbation is not clearly demonstrated, rather it appears to follow a continuation of past developed trends and recent commitments.

Redcar & Cleveland is within the core conurbation area and has 21% of the population of the Tees Valley. However, only 16% of the allocations to Tees Valley have been made to Redcar & Cleveland.

The Council is seeking a higher housing allocation for Tees Valley City Region, with an increase in the allocation under Policy 30 to Redcar & Cleveland of 500 dwellings in total equating to an average annual net addition of 310 dwellings.

228 Stockton Borough Council

Policy 30 & para 3.69

Stockton has been allocated an annual average completion rate of 405, which over the 17 years adds up to some 6,885 new dwellings over the period. This compares to the Consultation Draft which previously apportioned some 7,225 dwellings over the same period. The completion rates to be phased together with a comparison of the rates of the Consultation Draft are as follows :-

Phasing Period	Consultation Draft	Submission Draft
2004 – 2011	450	600
2011 – 2016	415	270
2016 – 2021	390	270
Total	7,225	6,885

Recognition is now given to need to ‘front load’ the completion rates between 2004 – 2011 to accommodate the large number of extant planning permissions (eg Ingleby Barwick whose build rate alone could amount to between 250 to 350 dwellings per annum). This would therefore give further flexibility to bring forward the significant brownfield opportunities that exist within the SMI core area. The principle of the ‘front loading’ the phasing rates is therefore welcomed.

However, in terms of the overall apportionment to the Tees Valley compared in particular to County Durham, there appears to be a significant conflict with the overall locational strategy in sustainability terms. Throughout the Submission Draft, emphasis is given to the role of the City Region, particularly to the core areas as being the drivers of the North East Renaissance in lieu of the significant employment and accessibility opportunities. However, in sustainability terms, this does not appear to be reflected in the overall apportionment of the housing requirements. In the event that these apportionments are accepted, there is the very real risk of diverting housing interest and population away from the conurbation and its core areas (ie the SMI) thereby, undermining Housing Market Renewal agendas and regeneration aspirations of the Tees

Valley. It is therefore considered that the overall housing requirement for the Tees Valley sub-region is too low and should be objected to on this basis.

At the sub-regional level, Members will recall that it was accepted that the Consultation Draft's requirement for Stockton (7,225) must be treated as the absolute minimum. This recognised the fact that taking into account existing commitments there are significant redevelopment / regeneration opportunities within the SMI core area, which potentially would exceed the 7,225 threshold. Members will recall that it was resolved to request that an additional 1,000 dwellings be given to the Borough. The Submission Draft's proposed reduction to 6,885 is therefore considered to be insufficient to allow the Stockton Middlesbrough Initiative to be implemented. This housing requirement is clearly in conflict with the locational strategy at Policies 5 and 7 which correctly point to particular priority being given to regenerating the core areas of the City Region, ie Stockton and Middlesbrough. The overall requirement for this Borough which should at minimum be increased by an additional 1,350 dwellings and at best a further 2,000 dwellings. In effect raising the average annual completion rate from 405 to between 484 and 523 dwellings per annum.

151 Sunderland ARC

(Dwelling Provision) Sunderland arc proposes

- the addition of a further subsection [f] to read
“f) focus new high density development within and on the edge of town and city centres and immediately adjacent to other major nodes along good quality public transport corridors”
- the extension of the last bullet point to read “where appropriate locate lower densities in areas less well served by public transport and amenities and restrict higher density housing resulting from sub-division or other intensification to protect an area’s characteristics and ability to contribute towards types, sizes and tenure currently under-represented in the region’s dwelling stock” [n.b. additional wording shown in italics]

29 Sunderland City Council / Tyne &

– Dwelling Provision: The basis of objection to this policy is discussed in the joint Tyne and Wear response in the appendix. Notwithstanding Sunderland should raise specific objection in relation to its allocation of dwellings. Policy 30 proposes that Sunderland should provide for a total of 11,130 additional dwellings between 2004 and 2021, at a rate of 640 p.a. between 2004 and 2011, and 665 p.a. for each of the subsequent 5-year periods.

The total number is a reduction of 940 dwellings on the RSS Consultation Draft policy. Not only that but the initial rate of development is the lowest of the rates for the three time periods and does not reflect the expected step change in development for the City that is being driven by the Sunderland arc proposals.

There is continuing concern, particularly from the Tyne and Wear Research and Information Unit, about the robustness of the Experion Model being used by NEA to project population and household numbers for differing regional economic scenarios. Until this issue is resolved the Council should object to the housing allocations policy on the basis that it could be inaccurate as well as inappropriate.

Sunderland’s draft Interim Strategy for Housing Land (ISHL) published for consultation in November 2004 calculated the City’s needs on a different basis. It identified a need for 13,800 additional dwellings between 2004 - 2021. A revised strategy is being prepared taking into account representations received and also revised national population estimates and projections of the City’s population which affect the estimates for future housing provision. However the revised number is still expected to be substantially higher than RSS proposes. Objection to the figure should therefore be made to allow the City Council to pursue its ISHL provision through the Examination process.

Id No	Respondent	Policy 30
207	Tees Valley Joint Strategy Unit	<p>Although the Tees Valley Joint Strategy Committee broadly welcomes the locational strategy identified in RSS, there is concern that the strategy is not strongly reflected through the net dwelling provision shown in policy 30. The locational strategy states (policy 5) that in order to maximise major assets and opportunities and regenerate areas affected by social, economic and environmental problems the majority of new development should be concentrated in the conurbations and main towns of the Tyne & Wear and Tees Valley city regions. This applies to both economic development and housing development. This locational strategy is supported as being fundamental in meeting the RSS objectives of creating a step change in the regional economy, reducing regional disparities, stemming population decline, reducing out-migration, and regenerating deprived areas. However the proposed distribution of the region's net housing requirement in RSS policy 30 closely follows the current distribution of population.</p> <p>Therefore greater priority to development within the conurbations and main towns of the Tees Valley and Tyne & Wear city regions would suggest that there is scope for increased housing development within those sub-regions.</p> <p>In accordance with the strategy the Tees Valley will, over the RSS period, become a focus for new economic activity and employment (for example chemical & port related development, renewable energy and recycling industries, airport development, research & development associated with the universities) and this should be reflected through the housing provision. A further stated objective of RSS is to ensure access to employment for all sections of society and to reduce the need to travel. This reinforces the need to provide housing that is easily accessible to sources of employment, allowing the creation of sustainable communities and reducing the need for longer distance commuting.</p> <p>A significant amount of new housing development in the short to medium term in the Tees Valley will take place on greenfield land that has current planning permission. Four major regeneration schemes are proposed in the Tees Valley by Tees Valley Regeneration (an Urban Regeneration Company working in partnership with English Partnerships, One NorthEast and the 5 local authorities) that will make a major contribution to improving the choice of housing in inner urban areas. Although the net dwelling provision does allow some flexibility for progress to be made on major regeneration schemes in the Tees Valley, it needs to be recognised that there is a degree of uncertainty associated with these schemes in terms of the number of housing units that will eventually be delivered. Housing allocations in RSS need to reflect this uncertainty and ensure that there is an allowance for alternative options to be explored to provide an adequate range of choice and location of housing. In addition Tees Valley Living (a partnership of the local authorities, housing associations and private sector) is addressing the issue of low demand in traditional inner area housing in both the owner occupied and private rented sector and this will include widening the choice of housing in such areas.</p> <p>Therefore to reflect the RSS strategy, the priority to focusing development within the conurbation and main towns of the Tees Valley, and to allow for a degree of uncertainty associated with major urban regeneration proposals, the net dwelling provision for the Tees Valley should be increased by about 10 per cent to provide some 32,000 net dwellings over the 2004-2021 period.</p>
148	Tees Valley Regeneration	<p>Notwithstanding the objection to the reduction in the overall figure for the North East, TVR consider that the submission draft provision for the Tees Valley authorities to 2021 just about allows their schemes to progress as envisaged, although it is tight in the early phase based upon calculations of current supply. Crucially, the phasing and control of other non-strategic sites, through RSS and future LDF policy will dictate whether the RSS (and TVR's) strategy is successfully implemented.</p>

Id No	Respondent	Policy 30
43	Teesdale District Council	<p>Teesdale has continued to deliver housing in a planned and policy led fashion. Beyond allocated sites, there had been no greenfield development in Teesdale. As we move into a new plan period where the development of greenfield sites will be necessary, it is more important than ever that the delivery of housing continues in a planned, strategy led approach. The priority in Teesdale, as demonstrated through the Community Strategy is to retain our young people through the provision of employment and housing opportunities, our aspiration is for stability, providing for our indigenous population and attracting enough people in to the District to retain facilities and services.</p> <p>We can already evidence that Teesdale has become a hot spot for affordability and this is not adequately recognised in the RSS despite having been identified by the Regional Housing Board, and born out in our Housing Needs Assessment which requires 100% of our house building for the period 2004-9 to be developed for affordable units if our needs are to be met. The facilitation of much of the affordable housing will be related to the development of private sector housing, it is unlikely that RSL's will have the funding to deliver all of the units required in Teesdale over the period. The higher figure for Teesdale is therefore most welcomed and essential to provide the mix, of housing, and the provision of new housing across the range of tenures.</p> <p>TDC support the overall County figure of 20,000 additional new dwellings on the basis that this is the minimum necessary to facilitate population stability in County Durham.</p> <p>The Council welcomes the increased dwelling provision as a minimum requirement for the district, together with the flexibility to depart from PPG3 where lower densities can be justified, as set out in Policy 30.</p>
290	Timber Supplies	<p>Object to Policy 30 that only 640 dwellings can be built in Sunderland per annum 2004-2011. Given the number of planning permissions already granted but not taken up and applications for large sites such as the former Groves Cranes site, this number is insufficient to allow sites such as Farringdon Row to come forward thus stifling the aims of the Sunderland Arc.</p> <p>One regional house builder has had 4 refusals on 4 separate sites in Sunderland each going to appeal in the last 12 months. The Urban capacity Study requires some updating to take into account sites such as Farringdon Row and enable them to come forward before appeals that might be allowed on other sites in the City.</p> <p>The sort of ring fencing that should be considered would be the Newcastle-Gateshead Pathfinder which promotes sites in its area before other sites for which applications are made. To remove this objection, such a policy should be adopted in the Sunderland Arc area in the final version of the RSS</p>
415	Tithe Barn Land	<p>Page 90, para 3.71 I agree.</p> <p>Page 91, Policy 30 I disagree with annual net additions to dwelling stock for Stockton from 2011 onwards. After all that has been written by the RSS, particularly at Policy 5, about "concentrating the majority of new development in the conurbations and main towns, particularly within the core areas;" it will be disappointing for everyone who cares about the future prosperity of Stockton to read the net additions of dwellings allocated by the RSS to Stockton. The first period allocations are in line with the numbers that I am used to, thinking of 700+ completions against an 800+ target as</p>

being the highest type of level. Then the figures are slashed to 45% of the initial targets of 600 per annum.

A GVA target of 3.8% is aspired to repeatedly in "VIEW". If 2004 economic activity is taken as 100, and growth is 3.8%, then 2011 economic activity will be 130. If the intention were not so much to reinforce success as merely complement it and keep pace with it, then a target of 800 would be mathematically logical.

Stockton is mentioned as one of the three urban authorities in the whole region with an affordability problem (Page 93 para 3.79). To reduce the housing provision seems an odd way to try to solve it. Newcastle plans for increasing housing provision throughout the plan period.

Of the 23 local authorities, seven are planned to grow in investment between periods one and two. Of the rest the declines in growth rate are in the 10% region except for Wear Valley and Stockton where massive slashes in growth rate of 55% are planned.

Gateshead, Newcastle, North and South Tyneside and Sunderland are planned to grow and thrive with increases in housing investment during the plan period, in accordance with the policies and aspirations set out in VIEW by the RSS for the polycentered city region of the Tyne. One would imagine that this aspiration for growth also reflects the views of the city leaders!

Exactly the same can be said of Middlesbrough in its role of half the Tees city and in its leaders with their plans for the town. They plan for a 23% increase in investment between the first two periods, which is in working distance of the 3.8% GVA.

Stockton is in a completely different position with its planned 55% reduction in growth rate. It is though the town's archenemy had been asked to plan its future and make representations for it. It is as though the planning officers and/or councillors hated the whole idea of the RSS and wanted to do everything possible to ignore or thwart its aims. But at what a high cost to Stockton! Stockton should accept its role as a partner in the Tees city region, a national and world wide chemical and steel centre with the country's second biggest port instead of thinking back to the Civil War days when troops were sent to block the bridge at Yarm. The Stockton civic leaders should aspire to success. I think that a lot of the advantages that the City Challenge money should have given were dissipated.

I talked to the planning department on the 3rd October and was given to understand that they might plan for increased investment.

Ms Kate Barker noted that house-building rates were at a very low level and recommended that more be built.

The ODPM set a target of 4.4 million houses in twenty years. This is 74,000 houses per million based on a UK population of 58 – 60 million. With 2.4 million people in the N.E. our fair share is 177,600 new houses and all of the investment and economic activity that goes with them. The RSS is proposing 107,000 additional houses. After all the laudable ambitions for the region expressed in the Submission Draft it seems very faint-hearted to propose we get a significantly smaller share of the national economic activity. To aspire to just 60% of our share is shameful.

We do not have the problems of traffic flows at the speed of a walking horse, congestion charges, two hour each way commutes, expensively subsidised overcrowded public transport at the mercy of power cuts, militant workers etc, drinking water shortages, other massive infrastructure deficits, flooding risks and an alienated racial mix faced in the S.E. and other parts of the country. We should claim a bigger share of the planned national investment.

Id No Respondent

Policy 30

On the ODPM figure of 74,000 houses per million in the plan period, and given a population of 170,000 for Stockton, Stockton would deserve 12,580 house plus all the connected investment. Instead it has been allocated 6885. This low figure is against the background of it being one of the lead areas in VIEW as presented by the RSS.

I beg to disagree with this small allocation and aspiration,

11 Tyne & Wear Authorities (Jointly)

The unresolved housing issue is the sub regional allocation of additional housing. Tyne and Wear has been consistent in arguing that the strategy of focusing the majority of new development in the conurbations is correct, but the proposed sub regional housing allocations are not an adequate response to the strategy.

The further revised option shows, compared with previously circulated figures, a reduction of additional housing proposed for Tyne and Wear as well as a decrease in proportion, with Northumberland remaining the same and an increase in favour of County Durham.

The Tyne and Wear Districts remain concerned that the 107,000 net dwelling additions for the Region is too high. It will allow too much housing development to proliferate in the early years beyond the conurbations. It doesn't appear that housing numbers have been calculated on a consistent basis for 3 of the 4 sub-regions.

An over supply of new housing land across the Region will exacerbate, not reverse, the existing trend of leakage in population from Tyne & Wear districts to Durham and Northumberland. This will work against the sustainable communities principle for RSS preparation. The likely consequence is that volume housebuilders would take a short-term view and continue to prefer to develop Greenfield sites in Durham and Northumberland until land stocks ran out. (Of the total Greenfield allocations in the Region, 57% are in Northumberland and Durham, including some 4,500 units with existing planning permission.) Accordingly the take-up of previously developed land (PDL) in the Tyne and Wear regeneration areas would not happen at a fast enough rate to achieve the urban regeneration and locational strategy objectives of the RSS.

RSS Policy 30 includes the requirement that "Local Development Frameworks will...b) meet the regional target for housing development on previously developed land and through the re-use of existing buildings, of 60% by 2008 and 65% by 2016." The revised wording indicates that individual districts must meet the brownfield targets. It is welcomed and supported by the Tyne and Wear Districts, but to avoid any ambiguity it is requested that "by district" is added to Policy 30(b) after "...targets."

And amend 30(c) to say "Ensure that the necessary new or improved infrastructure, public transport and other services are provided and co-ordinated with the development of new housing".

There is a major inconsistency between this part of the policy and the sub-regional housing allocations being proposed by NEA.

Only Tyne and Wear has the PDL capacity to meet the requirement. All other sub-regions fall considerably short of the target. The final column indicates the amount of additional housing currently proposed by RSS that cannot be accommodated with the 65% PDL target imposed. It also indicates that maximising use of brown field land in Tyne and Wear could reduce the disparity to just 4,000 dwellings, further argument for the

Id No Respondent

Policy 30

Tyne and Wear Districts' view that the Regional figure should be reduced to 100,000 and the other sub regions reduced to allow them to meet RSS PDL targets.

Northumberland, Durham and Tees Valley all have a level of Greenfield permissions that greatly exceed 35% of the annual average (max. Greenfield allowance). In addition these sub-regions also have permissions outstanding on PDL. The Tyne and Wear Districts request that RSS ensures that no further green field permissions are granted in these sub-regions and imposes mechanisms to restrict new permissions until the current permissions have run out. This would most appropriately be done through amendment of Policy 31 and should include the strict phasing and regular review of all housing land allocations in conformity with the principles upon which RSS is based.

The Tyne and Wear Districts continue to request that Policy 30 of the RSS should seek to set a lower control figure of 100,000 net increase in dwellings (2004-2021) with 50% in the Tyne and Wear Sub-Region. This would allow for modest growth in population, would fall within the bronze and bronze/silver economic growth scenarios and could allow for all sub-regions to achieve PDL targets.

In addition, this more cautious approach to the scale of development advanced in the RSS would provide for realistic achievable growth and by means of plan/monitor/manage, additional housing allocations could be considered at the review stage if it becomes clear that economic improvements are being delivered. There could also be trigger points within the policies that allow higher build rates to be adopted.

105 Tynedale Council

The figures set out in this policy, relating to Tynedale and Northumberland in the period up to 2016 are strongly supported. They are in line with the newly adopted Structure Plan and are intended to bring about a stabilisation of the population. They are based on a high completion rate to begin with, (to take account of the large number of outstanding sites), followed by a much reduced figure, so as to allow population levels to adjust back to 2002 levels by 2016. The importance of achieving this strategy has been agreed and it the Council's intention to adhere as closely as possible to these figures. It is essential that the figure remains at this level so that the population level can be stabilised and that housing needs can be met

The figure set out in this policy, relating to Tynedale in the post 2016 period – i.e. 80 per annum – is not supported. It is out of line with the assumption that population stability will have been reached by 2016. In order to maintain this stability thereafter, it may be necessary to have up to 125 completions per annum, (the average for the first part of the period). Otherwise population levels will not be maintained, especially considering anticipated reductions in average household size.

The policy should provide for a minimum of 30 dwellings per hectare. Experience shows that development with this minimum density is achievable and does deliver a range and choice of housing.

There is also no need to define an upper limit (of 50) to the average density.

446 Ushaw College

As the subject site is promoted for housing development, then Policy 30 which allows only 280 dwellings per year 2004-2011 is over-restrictive as a district total. By its nature the district does not have enough previously developed land to meet the target of 60% brownfield by 2008 and so inevitably would need to look to Greenfield sites for a source of urban capacity.

To remove this objection the figures for the district should be revised upwards.

45 Wansbeck District Council

Wansbeck district Council objects to the proposed levels of housebuilding for Wansbeck in policy 30. They are too low, particularly for the 2016-21 period.

Id No Respondent

Policy 30

The Council is concerned that the low level of the housebuilding envisaged will prejudice aspirations for the regeneration of parts of Wansbeck, and, in particular efforts to diversify and rebalance housing stock. The Housing Market Assessment carried out for SENNTRI in 2004 confirms that new housing is crucial for this purpose. There is a danger that projects already underway to regenerate local communities at Newbiggin by the Sea and East Ashington will be put at risk.

The allocations set out in Policies 28 and 30 maintain a conurbation centred approach to development which is inconsistent with the city region philosophy advocated in policy 6. Policy 6 calls for the regeneration of Ashington and the rebalancing of the housing stock in the SENNTRI area to meet local aspirations. These policy requirements are not supported by the allocations.

Wansbeck District Council would wish the allocation for Wansbeck to be as follows:

2004 - 11 = 185

2011 - 16 = 170

2016 - 21 = 170

The Council may wish to change these figures further when information is available from current studies on housing needs, and housing market assessment.

243 Wear Valley District Council

Support to:

- the redistribution of housing provision to allow 20,000 net additions to the existing housing stock providing that this is deemed as the minimum required meeting population stability in County Durham.
- the short term housing allocations providing that early review of these is allowed for to help meet the medium and long term needs and aspirations of the District. It should be recognised in the policy that County Durham districts have recently commissioned work on a Housing Market Assessment that will inform the quest for provision of sustainable communities within the District. Greater flexibility around housing numbers and distribution is required and therefore requested to enable Council's to respond better to demand, regeneration and affordability issues as more detailed information becomes available.
- the flexibility allowed in pursuing nationally prescribed housing densities.

413 Woodford Land

Woodford Land consider that the suggested amount and distribution of housing land within the Tees Valley fails to reflect the stated objectives of the RSS to regenerate the core areas of the Tees Valley City Region. The suggested allocations would be so low in the case of Stockton on Tees Borough Council that it would cause core brownfield sites adjacent to existing residential areas and Town Centres to remain undeveloped for the plan period. Further consideration should be given to both the total amount of housing allocated to the Tees Valley and the distribution within the sub region to ensure that the objectives of the RSS can more credibly taken forward.

We recognise and support the emphasis which is given to the growth of 'city regions' and in particular endorse wholeheartedly the 'Stockton/Middlesborough Initiative' (SMI) which seeks to tackle the difficult urban core at the heart of the Tees Valley. Woodford have acquired

land interests in the Tees valley and look to play a prominent part in remediating key brownfield sites. This objective sits squarely with current and developing government agenda.

We have examined the proposed sub regional distribution of housing set out in policy 30. The stated policy emphasis upon growth within the identified city regions does not seem to be entirely consistent with the allocations apportioned to individual areas.

Overall the growth proposed for the Tees Valley in particular seems to be only marginally ahead of the growth proposed for the neighbouring Co. Durham sub region. This seems inconsistent with the recognition to be afforded to the conurbations at the heart of the Tees Valley City Region.

Within the Tees Valley we note that there are substantial differences in the challenges facing the different local authority areas. Some LPAs such as Middlesborough and Redcar & Cleveland have substantial amounts of older housing stock which require demolition. Others such as Stockton have substantial amounts of brown field site accommodating historic land uses which are no longer consistent with the vision of revitalising the Tees Corridor and regenerating surrounding town centres. In addition, a number of the authorities, chiefly Stockton on Tees and Darlington, are constrained by extant planning permissions which will run for many years to come within the plan period. These will have the effect of pre-determining a significant portion of the allocations which might otherwise be made by the LPA's in their emerging Local Development Frameworks.

We consider that the suggested distribution of housing fails to fully reflect all of these factors. In the case of Stockton on Tees, a significant amount of the boroughs allocation within the plan period is already committed through the ongoing development of Ingleby Barwick. Although it does have areas of poor housing, these are smaller in comparison to the challenges facing its neighbours and it seems unlikely that the authority will be able to significantly increase its rate of housebuilding by embarking upon a programme of clearance. In the majority of cases, clearance

schemes are already well advanced and are actually regenerating areas at higher densities than existing developments, fully in accordance with the density requirements of the RSS.

Stockton lies at the heart of the Tees Conurbation and City Region. It is a borough which has significant brownfield capacity stemming from former industry. We accept that not all of the borough's brownfield sites are suitable for residential for residential development. Many areas lie within former chemical complexes with blast zones and incompatible uses precluding residential development. However the Urban Capacity study for the Council demonstrates that the borough has far more capacity to deliver housing on suitable sites than it will have allocation capacity for within the RSS plan period.

The net affect of this situation will be to artificially maintain brownfield sites in an un-remediated and derelict state until either the expiry of the plan period or until a future review of the plan based upon higher levels of growth distributes more housing within the area. Where these are sited close to existing housing areas or lie within the SMI area, it seems inconsistent with the core renaissance objectives expounded in the RSS.

436 Wynyard Park Ltd

Notwithstanding the aforementioned anticipated economic growth in the Region through the plan period, Table 20 on page 30 of technical Background paper No 4 and Policy 30 - Dwelling Provision in the RSS presently promotes a reduction in the annual rate of house building in the Tees Valley City Region to coincide with the anticipated growth in the economy through the plan period.

Policy 30

It would be wrong to suppress build rates beneath those currently being achieved in the Tees Valley City Region rather than to make provision for a planned increase in house building to reflect the anticipated growth of the economy during the plan period. Such action would artificially constrain growth in an area in need of regeneration. And would represent a significant missed opportunity. Others have verified the link between economic prospects and homes and this is well established.

The Barker Report seeks a more flexible and market responsive housing sector (both public and private) which can respond to stress in the market. A reduction in build rates in the Tees Valley coincides with economic growth will only compound housing stress and hence fly in the face of the barker recommendations.

The projected annual housing requirements for the Tees Valley City Region in 2011-16 and 2016-21 must be more reflective of both current housing indicators and of the policy aspiration enshrined in Policy 1 - North East Renaissance of the RSS to deliver economic prosperity and growth in the Region.

The Tees Valley City region is only second to Tyne and Wear as the most sustainable location in the Region. Build rates in the Tees Valley should therefore mirror the approach taken on projected housing numbers in Tyne and Wear, where increased build rates will accompany planned economic growth through the plan period. We appreciate that this will require an associated reduction in build rates in rural areas of the Region. Such as Northumberland, that are subordinate to the Tyne and Wear and Tees Valley City Regions in sustainability terms.

The distribution of both housing and employment land needs to take account of the City regions and their aspirations within the RSS plan period. Specific annual requirements for each authority should be made within context of the City Regions and the anticipated growth in the economy during the plan period.