

Newcastle-Gateshead One Core Strategy: Major Changes Report

Formal Objection from the Green Parties of Newcastle & Gateshead

1. Summary Statement
2. Main objections
3. Supporting Evidence Statement

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This is a submission, on behalf of both Newcastle & Gateshead Green Party branches, giving a formal response to the second stage of the consultation on the Newcastle-Gateshead One Core Strategy: the 'Major Changes Report'.

Summary

There are improvements in the *Major Changes Report (MCR)*, especially the removal of the highly controversial proposed development site at Salters Lane. However, we have to restate our fundamental objection to the *One Core Strategy (ICS)*, both in terms of its assumptions and its goals. The *National Planning Policy Framework (NPPF)* stresses that any acceptable land use strategy must be based on "sustainable development". The *ICS* is still not based on any rigorous concept of what might constitute a 'sustainable city'.

Thus, on the NW side of Newcastle, large areas of greenfield land remain under threat, while, south of the Tyne, valuable open spaces such as Dunston Hill are also endangered. Much is being made by Newcastle councillors in particular of reductions in the land to be taken for housing but, in reality, the situation has worsened in some areas. Indeed, actual withdrawals from the original list of sites at risk such as Gosforth's Salter's Lane and Gateshead's Leam Lane have **only** happened because of strong public protest. Future threats to greenfield sites would be intensified by the precedent set by the removal of Green Belt land if the current *ICS* were to go ahead.

The *ICS* essentially remains a car-based development plan, predicated upon an unsustainable level of urban sprawl, central to which will be an unnecessary and unviable schedule of more executive-type housing, more retail and office developments, coupled to more major road-building. It is still based on unwarranted extrapolations of past trends, untenable predict-and-supply modelling and, often, sheer wishful thinking about the prospects for and desirability of population and economic growth. This is not really proper public planning. Rather it is more a matter of self-serving projections that, in practice, cater for special interest groups, most of all the big construction firms.

There are compelling arguments, ignored by the *MCR*, that pursuit of conventional models of urban development will be counter-productive and that a quite different path must be followed. Though it claims to be evidence-based policy-making, the *MCR* signally fails to base itself on up-to-date and scientifically reliable evidence about growing environmental constraints. Such factors ought to be the starting point for a 'Sustainable City' Plan. The evidence in the *MCR* suggests that is not the case. Many of the proclaimed 'improvements' to the original draft *ICS* are more spin than substance.

The *MCR* is simply not practicable. According to the *NPPF*, "plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened." The *ICS*, as modified by the *MCR*, is still far too ambitious, too vague regarding secure funding and too prone to likely delay. Moreover, the two councils have a bad record regarding past delivery. Overall, the *ICS* still fails to meet the proper criteria of sustainable development.

Fortunately, there are genuine opportunities to reuse brownfield sites in the suburbs and empty properties in the city centre. This is real sustainable development. Examples of such schemes can be found in the successful cities in the recent European Union Green Capital Award (a competition in which, revealingly, Newcastle scored badly). If adopted locally, they will pay lasting dividends in terms of health, durable jobs, recreational opportunities, indeed a more beautiful environment as well as a more sustainable way of living for **all** citizens. Greater protection for the other species would naturally be part of this alternative.

Overleaf we summarise our specific objections to the *MCR*. Then we provide supporting evidence and argument.

Main objections

1. The unsustainable impact of the proposed new road on NW side of Newcastle.
2. Validity of consultation process in the light of (1).
3. Unsustainable economics of (1).
4. Inadequacy of Community Infrastructure Levy (CIL) system and limits to technological mitigation.
5. Inadequacy of protection afforded to Gosforth Nature Reserve and Watergate Nature Park.
6. Inadequacy of Green Infrastructure element.
7. Inadequacy of climate change planning and its strong integration into the *ICS*
8. Failure to learn lessons from Newcastle's poor performance in 'Green City' bid.
9. Inadequacy of response to flooding and sewage contamination threat.
10. Unsustainable bias towards property demolitions, not refurbishment.
11. Insufficiency of social housing provision.
12. Insufficiency of provision for the elderly.
13. Unwarranted expectations regarding housing market.
14. Unwarranted expectations regarding job creation potential of the *ICS*.
15. Unsustainable focus on retail-based growth.
16. Inadequate planning for a more sustainable transport system.
17. Inadequacy of mechanisms to ensure concentration on sustainable brownfield regeneration.
18. Underestimation of the scale of likely urban sprawl and its negative social as well as environmental consequences.
19. Inadequacies regarding well-being and 'healthy city' dimension
20. Inadequacies regarding 'duty to co-operate' (Localism Act).
21. Failure to address problems caused by 'land banking' by developers.
22. Failure to address problems posed by population growth and an unsustainable commitment on on-going growth
23. Failure to absorb lessons from the problems linked to the Newcastle Great Park master plan and its implementation.

Detailed objections

1. Our first objection to the *MCR* concerns the proposed **new road** on the NW side of Newcastle. This proposal fails to satisfy any reasonable criteria of ‘sustainable development’. It will carve through the Green Belt, destroying wildlife habitat and foraging land as well as fragmenting farms. Such road infrastructure leads to large amounts of consequential development along its route. It requires little imagination to see that, once started, proposals would follow to extend it right round to the A19, leading to even more sprawl.

We call for the abandonment of this road scheme.

2. The way in which knowledge of this scheme surfaced throws into doubt the **very validity of the whole consultation process**. News of it has only emerged comparatively late in the second round of consultation (see front page *Evening Chronicle*, 05/09/12). It is hard to avoid the conclusion that this information has been deliberately held back due to fears on the part of its proponents of a voter backlash at last May’s local elections.

This road is intimately linked to the *ICS*. It has been described by the council thus: “the proposed road between the A69 and A696 will be built to service the proposed development” (*Evening Chronicle*, 05/09/12). It cannot, therefore be treated as something separate to the *ICS* and not part of the consultation process. The public had a fundamental right to know and to be consulted in sufficient time about new road schemes. This simply has not happened.

We object to this serious breach of local democracy.

3. The funding of such schemes is unsustainable, other objections apart. Though details are not clear at the moment, it has all the hallmarks of what is colloquially called a “Ponzi Scheme”. It has been said that developers will pay for the road. Given the likely level of CIL payments set against the possible final cost of the road (£60-75 million?), this assumption is implausible. If its funding is based on the **City Deal** arrangement, it will be funded by borrowing against future revenues which, in reality, are unlikely to grow to the necessary extent. This, in turn, will necessitate even further cuts in essential services. The lessons have not been learned from the rising costs of **Private Finance Initiative**.
4. We further object to the failure to spell out publicly and in proper detail the mechanics, not least underpinning cost calculations, of the **Community Infrastructure Levy (CIL)**. Talk of ‘mitigation’ has no meaning without such details. These include the likely impacts of any development (exacerbated flooding and sewage contamination risks, farm fragmentation, habitat loss, extra traffic levels and greater congestion, aggravated air and noise pollution, and so forth); the costs of full-scale mitigation; and evidence that there will be actual and timely payment of all those costs by those who will profit from planning permission.

The evidence from public consultations suggests that the level of CILs will be inadequate; that there is exaggerated faith in the efficacy of technological ‘fixes’ for problems such as flooding and wildlife habitat loss; and, further, that developers will be reluctant to pay in full for such mitigation. In other words, there will be irreparable damage while much of the cost of any remedial works will fall on a (depleted) public purse.

We object to any dependence on such unsustainable economics as City Deal and inadequate CILs. Schemes that cannot be financed by more sustainable means should be abandoned.

5. We call for a rewording of the section in the revised *Strategy* on the Heathery Lane site, next to Gosforth Nature Reserve (GNR). It reads thus at present:

“The development would, however, add to existing pressures on school provision within the Gosforth area and, on the basis of revised scoring of the site against Green Belt considerations, would result in significant harm to Green Belt purposes. **It is a matter for debate** as to whether these considerations would be sufficient to preclude housing development (**in whole or part**).” (our emphasis)

That wording leaves open the door for actual development against the wishes of the very large number of citizens who objected to the original inclusion of the site. This was done, it must be emphasised, on a very distorted weighting of suitability, by the merger of two sites, in the original assessment. As it stands, a would-be developer could argue that the planners have not totally ruled out the site as wholly unsuitable.

We call for cast-iron guarantees regarding that land and its conservation for posterity. Indeed we propose that the Reserve should be used as the base for corridors and new nodes radiating out across Tyneside. The whole Ouseburn Corridor, not just GNR, should be the starting point.

6. We make a related and more general objection regarding wildlife and habitat conservation. The *MCR* correctly notes the special significance of GNR. However there are many other sites that also sustain considerable biodiversity, not least in the Callerton and Dunston Hill areas, land that also provides invaluable recreational opportunities. The preservation of a few ‘postage-stamp size’ reserves in a sea of urban sprawl guarantees their eventual destruction. There can be no conservation in isolation. Narrow concepts of preservation are not sustainable development.

We would propose instead a strategy based on a ‘greening’ of rundown Green Belt land, including birch wood plantings, rehabilitation of footpaths/bridleways and efforts to extent rights-of-way. At present, what is sometimes called ‘**green infrastructure**’ is treated in the revised draft as some sort of ‘bolt-on’, a possible and modest addition rather what it should be: the foundation for truly sustainable development. Instead, the *MCR* is still endorsing developments that, elsewhere, are being rejected as not meeting appropriate criteria. A recent, local example is:

<http://www.planningresource.co.uk/news/1146785/north-tyneside-rejects-450-home-scheme/>

We call for a ‘New Deal for Nature’ across the area, integrated into a ‘Green City’ Plan.

7. We further note that the *MCR* still contradicts the **Climate Change Strategy and Action Plan** adopted by Newcastle City Council. Thus official documentation talks of the *ICS* being “informed” by other plans such as the *Climate Change* and *Green Infrastructure* plans. This is simply not sustainable planning and reflects a continuing inability or unwillingness to put ‘first things’ first.

Any attempt to proceed with sustainable development will come to nought if there is adverse and serious climate change (rather: ‘climate crisis’), now widely accepted as a reality by most scientists in the field. This evidence is still not being treated with sufficient seriousness in the *MCR*. Its plans would result in significantly **higher carbon emissions**, especially from extra traffic journeys to and from the edge-of-town developments it proposes. Recent housing developments have often featured two garages. This suggests that the council is more concerned about increased council tax revenue than serious action to reduce car usage and therefore overall CO₂ emissions.

We call for plans regarding the developing climate crisis to be a central and major foundation for any local land use and development strategy, not a marginal matter.

8. The *MCR* fails to pay attention to the lessons of failed **Green City bid**. The EU expert report is a damning indictment of past ‘sustainability’ initiatives in the locality. [Newcastle came only 13 out of 18]. Talk of future sustainable development is meaningless without thorough and public examination of why Newcastle scored so badly. Otherwise plans for Green Infrastructure will rightly be thought to be nothing more than empty rhetoric. More effort should be made to learn from cities such as Bristol which scored so much better in the Green City ratings. There is still insufficient effort, for example, to encourage the best standards regarding water conservation, energy efficiency and photovoltaic or other local energy sources energy in new build.

We call for a comprehensive ‘green city’ plan. It should include firm strategies to deliver the protection and enhancement of biodiversity, widespread tree planting, protection of waterways, reduction of flood and sewage contamination risks, greatly reduced CO₂ emissions and cuts in other air pollutants, enhancement of footpath networks and so forth.

9. The revised draft still fails to grasp the scale and severity of potential **hydrological risks** in the area, especially north Newcastle. Recent events, notably so-called ‘Thunder Thursday’ and subsequent downpours, underlined the risks from flooding and sewage contamination. We strongly oppose false fixes such as the removal of vegetation along the Ouseburn simply to make its waters flow faster.

We question whether the technological variants of **SUDS** (Sustainable Urban Drainage Systems such as concrete detention basins and culverts, as opposed to more ‘natural’ methods) can cope with the waters released when further development is put on top of what in effect is a giant ‘sponge’ in the upper Ouseburn catchment area. The negative effects of Newcastle Great Park in that respect underline this point. The simple addition of more culverts and holding ponds in an expanded built-up area is not sustainable development.

It might be noted that such technological infrastructure uses large amounts of concrete, a raw material whose large-scale manufacture is a significant source of CO₂ emissions and indeed other environmental problems. This is but one of many on-going examples of a lack of ‘joined-up’ thinking in both the original *Draft* and the *MCR*.

The only sustainable policy is not to build on key hydrological areas such as Callerton. There is a further need to assure proper clearance and maintenance of existing drains and sewers. A plan for really sustainable development would make this clear.

We call for a truly sustainable drainage plan, including full protection for the Ouseburn.

10. In Gateshead, the policy of demolition, not property renovation, has been pursued even though it is, by far, the poorer ‘carbon policy’ and indeed one with many other environmental, economic and social flaws. There has been mass opposition locally to this policy that the *MCR* fails to reflect. Instead the *MCR* still has not integrated the lessons of both the 60s wave of demolitions and those under the now widely discredited *Pathfinder Programme*.

*We call for full recognition that **property renovation** is, in most cases, the sustainable option. We call for a halt to further demolition especially at Bensham and Clasper Village.*

11. Little is being offered to those lower down on the housing ladder. Though the government is watering down requirements for **social housing**, a responsible council would do whatever it can to focus housing development on the needs of lower income groups, not yet more ‘executive’ housing. There is little hard evidence in the revised Draft that such social groups will significantly benefit from all the likely housing construction. As things stand, it will most likely replicate the kind of executive housing estates found in area likes Whitebridge and Greenside in the north part of the Newcastle.

The council seems to be prepared to find new money to fund road developments. We call for any such resources to be diverted to new social housing.

12. There is still a failure to provide for the growing percentage of **elderly citizens** in the local population. Such people usually want to stay in a familiar area, one where they have friends and where there is easy access to facilities like shops and health care. Out-of-town schemes scarcely meet their needs. They can only be met by more provision of city centre and suburban accommodation for this group.

The *MCR* still fails to recognise that part of the housing problem is the huge amount of under-used properties, often ones in which elderly citizens are effectively trapped, unable to keep up repairs or find more suitable accommodation. A concerted effort to provide it would meet the needs of elderly citizens. This, in turn, might free up some bigger homes for working age families with children, thereby reducing the need for new estates on the urban fringe.

We would note in passing that the revised Draft does not taken into account the rising amount of **accommodation for students** in new halls of residence. This is coupled to a fall (and predicted further falls) in university applications. Such changes question the population estimates made in the *MCR*. They should be further revised downwards.

In areas such as Jesmond, there is an excessive concentration of multi-occupancy by students and others. It often creates a variety of new problems such as parking congestion, litter and noise. Many people in affected areas strongly feel that their lives are being blighted. Relevant planning regulations have to be specifically invoked, something that has failed to contain multi-occupancy or limit its negative consequences. The basic issue is that there is too much poor quality and badly maintained private rented housing.

The *MCR* still ignores the scale of these problems and specifically the fact that, of late, some landlords have been seeking to cram yet more tenants into such properties. It would be more sustainable to try and refurbish properties for family use in such areas, a strategy with the additional advantage of relieving pressure on greenfield sites.

We call for a programme to limit more concentrations of multi-occupancy and adapt property for family use. We recognise that extra expense involved but see it as an essential step towards a more sustainable city.

13. The *MCR* still glosses over the **depressed state of the housing market** and the fact that any significant recovery in it is rather unlikely. A leading British developer, Persimmon Homes, recently announced that it has 62,000 building plots. It is not the planning controls that are holding back construction but the lack of demand in the economy.

But worse is to come. Some 80% of government ‘cutbacks’ are still in the pipeline at the time of writing (September 2012). Meanwhile the cost of living, not least regarding food prices, utility bills and train fares, is set to rise substantially. Both factors will cut demand in the housing market. This evidence is being ignored. Already there are new houses in the area being ‘mothballed’ since they cannot be sold. The positive links between house construction, jobs and general expansion assumed in both original *Draft* and *MCR* simply do not hold water.

We call for a proper evidence-based assessment of who is going to buy all the proposed housing construction.

14. There is still a tendency in the *MCR* to make excessive claims about the **job creation** potential of new house build. Thus one reads articles in, for example, the *Journal* that state that the building of 15,000 new homes will create over 30,000 jobs. Actually it might just create 30,000 job years i.e.

about two years of labour are embodied in a standard house including the materials (and material production is not necessarily or even probably local).

Insufficient attention is also being paid to the phenomenon of ‘jobless’ growth, i.e. expansion in workplaces using computer-based systems (self-service banking and shop checkouts, automated factory production lines and so forth), not full-time, permanently employed human labour. Nor will the simple provision of more **business parks** help, not least because existing ones have many vacant plots. Any such policy would have even worse consequences if those new business parks were to be funded out of borrowings under **City Deal**. Their developers would effectively be subsidised in the hope of increased business rate monies for the council in the future. Again, just like the proposed new road for NW Newcastle, this is ‘Ponzi’ economics.

Furthermore, hopes placed in what the *ICS* has called ‘digital jobs’ and ‘creative hubs’ are misplaced in terms of large-scale job creation. This is evidenced by the failure to provide the 35,000 jobs it was claimed would be generated by Newcastle Great Park (where, it must also be noted, none of the research-related developments connected to the universities materialised either). Some industries deemed to be ‘sunrise’ ones by the *ICS* and associate economic plans, notably the media, are contracting in terms of employment potential. All these documents ignore the existence of better alternatives as we documented in our original submission (e.g. <http://www.greennewdealgroup.org>).

*We call for a radical reworking of the employment strategy, with a proper emphasis on the needs of those currently unemployed and the kind of job creation most likely to soak up local unemployment. In particular we urge the endorsement and adoption of the **Green New Deal** for sustainable job creation.*

15. The *MCR* is still over-optimistic about **retail-driven growth**. Even the recent Olympics did not deliver the desired shopping boom nationally (we leave aside the fact that the goal of greater consumerism contradicts the environmental ambitions of the *Climate Change Strategy* and *Green Infrastructure* plans). Here, we strongly question the assumptions beneath the desire to provide more retail space. Recent evidence from bodies such as the Local Data Company suggests that such plans will only lead to more empty shops. The importance of ‘recycling’ money within the local economy, including support for local businesses, is still being ignored in the *MCR*. Again the real sustainable development option has not been adopted.

We call for a moratorium on all new retail development & an alternative focus on the revitalisation of local ‘High Streets’

16. The proposed new road is not the only flaw in the *MCR* regarding **transport**. There is still too much rhetoric about public transport, cycling and walking but with little hard substance. Indeed the reality is that bus services are likely to decrease in the wake of spending cutbacks. Yet no attention is paid to this danger. Schemes for pedestrianisation remain conspicuous by their absence.

The issue of provision for cyclists highlights this gulf between rhetoric and reality. The development of cycle routes has been agreed in principle by council through *Delivering Cycling for Newcastle*, endorsed 2012 by full Council. But route development is not firmly rooted in the *ICS*. There has to be much stronger evidence that targets will be met. We note, in passing, the contrast with the ambitious current plans in Germany to promote cycling (for both obvious environmental and health reasons).

In the *Newcastle Journal* of September 6th, Council Murison was quoted as saying that “Whatever happens, there will be massive investment in public transport here.” Yet there is absolutely no evidence in the *MCR* that there are any firm plans nor indication how they would be financed. Generally there is a contradiction between the on-going quest for growth and the capacity of local transportation systems to cope with the resultant demand. Apart from other impacts such as land loss, air and noise pollution, far worse congestion is the most likely outcome, scarcely ‘sustainable development’. There is no evidence of any significant mitigation of these impacts in the *MCR*.

*We call for the most recent Strategic Routes map (10 agreed routes) to be included in *ICS* while pedestrianisation schemes should be more explicitly backed. There is a need for a full-scale review of the threat to public transport and ways to ameliorate it.*

17. We note the *MCR* does call for **brownfield development**. This has been also reiterated in council responses to public feedback regarding the first Draft. We welcome this shift of emphasis.

That said, the councils remain committed to ‘market-led’ development. This will produce a decided bias towards greenfield exploitation by developers. Such sites are usually more accessible, free from obstacles and contamination and therefore more profitable. There is a fundamental contradiction and one which vitiates any claims regarding sustainable development.

This point underlines the need for a Tyneside-wide approach (see 19, below). Throughout the area there are large numbers of brownfield sites, sufficient to fulfil the ‘5-Year land requirements’. For

example, on North Tyneside, large potential sites include Chirton South Industrial Estate in North Shields (predominantly derelict for many years), British Gas 'Norgas House' site in Killingworth (empty for many years and now subject to severe vandalism), Harvey Combe in Killingworth (a large part of the site no longer used by NTC), Smiths Dock in North Shields (permission granted in 2007 but not being developed due to 'change in the market conditions').

But even within Newcastle and Gateshead, many sites exist, as evidenced by the revisions to the preferred sites maps which came up with locations that, somehow, had not been spotted first time round, perhaps because too much attention is given to the demands of the big developers. Similarly the increasing number of shop vacancies and vacancies-above-shops further evidences the abandonment of greenfield development in favour of truly sustainable development.

We call for every effort to be made to focus development on the regeneration of 'run-down' areas within the city boundaries, in other words a more sustainable use of the existing built-up land, instead of sprawl onto greenfield sites.

18. The overall impact of the *One Core Strategy* is seriously underestimated. The full picture can only be seen when proposed developments in nearby areas such as Ponteland (two sites sought by Lugano and Banks), Cramlington, south Morpeth and around Durham are added. The overall effect will be to create **massive urban sprawl**. It will swamp local communities and destroy large amounts of farmland and wildlife habitat as well as generate far more traffic with all its negative consequences.

Thus, in the NW side of Newcastle, the built-up area would stretch, as a result, from the Tyne Bridge to the far side of Ponteland, with only odds patches of open space set aside in between. Even if construction does not go ahead on the proposed scale, many areas will effectively be 'blighted' for years to come.

The loss of habitat and foraging land threatened by the *ICS* would be directly amplified in two major ways. First, the removal of significant amount of land from Green Belt status would set a precedent for further encroachment at a later date. Second, the road schemes would, as noted above, trigger further consequential development, beyond what is currently planned. For whatever reason, the *MCR* ignores this dynamic.

This reality is being disguised in **the spin about the major changes** after the first consultation. Thus the announcements made after the first consultation loudly trumpeted: "A reduction in scale of the previously proposed 'Callerton Park' from 4000 homes by 2030 (and 6,500 overall) to 3,000." It was not so clearly communicated that the land no longer needed was to be "safeguarded" which, in reality, means available for further development and no longer Green Belt. [It may be remembered that the controversial West Moor was 'safeguarded' by North Tyneside planners then offered to developers]

Furthermore, there is a clear implication that any land within the proposed NW by-pass to the east would also eventually be removed from the Green Belt, as the residual pockets at Woolsington and Bank Foot are not protected by "defined boundaries using physical features that are readily recognisable and likely to be permanent" (National Planning Policy Framework).

The revised *ICS* is, then, a plan for massive sprawl and the swamping of now-distinct local communities. It cannot be said to constitute 'sustainable development'. The consequence of all this development would be a '**doughnut**' city of the kind seen in North America, not least those in the 'rustbelt', whose history is not so dissimilar to that of the NE. They sprawl for miles, with rich people living on the outside and comparatively poor people within many inner city areas.

This is socially as well as environmentally unsound. Evidence from sources such as Wilkinson and Pickett's *The Spirit Level* suggest that such disparities are unsustainable. The likely outcomes of the *ICS* therefore contradict the 'stated goals of "Creating a Fairer City". Indeed the work of **The Fairness Commission** seems to be treated as something separate to land use planning whereas, in reality, social justice and physical development plans are intimately linked.

We call for a full and independent study of the 'social justice' implications of the ICS, not least regarding the health and general well-being of poorer parts of the conurbation.

19. Part of social justice is, of course, general '**well-being**' and particularly what might be called the 'healthy city' dimension. Much was made of such matters not just in the first draft of the *ICS* and *MCR* but also in other council literature about its plans. However these considerations remain, it seems, little more than rhetoric. Thus the policies proclaimed by the *MCR* follows its predecessor in ignoring the evidence that population and economic growth, beyond a certain point, produce decreasing returns and, indeed, increasingly negative impacts regarding key variables such as community spirit, neighbourliness, family life, health, law and order, leisure opportunities and overall contentment.

In other words, the *MCR* still subscribes to what might be called the ‘myths of bigness’. We cited considerable evidence to back these assertions in our previous submission. But it might be noted that the Office for National Statistics too has recently underlined the ‘well-being’ case against ‘growthism’:

<http://www.ons.gov.uk/ons/rel/wellbeing/measuring-subjective-wellbeing-in-the-uk/first-annual-ons-experimental-subjective-well-being-results/first-annual-experimental-subjective-well-being-results.html>

The *MCR* still fails, for example, to address adequately the health needs of the city. Specifically, open space and opportunities for healthy exercise must be very accessible on foot. The evidence suggests that, otherwise, many people will not avail themselves of such resources. The councils’ growth plans will erode such access (Dunston Hill, Callerton developments, etc), effectively making green space much more distant and often only accessible by car. The poorer parts of the city will remain especially disadvantaged.

20. Councils seemingly continue to think and act in isolation from other councils in the region. Thus Newcastle city planner Nicola Woodward talked about the need to “compete with other authorities” (Newcastle City Library briefing meeting, 18/07/12) for new residents, especially working age families. Indeed various local councils and planners seem to be counting the same heads as future residents and particularly potential house buyers. Such thinking is quite irrational and counter-productive, contradicting the new ‘**duty to co-operate**’ under the Localism Act.

We call for proper co-ordination especially across the four councils on urbanised Tyneside, a city region approach as opposed the current fragmentation.

21. Critical to any sustainable strategy is knowledge of **land ownership** which in turn gives some insight into the intentions of would-be developers. The phenomenon of land banking and the accumulation of more and more sites with planning permission simply to inflate asset value is well known... and harmful. The public can get a better picture of development if more information is made available.

We call for easily available and detailed information, including proper mapping, about which private businesses own what land in Newcastle and Gateshead. We would add council-owned land in addition since that was a factor in the Gosforth Nature Reserve controversy.

22. We come to **population-related issues**. The original Draft was formulated before the new figures from the Office of National Statistics on local and national population trends. That seemed somewhat premature.

However more worrying is the way planners and the leading councillors want to have it both ways. If there is population and economic growth, they want big new housing developments to accommodate it. If there isn’t sufficient population and economic growth (i.e. their target of 500,000), they want big new housing developments to encourage it. In other words, the councils are not just trying to cope with growth, they are actively attempting to encourage it.

This growth-oriented perspective is unsustainable. As a whole, the country’s population is growing quite fast. On present trends, 10 new ‘Birmingham’s’ will be needed by 2033. The impacts will be ruinous, creating vast urban sprawl, devouring farmland, overtaxing sustainable water and energy supplies and so forth. It is not just a matter of accommodating those extra numbers but also providing extra infrastructure. There will be intolerable pressures added to existing demand for not just housing but schooling, health, social care, transport and job provision. No problem facing society will be eased by population growth; all will be harder to solve.

The picture is rather more patchy regarding the **population in the North-East**, with even some localities experiencing a fall in their populations. Given the inescapable and irresolvable problems posed by extra additions to the total population load, a sustainable strategy would welcome the breathing space provided by zero or very low population growth. All overall growth must cease in a finite system. Surely it is better that it happens – in socially acceptable ways – when there is still room for manoeuvre and a chance to create a sustainable society, rather than later when it will be forced on society and in painful ways.

The extra burdens on socio-environmental systems of population growth are in turn exacerbated by economic growth and increases in per capita consumption. This is most obvious in the differences across the world in the national averages of CO2 emissions, all of which are directly correlated to increases in economic throughput.

More positively, we evidenced in our previous submission how no-growth cities and towns in the USA are registering better scores on social, economic and environmental criteria than ones experiencing expansion. We also noted cities with a good performance on many sustainability grounds. However those that have subsequently grown are encountering increasingly severe problems, ones that overwhelm attempts at ‘smart planning’ (e.g. Portland, Oregon). Such evidence

is compelling but still ignored by planners and councillors whose mindset seems stuck in the past mentality of more=better.

These are big issues facing society as a whole. There are, of course, very severe limits to what individual councils can do about them. What we can do, however, is to cease any rhetoric of the kind that economist Herman Daly has rightly called 'growthmania'.

There are, however, two sub-issues in the whole matter of local population projections about which the *MCR* is still deeply flawed. The first is the question of **working age families**. Their numbers are used to justify large-scale edge-of-town expansion in areas like Throckley, Callerton and Kenton Bank Foot. In the longer term projections, the *MCR* evidence still seems to rest on the top end of the range, presumably to justify the plan. The reality is more likely a drop in the future in the numbers of this population segment. The evidence simply does not justify a policy at whose heart is large-scale construction of the 3/4-bedroom houses.

The situation we face now and for the foreseeable future is that population growth is likely to taper, as in all previous recessions. So the evidence suggests that the councils' assumptions are unwarranted. Nor is it the case that younger people are leaving the city because of severe accommodation shortages. The cause is simply the lack of employment opportunities. Again the *MCR* still seems to rest on a very selective reading of the evidence to justify its excessive ambitions.

The other sub-issue of the general population and housing question is **migration**. The Newcastle City Council website states that:

"changes in migration numbers are the main reasons for the increase in the population figure... More people leaving the city to move to other areas of the region or country (called internal migration). For example, in 2008, an extra 600 people were estimated to have left the City - an overall net loss of 2,202 people, compared to the previous estimated loss of 1,600 people. However,... there are more people moving into Newcastle from other countries, compared with the numbers leaving for other countries (called international migration). The revised estimates suggest that in 2008, there are around 3,800 more people moving into Newcastle than leaving - an extra 900 people compared to the previous estimates."

This is an inherently volatile situation. Already, there is evidence of groups such as Poles leaving for their homeland or Germany as a result of the recession. Furthermore, government policy is to reduce immigration. In any case, many of the new immigrants are scarcely in a position to buy 4-bedroom executive housing.

Calculations based on such movements are a very bad basis for a major house-building programme. Already the revised population estimates have led both councils to cut substantially the number of planned homes. This is in itself evidence that the wishful thinking, not evidence, has shaped the *ICS*. Generally, it seems that council plans are not driven by real needs. Indeed, they might be construed as a desperate attempt to boost council funds by means of the New Homes Bonus and by attracting some of today's commuters (100,000 daily into Newcastle-Gateshead) to move into the city and pay council tax there, instead of elsewhere. Of course, other councils are seeking the very opposite. Such chaotic planning contradicts every principle of sustainable development.

However the latest population statistics seem to suggest no such growth in that segment of the total population and therefore no such related housing demand. Again, this underlines the extent to which draft *One Core Strategy* remains based on unmerited extrapolations and predictions, not a solid basis for any plan for sustainable development.

We call for a thorough reassessment of both the physical possibilities for, and desirability of, the search for more growth.

23. Finally there is the question of how much trust can be placed in the councils' delivery of its proclaimed good intentions. Past 'visions' have, too often, delivered what are, to say the least, uninspiring outcomes. Such histories suggest that the public may be wise to place limited confidence in the proclamations of developers, planners, and leading councillors.

There is, for example, the whole story of 60s development in the area that destroyed fine buildings such as the Royal Arcade and old Eldon Square. In Gateshead, there has been the slow & stalled Staithes South Bank housing development which after over 20 years is still far from complete. This old coke-gas works site was cleansed and prepared for the 1990 Garden Festival. It contains no social housing at all. [To be fair, there were some good design features regarding play areas and the encouragement of walking and cycling] Another part of the Festival site was zoned 'commercial', but no such development ever took place.

With regard to Newcastle Council in particular, the major evidence about possible gaps between proclaimed aspirations and actuality comes from the history of **Newcastle Great Park** (NGP). This history is difficult to grasp, not least because much evidence is anecdotal, though some of it comes

from presumably reputable sources such as the *Evening Chronicle*. The latter source made much, for example, of the gap (“What’s Missing”) between the stated aims for NGP and what actually transpired.

When looking at NGP today, we should remember the statements made when it was first launched: that it would be, for example, an ‘exemplar development’, a ‘new way of living’, a veritable ‘flagship’ and, of course, ‘sustainable’. It was suggested that there would be lots of tree planting, a village-style centre with a village green, community facilities, play areas, schools (primary, secondary and Catholic) plenty of public transport and provision for walking and cycling... and lots of jobs (a figure of 35,000 is sometimes quoted). ‘Section 106 agreement’ money, it was said, would fix any problems.

Some of these assurances produced nothing in actuality. Other ‘commitments’ were delivered only in part and/or very belatedly. There have been, allegedly, all sorts of problems: flooding (e.g. September 2008), tree deaths due to waterlogging, inadequate replacement of topsoil, cycle ways blocked by parked cars, poor bus services, inadequate school place provision... For very long periods, roads and paths were not properly made up and, today, there is parking congestion in some places. Some mitigation money is even rumoured to have been spent on developments off-site, allegedly on school refurbishment in Gosforth.

In the wake of the 2005/06 revised *Master Plan*, control of the ‘Park’ was effectively handed over to a consortium dominated by construction firms, with, it appears, the power to impose community charges on top of council tax to pay for (poor) community infrastructure. The area has become just another edge-of-town housing estate, one radically different from the original ‘prospectus’.

Control over builders, including systematic inspections during construction, appear to have been rather inadequate. Indeed all sorts of questions are raised by what is alleged to have been a retrospective issue of completion certificates. Extra houses apparently have been added to those planned for certain cells (H & I).

The NGP industrial park has only a small number of units (apparently empty at present). It seems that, in any case, that site is expected to be converted to housing. It is true that Sage moved onto their site, bringing its workforce. Even then there are rumours that the company threatened to move to Cambridge.

The system of ‘**delegated power**’ appears to have produced some very malign effects. We stress that we are not in a position to know the true history of Newcastle Great Park. Indeed we have had to cite rumours and allegations, though some of the above material has been culled from the local media, the *Times* and *Sky News*. We note in passing that the local MP, Catherine McKinnell, has expressed her strong concerns.

Whatever the truth, it does not seem to be a story to inspire confidence in what, in practice, the *One Core Strategy* will deliver.

We call for a full and independent investigation into the planning, construction and monitoring of the NGP development , to include a thorough review of what was promised and what was delivered. Only then can the public be in a position to judge the assurances being made about the latest land use plan.

Conclusion

Criticism of the *ICS* is not so-called ‘Nimbyism’. We refuted this tired argument in our first submission: (<http://neengland.greenparty.org.uk/assets/files/northeastfiles/Newcastle/Green%20Party%20objection%20to%20Core%20Strategy.pdf> p42). The fact of the matter is that it is only right and proper to defend land from unsustainable development. It serves the long-term needs of the vast majority. By contrast, the *ICS* is still a plan that will benefit only a minority, particularly at the expense of those living in the more run-down parts of the city. There is where a fair plan would concentrate, with community-led regeneration to address unmet basic needs. This would include the provision of affordable housing, the revitalisation of local shopping centres, and indeed ‘greening’ programmes in order to deliver the full health and other benefits of local ‘green spaces’.

In future years, the *One Core Strategy* probably will be seen as a dead-end, a case study in redundant modes of thinking. It is indeed a doomed attempt to bring back the very economy and lifestyles now shown by hard evidence to be unsustainable. It harks back to the era when demolition, road construction and urban sprawl were the order of the day. It is time to look forward.

The future does indeed hold terrible challenges, some of the greatest in human history, most of all adverse climate change. But there are alternatives. They are not only necessary if Newcastle and Gateshead are to play their part in avoiding disaster. They also offer the possibility of a more satisfying, fairer and more secure way of living. We documented some of the options in our original submission.

However there are already positive examples in our locality. They range from proposals for local pedestrianisation (e.g. Acorn Road) and new cycle routes to inner city housing developments (<http://www.gallifordry.co.uk/projects/construction/affordable-housing/reed-street-carbon-negative-community-village>, for example), town centre sheltered accommodation (Saville Lodge in South Shields) the ‘recycling’ of redundant buildings (as in the case of the old Berger Paint factory), photovoltaic installations, community orchards and wildlife parks (Benwell). The technology already exists, for example, to end the scandal of damp houses saddled with high fuel bills. It is the political drive that is lacking.

We should, of course, be learning from other parts of the country. The *ICS/MCR* simply fail to mention really important developments in fields like urban food production (e.g. <http://foodfromthesky.org.uk>). There are some really inspiring housing initiatives. Recent new build in Newcastle and Gateshead, however, is still behind far pioneering developments elsewhere in the UK. Examples include Nottinghamshire (<http://www.hockertonhousingproject.org.uk>); Aberdeenshire: (http://www.scotia-homes.co.uk/suburban_development/glenside) and London: (<http://www.bioregional.com/flagship-projects/one-planet-communities/bedzed-uk/>). We can learn from countries such as Germany about recycling and resource conservation. Indeed there are many exciting areas of sustainable innovation. They demonstrate that there are better alternatives.

But, sadly, the *One Core Strategy* is still stuck in outmoded thinking.

Given the recent news about the proposed new road/by-pass and outstanding questions about past developments, there now seems to be a strong case for the consultation process to be relaunched.

Minor modifications to the *One Core Strategy* are not enough. We need a whole new strategy, one which really will deliver sustainable development.

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