

Date: 20th October 2016
Consultee ID: 755686
Matter 1

NORTH TYNESIDE LOCAL PLAN EXAMINATION

Matter 1: Legal Requirements, Duty to Co-operate and Cross Boundary Issues

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 1 of the Inspector's *Schedule of Matters, Issues and Questions* (exam ref: EXINS11).
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan, dated 14th December 2015. The HBF has also expressed a desire to attend the examination hearing sessions.

Issue 1 – Has the Plan been prepared in accordance with statutory procedures and Regulations?

a) Has the Plan been prepared in accordance with the duty to cooperate with regard to the following?

i) How does the Plan align with those of other neighbouring authorities? (principally the Newcastle & Gateshead Core Strategy and the emerging Northumberland Local Plan)

ii) To what extent is North Tyneside part of a wider housing market area? What mechanisms or formal agreements have been established between authorities on cross-border strategic housing matters? (i.e. migration flows, inputs on respective Strategic Housing Market Assessments (SHMAs) etc.) Explain how the DtC has been met as advised in the PPG (ID 2a-010-20140306 & 2a-018-20140306).

iii) In overall terms has the Council cooperated constructively and actively on establishing the housing provision for its area?

iv) Explain how the Duty to Cooperate has been met with all relevant bodies set out in the LP Regs? Has the Duty to Cooperate dialogue with neighbouring authorities included respective economic strategies and targeted sectors in the North East Combined Authority Area (particularly the North of Tyne authorities)? (see also Matter 5)

v) What are the particular strategic matters that have required constructive engagement with other authorities and bodies?

vi) Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on strategic matters of relevance to the plan's preparation, as required by the Duty to Cooperate?

vii) Are there cross-boundary issues in relation to any of the proposed site allocations such as transport or other infrastructure requirements? In particular, highway capacity at the boundary of the Borough (e.g. A19 Moor Farm roundabout).

3. The HBF does not dispute that the Council has undertaken significant engagement with neighbouring authorities and notes it has agreements in place. We do, however, have some concerns with the efficacy of how these agreements have been translated into actions within the plan. The engagement which has taken place is described within the Council background paper '*Local Plan Supporting Paper 4: Duty to Co-operate Statement*' (exam ref: NT03/4/1).
4. The principal concern of the HBF is in relation to cross-boundary housing issues and in particular the issue of housing need. The HBF understands that North Tyneside is not considered to be a self-contained housing market area but rather is part of a wider housing market area which extends into Newcastle upon Tyne and Northumberland. It is therefore appropriate that the housing needs of the area are considered in the context of this wider housing market area (2015 SHMA NT07/1/2).
5. The HBF noted, within our comments upon the pre-submission plan, that the Gateshead and Newcastle Core Strategy and Urban Core Plan sought to reduce out-migration from Newcastle to North Tyneside, a point commented upon by the Inspector in his report upon their plan. It is therefore considered consistent that the North Tyneside plan replicate this agreement.
6. In terms of Northumberland they are seeking to increase growth to stabilise their working age population. Northumberland County Council has produced a *Duty to Co-operate statement*, dated October 2015 in relation to the preparation of their Core Strategy which has recently been consulted upon. This statement within Appendix 1 identifies that at a joint member meeting between Northumberland County Council (NCC) and North Tyneside Council, on the 18th November 2014, it was agreed that NCC would meet some of the unmet objectively assessed housing needs of North Tyneside. Once again it is appropriate this is replicated within the North Tyneside plan.

7. The HBF therefore agrees that the duty has been fulfilled in this regard. It is, however, noted that the assumptions used by North Tyneside within its economic led projections do not directly relate to the agreements made between the three authorities. This appears to lead to a mismatch of 53dpa, it is in this regard that the HBF questions the efficacy of the Duty to Co-operate rather than the process itself.
8. This mis-match is discussed in greater detail within our matter 3 hearing statement. It is, however, considered that it can be rectified by an appropriate adjustment to the housing requirement.

b) to d)

9. The HBF has no further comments at this stage.

e) Does the Plan provide effective outcomes in terms of cross-boundary issues? In particular (i) OAN; (ii) the local enterprise zone; (iii) coastal planning and protection of the SPA? (iv) Green Belt; (v) wider patterns (migration; movement(transport); jobs; regeneration?)

10. I refer to our comments made against question a above and our matter 3 and 6 hearing statements.

f) to h)

11. The HBF has no further comments at this stage.

i) Is a list of policies to be superseded by the Local Plan necessary for reasons of soundness?

12. Yes, the HBF consider this would provide both clarity and certainty to the plan.

Yours sincerely,

MJ Good

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