



Development Plan Document (DPD)

Submission Stage Representation Form

[Please copy and complete a separate form for each issue you wish to comment on]

[Please read the attached guidance notes carefully before completing this response form]

Ref:

(For official use only)

Name of the Development Plan Document (DPD) to which this representation relates:

(eg. Core Strategy, Area Action Plan, Site-Specific Allocations, Development Control Policies)

Hebburn Town Centre Area Action Plan

1. Personal Details *

* If an agent is appointed, please complete only the Title and Name boxes in column 1 below, but complete the full contact details of the agent in column 2.

2. Agent's Details (if applicable)

Title	Mr
First Name	Paul
Last Name	Winch
Job Title (where relevant)	Co-ordinator
Organisation (where relevant)	Tyne Crossings Alliance
Address - line 1	81 North Drive
- line 2	Hebburn
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Fax Number (where relevant)	
E-mail Address (where relevant)	stability@blueumbrella.net

3. Did you raise the matter that is the subject of your representation with the Local Planning Authority earlier in the process of the preparation of the Development Plan Document, ie. before it was submitted for Examination?

No Yes - at initial Issues and alternative Options stage * Yes - at first 'Preferred Options' draft stage *

If 'No', please briefly explain why you did not do so:

4.(a) Do you consider the Development Plan Document is:

Sound¹ (ie. you support the DPD) Unsound (ie. you consider that the DPD should be changed) *

➔ Go to Question 5 ➔ Go to Question 11(b) *

¹ - 'Sound' may be considered in this context within its ordinary meaning of "fit for purpose", "showing good judgement" and "able to be trusted" and within the context of fulfilling the expectations of legislation.

4.(b) If you consider the Development Plan Document is 'unsound', please identify which Test of Soundness your representation relates to (having regard to Test numbers 1-9 listed in the Annex to this form).

Soundness Test no. (see Annex)

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Please note: You should complete a separate response form for each Test of Soundness that you consider the Development Plan Document fails.

5. To which part of the Development Plan Document does your representation relate?

Paragraph no.

E

Policy no.

H5

Proposals Map

6. Please give details of what change(s) you consider necessary to make the Development Plan Document 'sound', having regard to the Test of Soundness you have identified at Question 4(b) above. You will need to say why this change will make the Development Plan Document 'sound'. Please be as precise as possible.

The introduction of a major supermarket is incompatible with the other aspirations in this Policy and with H4.

Experience at Darlington and in the USA illustrate the disastrous effect of large supermarkets on local employment and the local community. Contrary to various claims, employment in supermarkets is the ABSOLUTE MINIMUM - that's how they cut their prices. Experience in the USA is illustrated in the attached Note.

The Council's pre-empting this decision by designating a supermarket for this position in advance of consultation is improper behaviour in our view, in that this choice makes alternative scenarios harder to develop and implement.

We need relatively small but diverse shops, and the fact that we already have three butchers despite the discouragement presented by these threats of redevelopment is a good sign. The fact that we have lost many vital shops such as hardware and fish retailers, and we only have one greengrocer and one baker left can be put down at least in part to planning blight and poor arcade layout. By "relatively small" I would include shops as large as the present Netto's store or a slightly larger Netto-type store with more room in the isles and more choice. The present Netto's store does an excellent job and is much cheaper than Morrison's. In our view this represents a fair and workable balance between the retail chains and local owner-occupier shops which provide such excellent service and create a pleasing environment and MORE employment.

NOTE [1] A report "Wal-Mart and Social Capital" published in the American Journal of Agricultural Economics says: "Big supermarkets undermine social capital and local trust.....both the initial number of Wal-mart stores, and each store added per 10,000 persons during the decade, reduced the overall social capital measure".

The paper can be accessed via <http://www.blackwell-synergy.com/doi/abs/10.1111/j.1467-8276.2006.00949.x>.

(Continue on a separate sheet / expand box if necessary)

Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change. There will not normally be a subsequent opportunity to make further representations based on the original representation. After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. Can your representation seeking a change be considered by written representations, or do you consider it necessary to participate in person at the oral part of the Independent Examination?

Written representations

Participate at the oral examination

*

8. If you wish to participate at the oral part of the Examination, please briefly outline why you consider this to be necessary:

I don't think this message will "get through" any other way.

Please note: The Inspector will determine the most appropriate procedure to use to hear those who have indicated that they wish to participate at the oral part of the Examination

Paul Winch, for the Tyne Crossings Alliance

5th September 2007

The DPD has been prepared in compliance with the Statement of Community Involvement (SCI), or with the minimum requirements set out in the Town and Country Planning (Local Development)(England) Regulations 2004³ where no Statement of Community Involvement exists.

The Statement of Community Involvement (SCI) is a document which sets out a Local Planning Authority's strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications. The Local Planning Authority will submit a consultation statement with the DPD to show how they have complied with their SCI.

Test 3

The DPD has been subjected to a Sustainability Appraisal.

Local authorities are required to carry out a Sustainability Appraisal⁴ of DPDs which incorporates the requirements of the European Directive on Strategic Environmental Assessment⁵ (the SEA Directive). The Local Planning Authority is required to submit a Sustainability Appraisal Report when they submit a DPD for examination. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process.

3. Conformity Tests

3.1 The Conformity Tests are as follows:

Test 4

The DPD is a spatial plan which is consistent with national planning policy and in general conformity with the Regional Spatial Strategy for the region. It has properly had regard to any other relevant plans, policies and strategies relating to the area or to adjoining areas.

Spatial planning should not just be concerned with the physical aspects of location but also with economic, social and environmental matters relating to the development and use of land. Further guidance on what spatial planning means can be found in paragraphs 30-32 of *Planning Policy Statement 1: Delivering Sustainable Development*⁶ (PPS1) and 1.8-1.11 of PPS12.

The Government Office for the Region can be expected to comment on any possible inconsistency with national planning policy and the Regional Planning Body should identify any issue about the general conformity of a DPD with the Regional Spatial Strategy.

Test 5

The DPD has had regard to the authority's Community Strategy.

The Community Strategy is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the Local Planning Authority's area. The Community Strategy is subject to consultation but not to an independent examination.

4. Coherence, Consistency and Effectiveness Tests

4.1 There are four tests under this heading, test numbers 6-9. These are the tests to which you are most likely to wish to respond as they relate to the content of the DPD – ie. what the authority is proposing for your area. The tests require that:

Test 6

The strategies/policies/allocations in the DPD are coherent and consistent within and between DPDs prepared by the authority and by neighbouring authorities, where cross boundary issues are relevant.

The DPD should show how the policies and proposals within it relate to other relevant policies and proposals in the Local Planning Authority's area and in neighbouring areas.

Test 7

The strategies/policies/allocations represent the most appropriate in all the circumstances, having considered the relevant alternatives, and they are founded on a robust and credible evidence base.

The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

Test 8

There are clear mechanisms for implementation and monitoring.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. Any measures which the Local Planning Authority has included to make sure that targets are met should be clearly linked to an Annual

3 - view at: <http://www.opsi.gov.uk/si/si2004/20042204.htm>.

4 - Section 19(5).

5 - view at: <http://www.planningportal.gov.uk/england/professionals/en/1112201229095.html>.

6 - view at: http://www.odpm.gov.uk/stellent/groups/odpm_control/documents/contentservertemplate/odpm_index.hcst?n=5845&l=3.

Monitoring Report (AMR). This report must be produced each year by all local authorities and will show whether the DPD needs amendment.

Test 9

The DPD is reasonably flexible to enable it to deal with changing circumstances.

The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation.

5. Additional Considerations

- 5.1 If you think the process by which the DPD has been prepared is not sound you should consider the following before making representations:
- Is the DPD in question within the current Local Development Scheme (LDS) and if so have the key stages been followed? The LDS should be on the Council's website and available at their main offices.
 - Has the process of community involvement for the DPD in question been in general accordance with the Local Planning Authority's Statement of Community Involvement (or does it meet the minimum requirements set out in the 2004 Regulations⁷)? NB. It would not be appropriate to object to the processes set out in the SCI at this stage, since it is subject to a separate independent examination process⁸.
 - Has a Sustainability Appraisal Report been produced and does it relate to the DPD in question? Whether the resultant policies of the DPD are sustainable will be covered by other tests, notably the tests relating to the coherence, consistency and effectiveness of the plan, which deal with the content of the DPD.
- 5.2 If you think the content of a DPD is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:
- Is the issue with which you are concerned already covered specifically by any national planning policy or in the Regional Spatial Strategy? If so it does not need to be included.
 - Is what you are concerned with covered by any other policies in the DPD on which you are seeking to make representations or in any other DPD in the Local Planning Authority's Local Development Framework (LDF). There is no need for repetition between documents in the LDF.
 - If the policy is not covered elsewhere, in what way is the DPD unsound without the policy?
 - If the DPD is unsound without the policy, what should the policy say?
- 5.3 If you feel that the Local Planning Authority has not put forward sufficient evidence to justify a significant departure from national or regional policy, your comments should try to make it clear why you think the Local Planning Authority's case for departure is inadequate. Conversely, you may feel the Local Planning Authority should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national or regional policy and support your assertion with evidence.

6. General Advice

- 6.1 If you wish to make a representation seeking a change to a DPD or part of a DPD you should make clear in what way the DPD or part of the DPD is not sound having regard to the tests set out above. You should try to support your representation by evidence showing why the DPD should be changed. It will be helpful if you also say precisely how you think the DPD should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

⁷ - Regulations 25 and 26 of the *Town and Country Planning (Local Development) (England) Regulations 2004*.

⁸ - a separate guide is available on the independent examination of statements of community involvement: *Development Plans Examination - A Guide to Assessing the Soundness of Statements of Community Involvement* - view at: www.planning-inspectorate.gov.uk.