

NEWCASTLE UNDER LYME TOWN CENTRE SUPPLEMENTARY PLANNING DOCUMENT

COMPANION DOCUMENT

Contents:

Part one: Community involvement and consultation

Part two: Supporting strategies, plans and evidence base

Appendices:

- 1 List of all individuals and organisations who were informed about the preparation of the Supplementary Planning Document.
- 2 Representations on the draft SPD and response
- 2 Town Centre locations and definitions

Introduction and Summary

1. This is a companion document to the Newcastle-under-Lyme Town Centre Supplementary Planning Document (SPD). It is in two parts. The first deals with the record of public consultation and community involvement in the preparation of this SPD. The second covers the extensive background and context for the SPD in terms of national, regional and local planning strategies, and researched evidence base. Together they support the SPD in showing that it has been prepared in accordance with statutory guidance and that it is well founded on robust evidence.
2. The Council originally intended to prepare an Area Action Plan (AAP) to guide development in the Town Centre. Work commenced at the end of 2004 but when the final document was submitted to the government and the Planning Inspectorate in 2007, it became that it would not successfully pass through the remaining process to adoption. The Council therefore decided to withdraw the AAP and instead commence preparation of an SPD.
3. By maintaining the momentum of the preparation process up to that point, the Council ensured that the work carried out on public involvement and consultation would remain valid. This document contains details of that work, spanning a period of four years. It shows clear evidence of the Council's efforts to involve the public and key stakeholders at every level and its preparedness to respond to the results of that consultation.
4. The process of preparing the earlier AAP, with its greater emphasis on statutory processes, also means that the strategic context was covered in more depth than might have been the case if the SPD route had been chosen in the first place. This means that the SPD is well founded and robust. The second part of this companion document gives brief details of this context, ranging from national guidance to local strategies and initiatives.
5. Newcastle Town Centre, as one of the two strategic centres in the North Staffordshire conurbation, has an important role to play in the regeneration of the sub-region. It is a centre that performs relatively well, given the depressed nature of the North Staffordshire economy, but still falls short of its potential.
6. Paragraphs 2.9 to 2.17 and 3.1 to 3.5 in Part Two below show how sub-regional strategies set the tone for how the Town Centre needs to develop over future years to meet its potential.
7. One of the keys to the implementation of the Council's vision for the Town Centre is the North Staffordshire Regeneration Partnership. Unlike most of the other documents dealt with in this companion document it is work continually under review. Reference is made to it in the SPD, in Section 6.

Part One:

Community involvement and consultation

1. Introduction

- 1.1 The Council originally intended to prepare an Area Action Plan (AAP) to guide development in the Town Centre. Work began in earnest early in 2005, following a focus group in September 2004, to discuss with key stakeholders how we would undertake the process of preparing the plan.
- 1.2 Work on the AAP continued through to summer 2007 when the final document was submitted to the government and the Planning Inspectorate. An inspector was appointed and very soon came to the conclusion that he would be unlikely to find the plan "sound" in accordance with statutory regulations. There were three options then open to the Council: to press on with having the AAP examined; to withdraw it and start the process of preparation again; to withdraw it and not resubmit. The Council chose the third option, with the additional decision to start immediately to prepare a Supplementary planning Document.
- 1.3 A Supplementary Planning Document (SPD) does not have to be submitted for public examination, and though it is still subject to regulations as to its preparation, including the need for public consultation, the process is less complex. However, in many ways, the content of the SPD would be the same as that of the AAP, the main difference being that the SPD can contain no "policies" as such. Therefore by starting work on it immediately, the Council ensured that the momentum was maintained, and that the work carried out on public involvement and consultation would remain valid.
- 1.4 The details set out below cover both the events concerning the AAP and the later process of finalising the SPD.

2. Initial soundings

- 2.1 A focus group was held on 21st September 2004. It was attended by 25 people,

including elected members, Council officers, representatives from RSLs, Chamber of Trade, local businesses, community safety, Civic Society, the Police, RENEW and Urban Vision.

- 2.2 The purpose of the focus group was to cover two aspects: who and how to consult, and the issues that those present felt most important. On the first aspect, as well as those represented on the day, the importance was recognised of involving the business community, visitors, and residents of the Borough generally. There was also some advantage in consulting wider afield to combine consultation with marketing. Discussion of the issues revolved around identifying good and bad points of the town centre.
- 2.3 The most prominent issues that came out of the discussions were the problems surrounding the night time economy, the range of facilities within the Town Centre and the access between the main shopping area and the car parks.

3. Preliminary leaflet on issues and options

- 3.1 Following the successful focus group, rather than prepare a formal document to initiate consultations, it was decided to develop the "issues and options" stage through an informal set of displays and dialogues. First, a leaflet was printed and published at the beginning of April 2005 and delivered to all residents and all businesses in the AAP area.
- 3.2 The content of the leaflet was discussed initially with Members through the Cabinet and Planning Committee (Cabinet 9th February 2005.) It set out a draft vision, aims, objectives and underlying principles and some discussion about key issues. It also gave notice of a small exhibition to be displayed at the Civic Offices and in the library for a full week, including two Saturdays, manned for short periods on each day.
- 3.3 Numbers of people visiting the display when unmanned were not recorded, but during the manning periods, about 70 people attended. During these sessions, informal dialogues took place and people were encouraged to complete questionnaires.

The display was later taken to Newcastle College, and manned, for one day, and also taken to a meeting of the Newcastle Business Panel and used as the basis for an extended discussion. (Copies of the questionnaire can be obtained on request from the Planning Policy Unit.)

- 3.4 Notes were taken of conversations at the display, and a questionnaire was distributed for completion at the venues or for return later. About 150 questionnaires were returned - 80 initially from the library, 60 at the College and 12 from the business panel. Notes on the response is set out below
- 3.5 Overall, amongst visitors to the display there was a general feeling of disappointment with changes and elements of the town centre that have been lost. This may reflect the age profile of most of the visitors to the library exhibition. The notes below reflect mostly the general questionnaire responses from the library, with others as appropriate in relation to their number.
- 3.6 General satisfaction with the town centre was recorded, with overwhelming majority registering very good, good or fair; the lowest was in relation to evening entertainment, where the figure was 60%. However, in the returns from the college, that was the highest, with 88%, though "fair" was the largest in all the college responses. The business sector returned good results in relation to the town centre as a place to work, shop and for entertainment, but were very mixed on their judgement as a place to live.
- 3.7 The questionnaire asked for comments on the suitability of particular types of development in different sectors of the Town Centre area. The results were: shops followed by offices in the centre, housing followed by offices at Brampton and east of centre; housing followed equally by car parking and offices for south and west of centre. The high selection of offices conflicts with the low preference this received in a later question. In the college responses, car parking was preferred for all sectors, but office also featured highly and housing was identified strongly for the west, south and Brampton areas. In the business response, housing and offices were roughly equal for most areas except the central
- area, where shops were considered to be most suitable and housing least.
- 3.8 The "market tradition" of Newcastle was very important to 66% and important for 27%; the figures were lower for the college but still 33% in each case. For the business sector, the results were 58% and 42%. The striking difference between the ages was the percentage who regarded it as not important at all - 2% at the library, 21% at the college and none in the business sector.
- 3.9 Over half the respondents favoured a site by site approach for housing, with a quarter supporting a strict numerical limit. (These were offered as alternatives.) 17% thought there should be none (25% from the business sector). The results from the college were very similar. Preferences on types of housing (multiple preferences were allowed) showed high support for living over the shop and environmentally friendly housing, quite high for flats, apartments, family homes, supported and sheltered housing, but executive apartments were highlighted by only 17%, with bungalows at 23%. The college results were similar. Over half the respondents supported inclusion of affordable housing, three quarters for the college, and over half (nearly all in the case of the college and the business sector) supported low-cost rather than social rented.
- 3.10 Asked about offices in the Town Centre, the majority did not support (50 to 30 at the library and 50 to 10 at the college) except in the results from the business sector. This conflicts with the answers referred to above for the different sectors and may indicate that the question was interpreted as referring only to the central area, within the inner ring road.
- 3.11 Regarding night-time entertainment, 43% wanted to see it reduced, and 36% wanted a wider range (84% in the case of the business sector). Both represent a degree of dissatisfaction with the existing balance. In the case of the college, about the same proportion wanted to see a wider range, but very few wanted less. When asked in detail about different elements of the night-time economy, types that attracted most criticism (ie the respondents wanted less) were bars, late night music venues and fast food

outlets. More popular (respondents wanted more) were traditional pubs and quality restaurants. In the case of the college, respondents wanted more of everything (even traditional pubs) except "bars" (about even between more and less) and fast food outlets, which had a strong vote of disapproval.

- 3.12 65% are not satisfied with the amount and type of shops, (60% for the college) but about the same proportion think the open market is important.
- 3.13 Finally, car parking was considered sufficient by just over half at the library, but by only 31% at the college.

4. The People's Panel

- 4.1 The "People's Panel" is a group of six hundred local people who as a whole reflect the demographic profile of the Borough's adult population. They are consulted quarterly on a range of service provision related issues. The Council made specific reference in the LDS and the SCI to their involvement in the preparation of Local Development Documents.
- 4.2 In the People's Panel questionnaire that was sent out in August 2005, there were, amongst others, a large number of questions specifically targeted to Town Centre issues: covering housing, employment, design, car parking and subways. The results generally follow the tone of the comments made in the questionnaire referred to above, but their added depth and representativeness make them particularly valuable. The notes below provide a brief summary of the results. Copies of the full report on all the responses were displayed at the time on the Council's website.
- 4.3 There was significant support for more housing the area (town centre gaining more support than other options such as suburbs or villages), and preference within that for flats and apartments. On the other hand, there was a strong preference for conversions over new building. Regarding the specific facilities that town centre housing should offer, car parking featured strongly, as did the use of high quality building materials and pleasing appearance.

- 4.4 Office development was supported, though not particularly strongly, more people preferring out of centre locations. If office development is provided, the preference is for small businesses and especially those that are starting up.
- 4.5 There was very little support for a policy of reducing car parking to encourage the use of non-car alternatives.
- 4.6 Satisfaction with the Town Centre "as a place to " was highest for "live", followed by "work", but only fair for "visit". On facilities within the centre, most people thought the balance was right, though a significant number wanted more home and garden shops, fewer bars (a majority), and more "specialist shops".
- 4.7 Offered the alternatives of Newcastle remaining as a "traditional market town" or "developing a new identity", 88% chose the former. However, there was moderate support for public art, though mostly only if "sponsored" to avoid use of public funds. Of the types of public art offered, there was little distinction in preference for traditional or modern sculpture, murals or statues.
- 4.8 There was a set of questions about the subways. Most around the Town Centre are used fairly frequently, and a majority feel safe using them in daylight, but only a little over 10% feel safe on their own at night. Reasons against using them are mainly fear for safety, but vandalism, graffiti, poor lighting and poor maintenance are also cited. However, less than half the people questioned wanted money to be spent either on improving them or creating alternatives.
- 4.9 Design issues were also covered in some detail, but these were followed up later during the extra consultations on design policies that were to be undertaken early in 2006.

5. Site Based Representations

- 5.1 Because the consultation process in 2005 to 2007 was linked to the preparation of an AAP, there were specific representations from land owners or would be developers requesting positive policies to support their aspirations for specific sites. There was no formal invitation for such submissions, but the issues and options leaflet was delivered

to all businesses as well as residents in the AAP area. In addition, all developers and agents making pre-application enquiries since the beginning of the process early in 2005 were advised to make submissions in relation to the AAP process.

5.2 Up to the point of preparing the "Preferred Options" document in autumn 2005 four such representations were received in relation to the following sites:

- The former Zanzibar nightclub, Brunswick Street
- The former Titley's Warehouse, George Street
- The existing Subaru Garage, Brunswick Street
- The former Blackfriars Bakery and Kwikfit (with indicative proposals for adjoining land)

(The first three sites now within the "Live-Work Office Quarter" and the fourth represents the main part of the "Pooldam Waterside Quarter".)

5.3 All submissions were primarily for residential development, though the third suggested commercial uses at ground floor and the fourth proposes a "housing led mixed use development". The case made in each in relation to the housing element was similar: that there is relatively little housing in the Town Centre, that recent development has been extremely popular and that there is a need for high quality housing (particularly apartments). Most made reference to the need for housing for young professionals and early retired people.

5.4 The two submissions for Zanzibar and Titleys were based around proposals that were at the time the subject of planning applications, both of which have now been approved. The submission for the Subaru site suggested development on its own, or with the site of the current Jubilee Baths; it proposed development of 6 to 7 storeys. The Blackfriars submission suggested a "strong built frontage" onto Lower Street and Blackfriars Road with 7 to 8 storeys, though decreasing towards the Lyme Brook, where there would be an open aspect and the possibility of a new pedestrian route.

6. The AAP Preferred Options Document

6.1 The Preferred Options document was approved by Cabinet 26th October 2005 and published for consultation until 19th December. It was posted on the website, advertised in the local press and in the Council's own newspaper, "The Reporter", and through a leaflet delivered to all addresses in the AAP area. It was made available at the Offices and at Newcastle Library and copies were given free of charge.

6.2 The document carried forward the issues highlighted in the earlier stages and reinforced through the consultation period over the previous year. It set out strategic options on key issues to indicate the direction which the council wished to take in the next stage of the process. In addition, the document went further than the requirements in national guidance by setting out prototype policies to address the issues according to the preferred options for each element. It was considered that this was in the spirit of front loading in that it gave an early opportunity, particularly for key stakeholders and would-be developers, to consider the precise approach that the council might take if certain strategic options were followed.

7. Sustainability Appraisal Scoping Report

7.1 All Local Development Documents require a Sustainability Appraisal. For an SPD, this can be covered by the Appraisal carried out for the "parent" development Plan Document, though sometimes a separate process is required. In the case of the Town Centre SPD, there was no need to carry out a separate Appraisal. Firstly, an Appraisal had been carried out for the Core Spatial Strategy; secondly, an Appraisal had been carried out for the AAP.

7.2 The three statutory bodies for Sustainability Appraisals (English Heritage, Natural England and The Environment Agency) were contacted early in 2008, to ask whether they were content with using the Appraisal carried out for the AAP. They all consented. Details of that process are set out below.

- 7.3 Concurrently with the discussion on issues and options, in the spring of 2005, a Sustainability Appraisal Scoping Report was prepared and posted on the Council's website. It was sent for consultation to the then four statutory consultees (English Nature and the Countryside Agency then existed as separate bodies), all elected Members, the Parish Councils, the neighbouring planning authorities, the Highways Agency, Advantage West Midlands, the Regional Assembly and Newcastle Primary Care Trust. Comments received resulted in two additional objectives, some changes in wording of others, and a few additional baseline indicators.
- 7.4 In autumn of 2006, when the "Preferred Options" report was published, there was an accompanying Sustainability Appraisal, which had been directly associated with the generation and assessment of alternative options and the selection of preferred options. The appraisal process focused on the strategy options. It was part of the consultation process in that the documentation was available during the Preferred Options stage.
- 7.5 There was very little comment on the Sustainability Appraisal as such. However, the way the sustainability appraisal was carried out involved a measure of wider consultation. Members of the LSP Environment Theme Group (formerly the LA21 group) were invited to an afternoon session to assist with the independent validation of the appraisal being undertaken. It took the form of a sequence of brief discussions on each issue using impact assessment tables. Notes were taken of changes requested and other comments. There were six in the group, in addition to planning staff, including three from other council services (amenities, waste and crime & disorder), the co-ordinator of the LSP and two representatives from Sustainable Staffordshire.

8. Design

- 8.1 One of the key messages throughout the early consultation stage was a strong concern over the design of new development. Recent experience over

proposals for prominent buildings within the Town Centre had reinforced this perception. The Council resolved to commission consultants to consider and report on the issues. The reason for this was twofold: there is a lack of specialist design expertise within the council's paid service, and it was also felt that there would be added value in a public debate being co-ordinated through an external perspective. This approach was specifically highlighted in the Preferred Options document, which again had the added advantage of encouraging consideration and comment on the other issues in the autumn/winter consultation period, in the knowledge that time was to set aside separately for a debate on design.

- 8.2 The consultant selected was Taylor Young and their brief was to organise a public debate through a variety of means and submit a report to the Council on their deliberations, including specific recommendations for policies and strategies suitable for inclusion in the AAP. They worked to this brief during the period from January to June 2006. They also made detailed comments on the Preferred Options document, both in relation to the prototype policies and the approach to vision, aims and objectives. These latter comments were fed into the process of considering general representations as referred to above.
- 8.3 As an aid to their considerations, Taylor Young also had the benefit of two discrete design studies carried out in Spring 2005 and December 2005 by Latham Architects concentrating on two specific key areas of the Town Centre. These were commissioned initially as a Renew funded activity, and to meet specific short term needs for design advice. However, it was also intended that they would provide some kind of an input to the AAP process, enlarging the research and evidence base. Taylor Young built on the results of these studies but their brief was specifically to initiate a public debate and to provide clear guidance and policies that would be appropriate to be included in the AAP.
- 8.4 The consultation process undertaken by Taylor Young included a public meeting, interviews with key stakeholders, a Member focus group and manned displays. The exercise was publicised through press reports and leaflets delivered to all residents

and businesses in the AAP area. Details of the results from the surveys at the display are catalogued in their final report, which is displayed on the Council's website. Taylor Young also met with elected members (through the Strategic Planning Consultative Group) on two occasions in March and May.

- 8.5 Before Taylor Young finalised their report they sent a draft to Urban Vision and sought their views on it. This was a very useful process as it gave them an opportunity to make additional changes and meant that council officers were able to pass on the views of the Urban Vision panel to the Planning Committee when the report was finally discussed.
- 8.6 Taylor Young's final report was presented to a special meeting of the planning committee in August 2006 and their recommendations debated in detail. This provided key pointers as well as a general steer to the further development of the AAP. Their report formed part of the evidence base to the AAP, and much of the text for the design policies and spatial framework for the AAP was taken direct from their work.
- 8.7 The result of their work was a set of principles and policies, which, when placed before the Planning Committee, met with a broad consensus of support. The effect of the "front-loading" had been to raise the profile of the issue and draw conclusions that were practical, based on professional understanding, but with a wide measure of community support.

9. Results of the consultation process on the AAP Preferred Options

- 9.1 Comments on the AAP were received from 52 representees, covering 216 separate issues. Consideration of the comments was carried out in parallel with the analysis of the work by Taylor Young. All comments were considered in detail and led to many changes of approach, raised some new issues, led to reprioritisation and where specific policy wording was concerned to fine tuning of wording. Many comments were mirrored in Taylor Young's work, and the new approach they proposed appeared to meet many of the views received from others.

- 9.3 Consideration by the Planning Committee was carried out in two phases, with an informal meeting in August 2006, focusing on the Taylor Young Report and giving a "steer" to officers as to how much of their recommendations to take on board. This was followed by a presentation of a pre-submission draft AAP in November 2006, which adopted the approach agreed in August and responded comprehensively to the range of representations received.

10. Consultations on the SPD

- 10.1 Reference has been made above to the concept of "front loading". This is the term used in government guidance to denote the practice of involving community and stakeholders at the very earliest stage of preparing a plan so that there is a degree of consensus on the strategy being adopted and fewer objections to matters of detail later on. In the case of the SPD, it was considered that so much consultation had taken place, it was appropriate to move straight to the draft SPD stage.
- 10.2 Once the formal decision had been made, in February 2008, to withdraw the AAP and prepare an SPD, a letter was sent to all those who had been involved in any way in the preparation of the AAP. This informed them of the process to come and invited them to comment at the appropriate stages. Appendix 1 lists all those informed at that stage.
- 10.3 A draft SPD was approved by Planning Committee in June 2008 for the purpose of public consultation. A copy was posted on the Council's website from 14th July, and notification of its publication was sent to 160 relevant contacts on the planning database, 70 of whom also received a copy of the document. During a seven week consultation period, 38 representations were received covering just over 200 separate issues.
- 10.4 Appendix 2 shows a table setting out very brief summaries of comments made and the Council's response. (A similar table was posted on the Council's website at the end of the consultation period, but this showed only initial response at officer level prior to presentation to the committee. Committee.)

Part Two:

Supporting strategies, plans and evidence base

1. National Planning

- 1.1 National planning policy is set out in "Planning Policy Statements" (PPSs, or PPGs prior to 2000) on specific topics. It does not need to be repeated in Local Development Documents but in some cases it is necessary to show how these policies will be interpreted locally. The most important sources of national guidance for this SPD are listed below.

PPS 1: Delivering Sustainable Development

- 1.2 Published in January 2005, this sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. It emphasises the importance of design in all forms of development. A supplement on Climate Change was published in December 2007.

PPS 3: Housing

- 1.3 This was published in 2006 and aims to encourage local authorities to enable house building at an increased rate, while ensuring that the full range of requirements are met across the community. It emphasises the desirability of mixed, sustainable communities, in suitable locations.

PPG 4: Industrial development, commercial and small firms

- 1.4 This PPG, published in 2001 recommends a positive approach to development control in relation to development "which is necessary to provide homes, investment and jobs, or to meet wider national or international objectives". It also encourages mixed uses. It is currently being reviewed and will be replaced by PPS4 "Planning for sustainable economic development". The draft guidance places emphasis on "a flexible approach to the supply and use of land in recognition of the uncertainties in predicting future trends in the economy". It states that "Local Planning Authorities should avoid designating sites for single or restricted use

classes and develop policies which support sustainable economic growth." It also emphasises the need to give preference for office development to the identification of sites in or on the edge of town centres, consistent with the sequential approach in Planning Policy Statement 6, whilst recognising the influence of market demand.

PPS 6: Planning for Town Centres

- 1.5 Published in 2005, this aims to "actively promote growth and manage change in town centres", define a network and a hierarchy of centres", and "adopt a proactive, plan-led approach to planning for town centres". Town Centres are seen as the prime location for retail and office development.

- 1.6 As part of the approach to prioritising certain types of development in appropriate locations, PPS6 sets out a number of classifications and definitions for different parts of a town centre, and then gives guidance on policy to be followed within them to take a sequential approach. The key ones are "Primary Shopping Area", "Primary Frontage", "Secondary frontage", "Edge of Centre", "Out of centre", and the term "Town Centre" itself. The SPD interprets these terms, in accordance with the guidance in PPS6 and defines their boundaries. Further details of the guidance, and the way it has been interpreted for the SPD are set out in Appendix 3.

PPS 9: Biological Diversity and Geological Conservation

- 1.7 Published in 2006, PPS9 is of limited relevance to the Town Centre but it is important to recognise that opportunities to preserve and enhance biodiversity do not only occur in the countryside. As an example, specific reference is made in the SPD to the opportunity provided in the "Pooldam Waterside Quarter" to improve the ecological quality as well as the recreational potential of the Lyme Brook.

PPS 12: Local Development Frameworks

- 1.8 This was first published in 2004, with a "companion guide", and explained the new

process of preparing Local Development Documents. It was subsequently revised and republished in June 2008 entitled "Local Spatial Planning". The new version is considerably shorter and supersedes the companion guide as well as the PPS. However, there are also statutory regulations which were amended at the same time.

- 1.9 This SPD was prepared in accordance with the guidance set out in PPS12 published in 2004. This includes guidance on a Sustainability Appraisal (which in this case was carried out for the AAP), and the requirement for a formal consultation period of between four and six weeks. The new guidance, published during its preparation, did not materially change the requirements for an SPD. This SPD complies with both the current PPS and the related statutory regulations.

PPG 13: Transport

- 1.10 Published in 2001, this document has as its main objective to "actively manage the pattern of urban growth to make the fullest use of public transport, and focus major generators of travel demand in city, town and district". To this end, it recommends locating as much development as is appropriate in Town Centres. It also aims to ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling. Parking policies should be used alongside other measures, and people should be given priority over traffic movement.

PPG 15: Planning and the Historic Environment

- 1.11 Published in 1994, PPG15 sets out government guidance on the identification and protection of historic buildings, conservation areas and other elements of the historic environment. It explains the role played by the planning system in their protection. This is a central issue in planning and guiding development in the Town Centre and this is clearly reflected in the content of the SPD.

PPG 16: Archaeology and Planning

- 1.12 Published in 1990, PPG 16 sets out government policy on archaeological remains, and how they should be preserved or recorded. It clarifies the weight to be given to archaeological considerations in planning decisions and the use of planning conditions. Its relevance to the SPD goes beyond the one scheduled ancient monument (the Castle Motte), which is referred to specifically. It is likely that there are other archaeological remains yet to be discovered on a variety of development sites, and this PPG gives guidance as to how they would have to be dealt with.

PPG17: Planning for open space, sport and recreation

- 1.13 Published in 2002, PPG17 is intended to emphasise the government's commitment to open spaces, sport and recreation as important to people's quality of life. It aims to support urban renaissance, rural renewal, social inclusion, community cohesion and health and well being. It also promotes sustainable development – through ensuring that open space, sports and recreational facilities (particularly in urban areas) are easily accessible by walking and cycling and that more heavily used or intensive sports and recreational facilities are planned for locations well served by public transport. The relevance to the SPD is seen in the importance attached to public spaces in the Town Centre and in access to facilities by walking and cycling. PPG17 considerations will also be relevant to the issue of location for any replacement swimming facilities.

2. Regional and Sub-Regional Planning Policy

The Regional Spatial Strategy (RSS)

- 2.1 The Regional Spatial Strategy (RSS) occupies the highest, most strategic layer of the Development Plan. The current RSS was adopted in 2004 but a substantial review, in three phases, is underway. The phase II revision was consulted on during 2008, and covers housing, employment and town centres. The final outcome was not known by the time the SPD was adopted.

The key elements in the RSS Review relevant to the SPD are set out below.

- 2.2 The RSS identifies Newcastle Town Centre as one of the Strategic Town and City Centres of the Region, and thus one of the preferred locations for "major retail developments ... uses which attract large numbers of people including major cultural, indoor sport, tourist, social, leisure and community venues ... large scale office developments."
- 2.3 Newcastle is a "Tier 4" centre, whereas the City Centre, the only other Strategic Centre in North Staffordshire, is at "Tier 2". Newcastle is also identified as one of 10 Strategic Centres (along with the City Centre) which "*have a key role to play in achieving urban renaissance and should be priorities for investment to support this.*" It is also one of 12 identified as centres which "*have performed less strongly in recent years*" and "*should seek to maintain the competitiveness ... by building on their local distinctiveness and addressing weaknesses in their offer.*"
- 2.4 The RSS sets out Indicative figures for growth in comparison retail floorspace: an additional 25,000 sq m up to 2021 and a further 10,000 to 2026. For office floorspace, it indicates 60,000 sq m. up to 2026 "within or on the edge of" the centre.
- 2.5 The RSS Review is considered the most authoritative guide for housing numbers and gives a net figure of 5700 for the period 2006 to 2026, for the whole of the Borough. The **Core Spatial Strategy** currently being prepared, takes this further, and apportions the allocation to different areas of the Borough. This is explained in detail below, under a separate heading.

The Regional Economic Strategy

- 2.6 The West Midlands Economic Strategy is driven by the Regional Development Agency Advantage West Midlands, (AWM). The strategy is intended to deliver sustainable economic development and growth for the West Midlands and the strategy and its associated delivery framework set out the focus for AWM interventions. Many of these have a regional approach and impact but a

significant number are targeted at a more local level. It is intended that the targeting and prioritisation aligns closely with the Regional Spatial Strategy. Its spatial interventions include:

- Regeneration Zones, targeting areas of multiple market failure, of which North Staffordshire is one.
- High Technology Corridors based around existing concentrations of high technology led businesses.
- Promoting Birmingham as the major economic driver within the West Midlands economy.

- 2.7 The Strategy has three components, Business, Place and People. The "Business" component targets the productivity and growth of the regional economy and the demand for employment of the region's workforce. "Place" focuses on the role of place in both attracting and enabling economic growth but also in dissuading or constraining economic activity. "People" focuses on the contribution of the region's population to the sustainable growth and increased productivity of the region.

- 2.8 In North Staffordshire, AWM investment is channelled through the North Staffordshire Regeneration Partnership (NSRP) which was formed in 2007. The Business Plan for the NSRP recognises the role that Newcastle Town Centre has in regenerating North Staffordshire's urban core, to offer a physical environment that can attract and retain a diversified grouping of service sector companies that will be a key stepping stone towards economic stability and growth. One of the opportunities in the strategy is seen as the ability to establish a 'golden triangle' of economic activity and connectivity linking together Stoke on Trent Train Station, Newcastle Town Centre and Hanley.

The Work Foundation

- 2.9 In 2007, the North Staffordshire Regeneration Partnership commissioned "The Work Foundation" to identify how the area might address issues of long term economic decline and its negative image. The Work Foundation set out a number of practical recommendations in terms of transforming the local economy, the local

infrastructure and quality of life. One of the recommendations which cuts through each of these three themes, is a focus on the distinctive historic qualities of Newcastle town centre. The report recognises Newcastle town centre as one of the two strategic centres in North Staffordshire and argues that 'it is important that Newcastle town centre receives sufficient investment to fulfil its potential', albeit not requiring the same level of investment as The City Centre.

- 2.10 Specifically, the report identified the need to further develop new business accommodation in the town to house its growing professional services sector and to develop a retail offer that is distinctive to that of The City Centre in Hanley, particularly focussing on an independent retail offer. The report urges 'early action to capitalize upon Newcastle-under-Lyme's position as one of the most attractive places within the sub-region for knowledge intensive businesses to locate' suggesting that the development of the professional and business service accommodation should be a key priority. It also argues that plans to develop new business accommodation should be set within the context of a plan for the town which includes retail and leisure development as well as development of the public realm.

The North Staffordshire Integrated Economic Development Strategy (NSIEDS)

- 2.11 This strategy, commissioned jointly by the Regeneration Zone and RENEW North Staffordshire, sets the economic context for all spatial planning in the sub-region. Its approach regarding the hierarchy of centres within the conurbation is central to the development of an approach towards Newcastle Town Centre. The strategy integrates in a single document prior work on an agreed approach to land-use planning strategy, business clusters, transport, enterprise development and transport across both the Borough of Newcastle and the City of Stoke-on-Trent.
- 2.12 In 2007, economic consultants Experian re-assessed the employment projections contained in the original NSIEDS. Using industry projections and local factors, Experian project that over the period to

2021 employment in business services, banking and insurance will grow in the Borough by approximately 3,300 - the largest growth sector in the Borough's economy. Further, that employment in public administration and other (mainly public) services would grow by 1000. A further 4,400 people employed in 'office jobs' (in various guises) suggest the need for between 45,000 and 50,000 sq m of new office space to be provided in the Borough over the next 15 years.

- 2.13 This quantum of development is roughly in proportion to the proposal in the RSS for 60,000 sq m over a 20 year period. The aspirational element in the RSS is the assumption that the overwhelming majority can be located in the Town centre. Though this is supported by PPS 6 and PPS 4 (consultation draft), the latter particularly recognises that there will be pressure to locate some office development outside centres. However, if such provision is not made in the Town Centre, and the requirement remains, then this will be met elsewhere, almost certainly in less sustainable locations.

RENEW North Staffordshire

- 2.14 RENEW North Staffordshire is one of nine housing market renewal pathfinders working across England to regenerate areas in greatest need. The scheme was set up in 2003 and is funded by central government. It is a partnership involving all the local authorities and a number of other key players. The Intervention Area, within which a programme of separate schemes and projects has been formulated, includes parts of the Borough. In the initial two year period, there were a number of environmental improvement projects in the Town Centre, but subsequently, capital spending in the borough has been confined to the Area of Major Intervention (Knutton and Cross Heath) and Chesterton (General Renewal Area), though research and evidence gathering has taken place which is of equal benefit to the Town centre. However, the Town Centre (though not the entirety of the SPD area) remains within the Area of Intervention.

2.15 RENEW North Staffordshire identified Newcastle Town Centre as having the potential to “accommodate a vibrant housing market which caters for a mixed income community”. This potential, not only for housing but also for retail, economic and leisure development, has already resulted in a significant degree of development pressure within the area.

2.16 The SPD area adjoins the Knutton and Cross Heath Area of Major Intervention (AMI) under RENEW North Staffordshire. The AMI is subject to a process of large-scale housing clearance, the intention of which is to bring about a significant change in the range of housing available. This is being carried out with the aim of strengthening the communities of Knutton and Cross Heath in terms of their future sustainability. The strategy of reducing the concentration of social housing in that area has implications in other areas, in particular the Town Centre.

2.17 RENEW North Staffordshire has commissioned an extensive body of research which helps to inform the SPD. Initially, there was an “Area Development Framework”, prepared by Llewellyn Davies, which provided an analysis of the Town Centre in terms of housing market referred to above. Subsequently, an “Area Regeneration Framework” has been commissioned, covering the areas to the west and north-west of the Town Centre.

2.18 The work and processes of RENEW have now been embraced within the wider North Staffs Regeneration Partnership, along with the activities directed through the Regeneration Zone, referred to in paragraph 2.6.

3. Local Policies and Strategies

The Core Spatial Strategy

3.1 The key Development Plan Document “below” the RSS is the Core Spatial Strategy. This was prepared jointly with the City of Stoke on Trent and submitted to the DCLG at the end of 2008. In its Area Spatial Strategies, it sets out the vision for the Town Centre, broad spatial principles and approaches to implementation, and these

form the basis for the development of this SPD.

3.2 The Core Spatial Strategy carries the same vision for the Town Centre that was consulted on through the AAP process, with a minor amendment to make reference to its role as a University Town.

“Newcastle-under-Lyme is a University Town and its town centre will be a place recognised not only for this, but in its own right for its attractive heritage townscape, its high quality new developments, its vibrant public realm, its public open air market and its high quality shops, services and businesses. It will be a focal point for the economy of the Borough, and a place where people want to spend their time and money. Employment opportunities will be sustained and improved and the emerging residential market will be strengthened. The environment will be pedestrian-friendly and welcoming for all those who live, work and visit the Town Centre. Action will have been taken to address any damage done to the town’s historic character in the twentieth century, to create a more appealing historic Town Centre where the quality of the environment and its heritage is a key selling point. New development in particular will be well managed and sensitive to the best traditions of historic development in the town. New opportunities will have been grasped to enhance the historic heart of the town and to regenerate areas where sites and land are underused or otherwise detract from the image and identity of the town. Major gateways and the town’s public face will be improved, with environmental assets such as the Lyme Brook adding to local distinctiveness.”

3.3 The Core Spatial Strategy sets out Strategic Principles for development in the Town Centre. These are as follows:

- *The Town Centre is one of the two strategic centres in the conurbation, with a complementary role to that of the City Centre*
- *A strong retail offer, a strengthened financial and professional sector, a focus for new leisure and residential opportunities*
- *Mixed use development wherever practicable.*

- *Importance of enhancing the attractiveness and viability of the Open Market and the high quality public realm and open spaces.*
 - *Exploiting the potential of the Lymebrook,*
 - *Targets for retail, office and residential development (taken from the RSS)*
 - *High quality design standards, importance of landmark sites*
 - *Work with partners to help to secure a Sports Village complex on land adjacent to the new College development.*
 - *Links with Keele University and Science Park, the University Hospital of North Staffordshire and Newcastle College of Further Education playing a key role in marketing the town as a university town and place for research and learning.*
 - *The Core Spatial Strategy notes that a spatial framework will be formulated, identifying distinct zones both within the primary shopping area and beyond, aimed at maintaining their distinctive characters and helping to break through the perceived barrier of the inner ring road.*
- 3.4 The Core Spatial Strategy repeats the precise allocations relating to the Town Centre in the RSS and apportions the housing allocation across the Borough. A figure of 1,400 net additional dwellings is proposed for the Town Centre for the period 2006 to 2026. Currently there are commitments for something in the region of 300 units, and thus around 1100 still to identify. Within any housing development above the statutory threshold (currently 15 dwellings), affordable housing is to be provided at a rate of 25%. This should generally be 15% social rented and 10% shared ownership. In exceptional cases, it may be more appropriate to locate the affordable housing elsewhere, in which case, a commuted payment would be required, in accordance with the SPD on developer contributions.
- 3.5 It also indicates means by which its strategy and policies will be implemented:
- *Office development achieved through a combination of planning policy, direct provision, joint venture agreements with the private sector, and raising profile through marketing and public realm enhancement.*
 - *Use of Section 106 agreements (as set out in adopted Developer Contributions SPD)*
- to provide affordable housing, transport infrastructure, open space, public realm, education, and public safety measures.*
- *The draft Newcastle Urban Transport and Development Strategy 2008/09 – 2012/13 produced by Staffordshire County Council will balance the aims of the North Staffordshire Local Transport 2006 -2011 with the transport infrastructure requirements of future development in the borough.*
 - *Targeting investment to improving the quality of the Town Centre to provide an environment commensurate with its status as a university town.*
 - *The North Staffordshire Green Space Strategy 2007 will set out the strategic framework for the improving the quality of greenspace resources.*
- 3.6 It refers specifically to this SPD, which will set out details of the spatial framework with design guidance specific to the Town Centre. It notes that the SPD will provide guidance for private investment and for public investment in the Town Centre's public realm. It will be an invaluable tool for the Council to achieve its vision for the future of the Town Centre and will set the high standards of development which will be required. It also indicates that further detailed guidance will be included in the North Staffordshire Design Guidance SPD and the relevant Conservation Area Appraisals and Management Plans.
- The Newcastle Sustainable Community Strategy**
- 3.7 The Sustainable Community Strategy (SCS) for Newcastle is a high level strategic document setting out priorities for the Borough shared between the partnership members of the LSP.
- 3.8 The SCS makes clear the important role of the Core Spatial Strategy, and the rest of the LDF, in delivering the spatial aspects of the shared priorities. Under the theme of "prosperity", it notes that: "*The partnership will work together to improve the prosperity and economic vitality of the Borough and ensure that local people develop the skills they need to access new employment opportunities. Newcastle is a university town with Keele University as an internationally*

recognised centre for medical and other research".

- 3.9 There is also a Sustainable Community Strategy for the County of Staffordshire, which includes the Borough of Newcastle-under-Lyme. That strategy was heavily informed by the development of the Newcastle Community Strategy and thus the SPD is equally in conformity with it.

Local Transport Plan (LTP)

- 3.10 The LTP covering the SPD area is prepared jointly by the City of Stoke on Trent and Staffordshire County Councils, covers the period 2006 to 2011. It sets priorities and strategies against which any local requests for investment would be judged. Its analysis draws extensively from the preparatory work on the AAP and its strategy has been developed in consultation with the Borough Council.

- 3.11 The LTP identifies the key transport problems as follows:

- Buses operating on congested routes.
- Congestion problems on the ring road, and A34 and A53 radial routes.
- Pedestrian / vehicle conflicts in the Town Centre.
- Personal safety problems in the Town Centre.
- Problems of severance for pedestrians and cyclists created by the inner ring road.
- Road safety concerns at certain locations.
- Uncontrolled on-street car parking around the Town Centre.

- 3.12 The main transport proposals being developed are for traffic management, bus service improvements and pedestrian links. The most important is the closure of Hassel Street to consolidate the pedestrianisation of the central area and route more through traffic onto the inner ring road. This, with other associated measures, is intended to improve conditions for pedestrians, address night-time crime and security issues, provide adequate taxi provision, improve bus service reliability, provide adequate disabled parking and control traffic on the highway network. This complex scheme is being jointly managed by the Borough and County Councils and the police.

- 3.13 The County Council also intend that where appropriate, traffic management measures such as Urban Traffic Control, and Variable Message Signs will be implemented, together with bus gating, bus stop improvements, and "real-time passenger information" to help improve the quality and reliability of all bus services to and from Newcastle Town Centre.

- 3.14 The surface level pedestrian crossings and subways provide essential links across the inner ring road for trips between the primary shopping area and nearby key local facilities and residential areas. Additional pedestrian crossings are proposed, although the number and location of surface level facilities will need to be balanced against their impact on traffic movements on the ring road. The LTP notes that the condition and use of the nine subways is variable and recent public consultations indicate that use of the subways is reduced, particularly at night, due to fear for safety. County Council funding has been used to improve subways and developer funding has been secured to make further improvements. The LTP also notes the contribution to pedestrian movement, and off road cycling offered by the Silverdale Greenway and Lyme Valley Parkway.

- 3.15 On car parking, the Borough Council and the County Council are working in partnership to manage the situation to help reduce indiscriminate parking and congestion and encourage more sustainable forms of travel, but without discouraging investment into the area.

- 3.16 The Newcastle Urban Transport and Development Strategy 2008/09 – 2012/13 produced by Staffordshire County Council balances the aims of the North Staffordshire Local Transport Plan 2006-2011 with the transport infrastructure requirements of future development in the borough. Initiatives and actions arising from this strategy include the following: improvements to bus facilities, bus priority, traffic management schemes, Hassell Street pedestrianisation and addressing the severance for pedestrians and cyclists from the primary shopping area by the ring road. Developer contributions will play a significant role in funding the various

actions and initiatives of this Transport Strategy.

4. Research studies

North Staffordshire Retail and Leisure Study

- 4.1 This study was published in 2005 to update a previous one completed in 1998. It was informed by telephone survey of 1,500 residents, an on-street survey in a number of centres, pedestrian flow counts and a survey of businesses. It was commissioned by RENEW North Staffordshire and the Borough and City Councils. The report includes a detailed analysis of Newcastle Town Centre - a "Vitality and Viability Health Check", and an assessment of capacity for growth in the short, medium and long term.
- 4.2 In setting out capacity for growth, it indicates a quantum of development below that proposed in the RSS:

	Food: Sq m ("convenience")	Non-food sq m ("comparison")
By 2010	440 - 1,240	3,240 - 3,630
By 2016	990 - 3,050	9,380 - 10,870
By 2021	1,500 - 4,770	16,000 - 18,850

- 4.3 The RSS figure for comparison retail for the period to 2021 is 25,000 sq m. The RSS figure is on one hand aspirational but on the other a potential constraint, given that it has been derived as part of a strategy for the growth of different centres throughout the region. The data from Savills suggest that a degree of caution should be exercised in assessing retail proposals that may be acceptable in terms of the RSS. The Savills study also recommends that additional floorspace in the short term should be directed to the primary shopping area in the first instance.

Green Space Strategy

- 4.4 Two important studies have recently been undertaken that have helped in assessing the supply and distribution of green space and leisure facilities: the Urban North Staffordshire Green Space Audit and Strategy and the Newcastle Leisure Needs Assessment and Planning Pitch Strategy. Both studies have been carried out broadly

in line with the recommendation of PPG17: Planning for Open Space, Sport and Recreation

- 4.5 Provision of green space has been assessed across the urban area of the Borough by wards and "neighbourhoods". (These are groupings of wards based on severances/barriers such major transport corridors.) This was done to identify local supply issues. Town ward is the most represented within the SPD area, though the boundaries are not contiguous and care needs to be taken in any judgement from the headline statistics. Town ward does not include the New Ashfields area, the Victoria Street and Vessey Terrace area or the housing at the southern end of Silverdale Road. The SPD also excludes a small area of the ward at the north end of Albert Street.
- 4.6 Within the limitations of the data, however it is notable that the ward is deficient in quantitative terms, in relation to the urban area of the borough average, in all types of green space of unrestricted access. The figures are:
- 2.1 ha per 1000 population for informal green space (compared to 6.0 ha per 1000)
 - 2.1 ha per 1000 population for formal green space (compared to 3.8 ha per 1000)
 - 0ha per 1000 population for biodiversity green space (compared to 3.3 ha per 1000)
- 4.7 In relation to *accessibility* to green space, the ward performs better, with Brampton Park, Lyme Valley Parkway, Queen Elizabeth Park, Station Walks and Stubbs Walk all situated nearby and Queens Gardens within the inner ring road. However, there is poor accessibility to outdoor sports and semi-natural/biodiversity sites. In terms of quality, it scores highly for parks and gardens but poorly for other children's play areas and green corridors.
- 4.8 It is unlikely that opportunities for the creation of new green space within the Town Centre will arise, due to its dense, urban nature. However, this density itself means that it is heavily populated, by people living in, working in, or visiting the

area. Further development, particularly of residential units, will increase the pressure on already scarce green space and create a demand for either more or better facilities. It is also acknowledged that due to the urban nature of the Town Centre, some of this demand can be met by the provision of high quality public realm improvements to pedestrianised areas and access routes. The strategy will therefore address the issue of supply of adequate green space by:

- Setting local standards for quantity, quality, accessibility and connectivity specifically for the urban core.
- Protecting existing green space within the Town Centre and around its periphery.
- Securing the long-term maintenance and management of the existing green spaces.
- Seeking to improve the quality and accessibility of the public realm within the Town Centre.
- Seeking to implement 'street greening' initiatives in the Town Centre to improve its quality and contribute to climate change future proofing.
- Developing performance indicators to measure public satisfaction with green space and public realm.

The Extensive Urban Survey

- 4.9 This piece of work, commissioned by the County Council and the Borough Council was a pilot for a wider survey of all Staffordshire's historic towns. It is an archaeological and historical urban character assessment and forms part of a national programme of surveys initiated by English Heritage. It reviewed the historic development of Newcastle and identified "historic character areas" which were assessed for their contribution and vulnerability. It is referred to specifically in Section 1 of the SPD.

APPENDIX 1

ORGANISATIONS OR INDIVIDUALS CONSULTED, AND/OR MAKING REPRESENTATIONS, ON THE SPD

Local organisations

Community Council of Staffordshire
Confederation of British Industry (Staffs)
Connexions
Groundwork, Stoke-on-Trent
Islamic Educational and Community Centre
Keele University
Knutton / Cross Heath NMI
Madeley Conservation Group
New Victoria Theatre
Newcastle and District Trades Council
Newcastle CAB
Newcastle Chamber of Trade
Newcastle Civic Society
Newcastle College
Newcastle Communities Forum
Newcastle CVS
Newcastle Labour Group
North Staffs Chamber of Commerce and Industry
North Staffs Green Party
North Staffs Racial Equality Council
North Staffordshire Society of Architects
North Staffordshire Trades Council
North Staffordshire Trades Union Council
PARINS
Potteries and Newcastle Urban Wildlife Group
Staffordshire Blind Service
Staffordshire Enterprise Chamber of Commerce
Staffordshire Historic Buildings Trust
Staffordshire Playing Fields Association
Staffordshire RIGS Group
Staffordshire Wildlife Trust Ltd
Sustainable Staffordshire Forum
Thistleberry Residents Association
Urban Vision North Staffordshire
Westbury & Clayton Youth Club

Local Government and other statutory bodies

Staffordshire County Council

Staffordshire Fire and Rescue Service
Staffordshire LSC
Stoke-on-Trent City Council
North Staffordshire Regeneration Partnership
Renew North Staffordshire
Stafford Borough Council
Audley Parish Council
Betley Parish Council
Chapel and Hill Chorlton Parish Council
Keele Parish Council
Kidsgrove Parish Council
Madeley Parish Council
Maer Parish Council
Loggerheads Parish Council
Silverdale Parish Council
Staffordshire Police
Newcastle Police
Leek Police
InStaffs (UK) Ltd
North Staffordshire PCT
North Staffordshire Hospital NHS Trust

Housing and support providers

Arch (North Staffs) Ltd
Aspire Housing
Brighter Futures
Choices Housing Association
Keynote (Touchstone)
Lyme Trust
MIND North Staffs (Housing)
Salvation Army
Sanctuary Housing Association
Staffordshire Housing Association
Touchstone Housing Association

Government Departments, Agencies etc (including regional offices)

Government Office for the West Midlands
Department for Constitutional Affairs
Department for Work and Pensions
Department for Environment, Food & Rural Affairs
Department for Transport
West Midlands Regional Assembly
Advantage West Midlands (the Regional Development Agency)
Environment Agency
Natural England
English Heritage (West Midlands)
Highways Agency
Housing Corporation
English Partnerships

Crown Estate Commissioners
Property Services Agency
District Valuer

Other national or regional bodies

Access for the Disabled Committee
Ancient Monuments Society
Arts Council West Midlands
Business in the Environment
Campaign for Real Ale Ltd
Campaign for the Protection of Rural England (CPRE)
Centre for Accessible Environments
Church Commissioners
Council for British Archaeology (West Mids)
Culture West Midlands
Cyclists Touring Club
Disability Rights Commission
Disability Solutions
English Tourism Council
Freight Transport Association (Midlands Region)
Friends of the Earth
Georgian Group
Greenpeace
Gypsy Council
Help The Aged
MADE (Birmingham)
Planning Inspectorate (PINS)
Refugee Council, West Midlands Office
Society for Protection of Ancient Buildings
Sport England (West Midlands Region)
Sustrans (Midlands)
Tourism West Midlands
Twentieth Century Society
Victorian Society
West Midlands Planning Aid

Commercial companies

British Telecommunications Plc
Npower
Severn Trent Water Ltd.
United Utilities, Asset Protection
A C Robinson & Associates
Adams Holmes Associates
Addleshaw Goddard LLP
AGP Architects Ltd
Allan Moss Associates
Ancer Spa (Midlands) Ltd
Arriva Midlands
Atkins
Barnett Ratcliffe Partnership

Barrie Newcombe Associates
Barton Willmore Planning
Christopher Taylor Design Ltd
Cliff Walsingham & Company
Commercial Development Projects Ltd
Cromwell Country Houses
DEP
DTZ Pidea Consulting
Development Planning Partnership
Development and Planning
Ellis Hillman Partnership
Emery Planning Partnership
The Fairhursts Design Group
First City Ltd
First PMT
Forshaw Greaves & Partners
GVA Grimley
Harris Lamb
Hepher Dixon - Planning and Regeneration
How Planning
Hulme Upright Manning
JPK Design
JSP Architects
J S Bloor (Services) Ltd & Millwood Ltd
The JTS Partnership
Jonathan Hendry Architects Ltd
Jones & Payne Partnership
King Sturge LLP
Lambert Smith Hampton
Land Improvement Holdings Plc
Malcolm Lewis Architect Ltd
McDyre & Co
Mono Consultants (for Mobile Operators Association)
NTL Group
Panton Sargent
Peacock and Smith
Pegasus Planning Group
The Planning Bureau Ltd
The Planning Consultancy
Picea Design Ltd
Piercy Design
Radleigh Homes
Royal Mail Group
SecondSite Property
Silverdale Enterprise Park – centre manager
Smith Stuart Reynolds
Spawforth Associates
Stewart Ross Associates
Tarpey Barrett Associates
Taylor Young
Tetlow King Planning

TFA Architects
Tribal MJP
Turley Associates
The Tyler-Parkes Partnership
UK Land Investment Group
Wardell Armstrong LLP
White Young Green Consulting Ltd

Local individuals

16 local residents / businesses (not named in this table)

Ms Atkins MP
Cllr Boden (SCC)
Mr Cash MP
Mr Farrelly MP

APPENDIX 2 – REPRESENTATIONS ON THE DRAFT S.P.D. AND RESPONSE

1	1.1	Morbaine Ltd	Re page 30, mixed use development: Paragraph 2 is too prescriptive. Change "will be expected" to "will be encourage... where possible"	Given that this is an SPD rather than a DPD, there is no need for such dilution of the language. "Expected" is in any case different from "must".
2	2.1	Government Office West Midlands	Encouraged by the general approach.	Noted and welcomed
2	2.2	Government Office West Midlands	Para 2 of introduction: note that SPD cannot supplement national policy.	True. The government's proposals were amended after the SPD was approved. This was amended accordingly
3	3.10	R Redgwell (resident and Civic Soc)	Various details on the maps - suggestion for Savoy ex-cinema to be included in design statement.	Some of the detailed points were taken up, Savoy building is not really part of the site as such, merely one possible redevelopment opportunity amongst others.
3	3.1	R Redgwell (resident and Civic Soc)	Parking for disabled employees is needed	The point is recognised, but other than a general reference, the SPD is not the appropriate vehicle for carrying detailed proposals
3	3.11	R Redgwell (resident and Civic Soc)	The document should have paragraph or heading numbers and a strict hierarchy of titling.	The point is appreciated - numbering makes it easier to refer to and quote parts of the document. However, the intention has been to create a more readable, and less technical looking document, and this has been appreciated by others. Some section numbering has been added, plus numbering in the design section.
3	3.2	R Redgwell (resident and Civic Soc)	Need to define short medium and long term.	Accepted. Clarification added in the introduction and in the new section on longer term aspirations

3	3.3	R Redgwell (resident and Civic Soc)	Design statement is needed for Stubbs Street to improve the appearance from Barracks Road	The point is a good one, but is too detailed for the SPD. The appearance from Barracks Road should be taken into account, amongst other things, in determining any planning applications.
3	3.4	R Redgwell (resident)	Spatial framework could be used to emphasise both market and university.	This is perhaps an issue of naming rather than substance. It is the vision and the general description of the town that are meant to carry these issues, rather than the spatial framework.
3	3.5	R Redgwell (resident and Civic Soc)	Combination of market town and university town is a winner - but a University presence is needed in the town.	Support welcome. A physical University presence is being sought and this is specifically referred to..
3	3.6	R Redgwell (resident and Civic Soc)	Good design should be defined. More strict criteria such as used in Cotswold towns.	Some believe good design can be defined, and that there is no subjectivity - but others disagree. Cotswold towns tend to have more homogeneity of design styles and materials - Newcastle already possesses a wide range of styles.
3	3.7	R Redgwell (resident and Civic Soc)	Mention use of section 216.	These powers are not used at present, and although they do exist, as there are no proposals to use them, there is no reference in the SPD..
3	3.8	R Redgwell (resident and Civic Soc)	Questions the use of phrase inner ring road.	The term is used deliberately to emphasise the fact that the ring road does not define the outer edge of the Town Centre.
3	3.9	R Redgwell (resident and Civic Soc)	Use of topography is valuable - such as under the Midway car park, underground parking etc	The comment is acknowledged as a form of support. No references have been added in the SPD.
4	4.1	J Sutton (resident and Civic Soc)	Inner ring road should only be for local traffic.	Unfortunately, the A34, although not a trunk road, carries a great deal of long distance traffic.
4	4.2	J Sutton (resident and Civic Soc)	More needs to be done to cash in on hospital and uni.	This is largely is support of what is already written in the SPD

4	4.3	J Sutton (resident and Civic Soc)	Good safe car parks are essential.	Noted. A car park survey and assessment is underway.
4	4.4	J Sutton (resident and Civic Soc)	Need a town centre manager.	Noted. This is highlighted in the document, though without any commitment.
4	4.5	J Sutton (resident and Civic Soc)	What does legibility mean?	The term is used frequently by urban designers. In the two places where it occurs in the text, there is sufficient context for it to be understood.
4	4.6	J Sutton (resident and Civic Soc)	Fine fare/cinema building should be demolished.	Not really a practical proposition, without considerable resources.
4	4.7	J Sutton (resident and Civic Soc)	Building height guidelines are reasonable	Noted
5	5.1	J Howe (resident and Civic Soc)	Generally clear but the main issue is of enforceability of any of the guidelines.	Noted. Additional reference to this issue of making the guidance effective have been included in the text, particularly in Section 5.
5	5.2	J Howe (resident and Civic Soc)	Design guidelines could be stronger; should be aware of current eyesores.	A question of enforceability - see response above.
5	5.3	J Howe (resident and Civic Soc)	Support for bridge and relocating the Bus Station.	Noted.
5	5.4	J Howe (resident and Civic Soc)	Generally we have too many charity shops and eating places but too few good quality shops.	A popular issue, and one which does impact on the character of the town. But it is not something that the Council can affect directly. The issue is more of providing the right environment to attract the sort of businesses that we want.
5	5.5	J Howe (resident and Civic Soc)	General support	Noted and welcomed
6	6.1	Sport England	General support.	Noted and welcomed

6	6.2	Sport England	Concern over the lack of reference to requirements through PPG17 particularly in relation to the existing swimming facility.	Reference has been added in the companion document, but there is no firm decision on the location of a new swimming pool.
6	6.3	Sport England	The vision ought to include reference to the role of the centre in providing a healthy living and working environment.	The vision is not intended to be a checklist of all concerns offered by other specialist interests, and would suffer, in terms of its length and readability if it was.
6	6.4	Sport England	Design principles should include ref to "active design" (see their comments on the AAP).	Considered as too specialist a point for the SPD.
6	6.5	Sport England	Need to refer to the playing pitch strategy.	Very little relevance to Town Centre guidance
6	6.6	Sport England	St G and G school: preserve playing fields.	Not relevant, there were no playing fields attached to the school, which has, in any case, already closed.
7	7.10	J T Worgan (resident and Civic Soc)	The Borough Council should consider opting into the Sustainable Communities Act process.	This is not a matter for the SPD
7	7.1	J T Worgan (resident and Civic Soc)	Design: general support but needs clarification.	No specific example given - it may be more a general desire for specific guidelines.
7	7.2	J T Worgan (resident and Civic Soc)	University and market town combination is good, but needs a university presence.	The issue of a physical presence of the University is being pursued and this is referred to in the SPD
7	7.3	J T Worgan (resident and Civic Soc)	We need more employment to retain graduates.	There is reference already to this.
7	7.4	J T Worgan (resident and Civic Soc)	The spatial framework zones need to be better defined and explained.	All the text has been revisited, to improve its clarity, but no specific example or request is given in the representation.
7	7.5	J T Worgan (resident and Civic Soc)	Bus station should be better utilised.	Noted. This is one of the longer term issues flagged up and given more emphasis in the new Section on Longer Term Aspirations..

7	7.6	J T Worgan (resident and Civic Soc)	Taxi ranks proposal may harm the market stalls.	This is not a proposal of the SPD, but clearly an important issue. There will be consultation on the proposal, as referred to in the SPD.
7	7.7	J T Worgan (resident and Civic Soc)	Building heights: new building heights should not exceed current ones.	Such a restriction is not tenable. It would restrict architectural creativity unduly.
7	7.8	J T Worgan (resident and Civic Soc)	Support for addressing the "barrier" of the IRR	Noted
7	7.9	J T Worgan (resident and Civic Soc)	Design: Approaches to TC particularly important; design could reflect market town character	Generally covered in design introduction
8	8.1	G Lancaster (resident)	General support (vision, clarity, spatial framework) and pro-active planning.	Noted
8	8.2	G Lancaster (resident)	Support for mixed use principle, retention of historical street pattern, limited palette.	Noted
8	8.3	G Lancaster (resident)	Building heights: more discrimination needed around the IRR and gateway locations (for example, St Giles and St George's school site needs lower guidelines). Also, need to take into account views from Brampton, King Street and George Street.	Noted. There were other similar comments. The text has been revised to ensure there is sufficient flexibility while still maintaining the element of certainty
8	8.4	G Lancaster (resident)	Support for approach on key development sites	Noted
8	8.5	G Lancaster (resident)	Essential fro Newcastle to remain distinct from Stoke,	Noted. Essentially this is support for the overall approach
8	8.6	G Lancaster (resident)	Essential that detailed decisions (licensing, DC etc) support vision	Noted. This is part of the issue of ensuring that guidance is followed in every possible aspect.
8	8.7	G Lancaster (resident)	Bus centre decision needed a.s.a.p.	Noted

8	8.8	G Lancaster (resident)	Public art supported, but probably of a more traditional nature.	Not referred to in the SPD as such, and considered as too detailed at this stage. (A survey was carried out on public art earlier in the AAP process, and it showed a high level of support, but like the representation, more in terms of traditional sculpture.)
9	9.1	J R Taylor (resident)	(More in relation to the display than the document). Employment is the key issue. There are not enough public toilets in the TC; the refurbishment of the Guildhall provides an opportunity to provide one.	Noted
10	10.10	CPRE	BUILDING HEIGHTS: The approach on taller buildings at gateway locations is over simplistic. CPRE suggest instead: "a design these that provides a firm building frame or edge that in its plan shape echoes the junction's road entry and exit lines and assists identification of route alignment and directions for road users". CPRE also suggest that there should be design study of the inner ring road "as a continuous visual experience, changing but coherent".	The point about the notion of "Gateway design" is appreciated. It was recommended by both the urban design specialists commissioned to assist with formulating the guidance. Text has been revised to ensure that a blanket approach is not implied.
10	10.1	CPRE	General support for: the vision, the identification of the Uni Town, which distinguishes the TC from Hanley, the Spatial Framework, (though see below).	Noted
10	10.2	CPRE	Details: "accessing" on page 6, could be better worded. Page 22, clarity on use of developer contributions.	Noted. On the first point, that part has been rewritten completely. Regarding the second, it is felt that there is already sufficient clarity.

10	10.3	CPRE	Spatial framework: more thoughtful assessment and discipline required. Historic Core should include St Giles Church and northern quarter and gateway should be reconfigured and combined or more strongly associated. Waterside quarter - general support, with the hope that the midway car park will be replaced more sympathetically. Northergateway: care needs to be taken with any "striking design".	The point about the Church is well made. It could be included in the Historic Core, together with part of Bridge Street. However, after discussion with Planning Committee, it was decided to leave the boundary as drafted. Historically, as indicated in the Extensive Urban Survey, the Church shares its origins with the early settlement in the Bridge Street area. The presence of both in the Northern Quarter also helps to root that latter area in an important element of its past.
10	10.4	CPRE	Making it happen: support for general approach, but principles and criteria should be more strongly defined.	Noted. There is now more emphasis on this issue of the use of the guidance.
10	10.5	CPRE	Subways - widen the entrances.	Too detailed for the SPD but may be worthy of further consideration. Unfortunately, it would also be costly.
10	10.6	CPRE	Need for an overall house style and individual character that spells Newcastle.	This is really asking for yet another design study. The SPD is not intended to be a specialist design study - it has a wider remit. Moreover, there is a North Staffs Design SPD being carried out, and that will be more specialist (and informed) even if it does not have a single Town Centre focus.
10	10.7	CPRE	Expression of scepticism over the term "development management".	Noted
10	10.8	CPRE	Concerns over the aspiration to increase the amount of office employment, because of the traffic implications.	Noted. The point is appreciated, but it is government and RSS policy. It is also a crucial ingredient in making the town centre thrive.

10	10.9	CPRE	DESIGN: general support for the approach but a number of detailed concerns. 1. Insufficient attention to the creation of new buildings and groups. 2. page 31 re car parking: "detrimental" should read "positive". 3. define some of the terms used. 4. expand of "lighting schemes". 5. does the reference to technological equipment on page 33 supersede that on page 31? 6.The word "degenerated" is inappropriate. (page 32). OVERALL the guidelines are insufficiently clear and too flexible.	1. Sufficient level of detail in the SPD. 2. Misunderstanding but clarity improved by small amendment. 3. The text has been reviewed, but if words such as "innovative" were expanded upon, the result would be too long. 4 and 5 The new draft has removed these possible misinterpretations. 6. Mis-type has been corrected
11	11.1	Urban Vision	The SPD should give more detail on the link between high quality design and the economic and social aspirations for Newcastle.	This was covered generally in the consultation draft, but has been strengthened a little in the final version, and to some extent, in the Companion Document.
11	11.2	Urban Vision	"Local design context analysis and more specific aspirations for the future should be drawn out, and preferably graphically presented."	(Clarification):UV would like to see a brief description of the urban design character of the TC - they recommend particularly reading "Urban Design Compendium" by English partnerships. In the final version there is reference to the Extensive Urban Survey, as part of origins of the character of the Town Centre, and also a reference to the manual recommended.
11	11.3	Urban Vision	Issues around sustainability should be allowed to play a greater part including how the town centre and nearby housing areas could become a "walkable neighbourhood".	This is a key feature of the TC and part of the whole reason why such things as offices and mixed development are encouraged, as well as the emphasis on providing more housing. It is difficult to see how this can be emphasised further
11	11.4	Urban Vision	The TC proposals should be rooted in a wider context with an emphasis on drawing out the key drivers for success of a "University Market Town".	See response to 11.1

11	11.5	Urban Vision	Further thought should be given to the illustrations. All photos should have a caption and be included solely to make a point. There could also be illustrations of examples of good practice elsewhere.	Noted. Some new photos have been used and captions have been added. However, they are used in part simply to add to the attractiveness of the publication. Also, it is considered that showing pictures of things from elsewhere may not send the right message.
11	11.6	Urban Vision	Need more detail on house numbers, office floorspace etc from RSS. (Included in the UV notes but not one of the specific recommendations).	This is a key issue, relating to the role of an SPD as compared to an AAP. But it is really covered by the Core Strategy. Clearly the UV panel did not feel that the linkage was properly explained. There is some added clarity in the new introduction.
12	12.1	A Cook (resident)	Lack of clarity regarding building heights; five storey not acceptable	The issue is the heights rather than clarity. The approach on heights has been reviewed, but a blanket ban on five storey development is considered inappropriate.
12	12.2	A Cook (resident)	Lack of vision. Too many cafes and charity shops, not enough individual shops. Parking too expensive, market holders do not like new stalls, not enough access for disabled people.	General wish list covered by other respondents, but includes some issues at too detailed a level. Charging for car parking is in line with government policy (connection to global warming etc). Council cannot directly affect profile of shops - only provide the right climate.
12	12.3	A Cook (resident)	Spatial framework not helpful. (Map needs street names).	It is intended to be diagrammatic, but the point is noted. Final version includes a large map on an Ordnance Survey base.
12	12.4	A Cook (resident)	Design: buildings should not be modern, and not over three storeys high.	A fundamental point but one which is not supported. Old styles that are currently revered were modern at their time of creation.
12	12.5	A Cook (resident)	Site guidance is open to interpretation. Offices are no use if they remain empty.	Issue about how firm an SPD can be. Point about offices is understood - but they are unlikely to be provided if there is not chance of them being let.

13	13.1	Newcastle Labour Group	We should still be calling Newcastle a Market Town. Though Keele University is an important asset.	The message that Newcastle is both a University Town and a Market Town. They are in no way incompatible. The importance of both has been re-emphasised in the final version.
13	13.10	Newcastle Labour Group	Georgia Pacific site: need to address relationship with nearby listed buildings plus former Sweatenhams building.	This is a matter to be addressed through the DC process, but is already covered at the appropriate level in the SPD.
13	13.11	Newcastle Labour Group	Taxi ranks should be located for day time shopping as well as late night. For the latter, need to enable efficient clearing of the area.	Taxi ranks location is part of the issue being consulted on - see response under 13.7
13	13.2	Newcastle Labour Group	Market Lane should be improved.	Point noted - but too detailed for the SPD, though is certainly important. (It falls within the Historic Core area and any proposals would be treated accordingly.
13	13.3	The Labour Group	Guildhall should be open 6 days a week and be used for public events.	Not a matter for the SPD
13	13.4	Newcastle Labour Group	Town square, Red Lion Square - new squares are important and should not allow parking (including motor cycles).	Point noted. Parking/servicing regime is already mentioned in the SPD and in the final version there is more on the importance of public squares.
13	13.5	Newcastle Labour Group	Midway Car Park still has problems of graffiti and anti social behaviour.	Important issue, but outside the scope of the SPD.
13	13.6	Newcastle Labour Group	Subways should be better managed (joint action by BC and CC.) Support for new surface crossings.	Support noted. There is a programme of enhancement already underway. The issue of management is outside the scope of the SPD.,
13	13.7	Newcastle Labour Group	Open Market is important and needs more attention. Should not be neglected at bottom end of High Street, and care needs to be taken in plans for Guildhall Square not to damage the market.	There is a separate consultation process on the market stalls (design and location)
13	13.8	Newcastle Labour Group	Hassell Street - potential for redevelopment - redundant public toilets need attention.	The public toilets are closed and will be refurbished as storage area in connection with the use of the offices above.

13	13.9	Newcastle Labour Group	Bus station: support relocation to current Sainsbury site. Could include a Shopmobility facility.	Noted. There is currently no proposal to develop a Shopmobility facility.
14	14.1	West Midlands Regional Assembly	The production of the SPD ... is clearly aligned to the aims and objectives of the published RSS	This confirms conformity with RSS and is therefore welcomed
14	14.2	West Midlands Regional Assembly	Comment concerning the reference to the retail figures. The Regional Assembly notes that "the joint core strategy is the proper forum for detailed discussion and decision at a local level with respect to the appropriate future retail development requirements within the town centre.	This is not really an objection to the text in the SPD. It may be a matter of misinterpretation, as the Core Strategy covers the issue in the way that the Regional Assembly suggests..
15	15.1	Newcastle Chamber of Trade	General support, but design guidance needs to be more robust, and followed through in development control.	Noted - the issue of enforceability and effectiveness is covered in a number of representations, which has resulted in a number of changes.
15	15.2	Newcastle Chamber of Trade	Vision not supported. Insufficient emphasis on the importance of retail. Objection to what the Chamber of Trade sees as a proposal to reduce the size of the open market, and particularly for the proposal to put a tax rank on High Street. Market Town recognition is far more important than that of a University Town.	A fundamental point but one that cannot be supported. Other uses besides retail are also vital, but the SPD (consultation and final versions) could not emphasise the importance of retail any more strongly. The issue of the market stalls is the subject of a separate consultation process.
15	15.3	Newcastle Chamber of Trade	development sites: general support for guidance	Noted
15	15.4	Newcastle Chamber of Trade	Disruption caused during redevelopment needs to be kept to a minimum so not to damage businesses. Business rate reduction should be considered.	Noted, but outside the scope of the SPD
15	15.5	Newcastle Chamber of Trade	More car parking is required - particularly in the light of the loss of parking at the current Sainsbury site.	Noted - to be addressed through the car parking survey.

16	16	Police Architectural Liaison Officer	Support for the vision and a number of specific references as follows: page 9, reference to safe and pedestrian friendly streets; the phrase "contribute positively to the attraction and attractiveness of the town centre (page 16); page 23 reference to national planning policy; page 24 on good design, sustainability of lifestyles; page 31 reference to secure by design.	The support is noted and welcomed.
17	17.1	Staffs County Council	Concern that a number of ideas have not been discussed with the highway authority. The lack of any prior discussion should be made explicit.	Noted., An appropriate reference has been added. This also relates to the role of the NSRP Business Plan which is now covered in more detail.
17	17.10	Staffs County Council	General support fro references to the historic character of the Town Centre. Request for reference to the Extensive Urban Survey and to PPG18 (Archaeology and Planning) in appendix 1.	Noted. Reference was added as part of a significant expansion of the first section.
17	17.11	Staffs County Council	There should be reference in the SPD to guidance in the "West Midlands Streets for All" document.	Noted. It was decided not to refer to it in particular, but it clearly remains relevant.
17	17.12	Staffs County Council	General support for the identification of the zones, but concern about the "areas lying between the zones".	Presumably this refers to all those areas outside the zones. Generally they are not included because their composition is too mixed to warrant any specific identification or description. The boundaries could all be amended so that the whole SPD area was included, but this would be a little artificial. Additional text has been added to ensure that there is no implication that there is a "free-for all" in these areas.
17	17.13	Staffs County Council	General support for the descriptions of the Historic Core, the Northern Quarter and the Live Work Office Quarter. Request for reference to the Extensive Urban Survey Character Area 10.	Support noted. EUS now referred to in some detail.

17	17.2	Staffs County Council	The bus station should remain where it is. Relocation or removal would result in confusion. Its operation has been greatly improved by the highway authority.	Noted
17	17.3	Staffs County Council	It is not sufficiently clear that there is an up-to-date and approved transport strategy for the area up to 2012/13. The subway artwork is unlikely to be completed by August 2008. The Midway car park improvement did not contribute to the objective of "improve the provision of car parking around the town centre" (there is no such objective). The new bus drop-off point has not been completed. The NTADS is no longer a draft strategy as it was adopted by the County Council on 31st July 2008.	These are all points of fact, which have been taken into account in amending the final text
17	17.4	Staffs County Council	Reference should be made to the highway authority's approved cost sharing methodology (NTADS)	This does not affect the approach in the SPD but NTADS was already referred to in the appendix to the draft SPD. The reference is now in the Companion Document and has been updated.
17	17.4	Staffs County Council	Suggestion that there should be an overall Transport Strategy for the Town Centre - ideally prior to any planning applications.	SCC will be directly involved in any future transport studies.
17	17.5	Staffs County Council	It is incorrect to state that existing crossing facilities close to Georgia Pacific are not of a high standard.	The text has been amended.
17	17.5	Staffs County Council	Concern that initiatives such as street furniture may overlook issues of way leaves, licenses from the highway authority and maintenance.	Noted
17	17.6	Staffs County Council	Request for County Council involvement in the consideration of the results of the parking study	This will be the case.
17	17.7	Staffs County Council	Concern that the reference to the SPD on design does not give sufficient confidence that it will be legally robust.	This is also raised in representation 35. The text has been substantially amended.

17	17.8	Staffs County Council	Reference should be made to the ELC Action Plan, with English Nature as the lead organisation	Clarification sought as to the relevance of this
17	17.9	Staffs County Council	There should be reference on page 14 or 37 to the maintenance and enhancement of the ecological quality and connectivity of the Lyme Brook	Noted. Reference added
18	18.1	A Drakakis-Smith (resident)	The SPD contains too many contradictions to be clear	Noted
18	18.2	A Drakakis-Smith (resident)	The vision is not clear. It gives no indication what we want the town to be, other than more of the same. "Visualised in terms of a person, it shows a foul-mouthed down at heel Madonna" rather than the preferable "up-market Audrey Hepburn"	The symbolism in the criticism is striking. But the vision, it is argued, is clear. It even talks of repairing past damage.
18	18.3	Angela Drakakis-Smith	A measure of support for the Spatial framework, but concern that it will be worthless because the Council will not have the power of the will to enforce any of the guidance	The comment is noted, and reflected in those of other representees. It is an important point, though outside the scope of the document itself. However, some additional clarity has been added, though this is unlikely to be to the degree preferred by the representee.
18	18.4	A Drakakis-Smith (resident)	Design guidelines are probably not sufficient. There is no consensus on what is good design, because the identity of the Borough is not defined. Building height is becoming an important issue and the guidelines will allow too great a tolerance.	The comment is probably based more on displeasure with recent decisions than with the attempt in the document to set out new guidelines. The emphasis on building heights is noted. (There is a specific reference to the limit being too high on all the development sites.)
18	18.5	A Drakakis-Smith (resident)	If hotels were allowed on all the suggested sites, there would be too many.	It is extremely unlikely that this would happen. The SPD simply puts forward a number of alternative locations - the market for hotels will find its own level, but there is undoubtedly capacity for more than currently present.

18	18.6	Angela Drakakis-Smith	Dismantling the Brampton Complex is a questionable move	This may be a reference to the proposal to relocate museum facilities to the former School. The representee does not directly criticise the proposed use of the former school.
19	19	G Taylor (resident)	There should be public conveniences closer to the centre/market area. Suggests Pepper Street.	Noted. However, the Council's policy is unlikely to change.
20	20.1	C M Harp (resident)	More should be done to stimulate manufacturing industry.	Outside the scope of the SPD
20	20.2	C M Harp (resident)	There should be more public toilets - Pepper Street facility should not have been closed.	Noted. See under 19.
21	21.1	D Taylor (resident)	Generally very supportive of clarity, guidance and vision. Would have preferred manufacturing industry at Georgia Pacific, to replace lost employment.	Support welcomed, and noted
21	21.2	D Taylor (resident)	Lack of public conveniences.	Noted. See under 19
22	22.1	Advantage West Midlands	AWM note the relationship between the SPD and aspects of the West Midlands Economic Strategy Delivery Framework and support the aims and objectives of the SPD. They would appreciate more detail over the precise nature of the mixed development promoted in the SPD, see particularly page 30.	The support is welcomed. On mixed development, the phrase is used in the same sense as in government guidance. In general, where there is a "lead use", this is noted, but in most cases, the guidance is deliberately open.
23	23.1	Turley Associates (on behalf of Sainsbury)	Support for the SPD assertion that the RSS figures for retail extend beyond the capacity of the town centre, But ask that figures are updated to reflect the two permissions given to Sainsbury.	The aim of the representation is to reduce the apparent capacity of the Town Centre for further retail development. It is true that current commitments (and developments completed since the figures were postulated) need to be taken into account but this will be done as and when the need arises when a new proposal is considered.

23	23.2	Turley Associates (on behalf of Sainsbury)	The proposed new retail study (page 27) should be carried out before the SPD is adopted.	The thrust of the representation is that the SPD should be delayed. In fact, the retail study referred to is a limited piece of work, looking at types of shopping (particularly high quality retail) and would not affect the overall capacity.
23	23.3	Turley Associates (on behalf of Sainsbury)	Retail should not be allowed on any of the edge of centre sites, because of lack of need (as set out in PPS6) and that an assessment should be carried out before such a proposal could be set down.	The objection is made on behalf of Sainsbury, who has just received permission for a large edge of centre supermarket. Their case is that capacity is now filled. Capacity (and need) would be judged at the time of any application. (The Government propose to remove this requirement from PPS6, but there is no certainty on the likelihood or timetable for this.)
23	23.4	Turley Associates (on behalf of Sainsbury)	The SPD should confirm the existence of the current planning permission (to Sainsbury) for the Ryecroft site. The development of the site must be practical in terms of unit size, layout servicing and access, and therefore the proposals in the SPD are incompatible with this.	The permission exists and does not need to be referred to. There is no reason why an application for a different form of development should not be submitted and permitted.
24	24.1	DTZ (on behalf of Morston Assets)	Add "through sensitive redevelopment" in the Vision after " Major gateways and the town's public face will be improved"	This would give the impression that redevelopment was the only way to improve the public face. This cannot be supported
24	24.2	DTZ (on behalf of Morston Assets)	Guidelines on maximum heights is overly restrictive. There should instead be a requirement to demonstrate that the height of any proposal is acceptable and in keeping with the relationship to the wider area.	A large part of the text on building heights was amended, to ensure that there is no perception of a blanket approach that does not take into account local characteristics and setting.

24	24.3	DTZ (on behalf of Morston Assets)	Blackfriars site: need to take account of both flooding and ecological issues in encouraging activity close to the brook. Radical solutions to the junction would be outside of the influence of any developer of the site. Amend details of "current proposals of the landowner" - they wish the list "retail, leisure, commercial, residential, office" to be included and want the reference to the removal of the Midway car park deleted.	The text was amended to give less prominence to any current proposals, as these might change.
25	25.1	R Hampson (resident)	Concern over the development of "bland" buildings - such as the Vue cinema and Brunswick Court. (Holditch Industrial Estate also cited). In contrast, No 1 London Road cited as having "variety of both colour and surfaces" and forming "an interesting an	Comments noted. The reference to No 1 London Road illustrates the variation in views on design.
26	26.1	M Coley (resident)	Support for more surface crossings and pedestrian bridges rather than subways	noted
26	26.2	M Coley (resident)	Support for the range of facilities offered in the Town Centre. Seating in the public areas is very important, as is keeping the area litter free. Support fro a number of elements: reduction of vehicles in pedestrian areas; town centre manager; St Giles	Support welcomed and comments noted.
26	26.3	M Coley (resident)	General support for design guidelines, but concern over building heights and in particular the canyon effect on the inner ring road	Support welcomed, and concern over building heights noted. The text, particularly as amended, indicates that the "canyon effect" is to be avoided, and thus over-rides any general interpretation of the guidance on building heights.
26	26.4	M Coley (resident)	Bus station should remain where it is.	Noted

27	27.1	Peacock and Smith (on behalf of Morrisons)	Savil's retail study shows that there is capacity in the TC in the medium term for a new small to medium food store. This has now been taken up entirely by the new Sainsbury. The SPD should reflect this.	Noted. The SPD must, however, also take into account the provisions of the RSS. In addition, any specific proposal for additional retail would be likely to be accompanied by an up to date assessment of capacity.. Regard will also need to be had to PPS6
28	28.1	DPP (on behalf of Court Services)	General support for vision, spatial framework. But design guidance is not sufficiently flexible. It does not encourage innovation. The requirement for landscaping should be omitted.	Support welcomes and other points noted.
28	28.2	DPP (on behalf of Court Services)	In agreement that the Ryecroft area provides opportunities for a variety of developments.	Noted
29	29.1	S Sheppard (resident)	General support but insufficient reference to PPS9 - biodiversity issues.	It is acknowledged that these issues are extremely important but their application in the Town centre is limited. The acceptance of the Town Centre as a sustainable location means concentrating development in the area in a way that might, within that small area, limit biodiversity. However, the wider agenda on biodiversity, linked to climate change and reduction of the use of greenfield land, is well served by such a strategy. The approach in the SPD concerning the Lyme Brook does have positive impact on biodiversity. PPG9 is now referred to in the Companion Document.
29	29.2	S Sheppard (resident)	Well Street and Garden Street should be included in a Town Centre Housing Area	The area concerned is too small and already too encroached by business use for the designation to have any credibility.
29	29.3	S Sheppard (resident)	More car parking is needed in the live-work office quarter.	Noted

29	29.4	S Sheppard (resident)	Pooldam Waterside Quarter: natural assets are under developed	See above in relation to 29.1
29	29.5	S Sheppard (resident)	Modern design detracts from ancient character. (Various existing buildings cited.)	Although this representation is not alone in presenting this view, it is not considered viable or good urban design to require all new development to imitate existing styles. Indeed, many very different existing styles are already represented.
29	29.6	S Sheppard (resident)	Concern expressed over threats to castle motte.	There is no proposal to develop the castle motte, which has the protection of being a scheduled ancient monument, and this is reflected in the text.
30	30.1	D Bevan (resident)	Concern over the power exercised by developers and retailers	noted
30	30.2	D Bevan (resident)	No support for the vision. Identifying Newcastle as a University Town is inappropriate. The SPD would encourage the town centre to change.	Noted. This is a fundamental objection. The views expressed run counter to the aims of the North Staffs Regeneration partnership, which have been endorsed in principle by the Council.
30	30.3	D Bevan (resident)	Support for the principle of good design, but a strong disagreement with what the SPD suggests it could include.	Noted
30	30.4	D Bevan (resident)	No more retail should be allowed on the Inner Ring Road	Noted This may need to be the case in certain situations, where no "need" can be shown, while this requirement exists. However, it is considered inadvisable to prevent the main retail area from growing.
30	30.5	D Bevan (resident)	Building heights should mostly respect existing Georgian buildings and be restricted to three storeys.	Text was amended to emphasise the need for sensitivity to setting and local circumstances, but a restriction of this severity could not be accepted
30	30.6	D Bevan (resident)	Car parking is important. Concern over loss of Midway car park. Access across IRR should be improved.	Noted

31	31.1	Renew North Staffordshire	General support. Would like to see reference to the community involvement that took place.	Noted. There is a brief reference only, as it was felt important not to detract from the overall message. Full details are now included in the Companion Document.
31	31.2	Renew North Staffordshire	Presentation: suggest bullet points for each zone's strength and weakness; numbering all the development principles for easy reference; clarity on links between the development principles and the vision/spatial framework; executive summary; examples of best practice; 3D sketches and conceptual diagrams.	Noted
31	31.3	Renew North Staffordshire	Underground car parking requirement: should establish a threshold for commercial development	This reference has been reinstated
31	31.4	Renew North Staffordshire	Relationship with SPD on design should be clarified	The reference to the SPD on design has been substantially amended.
31	31.5	Renew North Staffordshire	There is no reference to a sustainability appraisal.	The three statutory agencies were consulted on this and they accepted the proposal to rely on the Sustainability Appraisals carried out for the AAP and the Core Strategy. This is now noted in the Companion Document.
32	32.1	Staffordshire Wildlife Trust	Pleased to see reference to the Lyme Brook corridor, but concern over the possibility of green space being increased is dismissed.	The importance of accessibility to green space is accepted, but there are no opportunities for creating it within the SPD area, given the need to concentrate development in such a sustainable location. However, one of the assets of the Town Centre as a residential area is its proximity to green space outside the SPD area and this is referred to in the text.

33	33.1	Michael Willmot	The implication that the Town Centre "complements, rather than competes with" ... the City Centre implies that Newcastle has unique features lacking in the city centre. These should be identified. We should not designate Newcastle as a university town when there is no bookshop, meeting hall and poor bicycle facilities.	The text in section 1 is devoted to the special character of Newcastle Town Centre. Although the point about the importance of its difference from Stoke on Trent is appreciated, it might be difficult to emphasise this point without directly criticising Stoke, which would not be appropriate. However, it is clear that Stoke is not also a "market town", and does not have the same - or as ancient - heritage. As far as the "University Town" description is concerned, the lack of the facilities mentioned is noted, but these should not undermine the Council's intention to take pride in, and develop the association with the University. More emphasis is now made in the text to the importance of establishing some physical presence in the Town Centre.
33	33.2	M Willmot (resident)	Lack of strategic analysis - in particular in relation to what the representee believes is the inevitable decline of shopping centres.	Reference to the strategic context, in all its forms, is now contained in the Companion Document.
33	33.3	M Willmot (resident)	Lack of proposals to assist cycling	Noted.
33	33.4	M Willmot (resident)	A new public meeting hall should be proposed	Noted
33	33.5	M Willmot (resident)	Building height guidance welcomed. Individual vistas and views are important and these should also be considered	Noted. The redraft of the text on building heights gives more emphasis on the importance of context.
34	34.1	Hulme Upright Manning (for owners of Tittley site)	Section 3 paragraph 2: this should refer to the activities of developers	This was amended.

34	34.2	Hulme Upright Manning (for owners of Titley site)	The SPD should make it clear that design and development innovation is supported.	The SPD does makes this reasonably clear, but the approach has undoubtedly attracted criticism.
34	34.2	Hulme Upright Manning (for owners of Titley site)	Lack of "flexible direction in respect of the site that includes Titleys Warehouse." In addition, concern that the Council is still seeing office use as the preferred option.	The site is included in the Live-work office quarter and thus is guided by that.
34	34.3	Hulme Upright Manning (for owners of Titley site)	Some developments have been let down by poor detailing and implementation. Better planning conditions and monitoring are required	The point is a good one, but in part outside the remit of the SPD. However it is part of the issue about the strength and effectiveness of the SPD and is now covered in more detail, in section 5.
34	34.3	Hulme Upright Manning (for owners of Titley site)	Concern over the Council's approach to increasing office development in the Town Centre.	Noted. But this is in accordance with regional and sub-regional policy.
34	34.4	Hulme Upright Manning (for owners of Titley site)	The Council should pay more respect to the advice of UV and this fact should be referred to in the SPD	Noted. Urban Vision performs an extremely valuable and valued service to the Council, under a contract covering advice and training. Reference is already made to this, but it has to be made clear that decisions on DC are made by the LPA, not by an outside body.
34	34.4	Hulme Upright Manning (for owners of Titley site)	Support for emphasis and efforts on the public realm, but more could be done.	Noted
34	34.5	Hulme Upright Manning (for owners of Titley site)	The requirement for underground car parking is too prescriptive	Noted, but this is not a DPD and the wording is less prescriptive than it could be. Underground car parking is always to be preferred and without some encouragement, the additional cost will mean that developers rarely bother even to consider the possibility.

35	35.1	Paul Farrelly MP	Concern that the Council's confidence in the NS Design SPD is not sufficiently clear, plus concern that it will not be detailed enough to obviate the need for detailed design guidance in this SPD	Noted. Discussions are taking place with Urban Vision, who are coordinating the commission.
35	35.10	Paul Farrelly MP	The importance of active frontages in new development should be emphasised further.	Accepted. Active frontages now appears as one of the elements of good design.
35	35.11	Paul Farrelly MP	The blanket approach to gateways and landmark opportunities is too inflexible and insensitive to the design needs of specific locations.	This is an issue raised by a number of representees. The redraft of the text on building heights gives more emphasis on the importance of context.
35	35.12	Paul Farrelly MP	Concern over building heights: too flexible (will allow buildings too high in certain locations, and particularly would be contrary to the caution over the "canyon effect". Specific reference to bad phrasing on page 33 in the reference to "maxima".	A popular subject for representations. But on both sides of the argument. The text makes it clear that concern over the "canyon effect" overrides any general guidance on building heights.
35	35.13	Paul Farrelly MP	General welcome for some of the intent of the SPD but a concern that it will have no force (being only an SPD) and will be ignored in decision making.	Noted. The issue of enforceability is addressed now in more detail (section 5)
35	35.14	Paul Farrelly MP	The lack of expert urban design advice in the Council will make it difficult for this SPD to have any effect and generally to raise standards.	Noted
35	35.15	Paul Farrelly MP	Georgia Pacific site: delete reference to the suitability of hotel development	Not accepted. Hotels would be a valuable addition to the offer of the town centre. There are a number of locations equally appropriate, but the Georgia Pacific site is certainly acceptable in principle.

35	35.16	Paul Farrelly MP	Insufficient reference to the NSRP Business Plan and its proposals for the Town Centre, but some support for some of the longer term ideas the new squares, the approach to the inner ring road.)	The Business Plan had not been approved at the time of writing. The representee was referring to an early draft version. However the NSRP Business Plan is not a statutory planning document and does not form part of the Council's LDF. It is produced in part to support bids for funding from AWM. It is not subject to public consultation. It is an important contextual document. It will be reviewed annually. Full details are now included in the nes section 6.
35	35.17	Paul Farrelly MP	(As an alternative to extending the Brunswick Road site) request that another key site should be added illustrating a design framework for the Titleys/Zanzibar area.	Development proposals on these sites would be subject of the considerations of the "live-work office quarter."
35	35.18	Paul Farrelly MP	Guidance for the Ryecroft area is devoid of content. There should also be reference to the NSRP Business Plan proposal to acquire the site.	Noted. The key sites guidance merely repeats elements from eh spatial framework and elsewhere in the SPD. Section 6 now contains further details of the NSRP Business Plan, which also refers to Ryecroft.
35	35.19	Paul Farrelly MP	Support for the improvement (compared with the AAP) to the presentation of the document and to the text within it. But suggestion of more captions/comment with photos.	Noted and welcomed. Most photos in the final version now have captions.
35	35.2	Paul Farrelly MP	Design should be identified as one of the key themes in section 1.	Accepted,
35	35.20	Paul Farrelly MP	A context map is needed – showing sub-regional location, link with Keele University, hospital etc.	Agreed. A context map is now included.
35	35.21	Paul Farrelly MP	Support for the recognition of the status of a University Town.	Noted
35	35.22	Paul Farrelly MP	General support for the longer term thinking	Noted and welcomed, but see also under 35.16 re the NSRP Business Plan.

35	35.23	Paul Farrelly MP	There should be detailed masterplanning and options appraisal for the Blackfriars Site. Plus concern over the possibility of a mass of unbroken frontage and development bulk on the site – out of keeping with the market town character. Plus concern that any bridge that allowed a physical extension of the shopping area would be detrimental in design terms	Noted. It is true that the site is extremely significant, but unless the Council intend to acquire it, it has to be addressed through the development control process. Further discussions are taking place on the landowner's revised proposals.
35	35.3	Paul Farrelly MP	More detail is needed on how the perceived barrier of the inner ring road will be addressed	This relates in part to the NSRP Business Plan. See response to 35.16
35	35.4	Paul Farrelly MP	General support for the zones, but with suggestion that they need more detail to identify their special character and to guide development within them.	Some additional detail has been added, but the text has remained deliberately succinct
35	35.5	Paul Farrelly MP	Concern that the SPD does not address the issue of specialist shopping – the need for more in the Town Centre, particularly in the Bridge Street area.	This is an important issue, but the Council's role is limited. There is reference to a possible study being commissioned as part of the development of the Strategic Investment Plan.
35	35.6	Paul Farrelly MP	Concern that the issue of edge of centre retail is not properly addressed, particularly in the case of the Blackfriars site – SPD should state that retail can only be accepted if there is sufficient capacity and note that the capacity has already been taken up.	What is being asked for here is a resolution of the issue of retail capacity. It is felt, however, that it is better refer instead to the sort of assessment that will need to be made at the time, so that the wording in the SPD remains up-to-date. There is also proposed to be a radical change to PPS6.
35	35.7	Paul Farrelly MP	The Brunswick/Barracks Road site should be extended to include Titleys and Zanzibar	The Key Sites are meant to be limited in their scale and relate to potential land assembly. The Titley and Zanzibar sites pose different issues from the area defined as site C in the SPD.
35	35.8	Paul Farrelly MP	There is no reference to the Sports Village	There is no longer a proposal for a Sports Village.

35	35.9	Paul Farrelly MP	Concern that the visual damage done by the Midway, and other multi storey car parks is not properly addressed – either through clear long term aspiration or by short/medium term measures.	It is accepted that the car parks do not contribute positively in terms of design and visual impact. At the time of writing the SPD, it appeared likely that the Midway would be replaced. If it is to remain for longer, then minor measure to improve its appearance could be proposed. However, there is no proposal currently, so the SPD does not carry any specific reference.
36	36.1	English Heritage	Welcome and support the prominence given to historic character. This should be carried through into a reference in the basic principles under the spatial framework.	The point is noted. It is largely a question of what is identified to be a principle, or a vision, or a key issue. There is now much clearer linkage between the vision and the other elements of the SPD.
36	36.2	English Heritage	Would like to see more cross references between the spatial framework and other parts of the text	This relates largely to Conservation Areas. However, there is now much clearer linkage between the vision and the other elements of the SPD.
36	36.3	Amanda Smith, English Heritage	Support for the reverences to the CAAMPs and looking at signage.	Noted
36	36.4	English Heritage	Make it clearer that not all important views are noted, and that decision will be taken (on matters including height) on the specific merits of the case. Make a link to requirements on Design and Access Statements	Tboth of these points have been taken up in the final version.
36	36.5	English Heritage	Add conservation area boundary to site maps.	Conservation Area boundaries have been added to the maps.
36	36.6	English Heritage	Reference should be made to the "extensive urban survey" undertaken by the County Council and this should be referred to	Reference is made in the final version.
36	36.6	English Heritage	Add reference to the County Council's Extensive Urban Survey	Reference will be made.

37	37.1	Savills on behalf of LSI Management LLP	General support but would like to see more emphasis on the importance of retail. Specifically include reference in the vision to the importance of retail development providing for the economic prosperity of the area.	It is considered that the importance of retail is emphasised sufficiently. The reference now in section 2 is perhaps a little stronger.
37	37.2	Savills on behalf of LSI Management LLP	Live-work office quarter should be renamed mixed use quarter. They would like to see more emphasis on retail in that area.	This cannot be supported. Rather than simply wanting to emphasise the importance of retail, the objector would like to remove references to the importance of office development. The importance of offices is supported by the NSIEDS and the Work Foundation.
37	37.3	Savills on behalf of LSI Management LLP	There should be more emphasis on retail in the Brunswick Court and barracks Road site	This is a subset of the comment made on the live work office quarter within which the site lies. The same response therefore applies. (The objector's concern is largely the Cannons building, which was the subject of an application at the time.)
38	38.1	Thistleberry Residents' Association	Presentation: maps and diagrams should contain street names;	Noted. The diagrams remain deliberately free from too much detail, but a new map on an Ordnance Survey base is now included.
38	38.2	Thistleberry Residents' Association	The vision is not clear - it "could have been wider, more far reaching" and "seems to be too diffused". There should be more consideration as to whether as a market town it is fortunate to have both a hospital and university nearby.	There is a balance to be struck between clarity, brevity and comprehensiveness. The representation does not specify how precisely the balance is wrong, or how to improve it.
38	38.3	Thistleberry Residents' Association	There is a danger of contradiction with the Conservation Area Plan.	There should be no contradiction, though it is accepted that the timing is less than ideal.

38	38.4	Thistleberry Residents' Association	There should be more prescription, in spite of the need for an element of flexibility	Noted. A current theme in many representations - associated with the concern that decisions will be made that do not comply with the SPD. It is considered that the right balance has been achieved.
38	38.5	Thistleberry Residents' Association	Building heights are a key concern. No buildings should be higher than 4 storeys.	A popular issue. To have a four storey maximum would not be considered reasonable by professional urban designers any more than by developers.
38	38.6	Thistleberry Residents' Association	Need for clarity as what constitutes good design. And there should be more public intervention.	Noted
38	38.7	Thistleberry Residents' Association	The Civic Offices should be in the Conservation Area as one of the better examples of the 1960s.	Noted, but discussions during the consultation process have suggested that there is little support for this view.
38	38.8	Thistleberry Residents' Association	A bus station is required - it would not be attractive to users to disperse the access points around the town centre.	Noted
38	38.9	Thistleberry Residents' Association	Too much weight is attached to Renew. A cost benefit analysis is required on the effect of Renew so far.	This is largely outside the scope of the SPD. Adherence to the approach and strategy of Renew is bound up in the work of the NSRP, which is broadly supported by the Borough Council.

APPENDIX 3 - TOWN CENTRE LOCATIONS & DEFINITIONS

The designation and definition of zones within and around Town Centres is a crucial element of policy in aiming to preserve the vitality and viability of Town Centres.

Planning Policy Statement (PPS6), "Planning for Town Centre", sets out details of the terms that should be employed and how they should be interpreted. (Annex A, Table 2). This is reproduced below, followed by details of how the definitions are interpreted in this SPD, with explanations where appropriate.

Three footnotes from the PPS need to be read to clarify the table:

- ❖ "In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances. For example, local topography will affect pedestrians' perceptions of easy walking distance from the centre. Other considerations include barriers, such as crossing major roads and car parks, the attractiveness and perceived safety of the route and the strength of attraction and size of the Town Centre. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient access to the centre."
- ❖ " For office development, locations outside a Town Centre but within 500 metres of a public transport interchange, within the urban area should be considered as edge-of-centre for purposes of the sequential approach."
- ❖ The ' The 'centre' for a retail development constitutes the primary shopping area. For all other main Town Centre uses the 'centre' should be regarded as the area embraced by the Town Centre boundary."

Guidance in PPS6

Term	Advice text in PPS6
Town Centre	Defined area, including the primary shopping area and areas of predominantly leisure, business and other main Town Centre uses within or adjacent to the primary shopping area.
Primary Shopping Area	Defined area where retail development is concentrated, generally comprising the primary and those secondary frontages which are contiguous and closely related to the primary shopping frontage. (Also noted that in smaller centres, the Town Centre may not extend beyond the Primary Shopping Area.)
Primary Frontage	Likely to include a high proportion of retail uses
Secondary frontage	Provide greater opportunity for a diversity of uses
Edge of centre	For retail purposes: a location that is well connected to and within 300 metres of the primary shopping area *
Edge of centre	For all other main Town Centre uses: this is likely to be within 300 metres of a Town Centre boundary *
Out of centre	A location which is not in or on the edge of a centre but not necessarily outside the urban area

Local interpretation

Term	Interpretation of guidance in PPS6
Town Centre	<p>For clarity, the term Town Centre is used for the whole of the area covered by the SPD.</p> <p>For retail development, and the application of the sequential approach, in accordance with PPS6, the term 'edge-of-centre' is defined (see below) in relation to the Primary Shopping Area, and hence does not apply to the whole of the Town Centre. (See third footnote above).</p> <p>For office development, as indicated in the second footnote, a wider definition is encouraged, allowing the term 'edge-of-centre' to embrace locations beyond the Town Centre itself, but within 500m of a bus station. Thus it is appropriate to treat office development anywhere within the SPD boundary as 'Town Centre'.</p>
Primary Shopping Area	<p>The area within the Inner Ring Road.</p> <p>Newcastle is not a "smaller centre" as referred to in PPS6. It is considered that the Inner Ring Road supplies the clearest definition for the primary shopping area, and one which best fits the explanation in PPS6. It is possible that in the future it would be reasonable to extend the Primary Shopping Area to beyond the inner ring road. But this would only happen if connectivity were to be significantly improved.</p>
Primary Frontage	<p>This has been defined on the basis of what appears to be the area with the highest footfall. Its definition has been amended since the Local Plan to take account of the new development at Castle Walks.</p>
Secondary frontage	<p>This is all the area within the primary shopping area that is not defined as primary frontage.</p>
Edge of centre	<p>For retail purposes: Any site adjoining the Inner Ring Road, or fronting the A34 within 250 m of the Inner Ring Road.</p> <p>This is considered to be a fair interpretation of the requirement for a location to be "well connected to and within 300 metres of the primary shopping area". Maintaining and improving the crossing facilities on the A34 is part of the Council's approach in the Public Realm Strategy, and referred to in the Spatial Framework.</p>
Edge of centre	<p>For all other main Town Centre uses: In this document, leisure is treated like retail, ie large developments should be well connected as in the category above. For office development, as discussed in the first part of this table under 'Town Centre', the categorisation of 'edge-of-centre' does not arise, as all locations in the SPD area are within the Town Centre.</p>
Out of centre	<p>For retail and leisure: within the SPD boundary, any location outside the Primary Shopping Area not covered by the 'edge-of-centre' definition.</p> <p>For office development: 'out-of-centre' would apply only to locations outside the SPD boundary.</p>