Dear Rebecca Andison,

Vacant Land To The North And South Tynemouth Metro Station Building To The East Of The Metroline Tynemouth Tyne And Wear. Ref. No: 20/00136/FUL

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I wish to object to the FUL and LBC applications above in the strongest possible terms. As the Ward Councillor and a resident in Tynemouth I have had the opportunity of talking with many residents who are extremely concerned that this proposal is totally inappropriate for this location. I have listed below the key concerns of myself and the residents who have contacted me.

The objections that I have received and read, highlight the fact that the residents have carefully reviewed the original and new proposal and are extremely concerned that this proposed development is; too big, not in keeping with a traditional village setting, overshadows an important heritage asset and peoples houses and will increase the pressures on parking. This new proposal, which increases the number of units whilst reducing the parking and appears to have completely ignored these concerns. The objectors are not opposed to change but this building would stand-out rather than blend-in and dominate the views and skyline of Tynemouth. It does not recognise the village-nature of its setting and would upset the balance between landmark buildings and townscape buildings.

I refer to the Village character statement which is planning guidance for the Tynemouth Conservation Area and was prepared by residents and officially adopted as Supplementary Planning Guidance, which states.

"Planning Decisions should be about managing change, not preventing it. Choices made by this generation will be the heritage of the next.

In short we hope to preserve Tynemouth's character."

I would also wish to request speaking rights at any future planning committee.

### **GROUNDS FOR OBJECTION**

### 1. THE SITE IS NOT DESIGNATED FOR HOUSING IN THE LOCAL PLAN:

The Local Plan (S4.3) specifically identifies sites for the future location for housing within North Tyneside. This site at Tynemouth station is not identified for this purpose.

## S4.3 Distribution of Housing Development Sites

The sites allocated for housing development are identified on the Policies Map, including those identified for both housing and mixed-use schemes.

 Many sites in Tynemouth have been identified for new housing in the Local Plan (S4.3) and these are listed below:

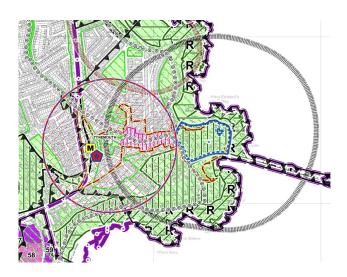
### S4.3

Site	Ward	Туре	Potential homes
Tanners Bank West (S)	Tynemouth	Brownfield	100
Stephenson House, Stephenson Street	Tynemouth	Brownfield	<u>5</u>
Land at Albion Road, North Shields	Tynemouth	Brownfield	10
Albion House, Albion Road,	Tynemouth	Brownfield	<u>36</u>
Land at North Shields Metro, Russell Street	Tynemouth	Brownfield	<u>30</u>
Coleman NE Ltd, North Shields	Tynemouth	Brownfield	14
East George St and surrounding area,	Tynemouth	Brownfield	174
Tanners Bank East	Tynemouth	Brownfield	42
Norfolk St/Stephenson St Car Parks Office,	Tynemouth	Brownfield	41
TOTAL			452

- This new development would be the third biggest development in the ward but not have been previously identified in the Local Plan as a site for housing.
- Other sites, not recognised in the Local Plan have already been allocated for additional housing in Tynemouth, most notably Bird Street (36 properties), Linskill Mews (9 proprties) and most recently Unicorn House (40+ properties).
- Tynemouth is a small and densely populated ward with many heritage assets and historic and cultural sites, which must be protected from overdevelopment. There are already well over 500 new properties planned for Tynemouth ward. An additional 71 properties are not necessary and would result in overdevelopment.

## 2. THE SITE IS SPECIFICALLY IDENTIFIED FOR NEW RETAIL USE WITHIN THE LOCAL PLAN

• The Local Plan specifically identifies this site as a future location for retail and not for housing. The blue and red icon by the station signifies a site for retail



## S3.3 Future Retail Demand

Key sites identified for retail development over the plan period are:

Site Name	Designated Centre	Total Floorspace (m² Net)
Tynemouth Station	Tynemouth	1,011

The original proposed plan contains 460sqm of space for commercial use. The update plans have reduced this down to only 130sqm by removing the commercial unit on the Tynemouth Road side of the development and replacing it with more residential units. This however is also being proposed as potential class E which could be restaurants, cafes or drinking establishments. I would also remind the Council that site is on the border of the cumulative impact policy as outlined below. Major new drinking establishments would have a very large impact on antisocial behaviour and alcohol related crime and nuisance in the area.



## 3. THE DEVELOPMENT DOES NOT FULFIL THE CRITERIA WITHIN THE LOCAL PLAN FOR ADDITIONAL HOUSING (A WINDFALL SITE)

The Local Plan does make allowance for additional housing that is not within the plan however this site does not fulfil all of the criteria for this purpose. The Local Plan sets out the criteria required for a windfall site:

## DM4.5 Criteria for New Housing Development

Proposals for residential development on sites not identified on the Policies Map will be considered positively where they can:

f. Make a positive contribution towards creating healthy, safe, attractive and diverse communities; and,

g. Demonstrate that they accord with the policies within this Local Plan

This development would not contribute positively, as is evidenced by the objections from the local community. It also is not in accordance with the Local Plan with regards to building on a Conservation area and wildlife corridor.

7.66 Policy DM4.5 looks to ensure that such proposals are appropriately located, sustainable and attractive and do not harm the amenity of neighbouring properties or land uses. This also reflects the principles of national planning policy in ensuring that new housing development is: Informed by the latest evidence of housing need; Takes full account of its surroundings;

This development is not attractive or appropriate for the site and its surroundings. The development will have a negative impact on its surroundings due to its size scale and design and will put pressure on local amenities, in particular; parking, schools and nurseries.

## 4. THE DEVELOPMENT HAS INSUFFICIENT PARKING FOR RESIDENTS

The developer presents a scheme of 71 homes, 1 retail unit and only 43 parking spaces. This scheme contravenes the Council's Local Plan, formally adopted on 20/7/17, in the following sections:

DM6.1 Design of Development Applications will only be permitted where they demonstrate high and consistent design standards. Designs should be specific to the place, based on a clear analysis the characteristics of the site, its wider context and the surrounding area. Proposals are expected to demonstrate:

e. Sufficient car parking that is well integrated into the layout; and,

AS8.23 Coastal Transport Through working in partnership with applicants for development, the community, public transport providers and Nexus, the Council will seek to improve the accessibility of the coastal area by:

e. Maintaining adequate car parking provision that serves the coast with improved access for sustainable transport that would cause no adverse impacts on people, biodiversity and the environment

DM7.4 New Development and Transport The Council and its partners will ensure that the transport requirements of new development, commensurate to the scale and type of development, are taken into account and seek to promote sustainable travel to minimise environmental impacts and support residents health and well-being:

c. The number of cycle and car parking spaces provided in new developments will be in accordance with standards set out in the Transport and Highways SPD (LDD12).

The Council's **Transport and Highways Supplementary Planning Document (LDD12)** sets out the criteria for sufficient parking for new developments. Appendix D states:

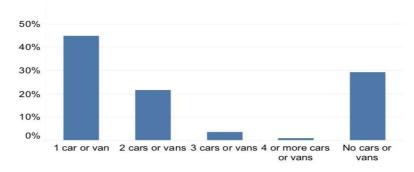
C3 Dwelling Houses	Dwelling Houses	1 space per dwelling for properties up to 2 bedrooms, 1 additional space per additional bedroom thereafter
		1 space per 3 dwellings for visitors
		Provision for access to an electrical facility suitable for charging an Electric Vehicle (EV)
	Flats (New Build and Conversions)	1 space per dwelling for properties up to 2 bedrooms, 1 additional space per additional bedroom thereafter
- Control of Market Mar	1 space per 3 dwellings for visitors	
		Electric Vehicle (EV) charging points by negotiation

The Councils own planning guidance would require approximately 110-120 spaces for the residential properties.

The development is woefully short of parking for the residential elements and the developer unrealistically justifies their inadequate parking provision because they have decided that a high proportion of occupants won't have cars. I would draw the Councils attention to their own data on car ownership in Tynemouth which shows that over 70% of residents own at least one car and over 20% own 2 cars.

## 15. Transport and Travel

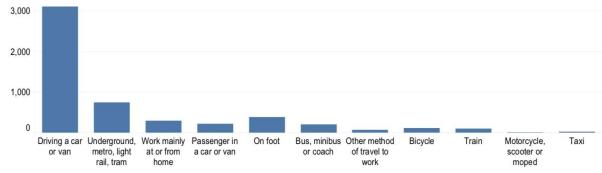




The assumption is also that the residents would commute to work therefore not require a car. I would again draw the Councils attention to their own data on methods of travel to work in Tynemouth which shows that the vast majority of residents still commute by car.

## Method of Travel to Work (No. Households)

Tynemouth



Produced by Policy, Performance & Research

# 5. THE DEVELOPMENT HAS INSUFFICIENT PARKING FOR THE COMMERCIAL ELEMENTS

Parking would also be required for the retail elements of the proposal. Currently there appears to be no associated parking provision. The developer is proposing **130sqm** of class E use. Appendix D also sets our these standards.

If the space is used for shops this would require 2 spaces.

North Tyneside Council LDD12
Transport and Highways

## Appendix D

## **Parking Standards**

	Park	ing <mark>standards</mark>
The standards below are determined on Gross Floor Area (GFA) unless otherwise stated. In areas with good accessibility, appropriate parking management and robust Travel Plan measures in place, a reduction in these standards may be considered acceptable.		
Use class	Type of development	Car parking standard
A1 Shops	Small Shops (less than 1,000m²)	1 space per 50m <sup>2</sup> Electric Vehicle (EV) charging points by negotiation

If the space is used for A3 or A4 use this would require 13 spaces.

A3 Restaurants and Cafés	Restaurants, Snack Bars and Cafés	1 space per 10m <sup>2</sup> of public floor area In addition 1 disabled space per 20 spaces In outline applications or at the pre-planning stage where the public floor area is not known a parking standard of 1 space per 20m <sup>2</sup> GFA will be applied Electric Vehicle (EV) charging points by negotiation
A4 Drinking Pubs and Bars Establishments		space per 10m² of public floor area     In addition 1 disabled space per 20 spaces     In outline applications or at the pre-planning stage where the public floor area is not known a parking standard of 1 space per 20m² GFA will be applied Electric Vehicle (EV) charging points by negotiation

Under the same guidelines the commercial element also requires disabled bays which appear to have been omitted.

6.3 Non Residential Developments

6.3.3 Commercial proposals will be expected, regardless of size, to provide disabled parking spaces, which must take priority over other car parking needs.

The development is completely devoid of parking for the commercial elements. Tynemouth already has considerable parking issues and the area of Tynemouth Road and Station Road where this development is planned is particularly congested with both sides of the road filled with parked cars.

# 6. THE DEVELOPMENT IS NOT APPROPRIATE FOR A CONSERVATION AREA AND BEING BUILT NEXT TO A HERITAGE ASSET

Tynemouth Station is Grade II\* listed and is located within Tynemouth Village Conservation Area. The Station is an important form of transportation for both locals and visitors and also serves as a focal point for the community and functions as an art display area and a venue for the weekend market. This development would result in a major change to the setting of Tynemouth Station and would dominate the Station as a landmark building. The proposal would result in the loss of some views of the Station which would be harmful to the setting of the listed Station building.

The proposal is within the conservation area, which retains the character of the village. The dominant building form is two or three storey developments with pitched roofs. The new development would create a landmark building that would dominate the area in terms of size, design and scale and be harmful to the character and appearance of the conservation area.

The proposal is overly tall, bulky and fussy and would introduce a very large building into the conservation area that is not in keeping with the character and appearance of the village. The development would be visible from Birtley Avenue, Station Terrace, Tynemouth Road and Tynemouth Station platform and footbridge and completely change the roofline of the village.

The development is considered to be of a scale, mass and height which would substantially harm the character and appearance of the conservation area. This concern particularly relates to the fact that the design appears to completely ignore the traditional buildings that surround it and draw its influence from modern buildings such as Knots flats and Mariners Point

The proposal also includes the demolition of 50 metres of a curtilage listed stone wall fronting onto Tynemouth Road. This would remove a positive feature of the conservation area and part of the curtilage of the listed Station.

The area of the proposed development is within a conservation area and guidance for building in this area is covered by:

- The Local Plan
- Tynemouth Village character statement
- Tynemouth Village conservation area character appraisal
- Tynemouth Village Conservation area management strategy

The plan contravenes the Local Plan in the following areas

DM6.1 Design of Development Applications will only be permitted where they demonstrate high and consistent design standards. Designs should be specific to the place, based on a clear analysis the characteristics of the site, its wider context and the surrounding area. Proposals are expected to demonstrate:

- a. A design responsive to landscape features, topography, wildlife habitats, site orientation and existing buildings, incorporating where appropriate the provision of public art;
- b. A positive relationship to neighbouring buildings and spaces;
- e. Sufficient car parking that is well integrated into the layout; and,

9.17 The Council has a good record of a proactive approach to the conservation of its heritage assets. Its strategy is to continue this: protecting, enhancing and promoting heritage assets so they can be understood and enjoyed by residents and visitors now and in the future.

## S6.5 Heritage Assets

North Tyneside Council aims to pro-actively preserve, promote and enhance its heritage assets, and will do so by:

- a. Respecting the significance of assets.
- b. Maximising opportunities to sustain and enhance the significance of heritage assets and their settings.

DM6.6 Protection, Preservation and Enhancement of Heritage Assets

Proposals that affect heritage assets or their settings, will be permitted where they sustain, conserve and, where appropriate, enhance the significance, appearance, character and setting of heritage assets in an appropriate manner. As appropriate, development will:

e. Ensure that additions to heritage assets and within its setting do not harm the significance of the heritage asset;

Any development proposal that would detrimentally impact upon a heritage asset will be refused permission, unless it is necessary for it to achieve wider public benefits that outweigh the harm or loss to the historic environment, and cannot be met in any other way.

9.25 Heritage assets, both designated and non-designated (as defined in the NPPF), are an irreplaceable resource and should be conserved in a manner appropriate to their significance. The settings of heritage assets can contribute significantly to their enjoyment through, for example, views, experiences and approaches, and should be given appropriate protection too. When assessing the potential impact of development on heritage assets and their settings, considerations could include scale, height, mass, footprint, materials and architectural detailing.

The plan also contravenes the **Village character statement**. This document is planning guidance for Tynemouth Conservation Area prepared by the Village Character Statement Design Team. The Council officially adopted this document as Supplementary Planning Guidance.

Visitors and residents alike have commented that Tynemouth has already been spoilt by inappropriate change. But they believe Tynemouth to have a strong and vibrant character, and want to be involved in its future. Consequently, the objectives for the future should be to manage change in order to preserve and improve the village. In order to achieve this objective, they said all new development should:

- Respect the character and appearance of the conservation area and recognise the 'village nature' which it retains.
- Not challenge the well established balance between 'landmark' buildings (e.g. churches) and 'townscape' buildings (e.g. terraces of houses) in the conservation area.
- Be designed to 'blend in' rather than 'stand out' and not be in a 'visual fight for supremacy' along the street.
- Reflect the design principles of each part of the conservation area. For example, it was felt
  that the Castle and Priory, the former Congregational church in Front Street, the Grand
  Hotel, the Drill Hall, the Collingwood Monument, and the railway station are all well
  separated by traditional buildings which combine to create Tynemouth's townscape.
- Add to the architectural richness of the area. For example, a building can be distinctive but should be in context.
- Preserve the balance between buildings, streets and open space that is such a fundamental part of Tynemouth.

Tynemouth village is already struggling badly with traffic congestion. The proposed site for the only entry into the properties is accessed via Tynemouth Road. This site is particularly problematic because.

- It is a very busy main road into the village which is beset with speeding issues and has recently had electronic traffic slowing signs fitted to slow traffic
- It is adjacent to the entries to both Kingswood Court and Kinder Castle nursery which will create 3 entries in close proximity.
- It is immediately prior to the speed change point from 30 to 20 as an entry into the village.
- It is between 2 nurseries and a major school that create problems with congestion during pick up and drop off times.
- The proposed entry point is regularly filled on both sides of the road with parked cars.
- There is a high probability that cars turning right into the development or out of the development (particularly at peak times) would cause congestion and queues and increase air pollution.

# 8. THE PROPOSED DEVELOPMENT DOES NOT PROTECT A STRATEGIC WILDLIFE CORRIDOR

The proposed site is within a strategic wildlife corridor and this building would have a huge impact on the movement and habits of species. Despite the efforts of the developer the scheme contravenes the Local Plan in the following areas.

8.27 Wildlife corridors allow the movement of species between areas of habitat, linking wildlife sites and reducing the risk of small, isolated populations becoming unsustainable and dying out. Wildlife corridors are important features that should be protected, enhanced and created, to protect and promote biodiversity and to prevent fragmentation and isolation of species and habitats.

8.28 North Tyneside's wildlife corridors are made up of three key components of equal standing:

### Strategic Wildlife Corridors

8.29 These corridors are important for their linkage value to the wider environment and not necessarily for their intrinsic ecological value but own particular significance on a regional basis. They can be the longest of wildlife corridors and sweep across important ecological assets contained within the Borough. They indicate the major open passageways between and into the urban areas.

DM5.7 Wildlife Corridors Development proposals within a wildlife corridor, as shown on the Policies Map, must protect and enhance the quality and connectivity of the wildlife corridor. All new

developments are required to take account of and incorporate existing wildlife links into their plans at the design stage. Developments should seek to create new links and habitats to reconnect isolated sites and facilitate species movement.

## 9. THE PROPOSED CYCLE PATH ALONG TYNEMOUTH ROAD WILL REMOVE OVERFLOW PARKING

Currently there are plans to create a cycle path from Tynemouth to North shields and beyond along Tynemouth Road where this proposed development will be situated. It has been acknowledged that this will necessitate the removal of parking along one sides of Tynemouth Road. This will remove much of the potential overspill space for residents or visitors to the development that will be required due to insufficient parking provision within the plans.

#### 10. THE VIEWS OF RESIDENTS HAVE BEEN DISREGARDED

As the ward Councillor for Tynemouth this development has been the single issue that has consumed most of my discussions, surgeries, emails and phone calls with residents. The feedback provided to the designers directly at the consultation (at which I was present) and via the Councils planning portal were clear. The main concerns were that the development was too large, inappropriate in design and scale and had insufficient parking. The new plans have both increased the number of residential units while decreasing the number of parking spaces. This has not just ignored the people who will be directly affected but demonstrated a complete disregard for their views. This demonstrates that the consultation with residents was no more than a box-ticking exercise to satisfy the planning requirements and not a genuine attempt to work with or listen to those whose lives will be affected by this development.