

**APPENDIX 1**

**HOUSEHOLD ALTERATIONS AND EXTENSIONS SUPPLEMENTARY PLANNING DOCUMENT – REPRESENTATIONS**

Reference	Respondent	HAE SPD Paragraph /Policy (Where applicable)	Description	Proposed Action
HAE1	Graham Snowdon  (Sintons LLP)		<b>Comment 1</b> Whilst the SPD document has a comprehensive approach could be used as a 'rule book' with quantified standards latched upon and applied rigidly. Document should be amended to provide more flexibility.	<i>Comment Noted – Amend</i> Following a consultation session with Development Control colleagues guidance within the draft SPD has been amended (where appropriate) to provide more flexibility.  In addition many policies have been amended to carry a caveat indicating all proposals are considered based upon the merits of the individual case.
		7.1	<b>Comment 2</b> In order to allow for more flexibility; document needs to provide guidance of how the council will assess loss of outlook and streetscene impacts of development proposals.	<i>Comment Noted – No Change</i> The draft SPD includes a definition and guidance upon the assessment methods employed by the LPA in assessing outlook and streetscene impacts. The guidance also indicates mitigation methods to negate these impacts.  Any further elaboration upon these issues would reduce flexibility in the LPAs approach; producing the 'rule book' approach identified as inappropriate in comment 1.
		7.2	<b>Comment 3</b> Presumption against two-storey front extensions should be reconsidered to recognise instances where such extensions can emphasise the character of existing buildings.	<i>Comment Noted – Amend</i> Guidance amended to provide flexibility. 'Two storey front extensions will not normally be permitted. However all cases will be assessed on their individual merits.'
		7.3	<b>Comment 4</b> This section has a 'one size fits all' approach requiring extensions to be subordinate. <ul style="list-style-type: none"> <li>▪ Guidance should be amended to allow for instances such as large detached dwellings where there is scope for the achievement of larger extensions.</li> <li>▪ The requirements for subordinate extensions may not be appropriate in instances where dwellings are situated in varied plot widths or surrounded by a variety of building types.</li> <li>▪ The requirement for side extensions to be no more than 50% of the width of existing dwellings appears arbitrary with no invariable design justification.</li> </ul>	<i>Comment Noted – No Change</i> A number of these points are already addressed within the SPD. For example in the case of large dwellings in varied plots applicants area advised that there 'may be greater flexibility' but that they should be contact the LPA to seek site specific guidance.  The 50% width guidance is issued to limit loss of in-curtilage amenity space, to avoid terracing and to ensure that extensions to existing properties remain subordinate. Furthermore the status of this guidance as a general rule provides scope for further discussions between applicants and the LPA.

		7.4	<p><b>Comment 5</b> Reasonableness of guidance questioned:</p> <ul style="list-style-type: none"> <li>▪ Restrictions within this section allow very little more than enjoyed under permitted development rights.</li> <li>▪ 45° rule prevents extensions to certain types of properties where pressure to expand to meet modern space standards is at its highest.</li> </ul>	<p><i>Comment noted – No Change</i> Whilst it is acknowledged that the guidance offers little more than enjoyed under permitted development rights, the context of a large number of sites namely the proximity of adjacent/adjoining dwellings often serves to limit the scale of rear extensions.</p> <p>In other instances the 45° chamfer or additional 0.1 metre guidance provides scope to increase the size of extensions.</p> <p><i>Comments Noted – Amend</i> Text amended to provide a better interpretation of the guidance of PPG2. Particularly what quantifies as a 'limited extension.'</p>
		12.0	<p><b>Comment 6</b> Questions guidance upon development within green belt; general presumption 'against development' within green belt not correct interpretation of PPG2 only 'inappropriate development' should be restricted. Advises to revise guidance in light of PPG2 and case law on this subject.</p>	
HAE2	Environment Agency	4.0	<p><b>Comment 1</b> Need to include notes regarding Flood Risk Assessment in flood risk zones 2/3 and flood risk zone 1 if site is over one ha. Note to include link to Environment agency 'standing advice.</p>	<p><i>Comment Noted – Amend</i> Information regarding the requirement for Flood Risk assessment included in introductory 'summary of points' alongside link to Environment Agency website.</p>
		4.0	<p><b>Comment 2</b> Recommendation to include policy encouraging the creation of green buffer zones along watercourses to enhance biodiversity.</p>	<p><i>Comment Noted – No Change</i> As only a small minority of household alterations and extensions would be located within the vicinity of a watercourse, applying such a policy would have a limited impact.</p> <p>Instead watercourses and flood risk zones are usually identified as a constraint through the validation process. Consequently the treatment and mitigation of such constraints will be dealt with through the application process on an individual case basis.</p>
		7.1	<p><b>Comment 3</b> Welcomes references within policy to permeable paving; but comments that this guidance may need to be expanded to include a reference to Sustainable Urban Drainage Systems (SUDs);.</p>	<p><i>Comment Noted – Amend</i> Guidance of section 5.3 amended to provide reference to SUDs and permeable paving as examples of sustainable design and construction.</p>

			<p><b>Comment 4</b> Suggests a note be added into the SPD advising of the need to check if land drainage consent is needed for a development. Offers standard paragraph:</p> <p><i>Under the terms of the Water Resources Act 1991 and the local land drainage byelaw, the prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within five metres of the top of the bank of any watercourse designated a 'main river'.</i></p>	<p>Comment Noted – Amend Recommended text incorporated into document in order to provide clarification on this matter.</p>
HAE3	Coal Authority	N/A	<p><b>Comment 1</b> Comment upon the need to reference 'ground stability' issues during construction of household alterations and extensions.</p>	<p><i>Comment Noted – Amend</i> Reference to ground stability added to additional requirements section of summary of points.</p>
HAE4	Gateshead Council	7.5	<p>Overall supportive of the guidance of the SPD. However raises concerns with regard to the text and images providing guidance within section 7.5 regarding Sunderland cottage dormers. Particular concerns are raised with regard to the use of a 50% rule for permitting such extensions.</p>	<p><i>Comment Noted – Amend</i> This section of the SPD guidance and supporting images/diagrams has been subject to substantial review, in order to make the guidance more transparent and easier to understand.</p>
HAE5	Natural England	4.2	<p><b>Comment 1</b> Raises an objection to the use of conditions to attain species surveys after a planning consent has been granted. Surveys should be requested throughout the planning process.</p>	<p><i>Comments Noted – Amend</i> Reference to the use of conditions has been removed from document. Surveys must be requested prior to the determination of planning applications.</p>
			<p><b>Comment 2</b> Highlights the need to introduce guidance similar to the following:</p> <p><i>In order to ensure that some proposals will not have a detrimental effect on a protected species or population of species mitigation measures may be required. Potentially this can affect the design of household alterations and extensions.</i></p>	<p><i>Comments Noted – Amend</i> Recommended text incorporated into document in order to provide clarification on this matter.</p>
		5.0	<p><b>Comment 3</b> Highlights a need to expand guidance to consider sustainability (in terms of green roofs, microrenewables and energy efficient buildings etc) as well as issues of aesthetics.</p>	<p><i>Comment Noted – Amend</i> Guidance of section 5.3 amended to provide reference to these examples of sustainable design and construction.</p>
HAE6	One North East	5.3	<p>Advises of the need to provide guidance upon the achievement of energy saving measures through household alterations and extensions. Particularly guides to provide reference to small renewable energy schemes and electric vehicle charging infrastructure.</p>	<p><i>Comments Noted – No Change</i> Guidance of section 5.3 amended to provide reference to these examples of sustainable design and construction.</p>
HAE7	Association of North East Councils		<p>No observations</p>	

HAE8	Northumbrian Water		<p>Comments upon the need to inform potential developers to check for the presence of utility services that could affect the viability and implementation of a proposed scheme. Offer standard guidance as below:</p> <p><i>Regardless of whether planning permission is required for domestic extensions in the City, applicants are required to check for the presence of utility services, such as public sewers. Building over public sewers is normally allowed provided certain conditions are met to protect the sewer and indemnify the utilities company.</i></p> <p><i>On rare occasions the position of the sewer can affect the size of the extension that is allowed. In these instances the size of the extension has to be altered to suit the existing conditions or the sewer has to be diverted. The advice of the Council's Building Control department should be sought at an early pre-development stage. Failure to do so may jeopardise the viability and implementation of a proposed extension.</i></p>	<p><i>Comment Noted – Amend</i> Suggested text incorporated into document.</p>
HAE9	North East Civic Trust	4.2	<p><b>Comment 1</b> Suggests the need to provide a more comprehensive list of additional requirements to be submitted with a planning application.</p>	<p><i>Comment Noted – No Change</i> In light of recent changes to National validation requirements and the impact of these changes upon local Tyne and Wear requirements, the LPA has decided to replace guidance relating to specific documents with a web-link to the latest version of Tyne and Wear Validation Checklist.</p>
		6.0	<p><b>Comment 2</b> Supportive of the policy not to encourage the use of uPVC however comments that the phrasing 'modern timber version' needs to be amended to avoid confusion. This element of guidance is particularly relevant when dealing with Conservation Area consent.</p>	<p><i>Comment Noted - Amend</i> Guidance changed to acknowledge the use of exact replicas where achievable over modern timber versions.</p>
		6.0	<p><b>Comment 3</b> Masonry paint should also be mentioned alongside cladding and render as this material can also radically alter the appearance of buildings. Questions whether to include a note that such additions can harm the fabric of the original building in the long-term.</p>	<p><i>Comment Noted – Amend</i> Use of masonry paint added to guidance, alongside note that these materials are unacceptable except where they are already part of the established character of a street.</p>
		6.0	<p><b>Comment 4</b> Questions whether there is a need to include a bullet about windows being set-back in an appropriate reveal. The image on page 7 whilst a positive approach overall, shows how a 'flat' visual appearance can result from not having new windows set back by at least half a brick from the face of the building.</p>	<p><i>Comment Noted – No Change</i> Providing such guidance would be highly restrictive and would reduce the opportunity for alterations and extensions of innovative designs. Moreover in some instances such guidance would be out of character with the established composition of existing developments.</p>
		7.5	<p><b>Comment 5</b> Welcomes the incorporation of guidance upon dormers; questions the 50% threshold and suggests 30% limit should be applied. (Even higher on terraces within Conservation Areas).</p>	<p><i>Comment Noted – No Change</i> The 50% threshold has been tested and upheld at appeal on a number of occasions and is considered appropriate to remain.</p>

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		13.0	<b>Comment 6</b> Suggests a note that flats do not have the same permitted development rights as a dwelling house.	<i>Comment Noted – No Change</i> Section 4.0 already serves to make this point indicating all works to flats or properties which exist following their conversion from flats will require planning permission in any instance.
			<b>Comment 7</b> Suggests a general policy that where the opportunity arises the Council will seek reversal of previous alterations/extensions now considered harmful and would work with applicants to ensure this happens.	<i>Comment Noted – No Change</i> Providing such guidance would be highly restrictive and would reduce the opportunity for alterations and extensions of innovative designs

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